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Eastbourne Town Centre Local Plan Submission Version

Matters Statement

4.0 Quantum and Type of Development

Date: May 2013

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4.0 QUANTUM AND TYPE OF DEVELOPMENT

4.1 Does the quantum of development align with the Core Strategy Local Plan (CSLP)?

- 4.1.1 The Eastbourne Core Strategy Local Plan identifies that 1,190 dwellings and 3,000 m² of office/commercial floorspace will be delivered in the Town Centre within the period up to 2027.
- 4.1.2 The Submission version of the TCLP reflected the housing and employment land requirements in the Core Strategy on the date that it was submitted (January 2012). The quantum of development at this time is set out in paragraph 4.20 of the Submission Version of the TCLP.
- 4.1.3 A main modification (ref M10) to para 4.20 of the TCLP is proposed to bring the figures up to date to align with the Adopted version of the Core Strategy. In addition, Main Modification M24 amends Policy TC17 to include reference to the five Development Opportunities Sites being required to deliver 450 of the 1,190 residential units identified in the Core Strategy to be delivered in the Town Centre, and 3,000 sqm of B1a office floorspace.
- 4.1.4 In addition, it is proposed to make a further modification to Main Modification M24 to further amend Policy TC17 to delete reference to the quantum of new B1(a) office floorspace and to state that the delivery of new office floorspace in the Town Centre will be confirmed in the Employment Land Local Plan.
- 4.1.5 Main Modifications (M22) to the explanatory text for the policy sets out the mechanism by which the Council proposes to monitor the overall delivery of the quantum of development. It is proposed that Main Modification M22 be further amended to delete reference to the 3,000 sqm of new B1(a) office floorspace and replaced with reference to the fact that the new quantum of office space in the town centre will be confirmed by the Employment Land Local Plan. In addition, it is proposed to make a further modification to Main Modification 41 (Monitoring Framework Table), to delete reference to 3,000 sqm of office floorspace from the 'Target' and 'Indicator' columns.
- 4.1.6 Therefore, it is considered that the quantum of development identified in the Town Centre Local Plan, and through the proposed modifications, does align with the Core Strategy Local Plan.

4.2 Does the plan identify the distribution of uses in the town centre?

- 4.2.1 The broad distribution of land uses in the Town Centre is defined by various aspects of the Town Centre Local Plan, including: through the allocation of Development Opportunity Sites that identify required and other acceptable land uses, and the identification of Transitions Area and Potential Areas of Change.
- 4.2.2 The table below identifies the distribution of uses across the sites and locations identified with the appropriate policy reference for the TCLP:

Site/ Location	Policy Number	Housing	Office	Retail	Community use	Tourism	Cafes/ Restaurants/ Bars
DOS1	TC18	✓	✓	✓	✓		✓
DOS2	TC19	✓	✓	✓		✓	✓
DOS3	TC20	✓	✓	✓	✓		✓
DOS4	TC21	✓	✓	✓			✓
DOS5	TC22	✓	✓	✓	✓	✓	✓
TA 1	TC23	✓	✓	✓	✓		✓
TA 2	TC23	✓	✓	✓	✓		✓
PAC1	TC24					✓	
PAC2	TC24	✓	✓	✓			✓
PRA	TC4			✓			✓
SRA	TC5		✓	✓	✓		✓
Elsewhere	TC6, TC7	✓			✓		✓

4.2.3 The TCLP does not explicitly identify a specific amount of development for each site in order to allow for flexibility to ensure that each site is deliverable and can respond to the market conditions at the time of proposed development. However, Main Modification M24 does identify that 450 residential units will be delivered across the five Development Opportunities Sites, with the remainder to be delivered on other identified sites and through windfall development.

4.2.4 In addition, Policy TC3 Mixed Use Development supports a mix of uses on Development Opportunity Sites and through redevelopments in order to contribute to the overall vitality and economic viability.

4.3 Is the reference to 3,000 sq metres of new office floorspace justified in view of the forthcoming review of employment land supply? Should the plan provide flexibility to allow for any additional office floorspace that may be required in the Town Centre?

4.3.1 Policy D2 of the Eastbourne Core Strategy Local Plan identifies that 3,000 m² of office/commercial floorspace will be delivered in the Town Centre within the period up to 2027.

4.3.2 Para 50 of the Core Strategy Inspector's Report indicated that the plan's approach to delivering employment land through development in the Town Centre (and Industrial Estates) is "positively prepared and justified by evidence which demonstrates the capacity of the town centre to accommodate 3,000 sqm of employment floorspace".

4.3.3 However, the Inspector considered that the evidence on employment land supply lacks clarity and does not demonstrate that Policy D2 is the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne. The Inspector recommended that Policy D2 should be subject to an early review, leading to its replacement with an additional Employment Land Local Plan to deal specifically with employment land supply.

- 4.3.4 Work on an Employment Land Local Plan has commenced with a review of the employment land supply but will not have progressed sufficiently far enough in order to provide up to date evidence for the TCLP.
- 4.3.5 As work on the Employment Land Local Plan is at an early stage of preparation, the Council considers that it would not be appropriate to specify the quantum of new B1(a) office floorspace at this time within the TCLP.
- 4.3.6 Once adopted, the Employment Land Local Plan will confirm the quantum of new B1(a) office floorspace that will need to be delivered in the Town Centre over the plan period. This will therefore add greater clarity to the TCLP, and in particular Policy TC17. This would mean deleting the reference to 3,000 sqm of office floorspace to enable the quantum to be confirmed by the Employment Land Local Plan. This approach is consistent with the flexibility of the TCLP, and will also prevent the need to undertake an early review of the TCLP in light of the findings of the Employment Land Local Plan.
- 4.3.7 In light of this, the flexibility of the Town Centre Local Plan in terms of providing additional employment floorspace can be enhanced through additional modifications to Main Modification M24 to delete reference to the delivery of 3,000 sqm of B1(a) office floorspace being delivered in the Town Centre, and to replace it with reference to the fact that the new quantum of office space in the Town Centre will be confirmed by the Employment Land Local Plan.
- 4.3.8 Therefore, the Council suggests that a further amendment is made to Proposed Main Modification M24 to read: "The five Development Opportunity Sites will deliver a minimum of 450 net residential units and *new B1(a) office space, the quantum of which will be confirmed in the Employment Land Local Plan*. These requirements should be provided across all five sites allowing flexibility for the quantum of development to be delivered on each site to be determined by an appropriate design led response."

4.4 Is the plan premature in view of this forthcoming review?

- 4.4.1 The suggested further amendment to Proposed Main Modification M24 will add additional flexibility to the TCLP and will confirm that the quantum of new B1a office floorspace to be delivered in the Town Centre will be in accordance with the Employment Land Local Plan. In light of this, the Council considers that the TCLP is not premature.
- 4.4.2 In addition, Para 60 of the Core Strategy Inspectors Report acknowledges that the Town Centre regeneration is "much needed", and in order for this to be delivered a Town Centre Local Plan needs to be in place to guide development in the Town Centre over the plan period. Any delay in the adoption of the Town Centre Local Plan will result in a policy vacuum specifically relating to the Town Centre.

4.5 Should the plan set out how it will balance residential and office space in the light of forthcoming PD rights to allow conversion of office to residential use?

- 4.5.1 The Submission TCLP was prepared prior to the Government's proposed changes to Permitted Development rights. The submission TCLP cross refers to Policy D2 of the CSLP (TCLP paragraphs 4.26 to 4.28) which seeks to increase economic prosperity and job growth. In addition, the Council has applied to the Government seeking exemption from the application of the PD rights policy for the Town Centre with regard to change of use from B1 to C3 uses, and has expressed its concern over the PD rights policy regarding A uses in the Town Centre. If necessary, the Council would consider using Article 4 restrictions to ensure the balance identified in the TCLP is retained.
- 4.5.2 If necessary the Council could revise this commentary as part of a subsequent review of the TCLP to account for the changes in PD rights and accounting for the proposed review of employment land supply as part of the CSLP.

4.6 Does the plan take account of windfall housing evidence which was prepared for the Core Strategy examination?

- 4.6.1 The TCLP brings forward the expected housing delivery rates for the Town Centre neighbourhood as identified in the adopted Core Strategy. The Core Strategy identifies that 475 of the 1,190 residential units identified for the Town Centre will come forward on windfall sites. The TCLP therefore relies on supporting evidence submission document CS31 (B). Background evidence – Additional Windfall Conversion Evidence (2012) to demonstrate that there is an adequate supply of sites in the Town Centre to meet this windfall target.