

# Carter Jonas

## Town Centre and Retail Study 2016

### STAGE 3: OPTIONS & RECOMMENDATIONS

Prepared on behalf of:

**Wealden District Council**

DECEMBER 2016

FINAL DRAFT

## QA

### Wealden Retail and Town Centre Study 2016

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Date:  
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Originators:

Approved:



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Carter Jonas

Dr Steven Norris  
Partner

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## 1 INTRODUCTION

- 1.1 Carter Jonas (CJ) and Regeneris were jointly instructed by Wealden District Council ('the Council') in 2016 to prepare the *Wealden Retail and Economic Study 2016* (WERS 2016).
- 1.2 This final *Stage 3: Options and Recommendations Report* deals with retail and town centre issues only, and draws on the key findings of the *Stage 1: Baseline Report* and *Stage 2: Needs Assessment Report*. It sets out high level advice on how the local planning authority can effectively plan for, manage and promote the vitality and viability of their main town and local centres over the development plan period<sup>1</sup>. The main centres covered are Uckfield, Hailsham, Crowborough, Heathfield, Polegate, Forest Row and Wadhurst.
- 1.3 In compliance with the Council's requirements this final Stage 3 Report specifically provides advice and recommendations on a number of key issues, and justification for the preferred approaches, including:
- the need for town centre uses within the main settlements;
  - the most appropriate mix of uses to enhance the overall vitality and viability of the main town centres;
  - options for the locations for new uses and recommend preferred locations based on a suitable strategy for the town;
  - town centre strategies and vision based on the above and any resulting town centre policies concerning retail and other uses;
  - the hierarchy of town centres based on the Proposed Submission Wealden Local Plan and Hailsham Area Action Plan;
  - the definition of primary and secondary frontages, primary shopping areas and extent of town centres based on the Proposed Submission Wealden Local Plan and Hailsham Area Action Plan; and
  - policy outputs for out of town shopping, where identified as necessary;
- 1.4 Our advice is based on the updated assessment of the quantitative and qualitative need for new retail (comparison and convenience goods) floorspace up to 2031 and 2037. It draws on a robust and up-to-date evidence base and new primary research, including a telephone interview survey of some 1,000 households carried out across the District and a wider defined Study Area. This survey has helped to establish current shopping patterns, leisure preferences and market shares, as well as the impact of the internet on different food and non-food purchases.
- 1.5 The study has been prepared in the context of national and development plan policy guidance, as well as other key material considerations. This includes the *National Planning Policy Framework* (NPPF) and the *Planning Practice Guidance* (PPG), which place weight on the development of positive plan-led visions and strategies for town centres, and promote new investment and development in town centres first ahead of edge and out of centre locations.

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<sup>1</sup> A Stage 4 report is also required by the Council to demonstrate how the work undertaken has been carried out in compliance with the NPPF's 'Duty to Co-operate'.

- 1.6 The key findings and recommendations are intended to help the Council with the preparation of the provisions and policies of the emerging Wealden Local Plan, as well as the Hailsham Area Action Plan (AAP).

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## 2 RETAIL NEEDS ASSESSMENT: SUMMARY

- 2.1 The Stage 2 report assessed the overall need ('capacity') for new (convenience and comparison goods) retail floorspace in Wealden District up to 2037.
- 2.2 The retail capacity assessment was carried out using CJ's **CREAT**<sup>e</sup> Capacity Model. It was informed by the findings of the Stage 1 Report which provided robust evidence on shopping patterns and market shares for different types of (food and non-food) retail purchases across the District and a wider Study Area based on the findings of a telephone interview survey of some 1,000 households. It also takes into account the current health and performance of the main study centres.
- 2.3 For the purpose of the capacity assessment it has been assumed that the retail market is in 'equilibrium' at the base year (2016) and that market shares will broadly remain constant over the study period. This is an accepted approach for retail assessments.
- 2.4 The table below summarises the total retail (convenience and comparison goods) capacity for new floorspace in the District over the short (2016 - 2021), medium (2022 – 2026 years) and long term (2027 - 2037). The forecasts take account of the scale and distribution of housing allocations over the plan period identified by Wealden District Council and the resultant population growth, as well as all known commitments at the time of finalising this study (see Stage 2 Report). Any changes to the scale and distribution of housing will necessarily require amendments to the capacity forecasts.

**Table 2.1 Wealden District – Retail Capacity Forecasts**

	2021	2026	2031	2037
CONVENIENCE GOODS RESIDUAL EXPENDITURE (£ million)	£16.0	£32.3	£48.2	£67.2
COMPARISON GOODS RESIDUAL EXPENDITURE (£ million)	£1.3	£25.6	£58.4	£109.4
<b>TOTAL RESIDUAL EXPENDITURE (£ million)</b>	<b>£17.3</b>	<b>£57.9</b>	<b>£106.6</b>	<b>£176.6</b>
TOTAL CONVENIENCE GOODS (SUPERSTORE) FLOORSPACE CAPACITY (sqm)	628	1,942	3,204	4,695
TOTAL COMPARISON GOODS FLOORSPACE CAPACITY (sqm)	197	3,453	6,952	11,231
<b>TOTAL FLOORSPACE CAPACITY (sqm net)</b>	<b>826</b>	<b>5,395</b>	<b>10,156</b>	<b>15,927</b>

Source: see Stage 1 Report (Appendix 6 and 8; Table 3)

Notes: Convenience goods capacity is for superstore-format floorspace only trading at a higher average sales density. For comparison goods the capacity forecasts are based on a floorspace 'productivity' growth rate of +2.5% per annum between 2024-2037.

- 2.5 The forecasts show limited District-wide capacity for new retail floorspace over the short term to 2021 due to the impact of new commitments in the planning pipeline. Total retail floorspace capacity increases thereafter to 5,395 sqm net over the medium term to 2026 and to 15,927 sqm net over the long term, to 2037.
- 2.6 These forecasts update and supersede the previous forecasts used by the Council to inform the adopted Core Strategy. By way of comparison Policy WCS3 of the Core Strategy identified the need for 17,000 sqm net of new retail (convenience and comparison goods) floorspace up to 2027 (see Stage 1 Report, Section 2). This is higher than the updated forecasts of 5,395 sqm net of new floorspace by 2026 and 10,156 sqm net by 2031. This difference is explained in part by the use of updated population, expenditure and 'productivity' growth forecasts, and the fact that the revised capacity forecasts are informed by a new household survey.

2.7 To further help inform the Council's assessment of the potential scale and optimum location for new retail (convenience and comparison goods) floorspace in the District, we have also carried out a more refined (location-by-location) capacity assessment. However, it should be noted at the outset that any forecast capacity identified for a specific centre/area does not necessarily mean that all the retail floorspace can and/or should be provided within that centre per se. For example, there may be a lack of suitable and viable sites available in some centres, or there may be other policy, heritage, transport and physical constraints to development. Alternatively it may be more appropriate to locate the floorspace capacity in one centre over another to encourage more sustainable travel patterns and/or help to achieve specific policy, regeneration and/or investment objectives.

2.8 Against this background the tables below summarise the forecast need for new convenience goods (superstore format) and comparison goods retail floorspace in the District's main centres over the study period to 2037.

**Table 2.2 Main Centres and Shopping Locations: Capacity for Superstore-Format Floorspace**

	2021	2026	2031	2037
HAILSHAM	497	1,157	1,807	2,571
UCKFIELD	139	317	479	676
CROWBOROUGH	132	330	512	728
HEATHFIELD	35	166	297	449
POLEGATE	-382	-345	-309	-266
WADHURST	25	38	52	67
FOREST ROW	48	68	84	104
OTHER LOCAL CENTRES	135	210	281	366
<b>TOTAL CONVENIENCE GOODS CAPACITY</b>	<b>628</b>	<b>1,942</b>	<b>3,204</b>	<b>4,695</b>

Source: Stage 2 Report (Tables 4-11, Appendix 6)

**Table 2.3 District's Main Centres and Shopping Locations – Comparison Goods Capacity (@2.5%)**

	2021	2026	2031	2037
HAILSHAM	990	2,487	4,103	6,093
UCKFIELD	256	985	1,758	2,701
CROWBOROUGH	-939	-537	-109	410
HEATHFIELD	-38	259	587	982
POLEGATE	-218	-178	-134	-81
WADHURST	18	63	113	172
FOREST ROW	9	40	71	109
OTHER LOCAL CENTRES	120	333	563	845
<b>TOTAL COMPARISON GOODS CAPACITY</b>	<b>197</b>	<b>3,453</b>	<b>6,952</b>	<b>11,231</b>

Source: Table 2-10, Appendix 8

2.9 In summary the tables show that most of the District-wide capacity for new (superstore format) convenience and comparison goods floorspace is allocated to Hailsham. The total forecast retail capacity is 5,910 sqm net by 2031. This reflects the population and expenditure growth generated by the new housing need in and around Hailsham over the Plan period; as set out in the emerging Wealden Local Plan 'Issues, Options and Recommendations' (October 2015). By way of comparison the Core Strategy identified the need for 6,230 sqm net in Hailsham/Hellingly over the plan period to 2027.

2.10 Notwithstanding the findings of the need assessment, we advise the Council that capacity forecasts beyond five years should be treated with caution, as they are based on various layers of assumptions and forecasts, including:

- the performance of the economy and the retail sector;
- the likely current and future trading performance of existing centres and stores; and
- the growth and distribution of population and retail spending;

2.11 For example, if the growth in Internet and multi-channel shopping is stronger than current forecasts suggest, then this would effectively reduce the future demand and capacity for new 'physical' space over the long term. The Council should take into account these margins for error when assessing the need for new retail floorspace, particularly over the medium to long term.

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## 3 TOWN CENTRE STRATEGIES: MEETING FUTURE NEEDS

- 3.1 This section provides a summary of the relative health, role and function of the District's main centres, and the forecast quantitative/qualitative need for new retail floorspace to 2031 and 2037 (see Stage 1 and Stage 2 reports).
- 3.2 Our review of the current performance of the Districts' main town centres has been informed by the findings of the most up-to-date evidence and research, including the health checks, centre audits and household survey. It also takes into account the current policy framework and strategic visions for each centre.
- 3.3 Drawing on the accumulated research and evidence we provide robust advice and recommendations on the potential for the main centres to accommodate the identified need over the short, medium and long term. Our assessment is based on our understanding of the potential availability and suitability of key sites in the main town centres. It also draws on our market knowledge of the current businesses models and requirements of retailers and commercial leisure operators, and the likely scale, format and location of space that they will be seeking over the short term.
- 3.4 As part of this assessment, we also review the extent of the defined primary and secondary shop frontages, as well as the Primary Shopping Areas (PSAs) and Town Centre Boundaries based on current and future provision and needs. By way of clarification the NPPF (Annex 2) 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 (such as restaurants, cinemas and businesses). The difference between the 'Primary Shopping Area' and 'Town Centre Boundary' is defined by NPPF (Annex 2) 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 Town Centre

- 3.5 Hailsham is the second largest town centre in Wealden District after Uckfield. It is a traditional market town dating back to medieval times, located some 10km north of Eastbourne on the A22. It is designated in the Core Strategy as a '*District Centre*' sitting at the top of the Wealden's Settlement Hierarchy alongside Uckfield and Crowborough. The emerging Wealden Local Plan "*Issues, Options and Recommendations*" (October 2015) defines Hailsham as a '*Market Town Centre*' in the Town and Village Centre Hierarchy.
- 3.6 Hailsham Town Centre's main retail and service offer is focused around the High Street and George Street. The centre has two purpose-built shopping centres; namely Vicarage Fields (anchored by Waitrose) and The Quintins (anchored by Asda). These shopping centres are located opposite each other within the Town's Primary Shopping Area (PSA), separated by the High Street. This area effectively forms the shopping "*heart of the centre*".

- 3.7 The Stage 1 Report confirmed that Hailsham's retail offer is effectively anchored by its three superstores; Asda, Waitrose and Tesco. As a result the centre is performing relatively well as a destination for food and convenience goods shopping. The foodstores also generate linked trips and expenditure to the benefit of other shops, services and businesses across the town centre. The important role and function of the town's main food and convenience stores should therefore be maintained and protected over the development plan period.
- 3.8 Notwithstanding the relative scale and quality of Hailsham's food and convenience provision, the survey-derived market shares indicate that there is still a relatively high leakage of food shopping trips and expenditure from its Core Catchment Zone (Zone 1) of 42.3%, principally to foodstores in and around Eastbourne (21.5%). On this basis there would appear to be potential to improve the scale, quality and range of the town's foodstore offer to serve the needs of Hailsham's existing and forecast population in a more sustainable manner.
- 3.9 The economic capacity forecasts also confirm a need for 1,245 sqm net of new convenience floorspace over the medium term up to 2026, increasing to 2,747 sqm net over the long term by 2037.
- 3.10 In our judgement there are three potential options available to the Council to meet the forecast need for new convenience goods floorspace:
- **Option 1:** would involve the refurbishment, extension and/or redevelopment of the town's existing foodstores to meet the forecast demand for new convenience goods floorspace.
  - **Option 2:** would involve attracting a new foodstore to a site either in or on the edge of the town centre that is well connected to the Primary Shopping Area (PSA) and capable of generate strong linked trips and expenditure to the benefit of the town's overall vitality and viability.
  - **Option 3:** would be to provide smaller convenience store formats (such as Tesco Express, Sainsbury's Local, Little Waitrose, Co-op, Spar, etc.) to serve the more frequent day-to-day (top-up) shopping needs of some of the larger new housing allocations proposed in a sustainable manner. In each case it will be necessary for the applicant to demonstrate that any new retail, leisure and other town centre uses proposed will not have a significant adverse impact on the vitality and viability of existing town, district and local centres.
- 3.11 In terms of the second option neither Aldi nor Lidl are currently represented in Hailsham Town Centre. We therefore advise the Council that they should prioritise the identification and assessment of potential opportunity sites that could accommodate the needs of these popular discounters either in or on the edge of the town centre that are well connected to the PSA and capable of generating strong pedestrian linked trips.
- 3.12 The Stage 1 Report identified that Hailsham has a more limited comparison goods provision, and its offer is mainly value/discount led. For example, the centre does not have any multiple fashion retailers of note, or many key high street brands generally. This is reflected by the fact that a high proportion of shopping trips and expenditure, particularly fashion purchases, are leaking to the higher order competing centres outside the District; principally to Eastbourne and, to a lesser degree, Brighton. In the context of the significant

growth planned for Hailsham there would appear to be potential for improvement in the town's comparison offer over time, subject to market demand.

3.13 The town centre health check and audits identified that there are 'gaps' in the town centre's retail and service offer, and there is a need to raise the quality of its shops, cafés and restaurants and overall town centre environment. The proposed housing allocations in Hailsham and the resultant population growth over the Plan period will significantly increase the town's catchment population, and in this context we consider that there should be potential for Hailsham to capitalise on this and for the Council to promote the centre more widely to help attract new investment and development.

3.14 The following provides a summary of some of the other key issues and actions identified by the health check include:

- The centre does not benefit from good legibility and linkages between the anchor food stores and the prime shopping area are poor. In our view the introduction of better "*west-to-east*" connections linking the two shopping centres (Vicarage Fields and the Quintins) and the Leisure Centre, focussed around an attractive public square, would help to improve the pedestrian circuit, and they quality and legibility of the overall shopping environment. This would make it more attractive to shoppers and visitors.
- The overall shopping environment would also benefit from significant investment in and improvements to street frontages, public realm and cleanliness. Although the secondary shopping streets are attractive, the "*heart of the centre*" lacks character, and does not necessarily have a strong sense of identity. The centre would benefit from stronger "gateways", public realm improvements and better overall marketing.
- The Vicarage Fields and Quintins shopping centres are dated and do not cater well for modern retail demands in terms out units size and layout, and visibility. The out-dated and tired architectural design of these centres also detracts from the quality of the environment in our view. It would be of great benefit if one or both of these centres could be redeveloped and reconfigured to accommodate modern retail units and contribute better to the sense of place. This could also involve the potential redevelopment and extension of the Asda and Waitrose stores that anchor their respective shopping centres.
- On the positive side vacancy levels in the Town Centre are relatively low and there are a number of retailers that have requirements. However, this also means that the supply of units is limited, and those that are available/ vacant are generally of small scale and do not cater for modern retailers' needs. Therefore provision of more modern larger format retail units should be assessed and promoted.
- Hailsham has limited multiple representation and its offer is mainly dominated by independent and specialist retailers. Bearing in mind the planned growth for Hailsham, we consider that there is potential to market the town centre to attract more mainstream multiple retailers, especially fashion retailers. This would significantly improve the appeal of the centre to the local growing catchment population, and would add to its vitality and help to claw back some shopping trips and expenditure from higher order centres.
- The centre also benefits from an independent cinema that has recently received some investment. This has had a positive impact on the town centre's evening economy, but we consider that there could be potential for a more modern multi-screen cinema to further strengthen the town's leisure offer and

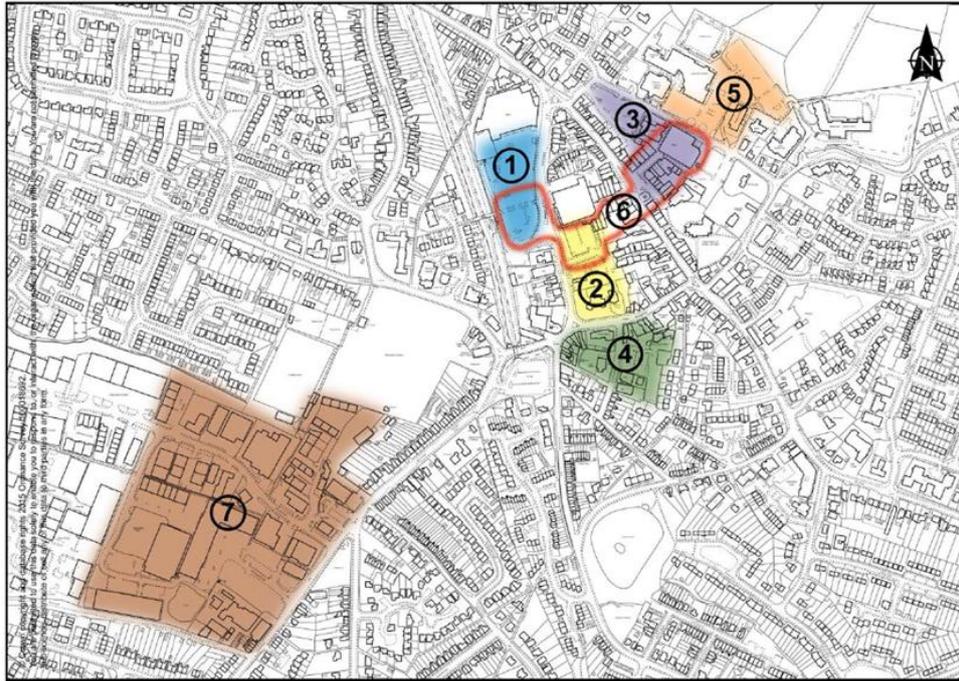
evening economy. This could be provided as part of a mixed use development on a key strategic site in or on the edge of the town centre (see below), or possibly as part of any potential redevelopment of Vicarage Fields and/or Quintins shopping centres. The potential for a new cinema in the town will require more detailed 'testing' of current and future interest and demand from cinema operators for representation, and assessment of the potential impact on the town's existing independent cinema offer.

- Hailsham has a relatively good mix of leisure uses, such as cafés, restaurants and takeaways, but it would benefit from more up-market establishments and branded restaurants. Experience of mixed use leisure developments in comparable towns indicates that attracting a multi-screen cinema as anchor helps to attract more branded food and beverage outlets to the town which appeal to a wider customer profile.
- Although the markets are relatively popular, they would benefit from better promotion and better facilities to encourage visitors to come regardless of the weather. Opportunities to improve and extend the number of market stalls should be assessed, alongside the potential for a covered market in the town centre and/or an improved 'market square'.
- Based on the findings of the health check, site visits and consultation we consider that the town's primary shopping area and offer lacks character and a strong sense of identity. The centre could hence benefit from public realm improvements, and better management, marketing and promotion.

3.15 Against the background of significant new housing and population growth forecast for Hailsham, the emerging Local Plan considers seven potential development options for accommodating new retail and mixed use floorspace in the town centre. The figure below shows the different site areas and options, and is reproduced from the WLP IOR for ease of reference.

3.16 As summarised in the Stage 1 Report, the emerging Local Plan identified that the Council's Preferred Option for new retail provision in Hailsham is a combination of Site Option 6 (the southern part of Site Options 1-3) and Site Option 7 (Station Road/South Road and the eastern end of Diplocks Industrial Estate/Ropemakers Park).

**Figure 3.1 Proposed Retail Allocation Options for Hailsham Town Centre**

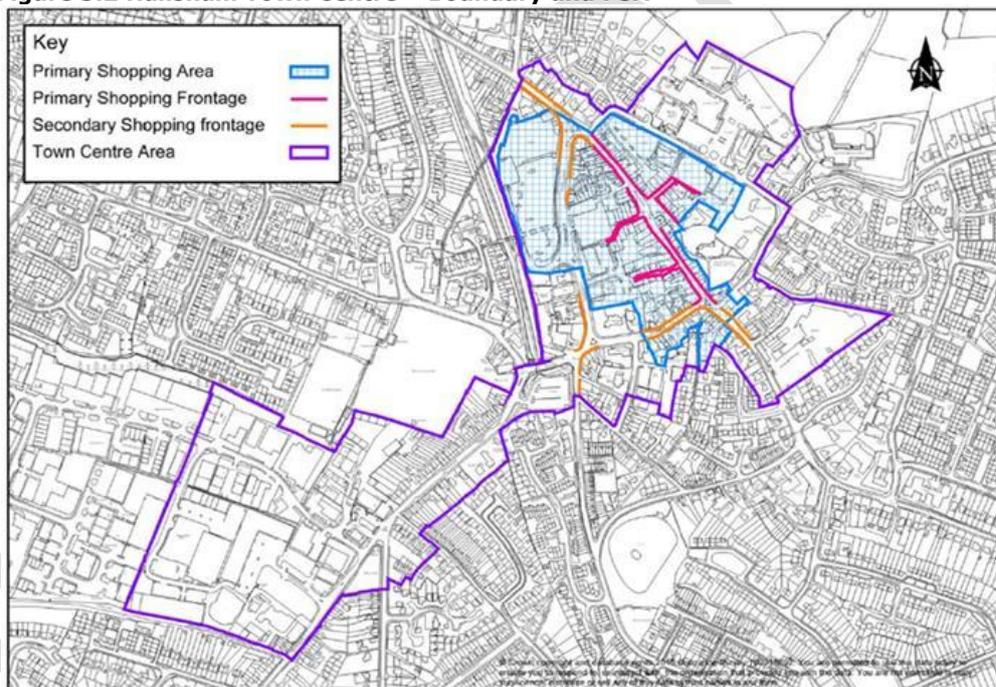


- 3.17 In the WLP IOR the Council identified that new development under Site Option 6 would provide a range of retail units with improved linkages to the High Street to help draw more people into the town centre. However, the Council also concluded that Option 6 would not accommodate all the need identified by the adopted Core Strategy and the likely additional need arising from the emerging Local Plan. As a result the Council forwarded Option 7 as providing opportunities to support additional retail provision, subject to the relocation of existing industrial units and further retail assessment and sequential testing.
- 3.18 Although we broadly agree with the Council's assessment of the most suitable sites to accommodate forecast needs in full over the plan period, it is vitally important that the phasing of any new development on Site Option 7 does not result in a significant adverse impact on the vitality and viability of the town centre, and specifically does not prejudice any potential market demand and investment in the town over the plan period. This would be contrary to the objectives of the adopted Core Strategy, the emerging Local Plan, the Hailsham AAP and the NPPF which promote new development and investment in town centres first.
- 3.19 Site Option 7 is in an out-of-centre site that is not well connected with the town's PSA. Even with improvements to pedestrian linkages it will not in our judgement generate significant benefits for the town's existing shops and businesses in terms of linked trips, footfall and expenditure. For this reason we advise the Council that it is vitally important that Site Options 1-6 are prioritised for new development and investment ahead of Site Option 7 in the emerging Local Plan policy and the AAP.
- 3.20 Based on our high level review we believe there is significant potential for new mixed use development on sites (Options 1-6) within and on the edge of the PSA to meet all the identified need up to 2031 for new comparison (4,399 sqm net) and convenience (1,930 sqm net) good floorspace. Only when the availability, suitability and deliverability of new mixed use development on these preferred town centre sites (Options 1-6) have been fully explored by the Council, and new investment and development secured, should Site 7 be considered as a long term option, post 2031. We also advise the Council that they will need to take a

proactive role in helping to facilitate and deliver high quality new mixed use development and investment in the town centre, ranging from land assembly (including the potential need to use CPO), through to funding new development opportunities.

- 3.21 Against this background we advise that the emerging Hailsham Area Action Plan (AAP) will need to carefully assess and test the different development options and potential end users for each of the key sites identified.
- 3.22 As described in the Stage 1 Report the Wealden Local Plan “*Issues, Options and Recommendations*” (WLP IOR; October 2015) consultation document defines the Hailsham Town Centre Boundary and Primary Shopping Area (PSA), along with Primary and Secondary Shopping Frontages. The boundary definitions and frontages are illustrated in the figure below.
- 3.23 Based on our initial review and audit of the Town Centre we consider that the definition of the PSA and (primary and secondary) frontages appear reasonable. In our judgement 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.

**Figure 3.2 Hailsham Town Centre – Boundary and PSA**



Source: Extract from Wealden Local Plan “*Issues, Options and Recommendations*” (October 2015), Map 29.

- 3.24 However, for the reasons set out above, we advise against extending the Town Centre boundary to the south-west to include Station Road/South Road and the eastern end of Diplocks Industrial Estate/Ropemakers Park (i.e. Site Option 7). Although this area includes Tesco Express, a KFC and a petrol station/shop, it is an out-of-centre location that is clearly separated from the main town centre provision. In our judgement including this area as part of the Town Centre at this stage would potentially undermine the priority of promoting new retail and mixed use development and investment in and on the edge of the PSA.

Only after the development and regeneration of the Town Centre has been fully explored and tested should this area, in our view, be treated as a potential opportunity to extend the Town Centre boundary and offer.

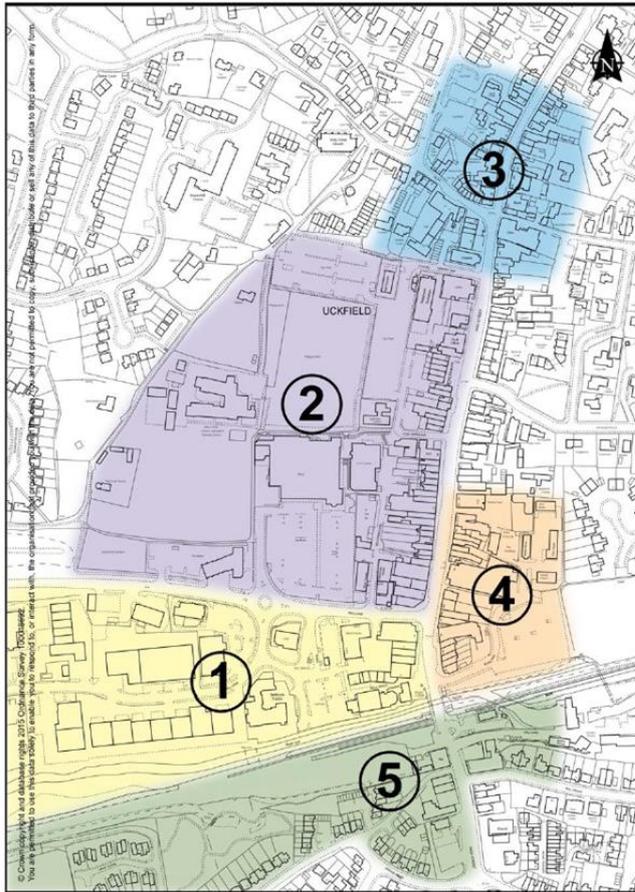
## Uckfield Town Centre

- 3.25 Uckfield is the largest centre in Wealden. It is situated in the middle of Wealden District, along the A22/ A26 corridor and acts as a hub and service centre for surrounding villages and settlements in the District. It is designated as a '*District Centre*' in the Core Strategy and as a '*Market Town Centre*' in the emerging Local Plan, at the same level in the hierarchy as Hailsham and Crowborough.
- 3.26 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.
- 3.27 The Stage 1 and 2 Reports have identified that that Uckfield Town Centre is performing relatively well as a shopping and leisure destination against a number of Key Performance Indicators (KPIs). For example, vacancy levels in the centre are low, which is a good indicator of its relative attraction and performance as a destination for shoppers, retailers and businesses in general.
- 3.28 The centre is well served in terms of food and convenience store provision. Its two main supermarkets (Tesco and Waitrose) help to generate linked trips and expenditure to the benefit of other shops, services and businesses across the town centre. It is also achieving a strong retention of food shopping trips and expenditure within its Core Catchment Zone (Zone 3) of 83.1%.
- 3.29 In general terms Uckfield Town Centre also has a relatively good and complementary mix of multiple and independent retailers. However it does lack strong comparison anchors, key high street retailers, fashion retailers and mid to high end quality retailers.
- 3.30 The centre's overall offer is largely dominated by service businesses and these are meeting the needs of Uckfield's local catchment population. The offer also includes a cinema and mix of cafés and restaurants, which help to underpin the town's relatively popular and successful night time economy.
- 3.31 Notwithstanding this, the Stage 1 Report concluded that the centre would benefit from a number of improvements to its offer and environment to help maintain and enhance its vitality and viability of the short, medium and long term. For example, the Stage 1 Report identified that:
- The centre faces strong competition from larger higher order centres in neighbouring areas, principally Royal Tunbridge Wells, and cannot be expected to compete with these centres for major national fashion and clothing multiples. Against this background Uckfield is better placed to build on the success of its strong and specialist independent offer, by improving the choice and quality of its provision.

- Although there are retailers and leisure operators who are currently interested in taking space in Uckfield (including Aldi), there is a limited supply of modern larger format units and/or suitable and available development sites to meet their requirements.
- The quality of the environment is mixed. The centre lacks a clear focal point and in our judgement it would benefit from a public realm improvement strategy.
- The market appears to be growing in popularity and is attracting new investment. However a more central, covered location would be of great benefit. Additionally active marketing and advertising should be utilised to raise awareness, seeking to make the market into one of the top attractions of the centre.
- Uckfield does suffer from traffic congestion and this does impact on accessibility and detract from the overall shopping experience. The re-modelling of the highway and delivering a traffic management scheme in the town centre would be of great benefit. We understand that the works to the pavement that are currently being undertaken will help to address the conflict between pedestrians and traffic on High Street.

- 3.32 In terms of the need for new retail floorspace the Stage 2 report forecast capacity for 369 sqm net of new convenience floorspace over the medium term to 2026, increasing to 768 sqm net over the long term to 2037. In our judgement this need could be met by the extension of the centre's existing foodstores, where feasible, or by the provision of new convenience goods floorspace as part of the potential for new mixed use development in and on the edge of the PSA. In terms of comparison goods, there is forecast capacity for 1,081 sqm net by 2026, increasing to 4,071 sqm net by 2037.
- 3.33 In terms of meeting the forecast need, the Wealden Local Plan 'Issues, Options and Recommendations' document (WLP IOR October 2015) identified five potential development options in Uckfield Town Centre. Map 35 of the *Retail Allocation Options* for Uckfield Town Centre is reproduced below for ease of reference and the key findings for each site are summarised in detail in the Stage 1 Report and are not therefore repeated here.
- 3.34 In summary the emerging Local Plan concludes that **Site 2** is the Council's preferred option to meet the identified need over the plan period. This site covers the area to the west of the High Street, north of Bell Lane, east of Belmont Road, Luxford Field and car parking area. The WLP IOR identifies that this area provides considerable space and scope for the provision of a range of new retail floorspace in close proximity to the High Street, and public transport interchanges. There is also an opportunity to create shop frontages onto Luxford Field, and the potential to create a pedestrian circuit. It concludes that this area provides scope to accommodate a considerable proportion, if not all of the additional floorspace requirements from the Core Strategy and any additional floorspace that may be required through the emerging Plan period.

**Figure 3.3 Retail Allocation Options for Uckfield Town Centre**



- 3.35 Based on our review of the five potential development opportunity sites we broadly agree with the Council that Site 2 has the potential to accommodate most, if not all the forecast need for new retail floorspace and a mix of uses over the plan period. This is particularly the case now that the revised total forecast retail capacity identified by this study of 2,527 sqm net in 2031, increasing to 4,839 sqm net by 2037 is lower than set out in the Core Strategy of 10,707 sqm net in 2027. The difference between the previous and current capacity forecasts for Uckfield is explained by the changes in the allocation and distribution of new housing and population growth to the south of the District, principally focussed on Hailsham.
- 3.36 Notwithstanding the Council's preference for the redevelopment of Site 1, we also advise that they should carry out a more detailed assessment of the potential to reconfigure and potentially redevelop the Bell Walk shopping centre, which forms part of Site 1 (Bell Lane South). In our view the redevelopment of this centre and wider area would not only help in terms of providing a mix of modern larger format units that are currently lacking in the town centre, it would also help to significantly improve the overall appearance, environment and character of this important part of the town centre. We advise that the assessment of the potential comprehensive redevelopment and reconfiguration of this site for new retail, leisure and mixed uses should also consider the re-provision of a modern transport interchange and the creation of stronger pedestrian linkages to the quasi retail/industrial estate off Bell Lane to the east, the High Street to the west, Tesco to the north and the station to the south. Although we understand that significant land assembly would be required and there is also a flood risk issue, we nevertheless do not see these as insurmountable obstacles to the delivery of a high quality mixed use redevelopment of Bell Walk and the wider site.

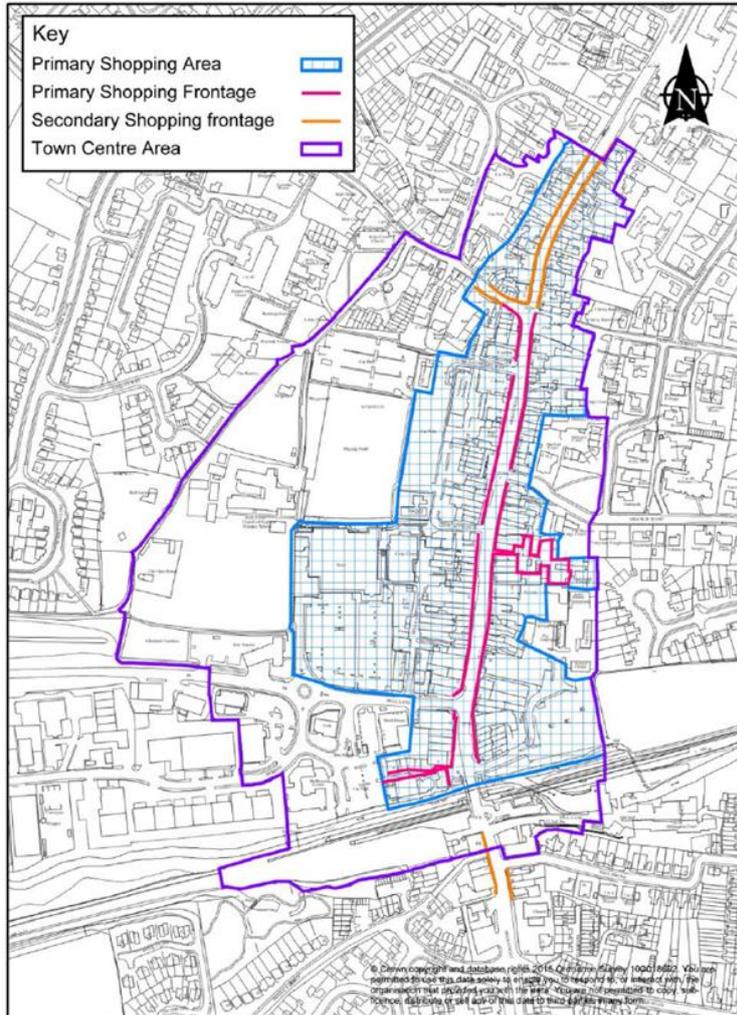
3.37 Against this background, we advise the Council that they should prepare planning and development briefs for both Sites 1 and Sites 2 as a priority to assess and test amongst other key issues:

- current land ownerships and the potential need for land assembly/CPO;
- the development potential of both sites, and any constraints to development;
- the current and likely market interest and demand for representation in the town centre and specifically on the two sites;
- the preferred development option and mix of uses;
- the financial costs and viability of the preferred development options for both sites, and any potential funding 'gaps';
- an action plan for delivery, including the potential phasing and funding of new development; and
- the Council's key role in the delivery of new development on both sites.

3.38 Depending on the outputs of the planning and development briefs for both sites, the Council could subsequently use these to procure a development partner or partners to help redevelop one or both sites over the plan period.

3.39 Turning to the proposed definition of the Town Centre Boundary and Primary Shopping Area (PSA), along with Primary Shopping Frontages (PSFs) and Secondary Shopping Frontages (SSFs), these are set out in the Wealden Local Plan "*Issues, Options and Recommendations*" (October 2015) and are reproduced in the figure below (also see the Stage 1 Report).

**Figure 3.4 Uckfield Town Centre – Proposed Boundary and PSA**



- 3.40 Based on the findings of our Stage 1 and 2 Reports, we broadly agree with the Council’s proposed boundary definitions and shop frontages. In our judgement, however, 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, and including the Bell Walk Shopping Centre) should be redefined as SSF. This will allow for more flexible policies to encourage a wider mix of uses in these areas. For the same reasons we also consider that it would be more appropriate for Olives Yard to be classified from PSF to SSF.

## Crowborough Town Centre

- 3.41 Crowborough is a market town and is the most northerly town in the District. Its retail offer is focused around the High Street and Crowborough Cross, the area around the Broadway and Croft Road and the Waitrose and Morrison’s supermarkets to the west of Croft Road/High Street and south of Beacon Road. However its role and function as a shopping destination is largely influenced by its proximity to Royal Tunbridge Wells. It is designated as a ‘*District Centre*’ in the Core Strategy and as a ‘*Market Town Centre*’ in the emerging Local Plan, at the same level in the hierarchy as Hailsham and Uckfield.
- 3.42 The Stage 1 Report identified that Crowborough is an attractive, vital and viable centre, which has shown improvements since 2008. For example, vacancy rates in the centre are low and have fallen over the last

eight years, which is a positive indication that market demand for representation in the town centre is strong from retailers, leisure operators and service businesses.

- 3.43 Crowborough caters predominantly for its local shopping and rural catchment population. It has a relatively good range and choice of multiple and independent shops, service businesses and other facilities.
- 3.44 The town's food and grocery provision is anchored by Waitrose, Morrisons and Lidl and complemented by a mix of smaller independent convenience stores. The larger foodstores generate frequent trips to the town centre and some linked expenditure to other shops and businesses, which benefits the town centre's overall vitality and viability. It is therefore important that the town's food and convenience offer is protected and enhanced over the plan period.
- 3.45 Notwithstanding the strengths of the town centre serving the shopping, leisure and service needs of its local and rural catchment population, the Stage 1 Report also identified potential areas to improve, manage and market Crowborough's offer to a wider audience, which may attract more shoppers and visitors and make it a stronger and more viable centre. The potential opportunities identified include:
- Building on its independent offer and improving the quality and choice of provision, would in our judgement help to sustain its attractiveness and to compete with other nearby centres.
  - There is some interest from multiple retailers seeking larger format units in the centre, and the centre would therefore benefit from establishing modern larger format retail units.
  - Promoting a stronger evening economy sector, underpinned by a high quality café and restaurant offer that appeals to a broad demographic profile.
  - Maintaining free parking in the town centre as this helps to attract visitors to the centre.
  - Improving the public realm, legibility and accessibility throughout the centre would be beneficial to the overall shopper and visitor experience.
  - The Market is currently an underutilised facility, and its location, scale and quality of offer requires careful thought and attention. Improvements to the market would help to strengthen the town centre's overall attraction and performance as a shopping destination, and help it to differentiate from the high order centres.
- 3.46 In terms of the potential need for new convenience goods floorspace over the plan period there is forecast capacity for 396 sqm over the medium term to 2026, increasing to 845 sqm net over the long term to 2037. Turning to the need for new comparison good floorspace, there is no forecast capacity over the medium term up to 2026 after allowing for known commitments. The capacity over the long term increases from just 23 sqm net in 2031 to 1,242 sqm net by 2037. The economic forecasts therefore suggest that there is no pressing need for major new retail-led developments in the town centre over the plan period. In our view most of the forecast need for new convenience floorspace could potentially be accommodated by the extension of existing stores in the Town Centre, where possible, or the provision of one or more smaller convenience store formats. One potential option to meet the identified need for new comparison and convenience goods shopping could also involve the reconfiguration of the Fernbank Shopping Centre. This

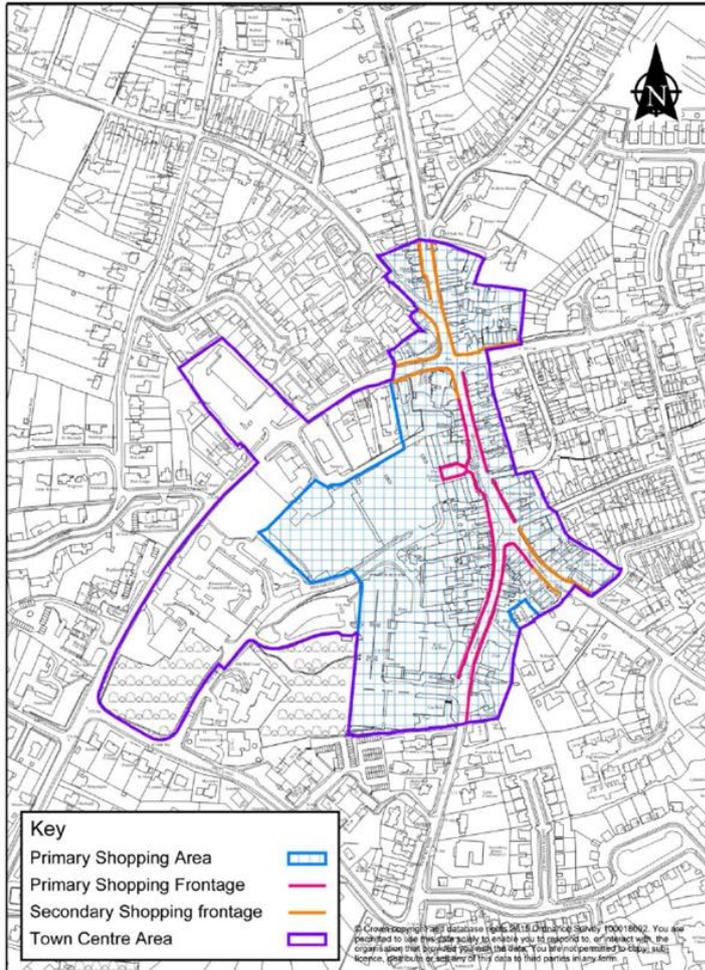
would also help to address deficiencies in the quality of the shopping environment and the accessibility issues highlighted above.

3.47 In summary our key findings and recommendations for improving the Town Centre are broadly in line with the '*Top of the Weald – A vision for Crowborough 2010-2030*', published in May 2010. We consider that there is an opportunity for the Town Council to review and refresh its vision in light of the findings of this work and other research. As part of this we recommend that a centre-wide spatial strategy (potentially in the form of a Masterplan, Area Action Plan or Neighbourhood Development Plan) be progressed to ensure that the Vision is supported by the community and key stakeholders. The scope of this strategy will require more detailed thought, but at this stage we consider that it should consider a number of the following key issues and themes:

- The opportunities to improve the Town Centre's public realm, spaces and street environment, particularly between Fernbank Shopping Centre and the High Street, at Crowborough Cross, and the linkages to the town's main foodstores.
- The opportunities to improve the street market. This could include the potential to relocate it to a more central prominent location where it will benefit from higher footfall; providing a more diverse range of food and non-food goods; introducing more niche food traders, which may appeal to visitors and residents; and increased branding and marketing to attract more shoppers and visitors to the town.
- The market demand from retailers, leisure operators and other businesses for representation in the Town Centre over the short, medium and long term.
- The potential opportunities to meet the forecast need through new development and/or reconfiguration of the town's existing floorspace. This could include the potential to reconfigure the Fernbank Shopping Centre in the heart of the town.

3.48 Finally we have reviewed the Town Centre Boundary and Primary Shopping Area (PSA), along with Primary and Secondary Shopping Frontages, as set out in the Wealden Local Plan "*Issues, Options and Recommendations*" (October 2015), based on the findings of the Stage 1 and Stage 2 Reports. The proposed boundaries and frontages are set out in the figure below.

**Figure 3.5 Crowborough Town Centre – Boundary and PSA**



Extract from Wealden Local Plan "Issues, Options and Recommendations" (October 2015), Map 30.

3.49 In summary, we consider that the proposed boundaries and frontages are appropriate and robust, and reflect the main shopping streets and extent of Crowborough's primary shopping area, including Morrisons and Waitrose.

## Heathfield

3.50 Heathfield is a small market town situated to the north of Hailsham, south of Crowborough and east of Uckfield. It is located near the junction of two main roads: the A267 between Tunbridge Wells and Eastbourne; and the A265 from Hawkhurst. It is almost equidistant from Tunbridge Wells and Eastbourne (approximately 16 miles).

3.51 The town's shopping offer is anchored by a Sainsbury's supermarket on Station Road and Co-op on the High Street. It acts as a service centre to a wide rural catchment, including a number of small villages and hamlets. The town centre has undergone environmental improvements in recent years that have improved its overall attraction. It also benefits from a leisure centre, a library and multi-purpose community building. The Parish Council has recently produced a vision for the town and there is an active Heathfield Partnership which promotes the area for business growth (see Stage 1 Report).

3.52 Heathfield is designated as 'Service Centre' by the Core Strategy, at the same level as Polegate, Wadhurst and Forest Row. However the emerging Wealden Local Plan "Issues, Options and Recommendations" (WLP

IOR, October 2015) consultation document seeks to designate Heathfield as a 'Market Town Centre', which would result in it moving up to the hierarchy alongside Uckfield, Crowbrough, and Hailsham.

3.53 The Stage 1 Report identified that Heathfield is a relatively healthy and viable centre, and is performing well against most of the health check performance indicators. For example, vacancy levels are low and there is relatively good market demand for representation in the town centre. In summary the Stage 1 Report identified:

- The centre has a good food and convenience provision, anchored by Sainsbury's and Co-op. The out-of-centre Waitrose is also a popular food shopping destination since it opened in 2015.
- The comparison goods offer is limited and mainly caters for the day-to-day needs of the local population. Attracting key high street retailers and increasing the comparison goods offer in general would help Heathfield raise its profile.
- However the lack of larger format units to meet this demand is an issue for Heathfield, as it is for the District's other main centres.
- Overall there is a good mix of multiple and independent retailers. Heathfield should build on its independent offer, improving the quality of provision and building its more specialist retail offer.
- The centre has a relatively pleasant environment, and benefits from good accessibility, free car parking and easy pedestrian movement.
- The centre lacks focus and would benefit from public open space to help create a sense of place.

3.54 The Stage 1 Report also advised that ensuring the future success and attraction of the market would be beneficial to maintaining and enhancing the centre's overall vitality and viability. The potential options for improving the market could include increasing the number of stalls; improving the range and quality of the products sold; and exploring the potential to relocate the market to a prominent/visible location in the town centre. These initiatives would help to attract more customers/visitors to the town, and should be combined with better marketing/promotion and more targeted events.

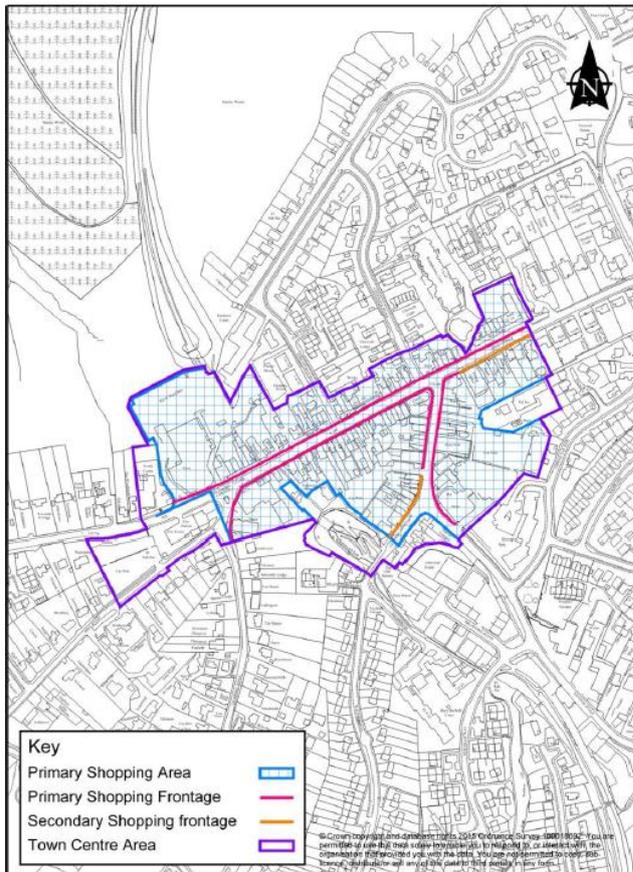
3.55 In terms of the capacity for new retail floorspace, the Stage 2 Report identified the potential need for 202 sqm net of new convenience goods floorspace over the medium term to 2026, and 513 sqm net over the long term to 2037. In our judgement this need could be met by the potential extension of the town's main foodstores, or the provision of a smaller format convenience store in or on the edge of the PSA.

3.56 For comparison goods the forecast capacity is for 293 sqm net by 2026, increasing to 1,517 sqm net by 2037. We understand from the Council that there are limited opportunities to meet the long term need for new comparison goods floorspace in the PSA. Based on our high level review of the centre we consider that one option could involve the redevelopment of the Heathfield Community Fire Station and the Mill Road car park at the eastern 'gateway' to the High Street, on the edge of the PSA. Any potential mixed use development on this site would represent a long term opportunity to meet the identified need by 2037, and is likely to involve the retention of the existing parking provision on-site. At this stage we recommend that the

Council carries out more detailed viability testing to better understand the potential opportunity for the redevelopment of this site for a mix of uses, underpinned by market testing.

- 3.57 Drawing on the findings of the Stage 1 and 2 Reports we have reviewed the Town Centre Boundary and Primary Shopping Area (PSA), along with Primary and Secondary Shopping Frontages proposed by the Wealden Local Plan “*Issues, Options and Recommendations*” (October 2015). The extent of these boundaries and frontages are illustrated in the figure below.

**Figure 3.6 Heathfield Town Centre – Boundary and PSA**



- 3.58 In summary we consider that the proposed boundaries and frontages are appropriate and robust in this case, and do reflect the main shopping streets and extent of Heathfield’s primary shopping area, including the Co-op and Sainsbury’s stores. The only revision we would recommend would be to reclassify numbers 14-30 High Street as Secondary Shopping Frontages to allow more flexible uses.

## Polegate

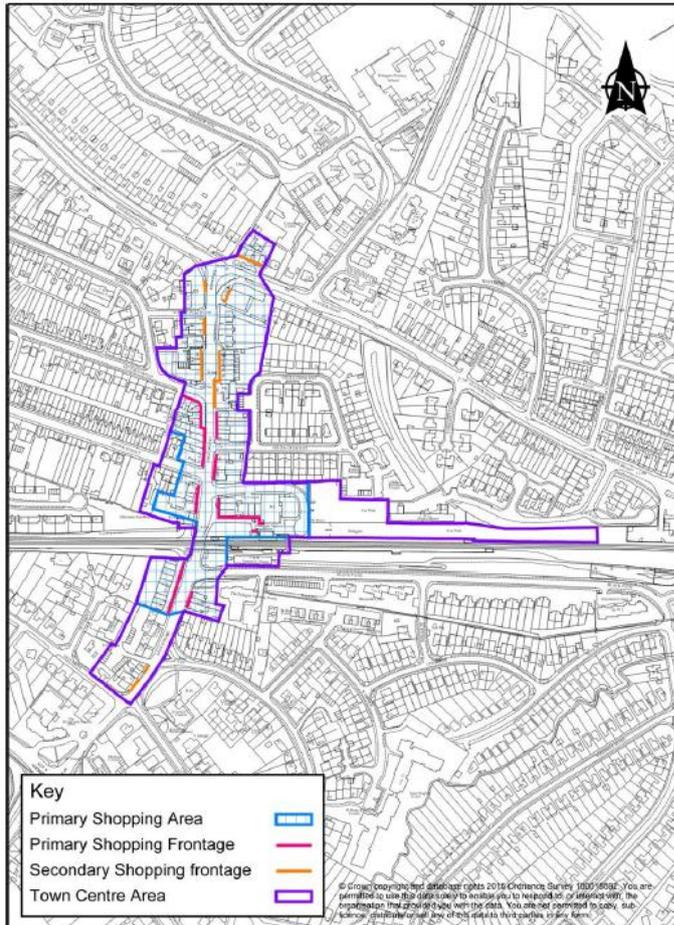
- 3.59 Polegate is a small settlement and its main retail, leisure and service offer is focussed around the railway station and on the linear High Street. However, the High Street is bisected by the railway line and level crossing, and pedestrian flow around the centre is affected by frequent barrier closures.
- 3.60 The centre sits in the shadow of Hailsham’s catchment and the higher order centre of Eastbourne, and mainly serves the day-to-day shopping, service, leisure and community needs of its local catchment population, and commuters who use the railway station. This is reflected by its designation as a ‘Service

Centre' by the Core Strategy (2013), and as a 'Primary District Centre' by the emerging Wealden Local Plan "Issues, Options and Recommendations" (October 2015) consultation document. It is therefore positioned below Hailsham, Uckfield, Crowborough and Heathfield in the retail hierarchy, and at the same level as Forest Row and Wadhurst.

- 3.61 In summary the Stage 1 Report identified that Polegate appears to be performing relatively well based on a number of key performance indicators. For example, there were just two vacant units at the time of the centre audit. The centre is highly accessible by different modes and benefits from the footfall generated by the station, particularly during peak travel times. The centre also has good parking provision and its linear High Street is easy to navigate. However it has a limited multiple offer, and its local shops and services mainly meet the day-to-day needs of its local catchment population, and those using the railway station.
- 3.62 Looking forward over the plan period, the Stage 2 Report identified that there is no forecast capacity for new retail (convenience or comparison goods) floorspace in Polegate up to 2037. This is explained by the fact that all the growth in residual expenditure arising from the new housing allocations and population growth in this area will be taken up by the permission for the new Lidl store (1,837 sqm gross) on an out-of-centre site located on the north side of Dittons Road and to the west of the A22 Golden Jubilee Way, on the north eastern edge of Polegate (ref: WD/2016/1067/MAJ).
- 3.63 Notwithstanding the lack of capacity for new retail floorspace in Polegate, there may be the opportunity to improve the scale and quality of the centre's food and convenience offer in the future through the extension of the existing Co-op store at the station gateway. This would inevitably be subject to a requirement from Co-op to extend their store. The Council may also need to consider the provision of smaller convenience stores and neighbourhood uses as part of larger housing settlements proposed for the Polegate area to help meet the more day-to-day needs of the new population in a sustainable manner. However, any proposals for new retail and other town centre uses in a 'neighbourhood centre' would need to satisfy both the sequential and impact tests carried out in compliance with the NPPF.
- 3.64 Overall we consider that the current mix of uses in the centre adequately meets the basic day-to-day needs of the immediate local population. There would appear to be limited potential to increase the scale of the centre's offer due to limited capacity, market demand and development opportunities. Nevertheless, we advise that there is the potential to improve the quality of Polegate's retail, leisure and service offer over time. In our view the centre also lacks character and identity, and would benefit from improvements to the public realm and buildings facades/shop frontages to help create a more attractive environment.
- 3.65 We have also reviewed the proposed Town Centre Boundary and Primary Shopping Area (PSA), along with Primary and Secondary Shopping Frontages set out in the Wealden Local Plan "Issues, Options and Recommendations" (WLP IOR, October 2015) consultation document (see figure below). In our judgement the definition of the boundaries and frontages are reasonable and robust. The only changes we would suggest to the current definitions are:
- 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 to the far south of the town centre, which include 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 to the north of the town centre, which include nos. 1-4 Millfields/Station Road.

**Figure 3.7 Polegate Town Centre – Boundary and PSA**



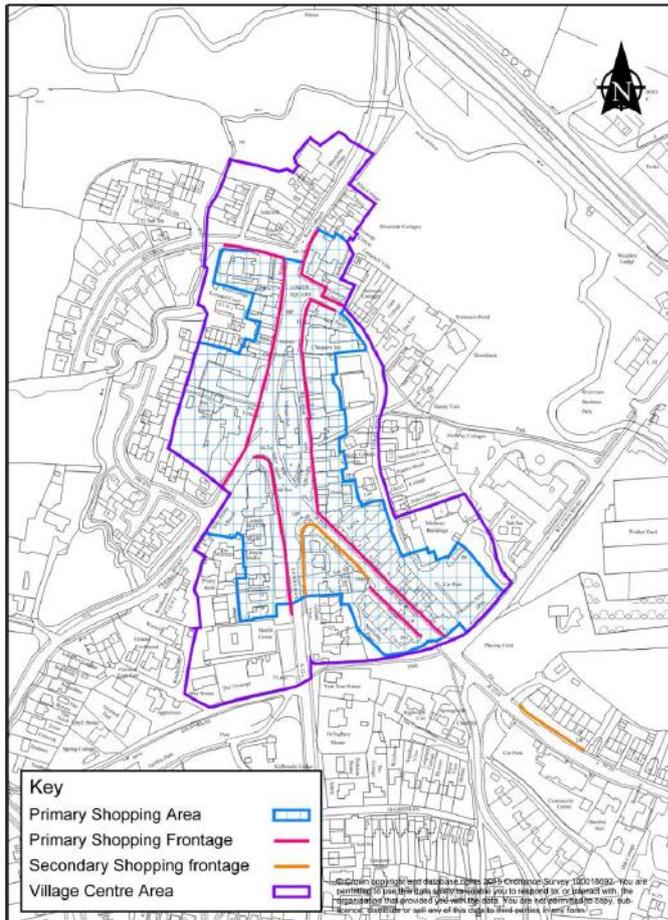
## Forest Row

- 3.66 Forest Row is a small village located in the north west of the District, approximately four miles south east of East Grinstead. The village centre is primarily focused along the main Lewes Road, which is the A222 through route towards East Grinstead. Part of the town centre also extends along Hartfield Road, and the Village Hall which sits on an island between the Lewes Road and Hillside/Upper Square.
- 3.67 Forest Row is designated as a 'Service Centre' by the Core Strategy (2013), and as a 'Primary District Centre' by the emerging Wealden Local Plan "Issues, Options and Recommendations" (WLP IOR, October 2015) consultation document. It is placed below Hailsham, Uckfield, Crowborough and Heathfield in the retail hierarchy, and at the same level as Forest Row and Wadhurst.
- 3.68 The Stage 1 Report found that Forest Row is a relatively attractive, healthy and viable centre, and is performing well against many of the health check key performance criteria. For example, vacancy levels in

the centre are low, which is a positive sign of the performance of existing shops and services and the good demand for space where vacancies do occur.

- 3.69 The centre is well served in terms of its retail and service offer, and predominantly meets the day-to-day needs of its local catchment population. Its retail mix is largely dominated by popular independent and specialist retailers, which also draw shoppers and visitors from further afield for specific purchases. The centre's offer is also underpinned by a popular and profitable market, and it benefits from good accessibility.
- 3.70 In terms of potential opportunities for improvement, the Stage 1 Report identified that Forest Row should look to build on its independent offer, improving the quality of provision and strengthening its niche retail offer to help differentiate it from other centres. There is also potential to improve the management and marketing of the street market to enable it to grow and flourish as an integral part of the centre's overall offer. The Stage 1 Report also identified the need to improve parking provision.
- 3.71 In terms of the capacity for new retail floorspace the Stage 2 Report forecast limited need for new convenience (75sqm net) and comparison (44 sqm net) good floorspace over the medium term to 2026. Over the long term, to 2037, the capacity for new convenience goods floorspace is forecast to increase to 116 sqm net, and to 172 sqm net for new comparison goods floorspace. The forecast capacity for new retail floorspace in Forest Row is therefore neither substantial nor pressing, and in our view the need can probably be met through infill development within and/or on the edge of the PSA.
- 3.72 Finally we have reviewed Forest Row's Town Centre Boundary and Primary Shopping Area (PSA), along with Primary and Secondary Shopping Frontages, as proposed in the Wealden Local Plan "*Issues, Options and Recommendations*" (WLP IOR, October 2015). The boundaries and frontages are set out in the figure below for clarification purposes. In summary, we consider that the definitions are generally robust and appropriate, but recommend the following changes to reflect the offer along different streets in the centre.
- The PSFs currently identified that run south from Holy Trinity Church along Lewes Road should be redefined as SSFs.
  - The street frontages that run south along Hartfield Road should all 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 PH at the junction of Priory Road and London Road also appears to be defined as part of the PSF and should in our view be excluded.
  - We also consider that the PSF extends too far north along Lewes Road. In our view the PSF 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.
- 3.73 In our judgment these suggested changes will help to create a more compact primary shopping area and frontages, and allow for more flexibility in those areas covered by the Secondary Shopping Frontages.

**Figure 3.8 Forest Row Village Centre – Boundary and PSA**



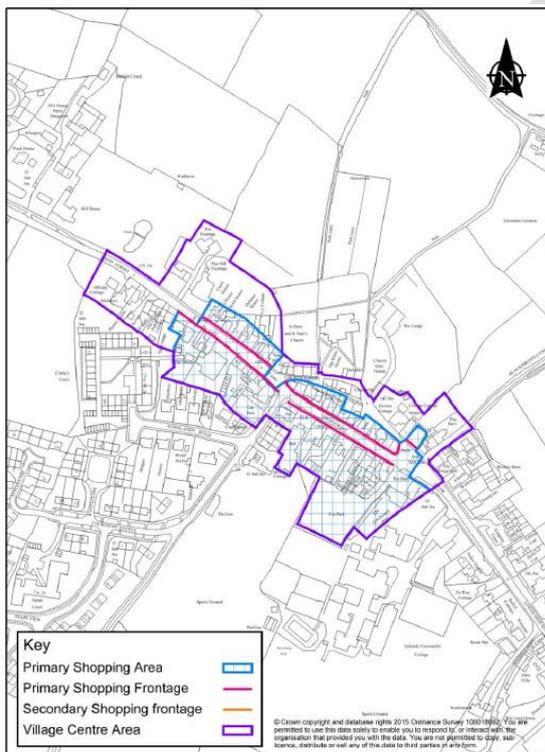
## Wadhurst

- 3.74 Wadhurst is a historic market town located in the north-east of the District, approximately seven miles to the south-east of Royal Tunbridge Wells. It is a smaller sized linear centre focused along the traditional High Street (the main A266 road through the village), and extends from the Square in the south-east to the Vicarage in the north-west.
- 3.75 It is designated as a ‘Service Centre’ by the Core Strategy (2013), and as a ‘Primary District Centre’ by the emerging Wealden Local Plan “Issues, Options and Recommendations” (WLP IOR, October 2015) consultation document. It is therefore placed below Hailsham, Uckfield, Crowborough and Heathfield in the retail hierarchy, and at the same level as Forest Row and Polegate.
- 3.76 The Stage 1 Report found that Wadhurst is a relatively attractive, healthy and viable centre that is performing well against a number of key performance indicators (KPIs). For example there were no vacant units at the time of our centre audit. It also has a good mix of convenience and comparison goods outlets, catering for the basic day-to-day needs of the local population.
- 3.77 The following provides a brief overview of some of the other key features of the centre’s offer, and the potential opportunities for improvement over the plan period:

- The shops are very popular with the local community, although the centre would benefit from some of the shops and leisure services opening later in the evenings.
- The centre's offer is dominated by independent retailers, which adds to its overall character and attraction. Wadhurst should therefore build on its independent offer, improving the quality of provision and its niche retail offer.
- The centre has a popular market, which should be encouraged to flourish through proactive management and marketing.
- The centre has a pleasant environment, but the on-street parking management could be improved.
- Some public realm improvements could be beneficial to maintain a pleasant environment.

3.78 In terms of the capacity for new retail floorspace the Stage 2 Report forecast limited need for new convenience (42 sqm net) and comparison (68 sqm net) good floorspace over the medium term to 2026. Over the long term, to 2037, the capacity for new convenience goods floorspace is forecast to increase to 73 sqm net, and to 246 sqm net for new comparison goods floorspace. As for Forest Row, the forecast capacity for new retail floorspace in Wadhurst is neither substantial nor pressing. In our view this need can probably be met in full through infill development within and/or on the edge of the defined PSA.

**Figure 12.1 Wadhurst Village Centre – Boundary and PSA**



3.79 The figure above illustrates the definition of centre's Boundary and Primary Shopping Area (PSA), along with Primary and Secondary Shopping Frontages as set out in the Wealden Local Plan "Issues, Options and Recommendations" (WLP IOR, October 2015). In summary, we consider that the definitions are robust and appropriate in this case and do not require any revisions.

## 4 TOWN CENTRE HIERARCHY: RECOMMENDATIONS

- 4.1 As described in the Stage 1 Report (Section 2), the review of the Local Plan proposes a revised Settlement Hierarchy based on a range of sustainability characteristics and a revised Town Centre hierarchy in compliance with the NPPF.
- 4.2 Figure 2 in WLP IOR shows the Sustainable and Local Settlements that sit at the top of the hierarchy (also see Stage 1 Report; Figure 2.1). The ‘*Sustainable Settlements*’ are defined as being either very accessible with good local facilities, or accessible with good local facilities. The District’s main centres are all defined as ‘Sustainable Settlements’ – namely Hailsham, Uckfield, Crowborough, Heathfield, Polegate, Wadhurst and Forest Row. ‘*Local Settlements*’ are defined as being accessible with local to very limited facilities, and below these in the hierarchy are the Neighbourhood and Residential Settlements, where public transport is “*unreliable*” or is not provided, and there is limited or no facilities available to the local populations. This revised settlement hierarchy appears reasonable in our judgement.
- 4.3 Section 16 of the WLP IOR deals with the issues, options and recommendations pertaining to the District’s main Towns and Village Centres. The Council has defined a network and hierarchy of centres based on their number of retail and non-retail units, diversity of uses and accessibility. The preferred Town and Village Centre Hierarchy is summarised in the table below (also see Stage 1 Report; Section 2).

**Table 4.1 Town and Village Centre Hierarchy**

CATEGORISATION	DRAFT DESCRIPTION	CENTRE
<b>MARKET TOWN CENTRE:</b>	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	Uckfield Crowborough Hailsham Heathfield
<b>PRIMARY DISTRICT CENTRE</b>	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.	Polegate Wadhurst and Forest Row
<b>SECONDARY CENTRE:</b>	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	For example: Pevensey Bay, Mayfield, Horam, Herstmonceux, Westham, Rotherfield
<b>LOCAL SERVICE CENTRE:</b>	A centre of less than 10 units, that provides a basic range of retail and limited additional facilities.	For example: Ninfield, Frant, Stone Cross, Hartfield, Groombridge and Buxted

Source: see WLP OIR (Table 1, page 120)

- 4.4 We note that the centre categories identified by the WLP IOR do not correspond with the definitions in Annex 2 of the NPPF which states that references to town centres or centres “*apply to city centres, town centres, district centres and local centres but exclude small parades of shops of 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*”.
- 4.5 Based on the NPPF definitions we therefore advise the Council that the Town Centre and Retail Hierarchy should be reclassified as follows:
- **Town Centres** – Uckfield, Crowborough, Hailsham and Heathfield.

- **District Centres** – Polegate, Wadhurst and Forest Row.
- **Local Centres** – include Pevensey Bay, Mayfield, Horam, Herstmonceux, Westham, Rotherfield

- 4.6 This reclassification would mean that all the centres previously identified as '*Local Service Centres*' by the WLP OIR would not be classified as 'centres' under the NPPF, as they would be defined as "*small parades of shops of purely neighbourhood significance*". The scope of this study has not considered the relative role, function and offer of the smaller centres that sit below Uckfield, Crowborough, Hailsham, Heathfield, Polegate, Wadhurst and Forest Row in the District's hierarchy and network of centres. We therefore advise the Council that it should carefully consider whether any of the smaller centres defined as '*Local Service Centres*' by the WLP IOR should be reclassified as '*Local Centres*' under the preferred definitions, thereby affording them policy protection under the NPPF and emerging Local Plan.
- 4.7 Notwithstanding the proposed reclassification of the main centres, it is clear that Hailsham and Uckfield are the District's only centres that could accommodate the forecast need for new retail floorspace and town centre uses over the plan period, subject to 'unlocking' the development potential of the main opportunity sites identified in and on the edge of both centres. As a result, it may be appropriate for both centres to be categorised as '*Main Town Centres*' in the District's centre hierarchy, with Crowborough and Heathfield classified as '*Town Centres*' to reflect the differences in their scale, offer and development potential.

## 5 LOCAL IMPACT THRESHOLD: RECOMMENDATIONS

- 5.1 This section examines whether there is a policy requirement for the local planning authority to set a local (floorspace-based) impact threshold, rather than use the default of 2,500 sqm gross identified by the NPPF (paragraph 26). This is important as it will determine whether applicants should carry out an impact assessment for new retail, leisure and office development outside of town centres that are not in accordance with an up-to-date Local Plan.
- 5.2 In summary the National Planning Practice Guidance (NPPG) published in March 2014 provides advice in setting a locally appropriate threshold and states that it will be important to consider the:
- scale of proposals relative to town centres;
  - the existing viability and vitality of town centres;
  - cumulative effects of recent developments;
  - whether local town centres are vulnerable;
  - likely effects of development on any town centre strategy; and
  - impact on any other planned investment.
- 5.3 While the quantitative and qualitative research evidence indicates that the main towns and smaller centres in Wealden District appear to be vital and viable, they are nevertheless vulnerable to increased competition from out-of-centre retailing and the growth of internet shopping. It is apparent that the main centres in the District have lost market share to competing out-of-centre foodstores, retail warehouses and retail parks.
- 5.4 Our assessment of retail trends in Section 3 has highlighted the dynamic growth in smaller convenience stores operated by the major grocers (i.e. Sainsbury's Local, Tesco Express, Little Waitrose, etc.). Although sizes vary from location-to-location, the main grocers are generally seeking new convenience stores (e.g. Tesco Express, Sainsbury's Local, Little Waitrose) with a minimum gross floorspace of circa 4,000 sq ft (372 sqm) gross. In circumstances where these smaller stores are proposed on the edge or outside of smaller local and village centres, often as part of petrol filling stations, they could result in a significant adverse impact on their trading performance, and overall vitality and viability. This will particularly be the case where smaller centres and villages are dependent on smaller supermarkets and convenience ('top-up') stores to anchor their retail offer and generate footfall and linked trips/expenditure to the benefit of other shops, services and facilities.
- 5.5 In addition, modern retailers selling a range of comparison goods (including fashion, homestore and 'bulky' goods retailers) generally have requirements for larger format shop units with a minimum floorspace of approximately 5,000 sq ft (465 sqm) gross. This scale of floorspace provides operators with the necessary minimum 'critical mass' of sales needed to display their full range of goods in-store and attract customers from a wider catchment area, particularly where they are co-located alongside similar stores in town centre and out-of-centre locations. In general terms larger format non-food stores of over 5,000 sq ft gross are also unlikely to trade as a purely local facility.

- 5.6 We therefore conclude in this case that it is reasonable for applicants proposing developments for new comparison and convenience goods retailing of 350 sqm gross and above to demonstrate that they will not have a significant adverse impact on the District's main Town Centres or the network of smaller District and Local Centres, either on their own or cumulatively with other commitments in the area, in accordance with the NPPF.
- 5.7 In our judgement this is a reasonable impact threshold as it will provide the local planning authority with sufficient flexibility to assess the merits and implications of edge and out-of-centre foodstore applications that could potentially have significant implications for the viability and delivery of new or extended floorspace in these existing centres. We also advise that this threshold should be applied, where relevant, to change of use applications and applications seeking variations of conditions.
- 5.8 In our experience a 350 sqm gross impact threshold is reasonable in this case based on our experience of advising other local planning authorities, and also drawing on the minimum impact thresholds identified in recently adopted local plans (including, for example, Richmondshire District Council, Rother District Council, Rotherham Metropolitan Council, Stafford Borough Council, Warrington Borough Council and Norwich City Council).
- 5.9 Notwithstanding the adoption of a lower locally set impact threshold, it is important that the scope of any Retail Impact Assessment (RIA) in support of planning applications is discussed and agreed between the applicants and the Council at an early stage in the pre-application process. The level of detail included within a RIA should be proportionate to the scale and type of retail floorspace proposed, and should be agreed between the Council and applicant on a case-by-case basis. In all cases the local planning authority should adopt a pragmatic and reasonable approach with regard to the scope and detail of evidence required in support of planning applications.

## 6 SUMMARY

- 6.1 In summary, we consider that all the forecast need for new retail floorspace over the plan period could be met in full by the various development opportunity sites identified by the WLP IOR both within and on the edge of the defined PSAs for the main study centres. Some of the forecast need could also be met by potential extensions to existing stores and/or through infill development in the smaller centres. This is in accordance with planning policy that seeks to direct new development and investment in town centres first.
- 6.2 As a result, at this stage we do not consider it is necessary for the local planning authority to identify and allocate sites outside the main town centres in the emerging Local Plan.
- 6.3 In our view Hailsham is the only centre where there could be pressure over the long term to extend the town centre boundary to the area covered by Station Road/South Road and the eastern end of Diplocks Industrial Estate/Ropemakers Park (Site Option 7 in the WLP IOR). This town centre extension would help to accommodate the forecast need for new retail and other town centre uses arising from the new housing allocation and population growth identified for Hailsham, but only if suitable sites cannot be delivered in and on the edge of the town's PSA. For the reasons set out above, we strongly recommend against extending the town centre boundary and allocating Site 7 for new retail and town centre uses at this early stage in the plan process, as we believe it would seriously damage any potential development and investment in the town centre first.
- 6.4 Through the preparation of the Local Plan and the Hailsham Area Action Plan the Council therefore has a key role to play in both assessing the development potential and phasing of the main town centre sites, and ultimately in helping to deliver new mixed use development in the town centres to meet the identified needs. This may range from direct involvement in land assembly (including the potential use of its CPO powers), through to procuring a development partner or partners and/or funding new development.
- 6.5 In the other main centres we advise that their long term futures and development potential can be secured through the preparation of a mix of planning and development briefs, masterplans/AAPs and other initiatives to help attract new investment and development to the right sites at the right time, and to help manage and curate the optimum mix of new retail and town centre uses.

## 7 GLOSSARY

<b>CITY CENTRES:</b>	The highest level of centre identified in development plans. In terms of hierarchies, they will often be a regional centre and will serve a wide catchment. The centre may be very large, embracing a wide range of activities and may be distinguished by areas which may perform different main functions.
<b>TOWN CENTRES:</b>	Town centres will usually be the second level of centres after city centres and, in many cases, they will be the principal centre or centres in a local authority's area. In rural areas they are likely to be market towns and other centres of similar size and role which function as important service centres, providing a range of facilities and services for extensive rural catchment areas. In planning the future of town centres, local planning authorities should consider the function of different parts of the centre and how these contribute to its overall vitality and viability.
<b>DISTRICT CENTRES:</b>	District centres will usually comprise groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies and restaurants, as well as local public facilities such as a library.
<b>LOCAL CENTRES:</b>	Local centres include a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot-food takeaway and launderette.
<b>TOWN CENTRE USES:</b>	Main town centre uses are 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, nightclubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, cultural and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
<b>TOWN CENTRE BOUNDARY:</b>	Defined area, including the primary shopping area and areas of predominantly leisure, business and other main town centre uses within or adjacent to the primary shopping area. The extent of the town centre should be defined on a proposals map.
<b>PRIMARY SHOPPING AREA (PSA)</b>	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). The extent of the primary shopping area should be defined on the proposals map. Smaller centres may not have areas of predominantly leisure, business and other main town centre uses adjacent to the primary shopping area, therefore the town centre may not extend beyond the primary shopping area.
<b>PRIMARY &amp; SECONDARY FRONTAGES</b>	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.
<b>EDGE-OF-CENTRE</b>	For retail purposes, a location that is well connected up to 300 metres from the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge-of-centre, account should be taken of local circumstances.
<b>OUT-OF-CENTRE</b>	A location which is not in or on the edge of a centre but not necessarily outside the urban area.
<b>OUT-OF-TOWN</b>	A location out of centre that is outside the existing urban area.
<b>CONVENIENCE SHOPPING</b>	Convenience retailing is the provision of everyday essential items, including food, drinks, newspapers/magazines and confectionery.
<b>SUPERMARKETS</b>	Self-service stores selling mainly food, with a trading floorspace less than 2,500 square metres, often with car parking.
<b>SUPERSTORES</b>	Self-service stores selling mainly food, or food and non-food goods, usually with more than 2,500 square metres trading floorspace, with supporting car parking.
<b>COMPARISON SHOPPING</b>	Comparison retailing is the provision of items not obtained on a frequent basis. These include clothing, footwear, household and recreational goods.
<b>RETAIL WAREHOUSES</b>	Large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for car-borne customers.
<b>RETAIL PARKS</b>	An agglomeration of at least 3 retail warehouses.
<b>WAREHOUSE CLUBS</b>	Large businesses specialising in volume sales of reduced priced goods. The operator may limit access to businesses, organisations or classes of individual.
<b>FACTORY OUTLET CENTRES</b>	Groups of shops specialising in selling seconds and end-of-line goods at discounted prices.
<b>REGIONAL &amp; SUB-REGIONAL SHOPPING CENTRES</b>	Out-of-centre shopping centres which are generally over shopping centres 50,000 square metres gross retail area, typically comprising a wide variety of comparison goods stores.

<b>LEISURE PARKS</b>	Leisure parks often feature a mix of leisure facilities, such as a multi-screen cinema, indoor bowling centres, night club, restaurants, bars and fast-food outlets, with car parking.
<b>CONVENIENCE GOODS EXPENDITURE</b>	Expenditure (including VAT as applicable) on goods in COICOP categories: Food and non-alcoholic beverages, Tobacco, Alcoholic beverages (off-trade), Newspapers and periodicals, Non-durable household goods.
<b>COMPARISON GOODS EXPENDITURE</b>	Expenditure (including VAT as applicable) on goods in COICOP Categories: Clothing materials & garments, Shoes & other footwear, Materials for maintenance & repair of dwellings, Furniture & furnishings; carpets & other floor coverings, Household textiles, Major household appliances, whether electric or not, Small electric household appliances, Tools & miscellaneous accessories, Glassware, tableware & household utensils, Medical goods & other pharmaceutical products, Therapeutic appliances & equipment, Bicycles, Recording media, Games, toys & hobbies; sport & camping equipment; musical instruments, Gardens, plants & flowers, Pets & related products, Books & stationery, Audio-visual, photographic and information processing equipment, Appliances for personal care, Jewellery, watches & clocks, Other personal effects.
<b>SPECIAL FORMS OF TRADING</b>	All retail sales not in shops and stores; including sales via the internet, mail order, TV shopping, party plan, vending machines, door-to-door and temporary open market stalls.
<b>GROSS GROUND FLOOR FOOTPRINT FLOORSPACE</b>	The area shown on the Ordnance Survey map or other plans as being occupied by buildings and covered areas measured externally.
<b>GROSS RETAIL FLOORSPACE</b>	The total built floor area measured externally which is occupied exclusively by a retailer or retailers; excluding open areas used for the storage, display or sale of goods.
<b>NET RETAIL SALES AREA</b>	The sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts.
<b>RETAIL SALES DENSITY</b>	Convenience goods, comparison goods or all goods retail sales (stated as including or excluding VAT) for a specified year on the price basis indicated, divided by the net retail sales area generating those sales.
<b>QUANTITATIVE NEED</b>	Is conventionally measured as expenditure capacity (i.e. the balance between the turnover capacity of existing facilities and available expenditure in any given area). Expenditure capacity, or 'quantitative need' can arise as a result of forecast expenditure growth (either through population growth or increase in spending), or by identification of an imbalance between the existing facilities and current level of expenditure available in an area.
<b>QUALITATIVE NEED</b>	Includes more subjective measures such as, for example, consumer choice; the appropriate distribution of facilities; and the needs of those living in deprived areas. 'Over trading' is also identified as a measure of qualitative need, although evidence of significant over-crowding, etc., may also be an indicator of quantitative need.
<b>OVERTRADING</b>	The extent to which the turnover of existing stores significantly exceeds benchmark turnovers may be a qualitative indicator of need, and in some cases inform quantitative need considerations. For example it may be an expression of the poor range of existing facilities or limited choice of stores and a lack of new floorspace within a locality. In certain cases 'overtrading' occurs when there is an imbalance between demand (i.e. available spend) and supply (i.e. existing floorspace capacity).
<b>BENCHMARK TURNOVER</b>	In the case of specific types of provision (such as foodstores) company average turnover figures are widely available and can provide an indication of a 'benchmark' turnover for existing facilities. However, turnover benchmarks should not be used prescriptively or in isolation to indicate a measure of 'need'. It is important to recognise that a range of factors (such as rental levels and other operating costs) mean that operators are likely to trade at a wide range of turnover levels. Given the inherent margins of error involved in this type of exercise, the use of company averages as benchmarks should be treated with caution unless they are corroborated by other independent evidence of under-performance, or strong trading. Examples might include the results of in-centre health checks, or the extent of congestion in stores and queuing at checkouts.