

Ref: EBC-EL-02

Inspector Robert Mellor BSc DipTRP DipDesBEnv DMS MRICS MRTPI
c/o The Programme Officer
Mrs Claire Jones-Hughes
Banks Solutions
6 Brading Road
Brighton
BN2 3PD

Friday 15 April 2016

Dear Inspector,

Eastbourne Employment Land Local Plan – Duty to Co-operate

I write in response to your letter dated 24 March 2016, and specifically the concerns raised in regard to the Duty to Co-operate. Please find Eastbourne Borough Council's responses to the questions set out below.

Qn 1 What account has been taken of these losses of business floorspace by EBC when concluding that Eastbourne can continue to meet its own employment land needs within its boundaries?

- 1.1 Eastbourne Borough Council considers that Eastbourne can continue to meet its own employment land needs within its boundaries, provided that the Employment Land Local Plan strategy is followed.

Employment Land Review

- 1.2 The *Eastbourne Employment Land Review (2013) [Document SD24]* forecasts the amount of employment floorspace required over the Employment Land Local Plan period 2012-2027. The forecast makes an allowance for windfall losses of employment space, which means that the overall requirement for office floorspace is higher than the demand forecast alone.
- 1.3 The employment land requirement also includes a headroom allowance made on top for the employment space forecast, specifically identified to reflect the unique circumstances of Eastbourne and its constrained supply position, to allow some flexibility and compensate for unexpected losses. *Eastbourne Employment Land Review (2013) [Document SD24]* identifies that this headroom should be 10% over the employment land requirement, and

therefore would equate to an additional 2,000 sqm. Therefore the total employment land requirement makes provision for the loss of 6,171 sqm. A full list of planning permissions resulting in a net change in employment floorspace is provided as Appendix 1.

Delivery/Loss of Office Space

- 1.4 Since the start of the plan period, 5,898 sqm of office space has been delivered, but there has been an overall net loss of 18,639 sqm (as at 1 April 2016). Of this, 12,525 sqm (67%) resulted from a single application for the conversion of offices to a Free School at the former Dental Estimates Board, Temple Grove, Compton Place Road (EB/2013/0038), which was completed in 2014/15.
- 1.5 The site where this loss took place was identified in the Eastbourne Core Strategy Local Plan as a key area of change with potential for residential and employment uses, so the Core Strategy expected that there would be some degree of loss of office space in this location. Core Strategy Policy C10: Summerdown & Saffrons Neighbourhood Policy identified redeveloping the Dental Practice Board site to provide a mix of health uses, as well as some residential, employment and community uses.
- 1.6 The site had an authorised Class B1 (office) use, having been used as such since 1939. The Dental Estimates Board began using the site in July 1948. As a result of increased computerisation and other organisational changes staff numbers on site began to decrease from 2006 and was severely under-occupied until the site finally became vacant in July 2012. Despite marketing by the NHS Business Services Authority (*acting for the Secretary of State*) for its existing office use between 2006 and 2012, there was no interest in continued occupation of the premises for office use. As such, planning permission was approved in September 2013 for the change of use of land from office (B1) to mixed use comprising non-residential education (D1), staff residential units (C2), and office (B1).
- 1.7 The site would have been vacant during the preparation of the *Eastbourne Employment Land Review (2013)* [Document SD24] in 2013, and therefore not functioning as office space when the employment land forecasts were made.

Impact of Permitted Development

- 1.8 In relation to Permitted Development, since May 2013 there have been 18 Prior Approval Notifications submitted for the loss of office space to residential under permitted development. As at 1 April 2016, 10 of these Prior Approvals have been completed, resulting in a loss of 4,487 sqm of office

floorspace (and the provision of 75 additional dwellings). There is one prior approval currently under construction (loss of 1,080 sqm) and seven prior approvals where development has yet to commence (loss of 2,541 sqm). This amounts to a total loss of 8,108 sqm from office to residential permitted development (and the provision of 118 additional dwellings).

- 1.9 The remaining Prior Approvals that have yet to be built are small offices, indicating that the remaining large office blocks are less likely to change use to residential under permitted development.
- 1.10 The rate at which Prior Approvals are being submitted has noticeably slowed down recently as those office buildings that can viably be converted are likely to now have been identified, and it is anticipated that the majority of the large office stock that may convert to residential will have already done so, meaning that the rate of loss of office space to residential via permitted development is expected to decrease significantly.
- 1.11 Of the 18 prior approvals, 13 are located within the Town Centre neighbourhood, amounting to 6,298 sqm. A number of the Prior Approvals are concentrated in the St Leonards Road/Commercial Road area of the Town Centre, which is considered to be a 'non-core' location within the town centre. A plan showing the distribution of the Prior Approvals is contained in Appendix 2.
- 1.12 The *Eastbourne Employment Land Review (2013) [Document SD24]* (para 4.66) identifies that the office stock in the St Leonards Road/Commercial Road area '*does not tend to meet the needs of modern office occupiers and is expensive to refurbish to meet modern standards. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to introduce suspended ceilings and raised floors to accommodate cable ducting, air conditioning pipes or other necessary infrastructure*'.
- 1.13 The office stock in this area was under occupied with high levels of vacancy, despite the marketing these premises for a considerable amount of time. The changes to the Permitted Development rights has resulted in a number of sites quickly getting Prior Approval for residential, which has changed the nature of the area and further discouraged new office occupation.
- 1.14 The long term underutilisation and vacancy of the Dental Estimates Board site and a number of office blocks in the Commercial Road/St Leonards Road area indicates that there was an oversupply of office space of this particular type and configuration, for which there was no demand. In comparison, the more modern or refurbished office space in the core Town Centre locations, such as Ivy House, has let more strongly.

- 1.15 This is the context within which the employment land demand forecasts were made. These sites, particularly the Dental Estimates Board, were no longer functioning as office space, and therefore it is appropriate that the ELLP does not make provision for the exact amount of loss, given that it was redundant and long term vacant.
- 1.16 As it is expected that the amount of office to residential conversion will slow down considerably over the next few years as all office space that is appropriate for conversion is converted, it is considered that the windfall loss allowance, alongside the additional headroom capacity, is appropriate compensation for losses.

Town Centre

- 1.17 In order to capture economic interest and potential to the local market, it is important that the office stock portfolio is appropriately balanced between 'in town centre' and 'out of town centre' in order to provide choice for occupiers. It is important to note that part of the reason for the vacancies in the Town Centre that have subsequently been converted to residential, particularly in the non-core area of the town centre, is that occupiers are seeking other forms of office stock. Demand for office space is generally stronger within core town centre locations, and therefore it is important that meeting demand provides choice for occupiers rather than just providing direct replacements within non-core town centre locations.
- 1.18 In the event that Eastbourne is not able to meet its employment land requirements, it is considered that there may be some additional capacity within the Town Centre to provide additional office space. However, there is a risk that significant additional delivery in the town centre would reinforce the inappropriate locational balance of office stock provision.
- 1.19 The strategy advocated in the Employment Land Local Plan allows for a balance in terms of the provision of an appropriate amount of office space, but also in terms of creating a sustainable mix of uses within the Town Centre. Significant levels of additional office provision may compromise this sustainable mix of uses by affecting delivery of residential development. The *Eastbourne Town Centre Local Plan (2013) [Submission Document SD/23]* identifies that the Development Opportunity Sites in the Town Centre should accommodate 450 net additional dwellings. Therefore it is considered that there is the potential capacity to provide some additional office provision on the Town Centre sites.

Conclusion

1.20 It is considered that Eastbourne is able to meet its own needs within its boundaries:

- The employment land requirements made provision to compensate for the loss of functioning office space through a windfall allowance plus additional headroom capacity
- The majority of the losses of office space over recent years have been underutilised and/or vacant, and therefore not functioning properly as office space before conversion
- The rate at which office space is being converted to residential under permitted development has fallen and it is expected that this will be low over the remaining plan period
- The Town Centre has capacity for some additional office space in the event that additional land is needed to meet employment land requirements, but it is critical that a balanced portfolio of office space is provided to deliver choice to meet market requirements so therefore the provision of office space in the town centre and in out of centre locations needs to be carefully considered.

Qn 2 No employment land documents are yet included in the evidence base for the Wealden Local Plan as published on the Wealden website. Can EBC rely on the conclusion that Wealden's employment needs can be met within the District if these have not been quantified in an up-to-date assessment?

2.1 The *Eastbourne Employment Land Local Plan (ELLP) [Document SD1]* provides a replacement for Core Strategy Policy D2: Economy, and therefore it is appropriate that the ELLP covers the same plan period as the Core Strategy (2006-2027). As such it does not consider employment needs post 2027.

2.2 The adopted *Wealden District Local Plan Core Strategy (2013)* covers the same plan period to 2027. The Wealden Core Strategy demonstrated that Wealden District Council is able to meet their employment needs up to 2027, which is the same plan period as the ELLP.

2.3 As the Wealden Core Strategy demonstrates that Wealden District Council can meet their employment needs up to 2027, this provides a strong indication that Wealden will continue to be able to meet their employment needs within their own District up to 2027.

2.4 The *Wealden Local Plan Issues, Options and Recommendations Report (2015)* indicates that Wealden has significant levels of land availability. The level of housing delivery identified in the Wealden Local Plan Issues, Options and

Recommendations Report provides a strong indication that Wealden will not be requiring Eastbourne to meet their employment needs. The Wealden Local Plan plans for 97 dwellings per year to meet Eastbourne's shortfall. This demonstrates that Wealden District Council considers that it has sufficient land available to provide for other local authority's housing needs as well as their own. As this is the case, it is considered a fair assumption that Wealden will have sufficient land availability to meet their own employment needs as well.

- 2.5 It is considered that all of the indications are that Wealden will not require Eastbourne to meet their employment needs, and it is not appropriate for the ELLP to pre-empt the Wealden Local Plan employment requirements after the ELLP plan period (2027).
- 2.6 In addition, Eastbourne Borough Council's *Local Development Scheme 2016-2019* identifies the preparation of a new Local Plan covering the period 2015-2035, with the adoption of this in 2019. This plan will consider the employment needs of Eastbourne and Wealden post 2027.
- 2.7 Therefore, it is considered appropriate for the ELLP to plan on the basis that Eastbourne will not be required to meet Wealden's employment needs over the ELLP plan period to 2027.

Qn 3 How are cross border employment issues being addressed in relation to the emerging Wealden Local Plan and how might that affect the Eastbourne ELLP?

- 3.1 The *Eastbourne Employment Land Local Plan (ELLP) [Document SD1]* demonstrates that Eastbourne is able to meet the employment needs of Eastbourne over the plan period to 2027. However the new Wealden Local Plan covers a different plan period that extends a further ten years to 2037.
- 3.2 In order to identify Wealden's employment needs to 2037, Wealden District Council are currently commissioning an *Economic, Town Centre and Retail Study* to inform the preparation of their Local Plan. This study will be a multi-functional study that considers economic issues across the functional economic area. This study will deal with all aspects of economic growth and will include cross boundary and strategic matters for the new Wealden Local Plan period 2013-2037.
- 3.3 The scope of the study in relation to employment needs includes identifying the functional economic market area, taking into account travel to work data on a settlement basis, identifying current provision and market signals, and identifying current demand for employment land and locational requirements.

As part of the work potential impacts on adjoining and nearby Local Authority areas will be identified, and liaison will be undertaken with those authorities, including Eastbourne.

- 3.4 As the employment land issues arising from this study will cover the period to 2037, it is considered that any employment needs and issues post 2027 that emerge from this study will be addressed in the future Eastbourne Local Plan. As the adopted Wealden Core Strategy demonstrates that Wealden's employment needs to 2027 can be met, it is not considered that there will be an effect on the Eastbourne ELLP.

Qn 4 Has EBC made any representations on the employment provisions in the emerging Wealden Local Plan Issues and Options?

- 4.1 Eastbourne Borough Council submitted a representation on the *Wealden District Council Local Plan Issues, Options and Recommendations Report* in December 2015. The full representation is included as Appendix 3.
- 4.2 Eastbourne Borough Council's representation gave support for the recognition that there are strong workplace linkages between Eastbourne and South Wealden, which is evidenced by travel to work data from the 2011 Census, which shows that 10,805 people travel between Eastbourne and Wealden for employment.
- 4.3 The representation confirmed that the Employment Land Local Plan made provision for Eastbourne to meet its own needs within the Borough up to the end of the plan period (2027). However, as the Wealden Local Plan period extends to 2037, the representation noted that Eastbourne may not have sufficient employment land availability to meet needs after 2027.
- 4.4 It should be noted that the *Eastbourne Employment Land Review (2013) [Document SD24]* shows that employment land needs to 2031 show little difference to the needs to 2027. This is due to the expected contraction of industrial and warehouse space, with a greater annual level of contraction between 2027 and 2031 than the annual levels between 2012 and 2027.
- 4.5 Eastbourne Borough Council's representation supported Wealden District Council's approach to focus employment provision in the South Wealden area as the least impactful solution for providing sufficient employment in Eastbourne and South Wealden to complementing the corresponding level of housing growth in the area. It was also considered that this will help to attract business into the area by providing a range of different employment space and locations.

I hope this letter and the accompanying appendices address the Inspectors concerns, however we would be happy to provide any further information required.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "L. Rawlinson". The signature is written in a cursive style with a long, horizontal flourish at the end.

Lisa Rawlinson

Head of Regeneration & Planning Policy

Appendix 1 - Planning permissions resulting in a net change in employment floorspace

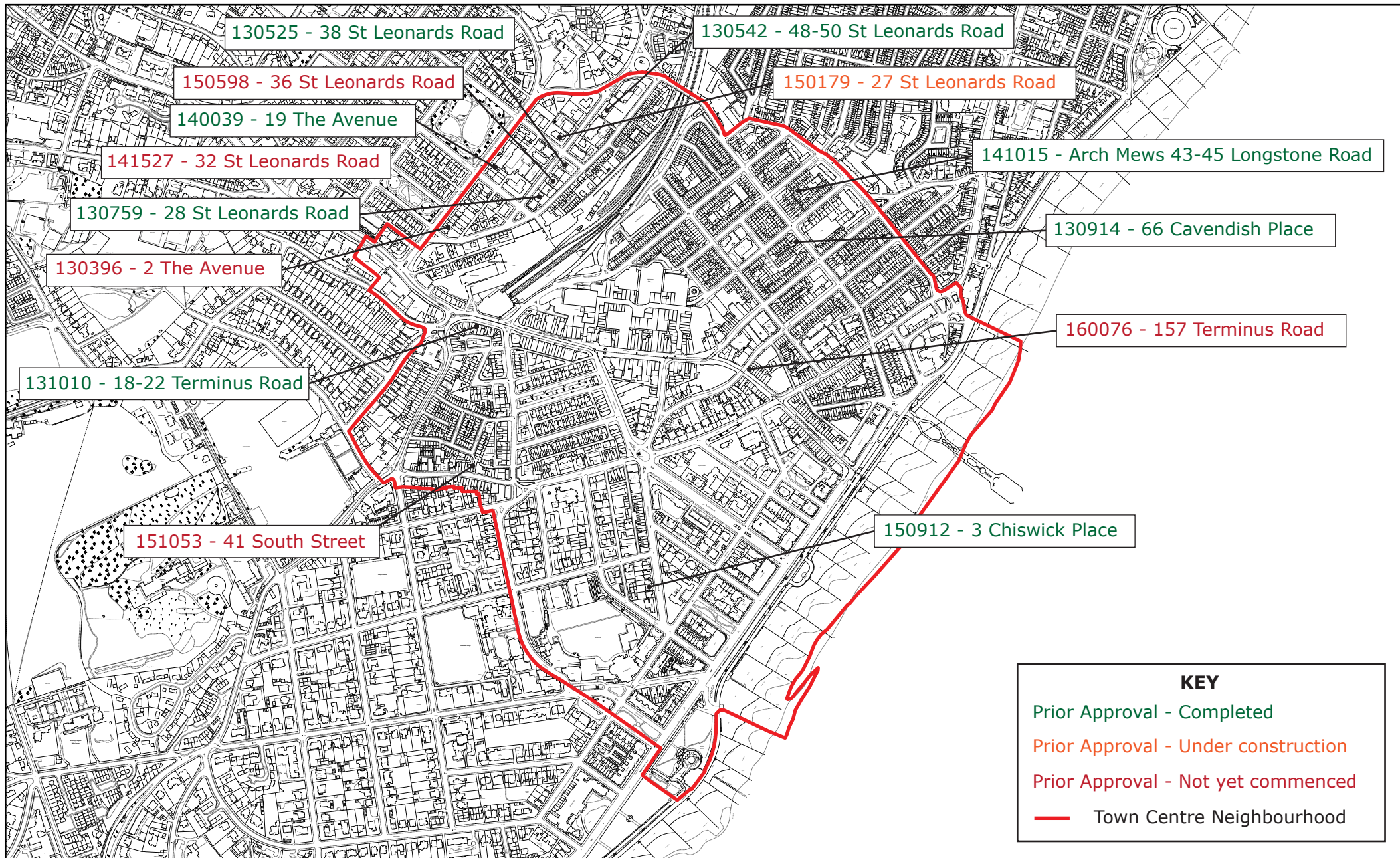
Completed Developments – 2012/13 to 2015/16 (1 April 2016)

Year	LA Reference	Site name	Description	Permission	Summary	Neighbourhood	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
								Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
2012/13	EB/2012/0123	46 and 46B Brampton Road	Change of use from Indoor Go Kart Track (Sui Generis) to mix use, motor vehicle auctions, car and van rental offices, vehicle body shop and garage, MOT testing station and associated offices, restaurant and parking, together with associated external alterations including demolition of part of existing building at 46 Brampton Road	Full Permission	Sui Generis to B8	Hampden Park	Hampden Park									4318	3321		
2012/13	EB/2010/0437	47 Aldro Building (University of Brighton)	Change of use from residential flat to office space	Full Permission	C3 to B1a	Meads	Meads	58	58										
2012/13	EB/2012/0597	82 Church Street	Change of use from hairdressers (A1) to office (B1)	Full Permission	A1 to B1a	Old Town	Old Town	109	109										
2012/13	EB/2012/0367	14c Maple Road	Change of use from B8 (storage) to gym (D2)	Full Permission	B8 to D2	St Anthony's & Langney Point	St Anthony's									0	-414		
2012/13	EB/2010/0170	15 Alder Close	Proposed extension to side elevation to provide cold store and installation of two wall mounted air conditioning units to rear elevation	Full Permission	New B8	St Anthony's & Langney Point	St Anthony's									100	47		
2012/13	EB/2011/0596	6A Alder Close	Sub division of premises to form self contained offices and self contained warehouse	Full Permission	Mixed B to B1a/B8	St Anthony's & Langney Point	St Anthony's	300	300							771	771	0	-1071
2012/13	EB/2012/0219	98 Seaside Road	Change of use of first floor from offices (Class B1) to part office (Class B1) and part residential (bedsittingroom)	Full Permission	B1a to C3	Town Centre	Devonshire	0	-22										
2012/13	EB/2012/0757	43 Gildredge Road	Change of use of ground floor from B1 to mixed use (B1/D1)	Full Permission	B1a to D1	Town Centre	Meads	0	-240										
2012/13	EB/2010/0399	Rear of 24, 26 and 30 Terminus Road	Conversion of property to form two retail units and studio flat on ground floor, two one bedroom and two studio flats on first floor and onetwo bedroom and a studio flat on second and third floors, including internal and external alterations	Full Permission	A2/B1a to A1/C3	Town Centre	Meads	0	-304										
2012/13	EB/2012/0467	St Annes Care Home, 4 St Annes Road	Retrospective application for the retention of single storey timber office building in the rear garden	Full Permission	New B1a	Upperton	Upperton	42	42										
2013/14	EB/2011/0197	15 Marshall Road	Single storey extension to north east elevation to provide covered access for deliveries	Full Permission	New B1c	Hampden Park	Hampden Park					30	30						
2013/14	EB/2012/0744	61 Croxden Way	Change of use from office to residential dwelling	Full Permission	B1a to C3	Hampden Park	Hampden Park	0	-78										
2013/14	EB/2011/0050	Land at Lottbridge Drove (Former ADM site)	New Morrisons foodstore & petrol station	Full Permission	B2/Sui Generis to A1	Hampden Park	Hampden Park							0	-3020				
2013/14	130901	Unit 10 Harvington Business Park	Change of use of existing factory unit to storage facility for PaxtonAccess, including alterations to internal layout; together with colour change of existing windows, doors and two roller shutter doors from red to blue and the display of	Full Permission	B1a to B8	Hampden Park	Hampden Park	0	-475							475	475		

Year	LA Reference	Site name	Description	Permission	Summary	Neighbourhood	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
								Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
2014/15	EB/2011/0402	18-22 Terminus Road	Proposed conversion of office accommodation on first and second floorsto provide 3 residential units (1No. Studio and 2No. 1 bed flats) inc luding provision of balcony at first floor level and roof garden at second floor level	Full Permission	B1a to C3	Town Centre	Meads	0	-158										
2014/15	130909	1 Commercial Road	Change of Use of ground floor units 32 and 33 from B1 to D2. The proposed use will be as fitness/yoga/dance studios	Full Permission	B1a to D2	Town Centre	Upperton	0	-205										
2014/15	141315	The Point Devonshire Park Offices College Road	Temporary change of use from B1a (Offices) to D1c (Non-residential Institution). For use by Eastbourne College to house a number of classrooms until 31 January 2017, whilst building works on its site are underway	Full Permission	B1a to D1	Town Centre	Meads	0	-345										
2014/15	EB/2011/0269	Hurst Motors, Hurst Lane	Application for extension of time for the implementation of permissionEB/2008/0074(FP) for the change of use from workshop and flat to two dwellings	Full Permission	B2 to C3	Upperton	Upperton						0	-93					
2014/15	EB/2012/0747	19 The Avenue	Change of use of lower ground floor from office (B1) to self-containedflat and installation of a door	Full Permission	B1a to C3	Upperton	Upperton	0	-98										
2015/16	150514	37a The Goffs	Change of use from B1 offices to C3 residential to form four one- bedroom flats with introduction of internal courtyard and replacement of existing doors and windows	Full Permission	B1a to C3	Old Town	Upperton	0	-216										
2015/16	150978	82 Church Street	Change of use of ground floor office (B1) to a residential flat (C3)	Full Permission	B1a to C3	Old Town	Old Town	0	-41										
2015/16	150111	Willingdon Methodist Church, Wish Hill	Change of use from office (Class B1) to two dwelling houses (Class C3)	Full Permission	B1a to C3	Ratton & Willingdon Village	Ratton	0	-150										
2015/16	150396	Unit 4 1 Finmere Close	Change of use from use classes B1 (office) and B8 (warehouse and distribution) to auction rooms (sui generis use) and relocation of existing security entrance gates to the front north side of the building. (Amended description).	Full Permission	Mixed B to Sui Generis	Roselands & Bridgemere	St Anthony's											0	-307
2015/16	131069	2A Beach Road	Demolition of existing warehouse and offices (Use Class B1), proposed 5 no. two-storey three bedroom terraced houses and 2 no. one bedroom flats	Full Permission	B1c to C3	Seaside	Devonshire					0	-596						
2015/16	140001	Willowfield Studios, 67A Willowfield Road	Conversion of this commercial garage and store into a two storey dwelling with lounge, kitchen / diner on the ground floor and a singlebedroom and full bathroom on the first floor	Full Permission	B1c to C3	Seaside	Devonshire	0	-40										
2015/16	130967	Site 6 Sovereign Harbour	Harbour Innovation Mall - Construction of new building consisting of three storeys totalling 2,323m2 net internal area for use within use classes B1(a)(b) and (c), occupying a site of 0.64ha and incorporating130 car parking spaces	Full Permission	New B1a	Sovereign Harbour	Sovereign	2350	2350										
2015/16	EB/2013/0051	24 Lottbridge Drove	Erection of extension to the rear to facilitate improved internal arrangement and layout	Full Permission	New B2	St Anthony's & Langney Point	St Anthony's							73	73				
2015/16	150243	Unit 11 Whiteknight	Change of use of premises to allow for a professional Jaguar and LandRover vehicle	Full Permission	Mixed B to B2	St Anthony's & Langney Point	St Anthony's							520	520			0	-520

LA Reference	Site name	Description	Permission	Summary	Locality	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
							Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
141478	17 Lushington Lane	Demolition of existing garages and erection of a three-storey block of four self-contained flats with garaging on the ground floor.	Full Permission	B1c to C3	Town Centre	Meads	0	-226										
130396	2 The Avenue	Conversion of office to flat - Change of Use	Prior Approval - Permitted Development	B1a to C3	Upperton	Upperton	0	-75										
130533	76 Firlie Road	Prior Approval Application for Change of Use from B1 (offices) to C3 (dwelling houses).	Prior Approval - Permitted Development	B1a to C3	Seaside	Devonshire	0	-53										
141087	41 South Street	Prior approval for the change of use from office (B1) to dwellinghouse(C3) under Class J	Prior Approval - Permitted Development	B1a to C3	Town Centre	Meads	0	-145										
141527	Greencoate House 22 St Leonards Road	Change of use from office (class B1) to residential (class C3), comprising 12no. self-contained apartments	Prior Approval - Permitted Development	B1a to C3	Town Centre	Upperton	0	-1000										
150598	Map House 36-38 St Leonards Road	Change of use from B1 (office) to C3 (dwelling)	Prior Approval - Permitted Development	B1a to C3	Upperton	Upperton	0	-930										
151053	41 South Street	Prior approval for change of use from office B1 to dwellinghouse C3 under class 0 of the GPDO 2015 for use of the first and second floors as 2x1 bedroom flats	Prior Approval - Permitted Development	B1a to C3	Town Centre	Meads	0	-150										
160076	157 Terminus Road	Change of use from Office (B1) to Dwellinghouse (C3) (Application for prior approval under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015).	Prior Approval - Permitted Development	B1a to C3	Town Centre	Devonshire	0	-188										

TOTAL	20301	15071	0	0	0	-	3945	1102	3358	1892	0	-40
--------------	--------------	--------------	----------	----------	----------	----------	-------------	-------------	-------------	-------------	----------	------------



Appendix 2 - Office to Residential Prior Approvals in the Town Centre



Appendix 3 - Eastbourne Borough Council's Representation on the Wealden Local Plan Issues, Options and Recommendations Report

1.0 Preface

1.1 Eastbourne Borough Council (EBC) welcomes the opportunity to comment on Wealden District Council's (WDC) Local Plan Issues, Options and Recommendations Report (October 2015), from here on referred to as the IOR Report, which has been published as the first stage in the preparation of the new Wealden Local Plan (WLP).

1.2 EBC's representation on WDC's IOR Report has been prepared in the context of significant cross boundary strategic issues between Eastbourne and South Wealden, and with regard to the National Planning Policy Framework (NPPF) and Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended), which imposes a duty to co-operate with other local planning authorities on issues which are likely to have a significant effect on more than one planning area.

1.3 EBC acknowledges the high level of growth proposed in the IOR Report. It is appreciated that growth in the Eastbourne and South Wealden area will have a mutually positive effect in terms of provision of jobs and housing choice for the local communities. EBC strongly supports the protection and safeguarding of areas of environmental and landscape importance within the Wealden District, but recognises that the level of growth proposed is significant, and difficult locational choices for development need to be considered.

1.4 However, EBC is concerned about the environmental impacts of the proposed levels of growth, and would particularly appreciate attempts to reduce this and prevent merging of settlements between Eastbourne and Hailsham in order that each town and village retains its own identity.

1.5 EBC acknowledges the approach being taken in WDC's WLP and wishes to continue to work constructively, in partnership with WDC. Comments have been made on a number of the planning policies, which are considered to be fundamental to the delivery of the WLP and which are likely, either directly or indirectly, to have an effect on Eastbourne.

2.0 Duty to Co-operate

2.1 EBC appreciates the opportunity to comment on the IOR Report as an important stage in the Duty to Co-operate.

2.2 The NPPF (para 178) requires public bodies to co-operate on planning issues that cross administrative boundaries, and work collaboratively to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans.

2.3 In addition, the NPPF (para 179) states that Local Planning Authorities should work together to meet development requirements that cannot wholly be met within their own areas because of a lack of physical capacity. This is the case in Eastbourne, where significant land availability constraints means that Eastbourne's development needs cannot be wholly met within the Borough.

2.4 EBC and WDC have and continue to work collaboratively over strategic planning matters that cross administrative boundaries. Discussion has been on-going between the two authorities and regular meetings have taken place. In addition, a number of cross boundary evidence studies have been prepared in the past, and EBC would welcome further opportunities for joint studies in the future.

2.5 EBC is keen to continue to work closely with WDC on housing, infrastructure, other development requirements and the protection of the environment in the preparation and review of our respective Local Plans.

3.0 Strategic Housing Strategy

Objectively Assessed Housing Need

3.1 The identification that EBC is in a housing market with South Wealden is welcomed. However Figure 1 of the IOR Report does not provide enough detail to indicate the exact extent of WDC's interpretation of the Eastbourne and South Wealden Housing Market Area (HMA). It appears that this area does not align with the HMA that was identified in Eastbourne's 2013 Strategic Housing Market Assessment (SHMA) and in the joint Eastbourne and South Wealden SHMA (2009), and further clarification of this point would be welcomed.

3.2 EBC is currently commissioning a SHMA to provide up to date information about the objectively assessed housing need in Eastbourne and an analysis of the extent of the Eastbourne and South Wealden Housing Market Area. EBC would welcome further and continuing discussions with WDC during and after the preparation of the Eastbourne SHMA in order to provide a clear understanding of the housing needs in the area, in line with the NPPF (para 159).

3.3 In recent years, residential completions in Eastbourne have been formed by a high proportion of flats rather than houses. Many of these have involved the conversion or sub-division of existing properties and there has been an over-reliance on windfall sites to meet Eastbourne's annual housing target. It is likely that this pattern of development will continue and it is therefore considered to be sensible that the housing provision in Eastbourne and South Wealden area are not considered in isolation from one another. EBC are keen to work together with WDC to ensure that the needs of the Housing Market Area are met in full across the whole area.

3.4 It is appreciated that the Wealden District suffers from strategic constraints that will affect the amount and distribution of housing, particularly Pevensey Levels and the Eastbourne Park Flood Storage Catchment Area in South Wealden.

3.5 The recognition that the impact of development on flood storage capacity in Eastbourne Park is a strategic cross-boundary issue is particularly welcomed, and it is considered that the flood storage capacity in Eastbourne could impact on the amount and location of development within the Willingdon Levels Catchment Area. EBC look forward to working with WDC to resolve this issue. This has been further elaborated on in Section 6.0 of this representation.

3.6 The NPPF (para 47) states that Local Plans should meet the full, objectively assessed housing needs for market and affordable housing in the housing market area, and EBC notes that, in order for the WLP to be found sound (positively prepared), it should seek to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

3.7 The Eastbourne SHMA (2013) identifies that Eastbourne's objectively assessed housing need (based on 2010 household projections) is 400 dwellings per annum. The Eastbourne Core Strategy Local Plan 2006-2027 (adopted 2013) plans for growth of 240 dwellings per annum (the target from the rescinded South East Plan) on the basis that future development will be restricted in Eastbourne due to land availability constraints. This results in a shortfall within Eastbourne of 160 dwellings per annum.

3.8 The Eastbourne SHMA that is currently being prepared could result in a higher objectively assessed housing need for Eastbourne than identified in the 2013 SHMA, and therefore the acknowledgement that the under-supply figure for EBC used in the preparation of the IOR Report does not take into account any additional future housing targets and is subject to change, is welcomed. EBC will be able to provide WDC with updated information on Eastbourne's shortfall once the Eastbourne SHMA has been completed.

Settlement Hierarchy

3.9 EBC supports the Settlement Hierarchy identified in the IOR Report, and the principle that growth should be located in Sustainable settlements with services and facilities to sustain the enlarged community. Consideration of growth in Local, Neighbourhood and Residential settlements should only be considered if there are exceptional reasons for it.

Preferred Option for Housing

3.10 EBC acknowledges the South Wealden Housing Option (with improvements to the strategic road network) as the preferred option for housing. In light of the requirements of the NPPF, EBC considers this to be the least impactful solution to meet EBC's housing shortfall in sustainable locations, whilst also protecting areas of environmental and landscape importance, and addressing infrastructure issues across the Eastbourne and South Wealden area.

3.11 EBC is represented on the A27 Reference Group, which brings together local MPs and local authority leaders. The Group has lobbied Government and Highways England (formerly Highways Agency) for an offline dual carriageway improvement to the A27 between Lewes and Polegate. It is considered that the growth identified in South Wealden will assist in making the business case for these improvements.

3.12 The identification of concentrated development in Hailsham of 9,390 dwellings is acknowledged in light of the NPPF, which states that supply of new homes can sometimes be best achieved through planning for larger scale development (para 52). It is recognised that some of the infrastructure issues in the South Wealden area, particularly the A27/transport infrastructure and the foul/surface water capacity, need to be addressed as part of the provision of development. Therefore, due to these infrastructure issues in the area, development in the South Wealden area must be of sufficient size to generate the ability to resolve the issues and create sustainable communities.

3.13 EBC notes that the provision of new infrastructure required to support a new settlement suggests a new settlement in South Wealden might not be viable in terms of sustainability.

3.14 The provision of housing within South Wealden will help meet the objectively assessed need for housing across the Eastbourne and South Wealden Housing Market Area. The proposal that this option will be able to provide 2,328 dwellings (or 97 dwellings per annum) to address the under supply of housing in Eastbourne (subject to caveats) is welcomed, and EBC would like to express its thanks to WDC for identifying this provision. EBC confirms that it will ensure that efforts have been made to accommodate housing need within the Borough through the evidence documents for the upcoming Local Plan.

3.15 However, EBC is concerned that this provision would not meet the objectively assessed housing need across the Housing Market Area as it would not address EBC's shortfall in full, to the extent of 63 dwellings per annum or 1,512 dwellings across the WLP plan period (as evidenced in Eastbourne's SHMA 2013).

3.16 This does not affect EBC support for the preferred option in terms of distribution of development, however EBC requests that WDC consider the identification of additional housing provision in the South Wealden area in order to meet EBC's shortfall in full.

3.17 It is noted that the IOR Report states that housing numbers for the South Wealden Option were significantly reduced in Polegate and Willingdon, and increased in Stone Cross to compensate. It is also noted that housing numbers were increased in Hailsham to account for the reduced numbers in Polegate and Willingdon and elsewhere in the District, as well as under supply from other Local Authority Areas.

3.18 EBC considers that the housing numbers for Stone Cross in this option are too high, and should be reduced. In addition, it is considered that Polegate has additional scope to accommodate the reduced numbers at Stone Cross, plus additional housing to meet Eastbourne's shortfall in full. This is further elaborated on in Section 5.0 of this representation.

4.0 Strategic Economic Strategy

4.1 EBC considers that, similar to the Housing Market Area, Eastbourne and South Wealden are within the same Labour Market Area, which is demonstrated by the fact that 10,805 people travel between Eastbourne and Wealden for work (2011 Census data). Therefore the recognition that there are strong workplace linkages between Eastbourne and South Wealden is welcomed and supported.

4.2 EBC can confirm that Eastbourne's employment land requirements can be met up to 2027, which are currently being planned for through the preparation of an Employment Land Local Plan. However it is considered that there may potentially be employment land availability issues to meet employment requirements post 2027. EBC would welcome joint working with WDC to establish employment needs and requirements within the Eastbourne and South Wealden area.

Preferred Option for Strategic Economic Strategy

4.3 EBC acknowledges the focus of employment provision, including retail, in South Wealden as the preferred option for the Strategic Economic Strategy. EBC considers this is be the least impactful solution for providing employment in the Eastbourne and South Wealden Labour Market Area, and also for complementing the corresponding level of housing growth in the area.

4.4 The identification of Hailsham as the focus for employment and retail growth will allow a range of different types of employment types and locations to be provided across Eastbourne and South Wealden in order to attract businesses into the area.

4.5 The provision of opportunities for tourist attractions and facilities in South Wealden to compliment the tourist accommodation and associated provision in Eastbourne is welcomed and supported, and EBC considers that this could have a

significant benefit for the Eastbourne and South Wealden area in terms of the numbers of visitors to the area.

4.6 The proposal to identify and promote the need to develop skills within the local workforce, and positively encourage the employment of the local workforce is also supported as it will have a wider benefit across the Eastbourne and South Wealden area. WDC may like to consider a policy to secure local employment and training measures as part of development proposals whereby developments of a certain threshold are required to sign up to a Local Labour Agreement to secure contributions that will support and benefit the local labour market and economy, enabling employment growth, raising skills and giving local people opportunities generated by new developments. EBC currently operates a similar policy and is further promoting it through the emerging Employment Land Local Plan.

5.0 Broad Locations around Towns and Villages

5.1 EBC believes that development in the Eastbourne and South Wealden housing market area should be in the most sustainable locations.

5.2 EBC acknowledges the identification of the broad locations for development in South Wealden as the least impactful solution, with the exception of development at Stone Cross. However, EBC would like to express concern about the irreversible environmental damage that will be caused by the proposed development and about the coalescence of settlements between Hailsham and Eastbourne, and these issues should be considered when defining development site boundaries.

Hailsham, Hellingly, Polegate and Arlington

5.3 EBC acknowledges the identification of Hailsham as a sustainable location with the greatest potential to accommodate a significant amount of housing growth. Hailsham is considered to be a suitable location to provide sizeable urban extensions, which is considered to be the most sustainable way of providing additional housing growth. In addition, it is considered that growth in this location can contribute towards much needed improvements to infrastructure in the Eastbourne and South Wealden area.

5.4 EBC acknowledges the Preferred Option for Hailsham, Hellingly, Polegate and Arlington as a suitable and appropriate way of providing the identified levels of growth in Hailsham.

5.5 EBC acknowledges the first choice for providing 5,380 of the 9,380 dwellings as an urban extension to the West of Hailsham, and appreciates the need for the A22 to be re-routed to accommodate this development. However, EBC is concerned that the second choice for providing 5,380 dwellings in the South Sector of Hailsham would result in the coalescence of Hailsham and Polegate. EBC consider that Land

west of Polegate should be the second choice in the event that West Hailsham cannot deliver sufficient development.

Polegate & Willingdon

5.6 EBC acknowledges the provision of housing in Polegate and Willingdon as a sustainable and accessible location that plays a very important role in the relationship between Eastbourne and South Wealden. It is considered that development in Polegate and Willingdon will bring important and much needed housing and employment investment into the Eastbourne and South Wealden Housing Market Area. However, EBC believes that Polegate has potential to provide a higher quantum of housing to help meet the needs across the Housing Market Area in full.

Mid Polegate

5.7 Despite concerns about the highways implications on the A2270, EBC appreciates the need to retain the provision of 700 dwellings in the Mid sector of Polegate and Willingdon (Hindslands site). It is considered that this location is integrated within the existing town of Polegate, being close to Polegate town centre, railway station and other sustainable travel nodes, which support sustainable travel. Housing development in this location will allow for provision to be made for family housing for the Eastbourne and South Wealden area, and should include provision of a new primary school and other community facilities that will compliment those provided in the Eastbourne Borough.

5.8 Development on the Hindslands site should integrate traffic reduction measures as part of the development, as well as provision of new and improved pedestrian and cycle links, including a new footbridge over the railway line, to provide sustainable transport links to Eastbourne.

5.9 However, it should be noted that the Mid sector of Polegate and Willingdon is within the Willingdon Levels Catchment Area, and the drainage of this site into Eastbourne Park will have implications on the capacity of Eastbourne Park to store flood water. Therefore the site will need to contribute to the flood storage infrastructure in line with the Preferred Option for Flood Risk.

5.10 EBC considers that any development site boundaries in this location should retain the open gap between Polegate and Willingdon/Eastbourne, which is considered to be of critical importance. It is considered essential to maintain the distinctive identity of settlements and to prevent the blurring and coalescence of the settlements of Eastbourne, Willingdon and Polegate. In addition, the provision of an open gap between Polegate and Willingdon/Eastbourne, including the protection of existing trees and hedgerows, will enable local biodiversity to continue to thrive.

West Polegate

5.11 EBC considers that, as the growth identified in the IOR Report does not meet Eastbourne's shortfall in full and that EBC maintain strong objections to the development of the South East sector of Stone Cross, a higher level of housing development should be identified in Polegate.

5.12 EBC considers that land West of Polegate provides the least impactful opportunity to increase the level of housing growth in Eastbourne and South Wealden to meet the housing need in full across the Housing Market Area. It is noted from the Sustainability Appraisal that land west of Polegate has been assessed as having similar sustainability impacts to development in West and South Hailsham, both of which have been identified for significant growth, so therefore there is no sustainability reason why this site should not be identified. Development in this location would have overall positive benefits in relation to the delivery of housing and employment, as well as infrastructure improvements that would have a positive impact across the Eastbourne and South Wealden area.

5.13 It is appreciated that the reconfiguration of Polegate Town Centre as well as significant infrastructure improvements are required, and it is considered that development of land West of Polegate would help facilitate such improvements and make Polegate a significantly more sustainable location, which would be of benefit to the whole of the Eastbourne and South Wealden area. In addition, it is considered that development to the West of Polegate would further enhance the business case and enable major improvements to the A27 between Polegate and Lewes.

5.14 In addition, the Wealden Landscape & Settlement Character Assessment (2014) does not identify this area as having a highly sensitive landscape, and the human influence in the form of the railway corridor detracts from the overall sensitivity and value of the landscape.

5.15 EBC recommends that the provision of housing in Polegate and Willingdon is increased through the identification of the West of Polegate sector to increase overall housing numbers to meet Eastbourne's shortfall in full and to compensate for the reduction in numbers as a result of the non-identification of land in the South-East sector of Stone Cross.

Stone Cross

5.16 EBC acknowledges the level of growth proposed in the Stone Cross area and it is appreciated that this will bring important and much needed housing into the Eastbourne and South Wealden area. However, Stone Cross is adjacent to the Eastbourne urban boundary and so the choice of the location for development needs to be considered in the light of ensuring that the village retains its identity.

5.17 However EBC is concerned about the locations of future development in Stone Cross, and raises an objection to the Preferred Option for Stone Cross. EBC

specifically objects to the identification of the South-East sector of Stone Cross as a location for development.

5.18 EBC considers that land to the south of the railway line (South-East Sector) should not be allocated for development for the following reasons:

- *Coalescence of settlements*

5.18.1 EBC considers that it is essential that the distinctive identity of settlements is preserved, and the blurring and coalescence of the settlements of Eastbourne, Stone Cross, Pevensey and Westham is prevented. The open gap between Stone Cross and Eastbourne south of the railway line is critical to this and should be retained. This green edge contributes to maintaining a strategic countryside gap between Eastbourne and Wealden's urban areas. Only a small section of this 'gap' lies within Eastbourne's local authority area, but EBC retains planning policies that resist development in this area. In addition, development in the 'South-East' sector is not considered to be appropriate because of the resulting loss of agricultural fields that currently prevent the coalescence of neighbouring settlements at Stone Cross and Westham.

- *Landscape Impact*

5.18.2 EBC considers that development within the 'South East' sector would have a negative landscape impact in terms of the prominent landscape and poor suitability for development due to the topography of the area.

5.18.3 The Wealden Landscape & Settlement Character Assessment (2014) identifies that the South-East sector at Stone Cross has high landscape sensitivity and the boundary with Pennine Way is a 'sensitive urban edge'. It also recognises that the open fields and gentle slopes contribute to recognisable strength of place, with views to the South Downs and Friston Forest further contributing to the value of the landscape. There is a moderately strong landscape pattern and structure of trees and hedgerows (low hedgerows are a feature in places).

5.18.4 The southern sloping topography of South East Sector at Stone Cross, combined with a highly visible ridgeline and lack of any natural boundaries, means that the majority of the site will have an unacceptable impact on the surrounding landscape that is considered to be highly sensitive.

- *Flood Risk and Water Quality*

5.18.5 The Eastbourne and South Wealden Strategic Flood Risk Assessment (SFRA) – Level 1 (2007) illustrates that the lower and eastern parts of the 'South-East' sector are located within Tidal Flood Zone 3a (high probability), with parts in Fluvial Flood Zones 3a (high probability) and 3b (Functional Floodplain).

5.18.6 The NPPF (para 100) requires that inappropriate development in areas at risk of flooding should be avoided, and that Local Plans should apply a sequential, risk-based approach to the location of development. It is considered that there are other locations in South Wealden that are not in areas at risk from flooding that could accommodate housing development instead of the South-East sector of Stone Cross.

5.18.7 The 'Technical Guidance to the National Planning Policy Framework' (2012) identifies housing as a 'more vulnerable use', and therefore the identification of this land would require the passing of an 'exception' test as outlined in NPPF para 102. EBC considers that development in the South-East sector would not provide wider sustainability benefits to the community that outweigh flood risk, and therefore development in this location would not satisfy the 'exception' test.

5.18.8 In addition, this site has strong links to the Mountney/East Langney Levels and Pevensey Levels to the east of the site and the site would drain into this area, potentially causing adverse water quality and biodiversity issues within these sensitive habitats.

- *Cumulative impact on existing Highways*

5.18.9 EBC considers that the cumulative impact on the existing highways arising from development in the South East sector at Stone Cross would be unacceptable, and have previously strongly opposed the development and its associated access from Pennine Way. It is considered that the impact of additional traffic at local junctions such as Pennine Way, Penrith Way, Oaktree Lane with Friday Street or the junction of the B2104 and the B2247 have not been identified and the detailed transport impacts of development in this location have not been properly assessed.

- *Drainage and Sewerage*

5.18.10 EBC considers that the need to provide additional sewerage capacity is critical to the delivery of development in Stone Cross. It is expected that development in this area will connect to the nearest point of adequate capacity in the sewerage network, which is expected to be Eastbourne Waste Water Treatment Works. EBC has previously confirmed with Southern Water that Eastbourne Waste Water Treatment Works only has capacity to accommodate the growth identified in the Eastbourne Core Strategy up to 2027.

5.18.11 Due to the limited capacity in the existing Waste Water Treatment Works, previous proposals have suggested that a 'Package Treatment Works' would be provided in situ. These package treatment works would drain into

Mountney and Langney Levels which would cause an unacceptable ecological impact upon the open water bodies in these areas, and could cause disturbance to nearby residents. Therefore it is considered that development in this location would be unacceptable.

5.19 EBC considers that land to the West of Polegate should be identified for development in order to replace the non-identification of land in the South-East sector of Stone Cross, and to provide additional housing to meet Eastbourne's housing shortfall in full (see paras 5.11 – 5.15 of this representation).

5.20 In addition, EBC considers that, due to the number of houses to be provided in Stone Cross, the provision of a railway station at Stone Cross should be investigated as part of the growth in the area. This would help to facilitate greater use of the rail network for the communities across Langney in Eastbourne and Stone Cross in Wealden and would help reduce the level of car travel into Eastbourne town centre. EBC's commitment to this is identified in the Eastbourne Core Strategy Local Plan (para 4.8.15), and as the railway line straddles the Borough boundary, EBC would welcome further discussion with WDC on this issue.

Westham

5.21 EBC acknowledges the Preferred Option for Westham as an accessible settlement with good links to Eastbourne that has potential to provide additional housing into the Eastbourne and South Wealden Housing Market Area.

5.22 EBC particularly supports the focus of infill development and the allocation of land in the North, West and North West sectors to the north of the railway line. EBC also supports the non-identification of land to the south of the railway line that is an area of high flood risk that provides an open gap that prevents the coalescence of Eastbourne and Westham.

6.0 Natural Environment

6.1 Although it is appreciated that the proposed level of growth is required in line with the requirements of the NPPF, EBC has concerns about the environmental impacts of development in some parts of the Eastbourne and South Wealden area. The level of growth proposed will result in irreversible environmental damage and there will be long-term problems associated with this.

6.2 The NPPF (para 109) identifies that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of ecosystem services and minimising impacts on biodiversity. EBC are concerned that the proposed growth in Wealden could conflict with these aims, and that the development proposed on Greenfield sites between Eastbourne and Hailsham would have particular adverse impacts upon landscape, ecosystems and biodiversity.

6.3 The NPPF (para 114) also identifies that local planning authorities should plan positively for the creation, protection, enhancement and management of networks of biodiversity. EBC are concerned that these issues have not been adequately addressed in the IOR Report.

6.4 EBC would appreciate confirmation from WDC that development will not be proposed in locations where it will have an adverse impact upon Sites of Special Scientific Interest, in line with the NPPF (para 118).

Preferred Option for Flood Risk

6.5 EBC welcomes the recognition that development should not exacerbate flood risk, and that this is a significant issue within the Willingdon Levels Catchment Area that needs to be addressed.

6.6 As specified in the IOR Report, the Willingdon Levels Catchment Area includes parts of Polegate, Willingdon and Stone Cross as well as Eastbourne, and within this area water drains via a series of channels into an area known as Eastbourne Park, which is a flat, low-lying landscape comprised of approximately 400 hectares of grazed wetland at the geographical centre of the Borough. Flood water is stored there in a series of lakes before it drains out to sea via the Crumbles Sewer. The storage of water in Eastbourne Park allows flood water to gradually flow out to sea, and prevents the town from flooding.

6.7 When there is additional development that creates impermeable surfaces within the Willingdon Levels Catchment Area (Eastbourne Park Flood Storage Catchment area), this requires additional flood storage compensation within Eastbourne Park. When they were created, the lakes were provided with sufficient capacity to cater for some level of future development within the Willingdon Levels Catchment Area. EBC is currently undertaking an assessment to identify the exact flood storage capacity remaining in Eastbourne Park, specifically in the four main flood storage lakes, and if necessary, how additional capacity can be provided to accommodate future development in the Willingdon Levels Catchment Area.

6.8 EBC welcomes recognition in the IOR Report that, unless it can be shown that it does not exacerbate flood risk, development within the Willingdon Levels Catchment Area will need to contribute to the flood storage infrastructure to ensure that Eastbourne Borough is not at increased risk of flooding as a result of development.

6.9 Therefore, EBC supports the Preferred Option for Flood Risk, specifically the reference to the requirement that, in the absence of adequate flood storage in Eastbourne Park, all development provides adequate drainage and does not exceed its current contribution to surface water runoff. EBC will continue to keep in

communication with WDC in relation to the flood storage capacity in Eastbourne Park.

Preferred Option for Pevensey Levels

6.10 Although Pevensey Levels is outside of the Eastbourne Borough, it is part of the same water system as Eastbourne Park, and therefore water quality issues in Pevensey Levels may lead to water quality issues in Eastbourne Park. EBC supports the Preferred Option for Pevensey Levels in that it proposes a policy that prevents negative effects on the hydrological regime or increase pollutants entering the Pevensey Levels via development.

7.0 Affordable Housing

7.1 EBC generally supports the Preferred Option for Affordable Housing to help meet the overall housing needs of the Eastbourne and South Wealden area. WDC will be aware of the appeal by DCLG to the legal challenge on the affordable housing threshold, and the recent legislation on affordable housing tenures, specifically starter homes, in the Housing and Planning Bill, which may have implications on the Preferred Option for Affordable Housing.

7.2 EBC recognises that the IOR Report proposes that WDC will help meet Eastbourne's housing shortfall, however EBC is concerned that WDC's affordable housing allocations policy may restrict the ability of Eastbourne residents to access affordable housing in the South Wealden area that is provided to meet their needs. It is recognised that this issue sits outside of the planning process; however EBC would welcome discussions with WDC to address this potential issue.

8.0 Infrastructure

8.1 EBC recognises that the level of growth proposed, particularly in South Wealden, will have a significant impact on infrastructure. EBC supports WDC in its work to secure the necessary improvements to the infrastructure of the area as part of the development.

8.2 EBC considers that it is important that the WLP takes account of cross-boundary infrastructure provision, especially in relation to development around Eastbourne's boundary, and where serious infrastructure deficiencies have already been identified. It is therefore imperative that the key infrastructure requirements are continually assessed and updated. They will then subsequently need to be monitored and reviewed and it is important that EBC and WDC work effectively together to ensure that the growth is delivered in an effective way that does not have a detrimental impact on the existing residential community and businesses.

8.3 The collection of Community Infrastructure Levy monies from development across Eastbourne and South Wealden will be fundamental in funding and delivering cross-boundary infrastructure needed to support growth.

Effective Provision of Infrastructure

8.4 EBC supports the Preferred Option for Supporting the Effective Provision of Infrastructure, and welcomes the importance that has been placed on infrastructure delivery. This is one of the essential components of the WLP and the issue upon which its overall deliverability will ultimately be determined.

8.5 EBC supports the wording which states that the release of land for development will be conditional upon there being sufficient capacity in the existing local infrastructure to meet the requirements generated by the proposed development, and believes this is a fundamental premise upon which to base development proposals. In addition, requiring the programme of delivery with infrastructure providers for infrastructure improvements to be provided at the time that they are needed is supported.

8.6 It is noted that the Infrastructure background paper outlines the infrastructure issues that need to be further explored, but significant details on WDC's expectations in terms of delivery, funding and timing are not yet available. EBC look forward to working with WDC to address cross boundary strategic infrastructure.

8.7 It is recognised that infrastructure requirements will be regularly reviewed as part of the Infrastructure Delivery Plan, and EBC is keen to work closely with WDC regarding the issues of infrastructure delivery in the Eastbourne and South Wealden area.

Green Infrastructure

8.8 EBC welcomes the recognition in the IOR Report of the importance of green infrastructure, and considers that there is considerable scope for joint working between EBC and WDC to ensure the 'existing network of green infrastructure will be protected, improved and enhanced' as identified in the Preferred Option for Green Infrastructure Provision.

8.9 EBC has prepared a Supplementary Planning Document (SPD) for Eastbourne Park to provide further detail on Eastbourne Core Strategy Policy D11: Eastbourne Park. The SPD sets out a detailed vision and series of proposals to conserve and enhance the existing environmental and ecological characteristics of Eastbourne Park, whilst at the same time sensitively developing one of the Borough's most important under-utilised resource for appropriate leisure and recreational uses to help enhance the social and economic well-being of the local community and attract

more visitors to the Borough. It is envisaged that the proposals for Eastbourne Park will provide benefits for existing and future residents living in Polegate/Willingdon and Stone Cross.

8.10 Eastbourne Park could have the potential to be extended northwards into the part of the Willingdon Levels Catchment Area within Wealden, providing excellent local access to an important area of green infrastructure.

8.11 EBC considers that there would be merit in both authorities working closely together to provide a consistent approach across the Willingdon Levels area to enable residents across Eastbourne and South Wealden to have enhanced access to an attractive area of green infrastructure whilst also preserving it for its important ecological value.