



# **EASTBOURNE'S DIRECTION OF TRAVEL:**

## **Issues and Options for the Eastbourne Local Plan**

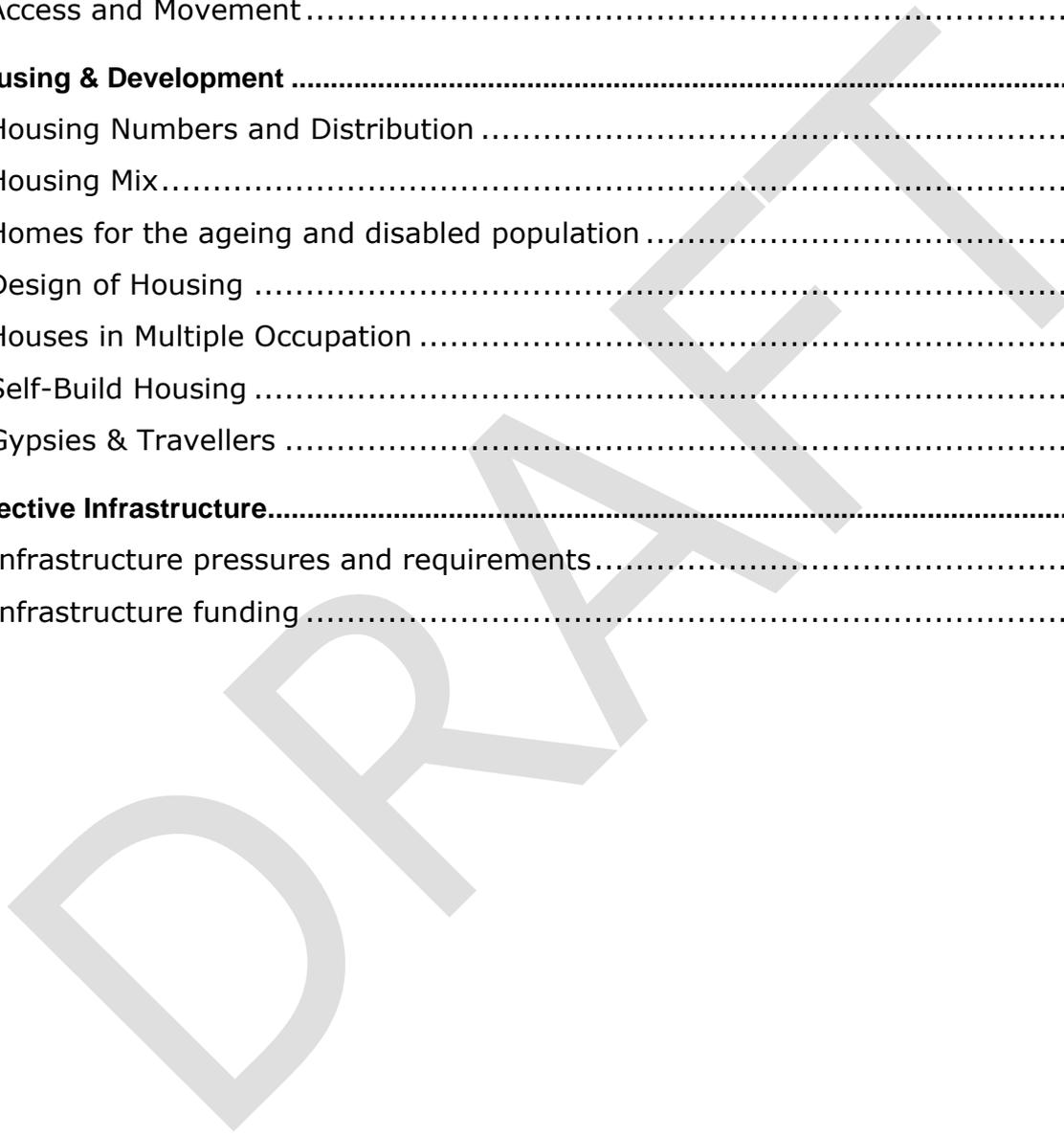
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# Table of Contents

<b>Introduction</b> .....	<b>1</b>
What is a Local Plan? .....	1
Why is a new Local Plan being prepared? .....	1
Purpose and format of document .....	2
Have Your Say .....	3
<b>Context</b> .....	<b>5</b>
Spatial Portrait.....	5
Population profile .....	6
Functional Geography .....	7
<b>Vision and Objectives</b> .....	<b>9</b>
Vision .....	9
Objectives .....	10
<b>Carbon Neutrality</b> .....	<b>12</b>
Modal Shift .....	13
Energy Efficiency .....	18
Renewable Energy .....	20
Carbon Capture.....	22
<b>Prosperous Economy</b> .....	<b>25</b>
Employment Spaces .....	27
Town Centre .....	36
Tourism .....	41
<b>Quality Environment</b> .....	<b>46</b>
Landscape .....	47
Water and Flooding.....	49
Eastbourne Park.....	52
Biodiversity .....	53
Green Infrastructure .....	54
Historic Environment and Townscape .....	55
Public realm.....	58
<b>Thriving Communities</b> .....	<b>59</b>

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Sustainable neighbourhoods .....	60
Sport and Recreation .....	61
Education .....	64
Health and Community .....	65
Local Service Centres .....	67
Crime .....	68
Access and Movement .....	68
<b>Housing &amp; Development .....</b>	<b>70</b>
Housing Numbers and Distribution .....	71
Housing Mix .....	80
Homes for the ageing and disabled population .....	83
Design of Housing .....	85
Houses in Multiple Occupation .....	87
Self-Build Housing .....	87
Gypsies & Travellers .....	88
<b>Effective Infrastructure .....</b>	<b>90</b>
Infrastructure pressures and requirements .....	92
Infrastructure funding .....	96



## Introduction

Eastbourne's Direction of Travel – how we want Eastbourne to change over the next 20 years – will be set out in a new Local Plan for Eastbourne that is currently under preparation. As part of this preparation, the local community and other stakeholders are being asked their views on the issues affecting Eastbourne and how these issues can be addressed in the future, in the context of growth over the next 20 years.

Whilst development can be controversial, it does provide the homes, jobs and other services and facilities that will be needed for future generations. This growth is required to help Eastbourne evolve in response to changing circumstances and remain a good place to live, work and visit in the future.

### What is a Local Plan?

The Local Plan is one of the most important documents shaping the future of Eastbourne. It is the key planning document that will plan and manage growth, regeneration and development across the Borough, based on a vision of what we want Eastbourne to be like in 20 years' time.

The Local Plan is used to guide decisions on the location, amount and type of development the Borough needs. This includes ensuring that new development contributes towards the town becoming carbon neutral; identifying land and uses that are required to create a prosperous economy; protecting what we value in terms of the environment and heritage of the area; creating thriving communities that meet the needs of local residents; delivering the right types of homes in the right locations; and providing effective infrastructure to sustain future growth.

Ultimately, the Local Plan is the starting point for determining planning applications for anything from new industrial estates to the extension of an existing house.

As such, it is essential that the Local Plan is kept up to date to enable the Council to pro-actively guide where, when and how new housing, employment and other development takes place.

As the South Downs National Park Authority is the local planning authority for the South Downs, Eastbourne Borough Council's Local Plan will only apply to the area of the Borough that is outside of the National Park.

### Why is a new Local Plan being prepared?

Government guidance indicates that local plans are likely to require updating in whole or in part at least every 5 years.

Eastbourne's current Local Plan, which consists of the Eastbourne Core Strategy Local Plan 2006-2027 (2013), the Town Centre Local Plan (2013), the Employment Land Local Plan (2016), and the saved policies from the Eastbourne Borough Plan 2001-2011 (2003), is considered to be out of date and needs to be reviewed.

The new Local Plan is needed to respond to changes in the Government's planning policy and legislation, and provide an up to date strategy for the future of Eastbourne that reflects the social, economic and technological changes that have taken place over recent years. There have also been changes in priorities, particularly in relation to the 'climate emergency' that was declared by the Council in July 2019, that necessitates a new vision for the future of the town and a new strategy for how this will be achieved.

The new Local Plan will cover the period from 2018 to 2038, and is intended to be a single comprehensive document containing both strategic and non-strategic policies that will replace the multiple documents that currently make up the Local Plan for Eastbourne. The stages in the preparation of the new Eastbourne Local Plan are identified in Figure 1.

**Figure 1: Stages in the preparation of the Local Plan**



### Purpose and format of document

This Issues and Options consultation marks a key stage in the preparation of the new local plan and the first opportunity for residents, businesses and other stakeholders to help identify the 'direction of travel' for the future of the town.

The scope of the Issues & Options consultation is to identify the key strategic issues and opportunities the Local Plan should address. It will also identify some options and initial ideas for the strategy for development and the 'direction of travel' for the new Local Plan. This is an invitation to the local community, businesses, visitors and other stakeholders to be involved in shaping what the updated local plan should contain. The responses to the consultation will inform the production of the Local Plan.

The Issues and Options report presents a Vision for Eastbourne in 2038, and objectives for what the Local Plan should achieve, and asks whether these reflect the community aspirations for the future of the town.

It also identifies issues for the future of the town and potential ways that those issues can be addressed, based on six topic areas: Carbon Neutrality; Prosperous Economy; Quality Environment; Thriving Communities; Housing & Development; and Effective Infrastructure.

The Issues and Options Report asks for views and comments on:

- ❖ **Issues** – the matters that the Local Plan needs to address
- a) **Options** – alternative strategies for addressing an issue
- o **Questions** – requesting views from stakeholders on particular issues

- **Direction of Travel** – strategies/policies that we think should be taken forward in the Local Plan
- **Further work** – additional work that is being undertaken or where further investigation is required

As plan preparation is still in the early stages, responses to consultation are likely to generate a need for further work to be undertaken and additional evidence to be gathered before consideration can be given to the development of detailed policies or potential land allocations in the Local Plan.

A Sustainability Appraisal Scoping Report has been published alongside the Issues & Options for consultation with the relevant organisations. This reviews relevant plans and programmes and identifies the sustainability objectives that the proposed policies will be appraised against.

In addition, the Council is also issuing a 'call for sites' to identify potential development sites, particularly for residential, employment and renewable energy development.

### Have Your Say

We are keen to receive views on any aspect of the Local Plan and you are welcome to respond to any or all of the questions we have set out. Even if there is only one question that you wish to answer, please feel free to do so. We are happy to receive general comments on the planning issues facing the town, or ideas and suggestions about any matters that you feel have not been fully addressed in this document.

The consultation is open for a 10-week period between Friday 1<sup>st</sup> November 2019 and Friday 10<sup>th</sup> January 2020. All consultation responses should be received by 5pm on Friday 10<sup>th</sup> January 2020.

The consultation can be accessed through the Council's on-line consultation portal ([www.lewes-eastbourne.gov.uk/eastbourne-local-plan](http://www.lewes-eastbourne.gov.uk/eastbourne-local-plan)). If you do not have internet access, the Issues and Options Report is also available to read as a paper copy at the Council Offices, 1 Grove Road, Eastbourne, BN21 4TW.

As part of the consultation we will be arranging a series of consultation events and exhibitions. The dates and times of these events will be publicised through your ward councillor and via social media and on the Council's website.

We would also welcome meetings with local residents associations, community groups and other stakeholder organisations. If you would like to take the opportunity to meet us please get in touch via email at [planning.policy@lewes-eastbourne.gov.uk](mailto:planning.policy@lewes-eastbourne.gov.uk).

You can respond to the consultation by:

- Submitting comments via our on-line consultation portal
- By completing a consultation response form, and returning either by email to [planning.policy@lewes-eastbourne.gov.uk](mailto:planning.policy@lewes-eastbourne.gov.uk) or post to: Planning Policy, 1 Grove Road, Eastbourne, BN21 4TW.
- By attending a consultation event and submitting comments there

Please note that although the consultation will be publicised using social media, comments made there cannot be considered as a formal response to the consultation. Therefore you are encouraged to make your comments via the formal channels identified above.

If you have any questions or experience any difficulty in submitting your representations, please contact us, the Planning Policy Team, via email at [planning.policy@lewes-eastbourne.gov.uk](mailto:planning.policy@lewes-eastbourne.gov.uk) or by telephone on 01323 415243.

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## Context

### Spatial Portrait

Eastbourne is a tourist resort on the Sussex coast, approximately halfway between Brighton and Hastings, and is one of the fastest growing seaside towns in the UK<sup>1</sup>.

One of the main attractions for the 5 million visitors per year is the town's high quality appearance and distinctive character, particularly the immaculate and elegant seafront façade and beautiful Victoria and Edwardian buildings. There are many other attractions, including the Grade II\* listed pier, the Bandstand (the busiest in the UK<sup>2</sup>), many and varied formal parks and gardens, and a newly extended shopping centre that is helping to transform the town centre into an important draw for both residents and visitors. Visitors are also attracted by the award winning events, including Airbourne and the Eastbourne International Tennis tournament.

Over recent years, the cultural, leisure and tourism offer has received careful and effective enhancement through significant investment at the Devonshire Park Conference and Tennis centre to ensure that the town continues to compete as a premier seaside destination in the UK.

The town is located at the eastern gateway to the South Downs National Park, which provides a high quality environment and setting that is valued by residents and visitors. There are extensive views along the 7km coastline towards the iconic cliff at Beachy Heads, which is the highest chalk sea cliff in the country and has featured in a number of films and television shows.

Eastbourne originally developed as a fashionable seaside resort in the second half of the 19th century. The 7th Duke of Devonshire was instrumental in initiating development of the seafront area including the Grand Parade and Cavendish Place, and creating many of the elegant buildings, villas and terraces that characterise the Eastbourne townscape today. During the post-war period the town continued to flourish as an important seaside resort.

Over recent years, Eastbourne has seen an increasingly diverse population established with many younger families having moved to the area, attracted by the high quality environment and surroundings. The University of Brighton has an established campus in the town, and the area is popular with foreign students who are supported by the many language schools.

Eastbourne contains one of the coolest neighbourhoods in the country<sup>3</sup>, and is regularly one of the sunniest places in the UK. The town has been placed in the top 10 of the UK's happiest towns<sup>4</sup>, reflecting the high quality of life for people living in the Borough.

There are many mixed and diverse neighbourhoods across the town that have good and easy access to a range of services and facilities via the numerous district and neighbourhood centres and small shopping parades. The town also provides a good range of different types and sizes of housing, particularly at Sovereign Harbour, which also features Europe's largest man-made marina.

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<sup>1</sup> ITV News, September 2015

<sup>2</sup> VisitEastbourne, September 2016

<sup>3</sup> The Sunday Times, October 7 2018

<sup>4</sup> The Argus, April 15 2014

Eastbourne is one of the key economic drivers for East Sussex, and has a broad economic base with businesses from a wide range of industries. Specialist advanced manufacturing and engineering businesses have a presence in the town's industrial estates, which is also home to the largest book distributor in the UK.

There has been significant investment in Eastbourne recently, including the £85 million extension to the Beacon Shopping Centre, the £45 million investment in the Devonshire Park Conference and Tennis Centre, and a £33 million redevelopment at Eastbourne College. In addition, there are major public realm works being undertaken in the town centre, and the Council is investing in leisure facilities through the provision of a new Sovereign Centre adjacent to the existing facility.

### Population profile<sup>5</sup>

The latest estimates show Eastbourne's population at 103,160 (2018), which represents a 5% population increase over the last 10 years. However, this also suggests a slowing down of population growth since the early 2000s.

The birth rate (births per 1,000 population) has dropped significantly over the last 10 years, although the death rate (deaths per 1,000 population) has remained relatively stable. The number of deaths in Eastbourne has been greater than the number of births, which means that population growth has been driven by migration.

Over the last five years, 30,192 people have moved out of Eastbourne, whilst 34,230 moved in, resulting in an average increase of 807 people per year. The majority of this migration is to and from other parts of the country, although around 7% of moves into and out of Eastbourne involve international migration.

The largest proportion of people migrating into Eastbourne comes from Wealden District (21%), whilst 17% move from London Boroughs. Migration from London tends to be people aged 45 and over. There also appears to be a growing trend of people moving to Eastbourne from Brighton & Hove, particularly people aged between 30 and 45.

Around 27% of people who move out of Eastbourne go to Wealden, whilst 13% move to other parts of East Sussex. A significant proportion of children aged under 15 who migrate out of Eastbourne (38%) move to Wealden, which suggests that this migration could be families seeking larger family accommodation that is more prevalent in Wealden.

Although Eastbourne has managed to attract more families and younger people into the town over the last 20 years, in the last few years this trend has changed, with more people aged between 15 and 44 moving out than in, and more people aged over 65 moving in than out. This means that Eastbourne has been a net exporter of younger people, and a net importer of older people, which is reflected by recent increases in the average age of the population from 42.4 in 2007 to 45.3 in 2017.

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<sup>5</sup> Data from East Sussex in Figures unless otherwise stated

Although the age profile of the town has changed over the last 20 years, the population is still older than average. In 2018, 32% of Eastbourne population was aged between 16 and 44, compared to 37% across the whole country, whilst 25% was aged over 65, which is significantly higher than the national average of 18%. Projections suggest that by 2032, nearly 33% of Eastbourne's population could be aged over 65.

The age profile of Eastbourne will have an impact on population growth in the future. Eastbourne's general fertility rate (births per 1,000 women aged 15-44) is consistent with national and regional averages, which suggests that the declining number of births is likely to be due to a lower population of women of child-bearing age.

Projections suggest that there will be 61.7 dependent elderly people per 100 people of working age, which is an increase from 43.4 per 100 in 2018. An ageing population has implications, particularly relating to a smaller workforce resulting in reduced tax income and lower economic growth, and an increased need for spending on health and social care and facilities.

Eastbourne has made great strides towards increasing the job opportunities through the provision of high quality workspace, such as that at Pacific House in Sovereign Harbour, through diversifying the economy and investing in facilities that will increase the value of the town's main economic drivers.

However, more needs to be done through the provision of high value jobs and providing the right types and sizes of housing that will attract younger people and families to the town, to complement the attractive environment and high quality of life that residents can enjoy.

Affordability is an issue for the town's residents, which also has an impact on migration. In the context of the wider area, average house prices in Eastbourne are low, which means the town is an attractive place to re-locate to. However, the relatively low wages of people working in the town means that residents can find it difficult to afford housing in the area.

The average house price in Eastbourne in 2018 was £239,250, and the average annual earning of people working in Eastbourne was £28,940. This means that average house prices are 8.27 times the average earnings, which represents a significant increase in the affordability ratio over the last 20 years<sup>6</sup>.

In addition, the composition of households has been changing, with a trend towards more people living alone. Around 36% of households in Eastbourne are occupied by a single person, but despite an increase in the number of single person households, the average household sizes have increased over the last 20 years. This suggests that larger households are staying together, possibly because people are unable to access housing to move out.

### Functional Geography

#### Summary of Issue:

- ❖ Eastbourne has a sphere of influence wider than just the Borough, and people's day to day

<sup>6</sup> Office for National Statistics, House price to workplace-based earnings ratio

functions are not contained within administrative boundaries. Therefore there is a need for a consistent approach to planning within the Eastbourne and South Wealden functional geography

Under the Localism Act 2011, Eastbourne Borough Council has a duty to co-operate with other local planning authorities and organisations to seek to address planning matters that are relevant across administrative boundaries.

Eastbourne is entirely surrounded by Wealden District, and the urban area of the Borough is contiguous with areas of south Wealden including Willingdon, Polegate and Stone Cross. The Eastbourne and south Wealden areas have many functional links – many people cross the administrative boundary on a day-to-day basis to access employment, retail, leisure and education, whilst the area also shares environmental characteristics such as flood catchment and green infrastructure.

Over half of the people who move between Eastbourne and Wealden do so either to or from the Polegate, Willingdon and Stone Cross area, which demonstrates the strong linkages that the area has.

However, a further 25% of people who move between Eastbourne and Wealden do so either to or from the Hailsham and Hellingly areas as well. The fact that there is a relatively large number of people who travel between Eastbourne and Hailsham for work means that this area could also potentially be considered to be part of the Eastbourne and south Wealden functional geographic area as well.

Because of the strong linkages between the Eastbourne and south Wealden 'functional geography', we believe that it is important that there is a consistent approach to planning across this area by both local planning authorities. We believe that it is particularly important that the planning and funding of infrastructure is considered in this wider context.

Question about the functional geography:

- What is the extent of the functional geography for the Eastbourne area?

## Vision and Objectives

### Vision

An important part of the Local Plan is the vision of what the town should look like in 2038. It needs to set out the ambitions for Eastbourne as a place and provide a clear picture of the role that development should play in creating a sustainable future for the town. All policies and proposals in the Local Plan should help to deliver the vision for the town.

The Vision for the Local Plan has been developed in consultation with local councillors, and subject to consultation with statutory bodies.

Eastbourne Borough Council has an ambitious agenda to transform the Borough, particularly in relation to creating economic prosperity, reducing carbon emissions and adapting to climate change.

On 10th July 2019, Eastbourne Borough Council declared a 'climate emergency' and committed to working in close partnership with local groups and stakeholders to deliver a carbon neutral town by 2030. The Local Plan will be a key tool in achieving this ambition, and as such carbon neutrality is an important part of the vision for Eastbourne's future.

### Vision for Eastbourne

In 2038... Growth within our premier coastal town, at the eastern gateway to the South Downs National Park, is contributing towards carbon neutrality through green infrastructure provision, renewable energy generation and energy-efficient development whilst embracing modal shift, culminating in a predominantly car-free town centre with excellent connectivity by cycle, foot and public transport to all of our communities.

Our neighbourhoods consist of an inclusive and varied housing mix that bolsters community cohesion and provide attractive places for larger families, smaller households and first-time buyers. Residents have convenient and sustainable access to their services and facilities, including health, recreation, shopping and community space. A sense of greenness persists in the town due to the tree-lined streets, green spaces and the nature reserve at the heart of the Borough, which with its lakes also helps protect us from flooding.

As a hi-speed digital hub, the town offers a diverse range of employment and training opportunities, infrastructure and workspace for existing employers and new business creation, alongside a high quality service and retail offering, complimented by a café and restaurant culture and a vibrant night-time economy.

The town is particularly attractive to tourists, with more overnight stays than ever before due to the well-maintained built heritage, flagship conference facilities, international sports and high quality events. Guests can stay in fashionable tourist accommodation and enjoy the award-winning beach that stretches from Sovereign Harbour to Holywell, taking in the historic Pier and stunning backdrop of the South Downs.

### Question on Vision

- Do you think that the Vision is ambitious enough? Are the priorities set out in the Vision appropriate? Is there anything missing from the Vision?

### Objectives

In order to implement the vision and provide more detail on what we want the Local Plan to achieve, a set of objectives have been proposed. These objectives will guide the preparation of policies in the Local Plan, and help to measure the effectiveness of those policies once they are on place.

#### *Carbon Neutrality Objectives*

1. To ensure that all development in the Borough is built to be carbon neutral by prioritising the reduction in carbon through the use of low carbon building materials, energy efficient design, renewable energy generation, low carbon transport measures and utilising on-site carbon capture, ahead of off-site carbon abatement schemes.
2. To achieve a modal shift by delivering new cycleways and footways and enhanced public transport connectivity linking services, facilities and communities, and reducing reliance on the carbon-emitting private car.
3. To enable carbon capture through the delivery of green infrastructure including greening development, tree-planting and the creation of new green spaces.
4. To increase renewable energy generation in the Borough through encouraging a range of smaller-scale localised generation as well as larger-scale, more centralised schemes.

#### *Prosperous Economy Objectives*

5. To stimulate growth in the economy, including District Centres and Industrial Estates, to increase value to local people through diversifying the employment offer and delivering workspace with focus on the digital economy and entrepreneurship.
6. To ensure that the Town Centre retains its status as main central business district, servicing the functional geography of Eastbourne and South Wealden, through increasing the range and variety of uses, creating flexible workspace, and delivering transport and public realm improvements.
7. To increase the value of tourism to the town through increasing spend and over-night stays; building on the new conferencing facilities, providing an appropriate balance of quality tourist accommodation and strengthening links to the South Downs National Park.

*Quality Environment Objectives*

8. To extend the network of trees and green spaces linking the South Downs, Seafont, Eastbourne Park and Pevensey Levels and enhance water quality in order to deliver a net-gain in biodiversity.
9. To improve the resilience of the Borough to flooding and other impacts of climate change and not increase the risk of flooding through new development
10. To facilitate high standards of design which maintain and enhance the quality of townscape and landscape, including views to and from South Downs National Park.

*Thriving Communities Objectives*

11. To improve the cohesion of and support for our communities and community groups through the delivery of appropriate and accessible services and facilities that enhances the opportunities for public participation in society.
12. To improve quality of life for people in the most deprived areas of the Borough.
13. To revitalise the vibrancy of local centres through increasing the range of uses and services on offer to near-by residents.

*Housing and Development Objectives*

14. To deliver a mix of homes and accommodation that meets the needs of the borough and makes efficient use of land, including larger family housing, smaller units and housing suitable for first-time buyers.
15. To ensure that housing development sites are delivered in a way that alleviates the impacts that they create through the provision of appropriate infrastructure.
16. To deliver high quality sustainable construction that maximises energy efficiency and reduces domestic energy consumption in new homes.

Question on Objectives

- Do you agree with the Objectives? Are there any additional objectives that should be added?

## Carbon Neutrality

### Summary of Issues:

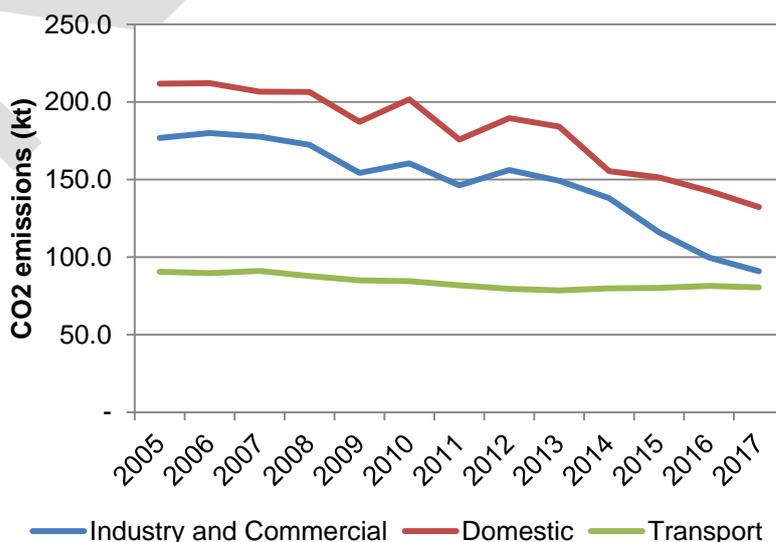
- ❖ Eastbourne Borough Council has committed to being Carbon Neutral by 2030 and the Local Plan has a key role to play in this
- ❖ Although there has been a decline over recent years, the most significant contribution to carbon emissions in Eastbourne is domestic and commercial energy use
- ❖ 20% of carbon emissions in Eastbourne come from road transport, and these emissions have remained at the same level over recent years, despite improving technology
- ❖ Planning policy is unable to mandate zero-carbon domestic buildings, although there are no limits for non-residential development
- ❖ Requiring energy efficiency and renewable energy generation on a new development will impact development viability and/or the amount of other social benefits that can be provided by development
- ❖ On-site carbon off-setting is unlikely to be able to compensate for all carbon emissions from new development, and therefore some off-site carbon abatement is likely to be required to some extent

On 10<sup>th</sup> July 2019, Eastbourne Borough Council declared a climate change emergency and committed to continue working in close partnership with local groups and stakeholders to deliver a carbon neutral town by 2030.

In 2017, 299.6 kilotonnes (kt) of carbon dioxide (CO<sub>2</sub>) was emitted in Eastbourne<sup>7</sup>. Domestic energy consumption was the largest emitter of CO<sub>2</sub> (44%). 30% of emissions emanated from industrial and commercial energy consumption and installations, whilst 26% came from transportation.

Whilst carbon emissions from industrial and commercial and domestic sources have fallen significantly (by nearly half) since 2005, carbon emissions from transport has been relatively steady, despite better fuel efficiency and eco technology. This is likely due to increases in the number of cars on the roads – the number of cars registered in

Figure 2: Carbon Emissions in Eastbourne



<sup>7</sup> Department for Business, Energy & Industrial Strategy, UK local authority and regional carbon dioxide emission national statistics

Eastbourne has increased by over 4,600 between 2010 and 2017<sup>8</sup>.

The Local Plan can help to continue and accelerate the decline in carbon emissions by requiring energy efficiency measures and renewable energy generation as part of new development. However, it is estimated that 80% of the housing that will be around in 2050 has already been built, so measures affecting the existing stock will also need to be considered.

The biggest issue for Eastbourne's Local Plan in terms of carbon emissions is the use of the private car. People in Eastbourne generally travel relatively short distances to their place of work, yet a significant proportion of them still drive. Eastbourne also has significant numbers of people who travel into and out of the Borough for work, and the majority of these people also commute by car.

Being a leisure and tourist destination means that people visit the town, particularly the town centre and seafront. Over 5 million people visit the town on day-trips or overnight stays per year, and many more will go into the town centre for shopping trips or other leisure purposes.

If Eastbourne is to be carbon neutral, the Local Plan will need to play a fundamental role in reducing carbon emissions and tackling climate change through shaping the nature, pattern and quality of development. It can do this by reducing the need to travel and facilitating changes in societal behaviour that promote a modal shift away from the private car to more sustainable modes of transport, by encouraging more energy efficient buildings and by identifying opportunities for renewable energy generation.

### Modal Shift

Modal shift means replacing one mode of transport (e.g. private car) with another more sustainable mode of transport. Modal shift will only occur when one mode has comparative advantages over another, so a switch from cars to sustainable travel will require disincentives to using the car, coupled with improvements to the capacity, cost, flexibility, safety and reliability of more sustainable modes.

Eastbourne has a number of advantages that make it a prime location for increased sustainable transport use. The density of the town means that the majority of people are located in close proximity to the services and facilities that they require, and the town centre has a public transport hub that is well served from other parts of the town. Eastbourne is also generally flat, meaning cycling and walking is easier, and new technology such as electric bikes can help overcome topographical issues found in the western part of town.

The Local Plan cannot deliver a modal shift on its own – it will involve a joined up approach with East Sussex County Council and the town's public transport providers. However, the Local Plan can influence modal shift by ensuring that new development is located in accessible locations; makes high quality provision of walking and cycling infrastructure; discourages the use of the private car; and concentrates services and facilities to enable easier sustainable transport connections.

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<sup>8</sup> Department for Transport (DfT), Vehicle Licensing Statistics series: veh105

The Local Plan should also seek to address and influence some of the reasons for people choosing not to walk, cycle or use public transport, including safety, convenience and reliability.

A reduction in carbon emissions is not the only reason for encouraging a modal shift. The use of sustainable modes of transport will create less pollution, improve air quality, and result in less congestion on the road, which in turn will make sustainable travel quicker and safer, as well as providing health benefits for those that walk or cycle.

The most regular journey for the majority of people, and therefore the journey with the largest scope for modal shift, is the commute to their place of work<sup>9</sup>.

There are over 40,000 people who travel to a place of work in Eastbourne, including 28,000 who are residents of the Borough. 68% of people who travel to a place of work in Eastbourne travel by car, whilst 11% use public transport and 19% walk or cycle.

There are also a significant proportion of people who travel to common locations for work. 13,000 people (33%) of people travelling to work in Eastbourne end up in the Town Centre. Despite the good public transport links, 54% of these people travel by car.

Other popular workplace locations include the Industrial Estates and retail areas adjacent to Lottbridge Drove (3,000 people) and in Hampden Park (3,000 people), and the Eastbourne District General Hospital and the adjacent East Sussex College campus on Kings Drive (4,000 people).

The majority of Eastbourne residents travel relatively short distances to their place of work. 63% of Eastbourne residents in employment travel less than 5km to work, which is equivalent to approximately ten minute drive at peak time. Therefore over half of the people who commute less than 5km do so by car.

Discouraging private car use within development, for example by restricting car parking provision, can have positive impacts in reducing car use.

Increasing the provision of car parking in Eastbourne could encourage increased car use. There is evidence from other urban locations that suggests that the availability of parking has a strong effect on levels of car ownership, and that higher levels of car ownership are associated with higher levels of car use<sup>10</sup>.

Current parking standards, set by East Sussex County Council as the highways authority, are based on evidence of trends in car ownership across different parts of the Borough and on the types of developments being planned.

In order to discourage car ownership to help achieve a modal shift, the Local Plan could seek to set lower car parking standards in new development than the current East Sussex County Council standards through a new policy. The creation of higher car parking standards is not considered

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<sup>9</sup> All journey to work data comes from the 2011 census, with is the most up to date comprehensive data that is currently available

<sup>10</sup> Mayor of London/Transport for London – Residential Car Parking Evidence base

appropriate due to the need to discourage car travel and change societal behaviours in order to achieve the aim of Eastbourne being carbon neutral by 2030.

#### Options for Car Parking Provision

Should the Local Plan:

- a) Continue to rely on East Sussex County Council's car parking standards; or
- b) Set local car parking standards for Eastbourne with the aim of reducing the amount of car parking provided in new development

It is accepted that a certain amount of car use is going to be necessary, especially where people have mobility problems, which is likely to be an issue with the ageing population. However, in order to reduce carbon emissions, as much car use as possible should be through ultra-low emission cars.

The number of ultra-low emission cars has grown over the last three years, but in 2018 this still made up less than half a percent of all cars registered in Eastbourne.

The take-up of ultra-low emission cars, particularly electric cars, will depend on the availability of infrastructure to service them. Therefore the provision of electric vehicle charging points in new development should help to increase the number of electric vehicles being used in Eastbourne.

The Local Plan will also require car sharing schemes ('car clubs') as part of new major residential development, so that residents can have access to a car when necessary without the need to own one.

#### Direction of Travel:

To encourage modal shift, the Local Plan will:

- Require Electric Vehicle Charging Points to be provided in all new developments
- Require car sharing schemes to be implemented to serve all new major residential developments
- Require personal and workplace travel plans to be put in place for all new major development

Encouraging more walking and cycling, especially on regular journeys such as to a place of work or education, will play a key role in modal shift in Eastbourne.

Walking to work is relatively common in Eastbourne, especially over shorter distances. Although 11% of all journeys to a workplace in Eastbourne are made on foot, this increases to over 40% when the distance is less than 2km (25 minute walk). Nearly half of journeys to work by foot are to the town centre.

Cycling is an important sustainable travel option for residents, commuters and visitors in Eastbourne, especially considering that a large proportion of residents travel relatively short distances to work and the relatively flat topography in the majority of the town.

Eastbourne has a number of established cycle routes, including the National Cycle Route 21 (NCR21) from the southern end of the Cuckoo Trail at Polegate to the seafront at the Sovereign Centre, with links off the route to other parts in the east of the town. The Horsey Way cycle route, developed in 2018, connects the eastern part of the town and the NCR21 to the town centre, whilst the King Edwards Parade cycle route connects the foot of the Downs in Meads to the Wish Tower and the Devonshire Quarter.

Despite this, less than 2% of all journeys to a workplace in Eastbourne are made by bicycle and the average amount of regular cycling activity in Eastbourne is some of the lowest in the county, with just 4.3% of adults cycling three or more times per week<sup>11</sup>. A journey of 5km is equivalent to an 18-minute cycle, however less than 5% of journeys to a workplace of less than 5km are made by bicycle.

There are limited north-south cycle links in Eastbourne. The western side of the urban area of Eastbourne has very limited cycling infrastructure, despite this area of town accommodating a number of schools, colleges and university campuses.

There may also be an issue with the 'on-road' nature of some of the existing cycle links. Cyclists were involved in 17% of all recorded road casualties in Eastbourne in 2018<sup>12</sup> and safety issues and perceptions may discourage some people from cycling to work.

The Cycling Strategy 2012 has identified a number of priority routes for cycling, including the implementation of a continuous safe cycling route along the entire seafront corridor as being one of the most important improvements for cycling in Eastbourne. Eastbourne Borough Council has already confirmed its support for cycling on the seafront.

Question on walking and cycling:

- What can the Local Plan do to encourage more trips by walking and cycling?

East Sussex County Council anticipates publishing a county wide Walking and Cycling Investment Plan for public consultation by the end of 2019. This will seek to integrate and update existing policies and strategies, including the Eastbourne Cycling Strategy.

Direction of Travel:

To increase walking and cycling, the Local Plan will:

- Support cycling on the seafront
- Work with East Sussex County Council to increase number of designated cycle routes across the town
- Require cycle parking to be provided in all new development

<sup>11</sup> East Sussex in Figures

<sup>12</sup> Sussex Safer Roads Partnership, Recorded road casualties by severity, age and road user type, 2004-2018, via East Sussex in Figures

- Require new development and public realm schemes to incorporate safety measures for pedestrians and cyclists
- Encourage implementation of 'Home Zones' and 20mph zones within strategic development sites

The provision of regular and reliable public transport will play a major role in creating a modal shift. In order to achieve this, it will be necessary for the Council to work with public transport providers to encourage more people to use public transport for regular journeys.

The density of Eastbourne means that the majority of people are within a 10 minute walk (400 metres) of a bus stop. Also, services and facilities in Eastbourne are very accessible by public transport, according to Journey Time Statistics produced by the Department of Transport<sup>13</sup>. 90% of households are within 15 minute travel time by public transport from a Primary School, whilst 83% of households are within 15 minute public transport travel time from a GP's surgery.

However, less than 10% of workplace journeys within Eastbourne are by public transport, with the bus accounting for 80% of these trips. Increasing public transport infrastructure and services to the limited number of main employment locations in Eastbourne (town centre, industrial estates and the hospital) should help to encourage more journeys by public transport.

Whilst increasing public transport use for journeys within Eastbourne will be important, there are other options to substitute car journeys such as walking and cycling. However, commuters in and out of the town are less likely to find walking and cycling as suitable alternatives to the car, which means that effective public transport provision becomes even more important.

Over the last 30 years, Eastbourne has gone from having a net inflow of workers to having a net outflow of workers. In 2011, there were over 500 more people travelling out of the Borough than into the Borough for work.

Car is the most common modal choice for both in-commuters and out-commuters. 69% of the 12,969 Eastbourne residents who travel outside of the Borough to their place of work use a car. 75% of the 12,380 people who travel in to Eastbourne to their place of work use a car.

Over half of the total in-commuters to Eastbourne come from Wealden, whilst a third of out-commuters travel to Wealden. 80% of these commutes are by car.

Public transport usage is more common for out-commuters than for in-commuters. 20% of out-commuters use public transport to travel to locations such as Brighton & Hove, Lewes and London. Less than 15% of in-commuters use public transport, with the majority of those coming in from Wealden.

It will be necessary for the Council to work with neighbours and public transport providers to deliver infrastructure that encourages in-commuters to leave their cars outside of the town, and travel into Eastbourne via public transport.

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<sup>13</sup> Department for Transport, Journey time statistics: Access to services 2016

A scheme to improve sustainable movement between Eastbourne, Polegate and Hailsham (known as the Hailsham, Polegate and Eastbourne Movement & Access Corridor) is being developed to provide a significant change in access to sustainable travel choices to support growth in the Eastbourne and South Wealden area. The scheme, which will involve improved bus stop infrastructure, bus lanes, junction improvements, and walking and cycling infrastructure improvements, is due to be implemented in 2020/21.

#### Direction of Travel:

To encourage more travel by public transport, the Local Plan will:

- Work with East Sussex County Council and public transport providers to encourage improved public transport provision and infrastructure within Eastbourne
- Work with neighbouring authorities and public transport providers to reduce the number of in-commuters travelling by car
- Identify and designate transport hubs as key locations where people travel to, with new development requiring links to these nodes.
- Work with public transport providers and ESCC to make public transport a more attractive travel choice

#### Question on Modal Shift:

- What else can be done to encourage a modal shift to more sustainable forms of transport?

#### Further work:

- Model the impacts of transport growth resulting from new development and sustainable transport improvements

#### Energy Efficiency

Energy efficiency is the use of less energy to provide the same service, and using energy more efficiently is an essential part of the strategy to lower carbon emissions. Not only will energy efficiency reduce carbon emissions, it will also help to tackle fuel poverty and cut energy bills.

The national standards for energy efficiency in new residential development are set out in Part L of the Building Regulations. National planning guidance is clear that the Local Plan can set higher standards for energy efficiency in residential development than those contained within the Building Regulations; however these standards can only be set to 19% above the Building Regulations standard (equivalent to the former Code for Sustainable Homes Level 4 standard). Higher standards are likely to have a cost impact that could mean that development is unable to meet other requirements or make financial contributions for off-site infrastructure.

Options for energy efficiency standards in residential development

Should the Local Plan:

- a) Require no increase in energy efficiency standards in new homes through Local Plan (continue to use Building Regulations standards); or
- b) Require that energy efficiency standards in new homes be increase to the maximum allowed (19% increase on Building Regulations)

The Local Plan is unable to mandate energy efficiency standards in new development that exceed a 19% increase on Building Regulation standards. However, it could provide encouragement to developers to build to zero-carbon standards.

It is approximated that net zero-carbon energy efficiency standards would require a 35% increase above the current Building Regulation standards and because of national planning guidance this cannot be required by the Local Plan.

Question on energy efficiency standards in residential development:

- How can the Local Plan incentivise zero-carbon design in new development?

The limits on the energy efficiency standards do not apply to non-residential development, so there are no restrictions on energy efficiency standards that could be required by the Local Plan for these types of developments. However, requiring higher standards will have a cost impact on development and could threaten its deliverability.

Question on Energy efficiency standards in non-residential development:

- How high should energy efficiency standards be set for non-residential development?

There are elements of the design of new development that can impact on energy efficiency without a significant cost implication. Passive solar design principles can be applied equally effectively in housing and commercial developments, and can address issues of overheating in the summer, as well as reducing need for heating in the winter. A range of design solutions can be use to help avoid overheating and the need for air conditioning, such as maximising natural ventilation and providing shade through planting and roof overhangs. Allowing sufficient space between buildings and using street layouts that encourage airflow can also reduce the effects of heat.

The Local Plan will contain policies requiring the incorporation of design elements such as building orientation to achieve solar gain, incorporation of external louvers, shutters, overshadowing from balconies and climate change adaptation measures such as green roofs and walls.

In addition, the Environment Agency has identified the whole of the South East, including Eastbourne, as an area of “serious water stress” and it is therefore imperative that water resources are managed efficiently. It is intended that the Local Plan will contain a policy requiring all new homes to minimise water consumption.

### Direction of Travel:

In order to maximise energy efficiency, the Local Plan will:

- Contain policy and guidance on sustainable design (e.g. passive design, low and zero carbon technologies).
- Require climate adaptation measures such as green space and green architecture (e.g. roofs, walls, etc.).
- Require new residential buildings to achieve water use of less than 105 litres/head/day

### Renewable Energy

The generation of energy from renewable sources can replace energy usage from sources that have a higher carbon footprint, which will therefore have an impact on reducing carbon emissions. Therefore it is important that new development makes the most of opportunities for producing renewable energy whilst at the same time fitting in with the surrounding environment with minimal impact.

Renewable energy can be provided at different scales, from larger scale operations such as wind turbines and Combined Heat and Power (CHP) that can generate energy for a district/wide area, to micro-generation schemes incorporated into buildings that can provide energy for an individual property.

#### *Microgeneration*

The term “microgeneration” is used to describe the array of small scale technologies (typically less than 50 kW of electricity generation and 100 kW of heat generation) that can be integrated as part of the development of individual sites. These include:

- Solar PV – solar panels that are usually placed on the rooftops and convert sunlight to electricity
- Solar Water Heating – solar panels that collect heat from the sun and use it to warm up domestic water, reducing the need to use conventional boilers or immersion heaters
- Air source heat pump – a pump placed on the outside of a building that absorbs heat from the outside air that can be used to heat radiators, heating systems or water in the home
- Ground source heat pump – the use of underground pipes to extract heat from the ground that can be used to heat radiators, heating systems or water in the home
- Biomass heaters – the burning of wood pellets, chips or logs to power domestic central heating and hot water boilers
- Building mounted wind turbines – small-scale turbines that are usually installed on the roof where there is a suitable wind resource to generate electricity from wind power

Retro-fitting microgeneration on an existing building often falls under permitted development and may not require an application for planning permission. However, Local Plan policy could require that small-scale energy generation is incorporated into new development from the start, although this may have implications on the design and deliverability of a development.

Options for how small-scale renewable energy generation should be included in new development:

Should the Local Plan:

- a) Require all new development to incorporate small-scale renewable energy generation; or
- b) Require a set % of the energy requirements of new development to be sourced from on-site renewable energy generation; or
- c) Set no requirement for on-site renewable energy generation.

*Community-scale renewable energy generation*

The constrained nature of Eastbourne means that there are limited opportunities for community-scale energy generation, however it is considered that there could be potential for:

- Large-scale wind turbines – a single turbine or group of turbines, probably between 50 and 90 metres, tall that generate electricity from wind power
- Ground mounted solar PV ('Solar Farms') – a large number of solar panels installed on the ground that convert sunlight to electricity
- Grown Biomass – the growing of energy crops that can be used to power biomass heaters
- District Heating networks – a system for distributing heat across a community through a system of highly insulated pipes that has been generated in a central location

Eastbourne Park may offer potential for large scale renewable energy generation. There are locations in Eastbourne Park that have sufficient wind speed and are far enough away from the urban area to offer potential for large-scale wind turbines, although this could create a potential impact on the landscape. Eastbourne Park could also offer the opportunity for a solar farm to generate energy from Eastbourne's record hours of sunshine.

Question on large-scale renewable energy:

- Should the Local Plan allocate areas of Eastbourne Park for large-scale renewable energy generation?

Much of Eastbourne's development is expected to be small-scale infill development on previously developed land, which makes it difficult to put in place the infrastructure required for community-scale renewable energy generation. The installation of such infrastructure may be easier on larger greenfield sites, and therefore requirements for renewable energy generation could be different on greenfield land compared to previously developed (brownfield) land.

Question on renewable energy requirements:

- Should renewable energy requirements be different for Greenfield and Brownfield developments?

It is likely that there are some larger sites and development areas that could provide enough new development to justify the incorporation of community energy generation, for example through a district heating network. The Local Plan could require the development of strategic sites to provide community energy infrastructure. However, the cost of implementing this alongside development could impact viability and mean that the development is unable to provide other infrastructure requirements.

Question on community-scale energy infrastructure:

- Should strategic sites allocated for housing be expected to provide community energy infrastructure e.g. district heating network

The NPPF states that new onshore wind cannot be approved outside an area “identified as suitable for wind energy” unless it is a community-led scheme. Therefore it is important that the Local Plan identifies areas that would be suitable for renewable energy generation.

It is also important that new development is ‘future-proofed’ to allow it to connect to community-scale renewable energy (such as district heating networks) in the future, even if that infrastructure is not available at the time of development.

Direction of Travel:

In order to encourage renewable energy generation, the Local Plan will:

- Identify areas suitable for renewable energy in the local plan, including CHP
- Requires new development within areas identified as being suitable for renewable energy generation to install secondary elements for district heating network to allow them potential to connect at a later date

Further and more detailed work will be undertaken to identify opportunities for renewable energy generation. In addition, a ‘call for sites’ is being undertaken alongside this consultation to request that sites with potential for renewable energy generation be identified to the Council.

Further work:

- Identify and map opportunities and areas suitable for renewable energy generation
- Undertake a ‘Call for Sites’ for renewable energy use

Carbon Capture

Although measures should be put in place to reduce carbon emission as much as possible, new housing development is likely to emit a certain amount of carbon, which will need to be off-set if the development is to be carbon neutral.

Priority should be placed on off-setting carbon through methods incorporated into the development. On-site carbon off-setting can take place through the provision of planting, particularly trees, but also the incorporation of green walls and roofs.

Direction of Travel:

The Local Plan will encourage on-site carbon off-setting by:

- Requiring tree planting as part of developments and public realm improvements
- Encouraging the inclusion of green roofs and walls into new development

Question on off-setting carbon emissions:

- What else can be required as part of development to off-set carbon emissions through on-site measures?

However, evidence suggests that on-site carbon off-setting methods are unlikely to compensate for all carbon emissions from new development<sup>14</sup>. Carbon off-setting through off-site methods could be used to compensate for any remaining carbon emitted from new development, but this should only be considered once on-site carbon reduction and off-setting has been maximised.

Large-scale tree planting within Eastbourne could provide some carbon off-setting for development, although there are limited locations where large scale tree planting could take place. One opportunity could be in Eastbourne Park, however further investigation needs to be undertaken to consider the potential effects on the nature of Eastbourne Park of tree planting within a wetland area.

A number of local authorities around the country have set up a Carbon Off-set Scheme that developers pay into in order to compensate for the carbon emissions that they have been unable to off-set through the development.

Carbon off-set payments could be pooled within a single ring-fenced pot and directed to projects that will reduce carbon emissions in the rest of Eastbourne that will compensate for any remaining carbon emissions in new development.

Question on local carbon off-setting scheme:

- What would the advantages and disadvantages be of the implementing a local carbon off-setting scheme to make development carbon neutral where it can be proved that no further carbon reduction can be made on-site?

Further work:

- Investigate impact of tree-planting in Eastbourne Park

<sup>14</sup> Currie & Brown (2018) "Cost of Carbon Reduction in New Building"

- Investigate potential for carbon off-setting schemes, including carbon costs

Although low-carbon homes may be more easily achieved in new-builds, it is estimated that 80% of the housing stock that will exist in 2050 has already been built<sup>15</sup>. Therefore retrofitting existing homes with better insulation, higher efficiency appliances and energy generation equipment represents a larger opportunity for delivering carbon neutrality.

Question on de-carbonisation of existing housing stock:

- How can the Local Plan encourage the de-carbonisation of the existing building stock through retro-fitting energy efficiency?

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<sup>15</sup> BBC News (2017), UK 'must insulate 25 million homes'

## Prosperous Economy

### Summary of Issues:

- ❖ Eastbourne has a predominantly low skill / low wage economy and future growth is forecast to be in low wage sectors
- ❖ There is a lack of available land for commercial development, which means growing businesses are unable to expand or are forced to move out of the Borough
- ❖ There is pressure on commercial land from higher value uses, which has resulted in a loss of commercial space
- ❖ There is a need to ensure that future office space is provided in the right locations to attract occupiers
- ❖ The potential for further employment space to be delivered through the intensification of industrial estates
- ❖ There is a perception that the integrity of Industrial Estates as business locations is being eroded by retail creep
- ❖ The value of small employment areas within residential area
- ❖ Ensuring development accords to the scale and function of District, Local and Neighbourhood Shopping Centres
- ❖ The provision of out-of-town retail can have an impact on the success of the Town Centre
- ❖ The contraction of traditional retail and the changing nature of town centres from selling products to experiences
- ❖ Increasing footfall in the town centre
- ❖ The positive and negative impacts of the night-time economy in Town Centre
- ❖ How and where residential development should contribute to the town centre
- ❖ Maintaining Eastbourne as modern day tourist destination
- ❖ Ensuring the provision of right quantity and quality of tourist accommodation

Eastbourne's economy has performed relatively well over recent years. The number and diversity of jobs have increased, and the value of goods and services produced in the Borough (Gross Value Added) is, on a per head basis, the highest in the county, although it does still lag behind the average for the South East region<sup>16</sup>.

The proportion of the Eastbourne population that is of working age has been increasing over recent years, although future forecasts suggest that this trend may change over the plan period. Eastbourne's workforce falls slightly behind the rest of the South East in terms of higher level qualifications. A lower proportion of the workforce is employed in higher skilled occupations than the regional average.

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<sup>16</sup> East Sussex in Figures

The average earnings of people who work in Eastbourne are higher than the average for the county, although significantly lower than the average for the South East region. The difference between the average earnings of people who live in Eastbourne compared to those that work in Eastbourne suggests that many people travel outside of the Borough to access higher paid jobs.

Job growth in recent years has mainly come about in lower value sectors. Although the computing, IT and telecoms sector has seen high proportional growth (as it started from a small base), the most significant absolute growth has come in the healthcare, residential care and social work, as well as the hospitality and recreation sectors. At the same time there have been decreases in the number of jobs in public administration and defence; and manufacturing, which reflects a country-wide decline of manufacturing-based activities in conjunction with a shift towards a service dominated economy.

Employment projections forecast that there will be approximately 9,400 jobs created in Eastbourne between 2015 and 2035. The forecasts suggest that over the next 20 years the residential care, social work and healthcare sectors will continue to be key drivers of employment growth within the Borough, whilst administrative and supportive services and public administration and defence sectors are likely to incur further employment losses. This suggests that the most significant employment growth will continue to be in lower value jobs that will have less economic benefit to the Borough as a whole.

The Town Centre is the main focus for Eastbourne's economy. Eastbourne Town Centre contains two-thirds of the town's office floorspace, along with just under half of the 286,000 sqm of retail floorspace. In retail terms, the Town Centre is estimated to have a catchment population of around 260,000 people; the majority of whom would currently travel into Eastbourne by car.

Eastbourne Town Centre has fared reasonably well over recent years, as evidenced by low vacancy rates, and confidence in the future of the town centre has been expressed through £85 million of private investment in the extension to the Beacon (formerly Arndale) Shopping Centre. However, town centres across the country are undergoing significant changes due to the contraction of traditional retailing, and the Local Plan must allow Eastbourne town centre to adapt to changing circumstances.

Hospitality-related employment is also clustered in and around the town centre, and tourism is one of the largest contributors to the Eastbourne economy. The 5.1 million visitors to Eastbourne in 2017 generated £465 million for the local economy and supported 25% of all jobs in Eastbourne, providing employment to 9,632 people<sup>17</sup>.

Whilst the majority of visits to Eastbourne are in the form of day-trips, the 700,000 overnight trips generated around 60% of the tourist spend. Encouraging more overnight stays to Eastbourne will have a more significant economic benefit, and this will rely heavily on the provision of the right quantity and quality of tourist accommodation in the right places, as well as the availability of tourist facilities and events.

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<sup>17</sup> Tourism South East, The Economic Impact of Tourism in Eastbourne (2017)

## Employment Spaces

Eastbourne has an established stock of commercial space supported by a number of successful business clusters in Hampden Park and off Lottbridge Drove. The demand for this commercial space is generally considered to originate from local companies, rather than businesses looking to relocate into Eastbourne from elsewhere.

The lack of inward investment is not expected to change significantly over the plan period; in fact, many local businesses looking to expand have experienced difficulties in finding suitable space in the Borough and instead are considering relocating outside of the Borough.

Limited land availability and viability issues have held back the development of new commercial space, and local market feedback suggests that there has been a particular shortage of premises to meet the need arising from light industrial uses.

To compound the issue, Eastbourne has been experiencing a decline in the amount of office, industrial, retail and leisure floorspace over recent years, driven partly by an ongoing economic restructuring but also as a result of increased pressure on a finite supply of sites from other higher value uses, particularly with regard to existing industrial and office uses.

Employment projections forecast that Eastbourne's share of office and industrial-related (class B) jobs to total jobs will reduce slightly over the next 20 years, and that only 15% of employment growth will fall within these class B sectors.

Between 2015 and 2035, it has been forecast that Eastbourne will have a need for around 70,000 sqm of class B floorspace, which will provide approximately new 1,475 jobs.

**Table 1: Employment (class B) floorspace requirements**

<b>Use</b>	<b>Floorspace Requirements (GEA) sqm 2015 - 2035</b>
Office (class B1a and B1b uses)	10,250
Industrial (class B1c and B2 uses)	9,070
Warehouse (class B8 uses)	50,770
<b>Total</b>	<b>70,090</b>

Of this floorspace requirement, around 3,000 sqm of office space has already been delivered through Pacific House at Sovereign Harbour, meaning that the future office requirement reduces to around 7,000 sqm. However, there have been further losses of existing industrial and warehouse uses in the intervening period that may need to be compensated for.

The employment projections forecast that there will also be a growth of 1,700 jobs in the retail and leisure sectors across Eastbourne, although the majority of this growth will be in leisure rather than retail. Comparison goods are expected to drive future requirements for additional retail floorspace in Eastbourne over the Local Plan period, significantly outstripping demand for convenience goods floorspace.

**Table 2: Retail and leisure floorspace requirements**

<b>Use</b>	<b>Floorspace Requirements (GEA) sqm 2015 - 2035</b>
Comparison Retail	42,825
Convenience Retail	5,905
Food and Beverage	7,310
<b>Total</b>	<b>56,040</b>

It is considered that the majority of this need would be required after 2025 as the recently opened extension to the Beacon Shopping Centre has provided approximately 15,000 sqm of retail space that will meet forecast needs over the next few years. In addition, the extension to Langney Shopping Centre will contribute 5,000 sqm towards meeting the requirement.

Further work:

- Update the employment floorspace requirements for the plan period

Eastbourne has potential capacity for around 80,000 sqm of commercial floorspace<sup>18</sup>; however not all sites will be suitable for all uses. For example, office space could sit well adjacent to residential uses, whilst some heavy industrial uses would not. As such, it is estimated that there is capacity for up to: 17,000 sqm of office uses, 30,000 sqm of industrial and warehouse uses; and 25,000 sqm of retail and leisure uses.

The broad locations that could potentially deliver new office, industrial and warehouse space are identified on Map 1. The Local Plan will allocate suitable sites for new employment or mixed use development.

<sup>18</sup> Eastbourne Strategic Housing & Employment Land Availability Assessment [SHELAA] (2019)

**Map 1: Broad locations for potential commercial development to 2038**



**Direction of Travel:**

To provide sufficient commercial space to meet the forecast need for jobs, the Local Plan will:

- Allocate sites for employment use

It is anticipated that the new Local Plan will be able to meet the need for office space in full, but that there will be a shortfall between the need for industrial and warehouse space and the amount that can be accommodated in Eastbourne.

Discussions with Wealden District Council have indicated that there may be capacity within Wealden to meet some of the shortfall in employment space that cannot be met in Eastbourne.

Sites that are appropriate for industrial uses are generally considered suitable for warehouse uses as well. However, warehouse uses are likely to generate significant lorry movements and as such prefer to be in close proximity to the major road network.

Given the fact that Eastbourne is unable to meet the full need for both industrial and warehouse uses within the Borough and some of this could be accommodated in Wealden, it is considered the Eastbourne should concentrate on delivering industrial uses, with the warehouse need being directed to Wealden where it would be more sustainably located closer to the A27 and A22 within the South Wealden part of the functional geographic area. This would prevent unnecessary vehicles

movements into Eastbourne and also provide space in locations that may be more attractive to potential occupiers.

### *Office Space*

In 2017, there was approximately 73,000 sqm of office space in Eastbourne. Around 70% of the total office stock was located in the town centre, with around 10% within the designated industrial estates and 20% in other locations around the town.

Current planning policies allocate land for 28,750 sqm of additional office floorspace. The existing office space allocations are:

- Town Centre: Land adjacent to the Railway Station - 3,750 sqm (as part of a mixed use development)
- Sovereign Harbour: Site 6 – 13,875 sqm
- Sovereign Harbour: Site 7a – 9,250 sqm
- Intensification of Industrial Estates – 1,875 sqm

This is in excess of the amount of office space that more recent forecasts suggest is needed in Eastbourne over the next 20 years, which means that not all of the existing office space land allocations will need to be carried forward into the new Local Plan.

Research<sup>19</sup> has suggested that successful local economies have a higher proportion of office space than retail space in their town centres, and they have better quality of office space in their town centres compared to their suburbs. This would indicate that the future office provision would be best directed towards the town centre.

However, Sovereign Harbour offers occupiers a high quality office environment and potentially a better work/life balance for employees, which might appeal to larger employers who would relocate into Eastbourne for this reason.

There may be potential to split the provision between the Town Centre and Sovereign Harbour, although office space is often more successful and attractive to occupiers when it is part of a critical mass of office space that creates the identity of a business district. Splitting the provision across multiple sites may not allow this critical mass to be created.

#### Options:

In order to ensure that new office development is provided in the most appropriate and sustainable locations, should the Local Plan:

- a) Direct the future provision of office space towards or close to the town centre
- b) Direct the future provision of office space to Sovereign Harbour
- c) Provide a balance of provision between the town centre and Sovereign Harbour

<sup>19</sup> Centre for Cities (2018), Building blocks – the role of commercial space in Local Industrial Strategies

In order to encourage higher-value jobs that tend to be more office-based, the Local Plan could seek to make additional provision for office space, over and above the forecast need. However, it is likely that this will be at the expense of land that might be required to meet other development needs.

Question on provision of office space:

- In order to encourage higher-value jobs, should the local plan make additional provision for office space, over and above the forecast need?

The amount of office space in Eastbourne has fallen by 23,000 sqm since 2000, with the majority being lost in the last five years. One of the main reasons for this loss has been changes to permitted development rights that have meant office space can be converted to residential uses through the prior approval process without the need for planning permission. Since 2013, approximately 18,000 sqm of office space has been lost or is due to be lost to residential use through permitted development, of which 14,000 sqm was lost from the town centre.

Some of the office stock that has been lost will have been low quality accommodation that was unable to meet occupier requirements. However there is concern that the trend could soon result in better quality office stock being lost.

Despite the loss of office space through permitted development changes of use to residential, the proportion of vacant stock is now higher than the five year average. This could suggest that the available stock is not of the type, style and location that appeals to office occupiers.

As the supply of office space becomes more focused on higher quality as a result of redundant stock being removed through redevelopment, rents should strengthen and therefore make new office development more viable. However, the oversupply of poor quality stock is likely to have had some impact in terms of suppressing values within Eastbourne.

Office to residential permitted development rights can be withdrawn through an Article 4 Direction if there is sufficient justification for doing so. Once these rights have been withdrawn, the Local Plan can put forward a policy to protect office space from change to other uses unless there are exceptional circumstances. This protection could be applied to specific locations such as the town centre, or it could be sought across the whole Borough.

Options:

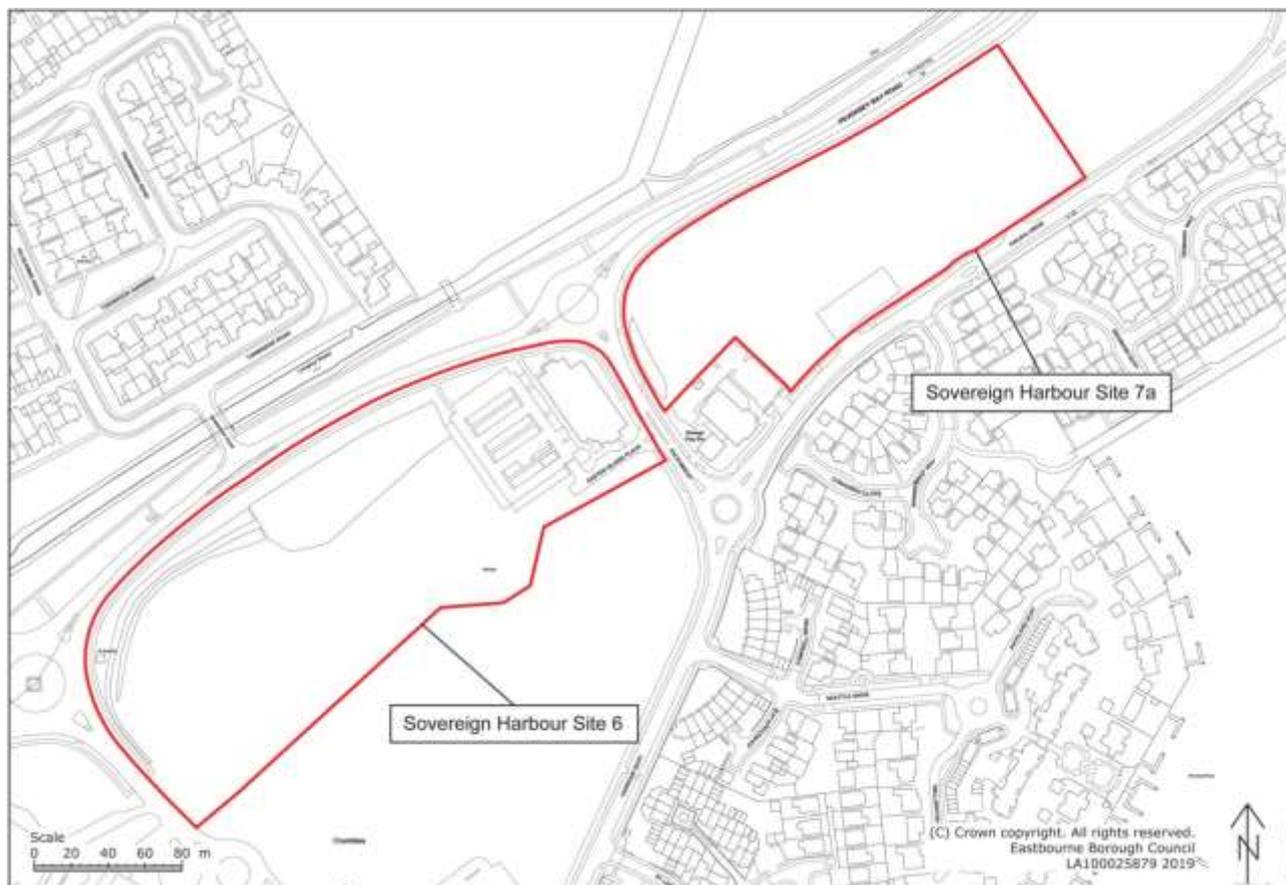
In order to ensure an appropriate supply of office space in terms of quality and quantity of the existing stock, should the Local Plan:

- a) Seek to protect office space across Borough; or
- b) Seek to protect office space in specific areas (e.g. Town Centre); or
- c) Provide no specific protection against the loss of office space.

*Sovereign Harbour*

Site 6 and Site 7a at Sovereign Harbour, as identified in Map 2, are currently allocated to provide additional office space. In the event that it is considered most appropriate for office provision to be directed towards the Town Centre rather than Sovereign Harbour, there would be no further requirement for Site 6 to provide office space. This may offer the opportunity to increase the range of employment uses that the site could accommodate.

**Map 2: Sovereign Harbour Site 6 and Site 7a**



There are recent and local examples of light industrial parks being successfully developed in close proximity to residential areas, and Site 6 may be an opportunity to help meet the need arising for light industrial uses, which are industrial uses that do not create excessive noise, dust or odour and are therefore compatible with the residential area. Light industrial uses would not include retail.

**Question on Sovereign Harbour Site 6:**

- Would Sovereign Harbour Site 6 be an appropriate and attractive location for light industrial development?

At the current time, Sovereign Harbour Site 7a is no longer needed to meet the office space forecast. However, it is considered the land should be developed for alternative employment-generating use to support the local community at Sovereign Harbour.

**Question on Sovereign Harbour Site 7a:**

- What employment-generating uses would be appropriate for Sovereign Harbour Site 7a?

*Industrial Estates*

The town’s Industrial Estates are the main focus for industrial and warehouse premises, with 80% of industrial floorspace and 90% of warehouse floorspace being located within the town’s seven main industrial areas identified in Map 3. They are also important locations to accommodate the types of uses that could be incompatible with other uses.

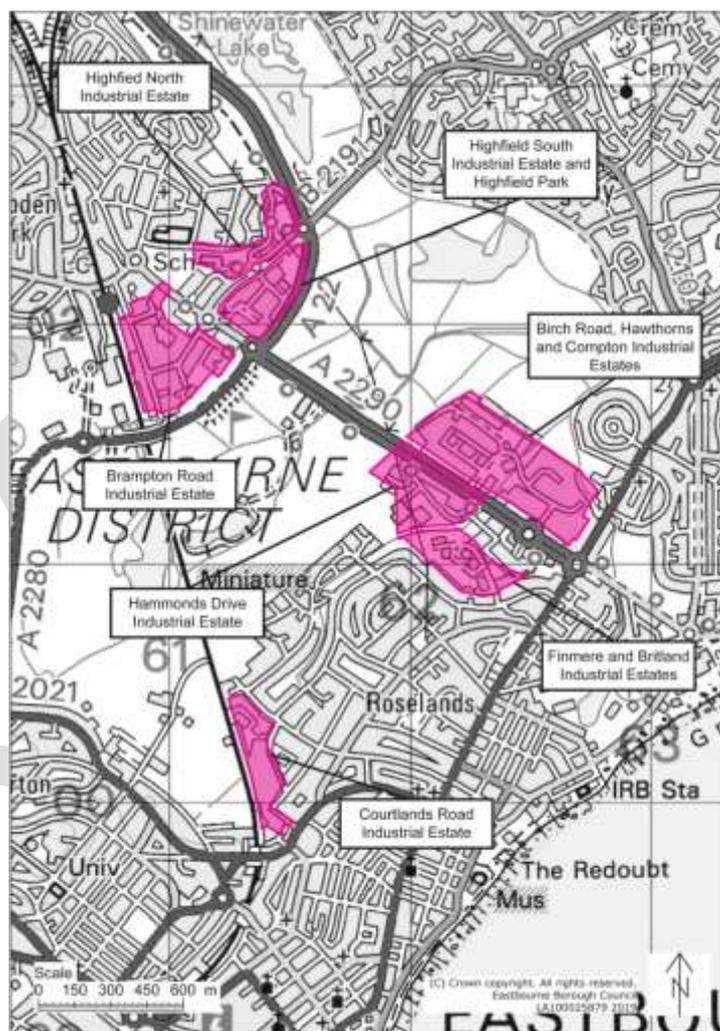
However, there is pressure on industrial estates to accommodate other non-industrial uses that are important for the local economy and job creation but cannot find suitable premises elsewhere. This raises a number of issues.

As established locations, and with few other options for the provision of industrial and warehouse space, the industrial estates could offer opportunities for successful redevelopment and intensification to provide more and higher quality employment space, especially as a number of buildings on the industrial estates are expected to reach the end of their economic life over the plan period. The loss of premises to non-B class uses will limit the long-term potential for redevelopment to take place.

In addition, a large collection of non-B uses can erode the business nature of an industrial estate, which tends to have an adverse effect on occupier and investor perceptions of the location. This in turn could have an adverse effect on the integrity of the Industrial Estates by undermining the B class nature of the Industrial Estates and driving existing occupiers out.

However, placing restrictions on the types of use that can be accommodated in industrial estates means that some businesses that could make important contributions to the local economy or provide a service that meets a local need may be driven out of Eastbourne or fail as a business altogether.

**Map 3: Eastbourne's Industrial Estates**



Options:

In order to maintain the industrial estates as important economic drivers for the town, should the Local Plan:

- a) Take a restrictive approach to maintain B uses within industrial estates; or
- b) Take a more flexible approach to non-B employment generation uses within industrial estates

Additional industrial and warehouse space could be created through the intensification of existing industrial estates, and there have been numerous examples of this happening over recent years.

Over the plan period a number of buildings on the Industrial Estates are expected to reach the end of their economic life and these will offer opportunities for redevelopment. This will enable the intensification of sites, enabling them to use space more efficiently and accommodate greater levels of activity.

One of the issues with the intensification of industrial estates relates to the provision of car parking. Around 65% of the nearly 8,000 people who work on the town's industrial estates travel to work by car. To support carbon reduction through modal shift, and also to create more capacity for development on the industrial estates, the Local Plan should support sustainable travel options to these locations and reduce the availability of parking.

#### Direction of Travel:

To increase the amount of employment space on the industrial estates, the Local Plan will:

- Support the intensification of existing sites in industrial estates to provide additional and better quality employment floorspace
- Encourage increased sustainable transport provision to industrial estates to reduce need for parking and free up more space for intensification

Whilst the vast majority of the town's 240,000 sqm of industrial and warehouse floorspace is located within the main industrial estates, around 10% is located in small business estates within the residential area.

These small employment areas are important for business start-ups and can provide employment opportunities for residents in the locality, helping to reduce the need to travel. However they can also cause nuisance for people living close by. Consequently, such areas offer the potential for redevelopment to provide additional homes on previously developed land in established, sustainable locations. The Local Plan should set out a strategy for addressing these areas.

#### Options:

How should the Local Plan address small employment areas within the residential area:

- a) Provide protection against redevelopment and retain for employment uses; or
- b) Encourage redevelopment and the relocation of existing businesses to the major industrial estates

Question on business start-ups:

- Is there an appetite for new live/work space? How can the local plan support entrepreneurship and small business start-ups?

*Retail*

The town has a number of district and local shopping centres and small shopping parades that play a vital role in providing a range of services in locations that are accessible to local communities.

The NPPF requires that the Local Plan identifies a hierarchy of shopping centres based on their scale and function. The Local Plan will encourage a range of shops, services and facilities consistent with the individual centre's position in the retail hierarchy, and require that the new retail development is first directed to the most appropriate shopping centre before 'edge of centre' or 'out of centre' locations are considered.

In neighbourhoods that are not currently well serviced by existing retail provision, new development of convenience retail may be appropriate to address this deficiency. This may also help reduce social exclusion problems within these areas and reduce the need to travel.

Direction of Travel:

To encourage good access to appropriate shopping facilities, the Local Plan will:

- Identify a hierarchy of shopping centres
- Ensure that new retail development is directed to appropriate shopping centres on the basis of the scale and function of centre
- Allow new local convenience stores outside of existing shopping centres where there is a need and the development would not adversely impact existing centres

Eastbourne has a number of out of centre retail parks that would fall outside of the retail hierarchy. These retail areas encourage single trips as they do not tend to provide a wider range of services and promote car travel through the provision of large car parks. In addition, they can have an impact on the viability of the town centre by drawing people out to their peripheral locations.

National policy promotes a 'town centre first' policy. The NPPF requires that retail and leisure developments outside of town centre that exceed a threshold of 2,500sqm of floorspace are required to undertake an impact assessment to evaluate the impact of the development on the town centre. However, this threshold is considered to be very significant for Eastbourne, and therefore the Local Plan should consider whether a lower threshold needs to be set.

Options:

To ensure out of centre retail does not impact on the town centre, should the Local Plan:

- a) Keep NPPF threshold for impact assessment for out of centre retail; or

b) Set a lower threshold for impact assessment for out of centre retail

### *Local Labour Agreements*

Over recent years, Eastbourne Borough Council has sought local labour agreements for major development to require local employment and training measures as part of development proposals, with the objective of improving training and skills in the town for the future economic development of the Borough.

This approach has resulted in an increase in work placement for students and unemployed people, NVQ starts and apprenticeships, as well as the use of local contractors in development and the employment for local people as part of the operation of the final property. It is anticipated that the Local Plan will continue to place this requirement on major development proposals.

### Direction of Travel:

To encourage local employment and training that supports the local economy, the Local Plan will:

- Require local labour agreements on major development, including operational stage for commercial development

### Town Centre

Eastbourne Town Centre has recently benefitted from a £85 million private investment that resulted in an extension to the Beacon Shopping Centre to provide 22 new and high quality retail units, 7 restaurants and a new 9 screen cinema. To complement this, the first phase of the Town Centre Improvement Scheme, which aims to make significant improvements to the public realm in the main shopping area, is soon to be completed.

Low vacancy rates of around 5% are indicative of a well-functioning town centre and are significantly lower than the national average. Retail growth in Eastbourne over recent years has been predominantly within the pharmacy, health & beauty and clothing industries and these sectors are forecast to be the areas that will continue to grow in the future.

However, like many other towns and cities, occupancy of retail units has been affected by the emergence of on-line retailing, and as a result the uses in the town centre are diversifying. Cafés, coffee shops, restaurants and health and beauty businesses that offer experiences rather than just products have been replacing retail in less central locations of the town centre.

This reflects national research that suggests that the fundamental structure of Britain's town centres has changed from goods transaction to one of consumption of food and experiential services. As a result, town centres that retain too many retail units could struggle and some of these need to be re-used for alternative uses that will make a contribution to the success of the town centre.

With uncertainty existing as to the nature of future retailing, the Local Plan needs to provide sufficient flexibility to enable the town centre to maximise future provision. An increasing population

and potential growth in visitor numbers also presents opportunities to support additional outlets, particularly in the food & drink sector.

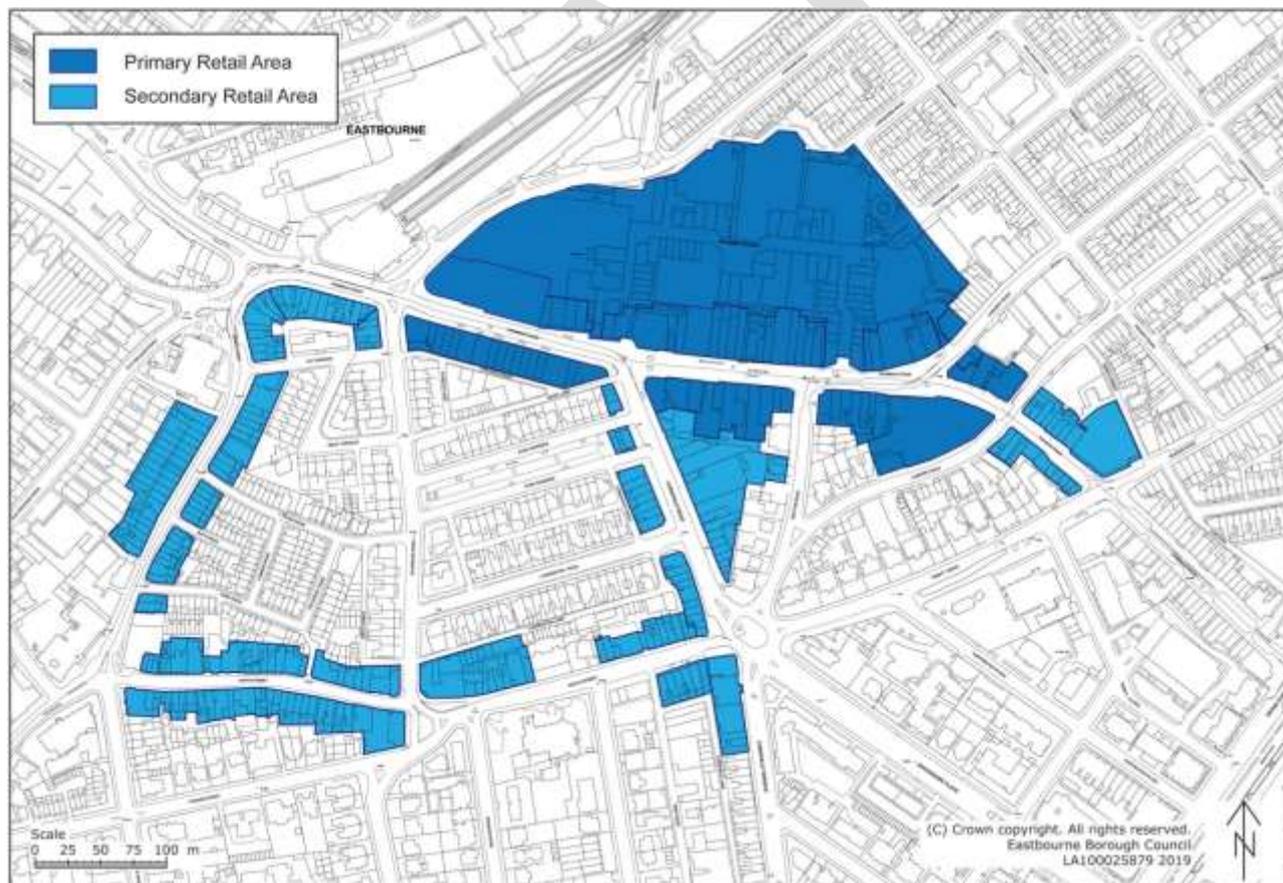
In order to plan for a successful town centre, the new Local Plan must take account of the shops still operating but it must explicitly not be predicated on retail alone as the central activity for the future.

### *Town Centre Retail*

Evidence suggests that many town centres in the UK have too much retail space and that bricks and mortar retailing can no longer be the anchor for thriving high streets and town centres<sup>20</sup>. It is suggested that town centres need to be repopulated and re-fashioned as community hubs, including housing, health and leisure, entertainment, education, arts, business/office space and some shops.

National Planning Practice Guidance expects planning policies to define the extent of primary shopping areas, and consider defining primary and secondary retail frontages. The primary retail area is currently defined in the Town Centre Local Plan, and includes the Beacon Shopping Centre and Terminus Road between Gildredge Road and Pevensey Road. A map of primary and secondary retail areas is presented in Map 4.

**Map 4: Current Primary and Secondary Retail Areas in the Town Centre**



<sup>20</sup> The Grimsey Review 2 (2018), <http://www.vanishinghighstreet.com/>

Existing planning policy requires that a certain number of units within different parts of primary retail area in the town centre should be retained in retail (class A1) use. This is designed to ensure that there is enough retail activity to support high levels of footfall.

Given the need to diversify town centres, but also ensure that there is sufficient retail activity to continue to attract shoppers who will also use the other services available, this approach may need to be reconsidered through the Local Plan.

A more flexible approach in the primary retail area might mean lowering the requirement for the number of units in a retail use and allowing a wider range of uses to be present. Alternatively, the requirement for a high number of units to be in retail use could be continued but within a reduced area.

Options:

In order to ensure that the provision of retail uses in the central part of the town centre is appropriate, should the Local Plan:

- a) Take a more flexible approach to the proportion of retail uses in primary retail area
- b) Reduce extent of primary retail area but continue to require the majority of the units in this area to be in retail use
- c) Continue the strict approach to retaining retail uses within existing primary retail area

A secondary retail area is also defined in the Town Centre Local Plan and covers a wider area including Grove Road, South Street, Cornfield Road and Terminus Road. Similar to the Primary Retail Area, existing planning policy places restrictions on the number of non-retail units that should be present in the Secondary Retail Area.

In the new Local Plan, the level of restriction could be reduced, either in terms of the area covered or the extent of the mix of uses within the area in order to encourage diversity of uses in the town centre. However, there is a danger that a concentration of certain types of non-retail uses could impact on the vitality of certain areas, introducing inactive and blank frontages that could reduce footfall and make them less viable as business locations.

Options:

In order to support economic activity in the areas on the edge of the central part of the town centre, should the Local Plan:

- a) Remove all requires for a certain proportion of units to be in retail use in secondary retail areas
- b) Take a more flexible approach to the proportion of retail uses in secondary retail area
- c) Reduce extent of secondary retail area but continue to require a proportion of the units in this area to be in retail use
- d) Continue the strict approach to retaining a high proportion of retail uses within existing secondary retail area

### *Diversifying the range of uses*

Outside of the primary and secondary retail areas, the clustering of similar uses can help develop a more robust structure to the town centre and increase legibility, making it easier for people to understand where they need to go to access particular services.

There are many interesting and distinctive shops and services across the Town Centre but they are spread out and usually fail to fully benefit from the kind of concentration that generates interest and footfall volume.

Cornfield Road, with its wide pedestrianised pavements and tree-lined streets, could be zoned to further improve the town's food and drink offer, whilst Little Chelsea (around the Grove Road / South Street area) has created itself as a centre for independent shopping with a similar minded food and drink offer.

However, the clustering of certain uses could be detrimental to the vitality of the town centre, particularly if uses are less active (e.g. Estate Agents) or have cumulative impacts on a local area, such as bars and pubs.

Evening and night time activities have the potential to increase economic activity within town centres and provide additional employment opportunities. However, the cumulative impact of this could be to create potential for noise, disturbance and antisocial behaviour in the Town Centre.

Consideration should be given to the extent to which the Local Plan should encourage 'zoning' of the town centre for similar uses, or if a flexible approach to the location of uses should apply across the town centre.

#### Options:

In order to encourage the diversification of uses within the town centre, should the Local Plan:

- a) Zone the town centre to identify appropriate locations for different uses
- b) Take a flexible approach to mix of uses throughout town centre

Encouraging a wider variety of uses, and therefore a greater number of people, into the town centre will be an important part of its continued success. The Local Plan should promote the Town Centre as a community hub incorporating health, housing, arts, education, entertainment, leisure, business/office space, as well as some shops.

Any potential relocation of education establishments, particularly University of Brighton and the East Sussex College Group campus, would result in a significant increase in the number of people using services and supporting businesses in the town centre, and therefore this relocation will be encouraged through the Local Plan.

#### Direction of Travel

In order to encourage a greater number of people to use the town centre on a day-to-day basis, the

**Local Plan will:**

- Identify sites and locations for additional arts, entertainment, leisure and education uses where appropriate
- Encourage relocation of universities and colleges into the town centre

*Residential*

The reintroduction of town central living through the creation of high-quality accommodation is integral to the revitalisation of the town centre. Not only will it give new communities easy access to a range of services that reduces the need to travel, but it will also support local businesses and employers and enable the town centre to move away from a restricted hours daytime economy.

Whilst it is essential that all new residential development exhibits outstanding contemporary designs that maintain the town's established reputation for quality, it is also important that the location of residential development within the town centre is appropriate. An area that is too focused on residential use could result in a change in dynamic and impact on the perception of that area as an economic location. There may also be conflict between residential uses and other uses, particularly those associated with the night-time economy.

On the other hand, the core area of economic activity could offer significant opportunities for new residential development, particularly through bringing empty space above retail units into residential use.

Consideration needs to be given to whether the Local Plan should limit new residential development to outside of the core areas of economic activity (i.e. primary retail areas) or if it should be acceptable throughout the town centre.

**Options:**

To ensure that new residential development makes a positive contribution to the town centre, should the Local Plan:

- a) Restrict the amount of new residential development that is provided in the core areas of the town centre; or
- b) Take a flexible approach to the location of new residential development throughout town centre

Increasing the number of homes in the town centre could be achieved through providing housing at higher densities in taller buildings. With the exception of South Cliff Tower, the tallest buildings in Eastbourne are located within the Town Centre, which means that it would be the most appropriate location for additional tall buildings in the town. However, it is important that any tall buildings are well-designed to limit any potential impact on the setting of the South Downs National Park.

**Direction of Travel:**

To increase the number of homes provided in the town centre, the Local Plan will:

- Identify locations for tall buildings in the town centre
- Set out design guidance for the development of any future tall buildings

### *Public Realm*

Phase 1 of the Eastbourne Town Centre Improvement Scheme is currently being implemented to provide an attractive pedestrian friendly environment, and to repair the structural integrity of the main carriageway and footways to Terminus Road, Cornfield Road and Gildredge Road, thereby promoting growth, employment and tourism.

Phase 2 will involve public realm improvements from Banker's Corner to Bolton Road and Langney Road, including additional pedestrianisation and the creation of a civic space that continues the character, vibrancy and palette of materials used in Phase 1.

The further pedestrianisation of streets and public realm improvements, particularly those within the primary and secondary retail areas, could help to enable car-free development and make the town centre an attractive and desirable location to spend time. There are different levels of pedestrianisation, from full pedestrianisation with access by vehicles for servicing reasons only, to schemes that prioritise pedestrians and discourage car access without removing access when necessary.

Decisions on pedestrianisation of streets in the Town Centre will be made in partnership with East Sussex County Council as highways authority, however the Local Plan can identify what level of support should be given to increased pedestrianisation of streets within Eastbourne Town Centre.

#### Options:

What principle level of pedestrianisation of town centre streets should be given in the Local Plan:

- a) Support the full pedestrianisation of streets in the Town Centre; or
- b) Support for the creation of pedestrian-friendly streets / weekend only pedestrianisation of streets in the Town Centre; or
- c) Limited support for the pedestrianisation of streets in the Town Centre

### Tourism

Tourism is crucial to Eastbourne's economy, and a significant proportion of tourism-related income is generated through overnight visitors staying in the town's hotels, guesthouses and holiday flats. In order for Eastbourne to continue to thrive as a tourist destination there needs to be an appropriate supply of accommodation to cater for visitors.

Eastbourne has approximately 250 accommodation establishments (including hotels, guest houses, Bed & Breakfast and self-catering lets) with a total of around 3,500 rooms. 63% of Eastbourne's hotels are independent establishments – the second highest proportion in the country after Blackpool.

Visitor Research conducted in 2012 indicated that accommodation usage in Eastbourne varies significantly by trip type and age of visitor. Hotels are more popular for those on a repeat visit, for couples, and older visitors, whilst B&B establishments have greater appeal amongst first time visitors, especially the under 35s.

Despite Eastbourne being stereotyped as 'only for old people', and although older visitors remain an important part of Eastbourne's visitor market, they are by no means as dominant as might be expected. The largest proportion of visitors falls into the 'middle aged' group - four in ten are aged 35-54 years. However, only one third of visitors consist of families with children.

Over recent years, changes in holidaying behaviour has meant that overnight tourists are taking shorter but more regular trips, and are more demanding of higher quality accommodation. Eastbourne has a high concentration of independently-owned tourist accommodation in the 2- and 3-star categories, which can struggle to meet modern standards, particularly as many are within historic buildings. This may mean that lower quality accommodation may become unviable as it is unable to be upgraded. However, significant losses of tourist accommodation may mean that there is not enough supply to cater for demand, particularly in peak periods, which could result in tourists being discouraged from visiting the town.

#### *Tourist Accommodation*

In Eastbourne, a number of hotels are located immediately adjacent to the seafront, with the areas immediately behind the seafront being a mixture of residential and tourist accommodation. Many of the properties in this area were initially built as residential properties, which means that there is pressure to convert the buildings used as tourist accommodation back into residential use. It is important to recognise that in such areas, residential and tourism uses can co-exist and that one use does not necessarily have to dominate.

The hotels fronting the seafront, from the Western Lawns down to Treasure Island, give the seafront a locally significant character that makes a particular contribution to the town as a destination. The importance of well-maintained hotel façades is crucial to the character and appearance of the seafront, and also these locations are where tourist accommodation will be most viable due to the sea views.

Current planning policy designates an area known as the Tourist Accommodation Area (Map 5), which represents what is considered to be the area where visitors would most expect to find visitor accommodation. Current planning policy expects that new tourist accommodation should only come forward within this area, and that the loss of tourist accommodation in this area would only be permitted if it can be demonstrated that the tourist accommodation is unviable.

**Map 5: Tourist Accommodation Area**

The current policy has been used on a number of occasions to prevent visitor accommodation from being lost to other uses. It has been argued that this policy approach is overly restrictive, meaning that a large amount of lower quality and unneeded accommodation is protected and resulting in an oversupply of rooms.

Removing the Tourist Accommodation Area designation would allow market forces to dictate the supply and demand for tourist accommodation. This presents a risk that a significant proportion of tourist accommodation might be lost to other uses that may not bring the same economic benefits to the area as tourism.

Reducing the area of that which is within the Tourist Accommodation Area designation would effectively mean removing some secondary parts of the seafront from policy restrictions on change of use, whilst still protecting the key locations on the seafront for visitor accommodation. However, in order to ensure there are sufficient opportunities for new tourist accommodation, a wider 'core area' could be identified as locations where new tourist accommodation would be acceptable.

If there is a requirement for new tourist accommodation to be located within a tourist accommodation area, there is scope to expand this area although this will result in the protection of a greater number of tourist accommodation properties that may cause an oversupply of lower quality accommodation and stifle improvements to the overall quality of the stock.

**Options**

In order to ensure that Eastbourne provides an appropriate quality and quantity of tourist accommodation, should the Local Plan:

- a) Retain the existing tourist accommodation area and area-specific retention policy
- b) Abolish the tourist accommodation area and retention policy, and allow new hotels to come forward in other locations across the town
- c) Shrink the tourist accommodation area and area-specific retention policy but identify new core area where new hotels could be located

- d) Expand the tourist accommodation area and area-specific retention policy but require new hotels to be located with the tourist accommodation area

The £54 million transformation at Devonshire Park to create a thriving and nationally important cultural and tennis destination with new state of the art conference space and restaurant/café facilities will put Eastbourne on the map as a top cultural, sporting and conference destination.

It is important that the right type and style of tourist accommodation is available to support the conference sector, which could include the provision of branded midmarket hotels that are currently lacking in Eastbourne. Therefore the Local Plan needs to consider whether a site should be allocated for additional tourist accommodation.

Question on allocating sites for tourist accommodation:

- Should the new Local Plan make specific allocations for new tourist accommodation?

Eastbourne's clean and elegant seafront is one of the Town's most important features that distinguishes it from most other seaside resorts. An important component of the Seafront is the relatively un-commercialised façade of hotels and guest houses, which is an approach that the Local Plan will continue.

Continuing the up-grading and improvement of tourist accommodation is seen as vital to the success of the tourism industry, so improvements to the quality of tourist accommodation will be supported, subject to carbon reduction and conservation issues.

Direction of Travel:

In order to support tourism, the Local Plan will:

- Restrict changes of use of properties on the seafront to commercial or retail uses (other than hotels and guest houses)
- Support upgrading of existing hotels and guesthouses
- Safeguarding conference-related facilities

*Tourist Facilities and Attractions*

Eastbourne has a diverse range of tourist attractions with a particular strength in attractions that are unique to a traditional seaside resort, supported by other leisure attractions.

The Visitor Research conducted in 2013 indicated that tourists would like to see the provision of more 'wet weather' facilities, more cultural facilities and the provision of a water park. These were particularly important attractions for younger visitors, who are less well represented in terms of the current visitor market. However, it is also important that attractions and facilities cater for the existing market and that care is taken not to alienate existing visitors happy with the current offer. Consideration needs to be given to whether additional tourist attractions and facilities should be

directed towards the Seafront area as the focal point for tourism but where there is little available space, or if new tourist attractions and facilities could be located elsewhere in the Borough.

Question on the locations for new tourist attractions:

- Should the new Local Plan set out preferred areas for new tourist attractions and facilities?

One of the main attractions for people coming to Eastbourne is the seafront, and the majority of these people would like to be able to use the beach and experience a typical seaside holiday. Therefore it is important that appropriate seaside activities are provided and can take place in order to ensure that visitors are not disappointed.

It is clear that the nature and character of the seafront changes in terms of landscape, land use and activities along its 6km length. These differing characteristics account for the unique appeal and positive qualities of the seafront.

Consideration should be given in the Local Plan to what extent land uses, activities and protection policies are 'zoned' to specific areas of the seafront.

Providing particular locations where seafront related uses are focused could help people better understand the seafront and may also mean that areas that are currently under-utilised will be better used. On the other hand, it may be unduly restrictive to the provision of new activities.

Question on the zoning of the Seafront:

- Should the new Local Plan identify specific zones on the seafront for particular uses?

## Quality Environment

### Summary of Issues:

- ❖ The contribution that the South Downs National Park makes to Eastbourne
- ❖ Potential landscape impacts of buildings on views to and from SDNP
- ❖ High levels of tidal flood risk and ensuring sea defences are sound
- ❖ High levels of fluvial, surface and groundwater flood risk
- ❖ Lack of capacity of water disposal infrastructure, especially in the town centre
- ❖ The desire to protect Eastbourne Park and safeguard of land for flood risk management
- ❖ How to achieve biodiversity net-gain on development, which likely to become a mandatory requirement of national policy
- ❖ The need to protect natural and semi-natural greenspaces
- ❖ Ensuring that development has an enhancing impact on the quality of townscape
- ❖ The protection of historic buildings in a manner that enables them to retain a viable use
- ❖ Impact of new development on Conservation Areas

Eastbourne is well known for its high quality natural and built environment, including over 4 miles of outstanding unspoilt coastline which includes Beachy Head and the Heritage Coast. It is a gateway to the eastern end of the South Downs National Park, which accounts for over 40% of the Borough and is under the planning jurisdiction of the South Downs National Park Authority. The Borough's downland includes 485 hectares (1,200 acres) of open access land as well as sites of special scientific interest (SSSI). It is important that new development respects the setting of the South Downs National Park and the contribution that it makes to Eastbourne.

Eastbourne Borough is at risk of flooding from a number of sources, particularly the sea, surface water and groundwater. Approximately 45% of the plan area is within an area that is potentially at risk of tidal flooding, although this area is protected by sea defences that are maintained to prevent a 1 in 200 year flood event. Due to a significant part of the town being within an area at risk of flooding, some development will come forward in this area but measures will need to be incorporated into the development to ensure that it stays safe.

Surface water flooding is the most common source of flooding, and the chalk geology of the South Downs to the west of the town and low lying marshland to the east contributes to groundwater flooding issues.

Eastbourne Park, which is the flat low-lying landscape of approximately 400 hectares of grazed wetland at the centre of Eastbourne, plays a vital role as a flood storage area. Many parts of Eastbourne Park are also rich in biodiversity and have national archaeological significance.

Eastbourne has a number of recognised sites of biodiversity importance. The largest habitat in Eastbourne is coastal & floodplain grazing marsh, and there are also significant areas of lowland calcareous grassland and deciduous woodland within the South Downs part of the Borough. In

2016/2017 there were 13,394 records of protected or notable species in Eastbourne, including the National Park area.

The Pevensey Levels, located less than a mile from the eastern boundary of Eastbourne Borough, is a designated Ramsar site, National Nature Reserve (NNR), Special Area of Conservation (SAC) and SSSI. Although this is not within the Borough, it is within very close proximity and is hydrologically linked with Eastbourne Park. A Habitat Regulation Assessment (HRA) will be undertaken to assess the potential impact of development in Eastbourne on the Pevensey Levels and other European designated habitats within the wider area.

It is estimated that around 43% of the Borough outside of the National Park is open space, with a further 17% forming domestic gardens. This, along with the many tree-lined streets, is one of the reasons that Eastbourne is seen as a green town.

In addition to this, Eastbourne has a rich Historic Environment from which the very character of the town is derived. Eastbourne has over 250 listed buildings and almost 10 per cent of the built up area is protected with Conservation Area status. Not only does this high townscape quality increase tourism, it also makes the town an interesting and varied place to live.

### Landscape

The overall diversity and distinctiveness of Eastbourne's landscape are considered to be a major environmental asset, contributing significantly to the Borough's uniqueness and to the quality of life for Eastbourne's communities.

The Borough of Eastbourne has a number of different landscapes, each offering ecological interest and potential. Part of the Borough's landscape is within the South Downs National Park, within which Eastbourne Borough Council does not have planning jurisdiction. However, because this area forms such an important part of the setting of Eastbourne, the issue of landscape needs to be considered together and addressed within the Eastbourne Local Plan.

The main landscape character types in the Borough are:

- Open Downland – elevated and expansive rolling chalk downland with dry valleys and scarp slopes
- Major Scarps – steep north and east facing chalk escarpment, generally covered in dense woodland, forming a distinctive edge to the chalk downland
- Scarp Footholds – smooth, visually prominent, generally convex chalk outcrops at the base of the steep scarp where the slope has been eroded, forming a transition between the scarp and the urban area
- The Levels – flat, low-lying landscape of grazed marsh, lakes and wet meadows, woven by reed filled ditches and channels
- Rugged Coast – rugged indented and varied coastline with dramatic chalk cliffs with an inter-tidal shoreline
- Smooth Coastal Strip – stretches of gently graded flint shingle beaches with wooden groynes and concrete retaining structures

Protecting features and patterns that contribute to landscape diversity, including enhancing their quality, character and function where necessary, needs to be considered within the Local Plan.

The South Downs forms an important backdrop and a distinctive skyline to the town that can be viewed from many places in the urban area. The Local Plan will need to consider the impact of development on the visual enjoyment of this scene from key locations.

In addition to this, the urban area also provides the setting to the South Downs and prominent sites as seen from the Downland can detract from its enjoyment, so development needs to be sympathetic to its impact from these distant views. The Local Plan should contain new policies that consider the character of the SDNP in new developments and the importance of the SDNP for the local economy.

Question on views from the South Downs National Park:

- Where are the key views to and from the South Downs National Park?

Direction of Travel:

In order to reduce the landscape impact on new development, the Local Plan will:

- Provide policies for the location and design of new development that protect setting of the National Park

Given the pressure for development within Eastbourne, consideration will need to be given to how the height of development can contribute towards meeting needs without having an unacceptable impact on the landscape.

At present, the Town Centre has the highest number of taller buildings, but overall the area is mostly within a range of between 3 to 5 storeys in height. Buildings of six or more storeys can become recognisable landmarks, and can signal important locations in the town. Because of their visual prominence, tall buildings should have special architectural quality and character, or distinctive and memorable features. However, tall buildings can also be an intrusive and unwelcome addition to the townscape, particularly when they are out of scale with their surroundings. As such, it is unlikely that tall buildings will be appropriate in all areas of the town.

Question on tall buildings:

- Should the Local Plan identify areas that have potential to accommodate tall buildings (6+ storeys)?

Further work will be done with SDNPA to identify key views to and from the National Park and ensure that these are protected.

Further work:

- Identify key views to and from the National Park

Existing landscape features such as trees, hedgerows and walls play an important role in the unique character of Eastbourne and make a valuable contribution to the otherwise sometimes harsh lines of the built form. Trees are perhaps one of the most important features in this regard and make a significant impact on the character of the town. The Local Plan will seek to protect these landscape features as it is considered that when more of the existing features that are retained, development is more successfully integrated into the local environment.

Good and appropriate landscaping within new development is vitally important to retain and enhance the unique character of Eastbourne. Therefore, the Local Plan will expect new development to contribute to that character by respecting the quality of the environment with complementary planting that is sympathetic and appropriate to the locality.

#### Direction of Travel:

In order to that new development contributes to the character of Eastbourne, the Local Plan will:

- Seek the protection and retention landscape features within new development
- Require appropriate landscaping to be provided within new development

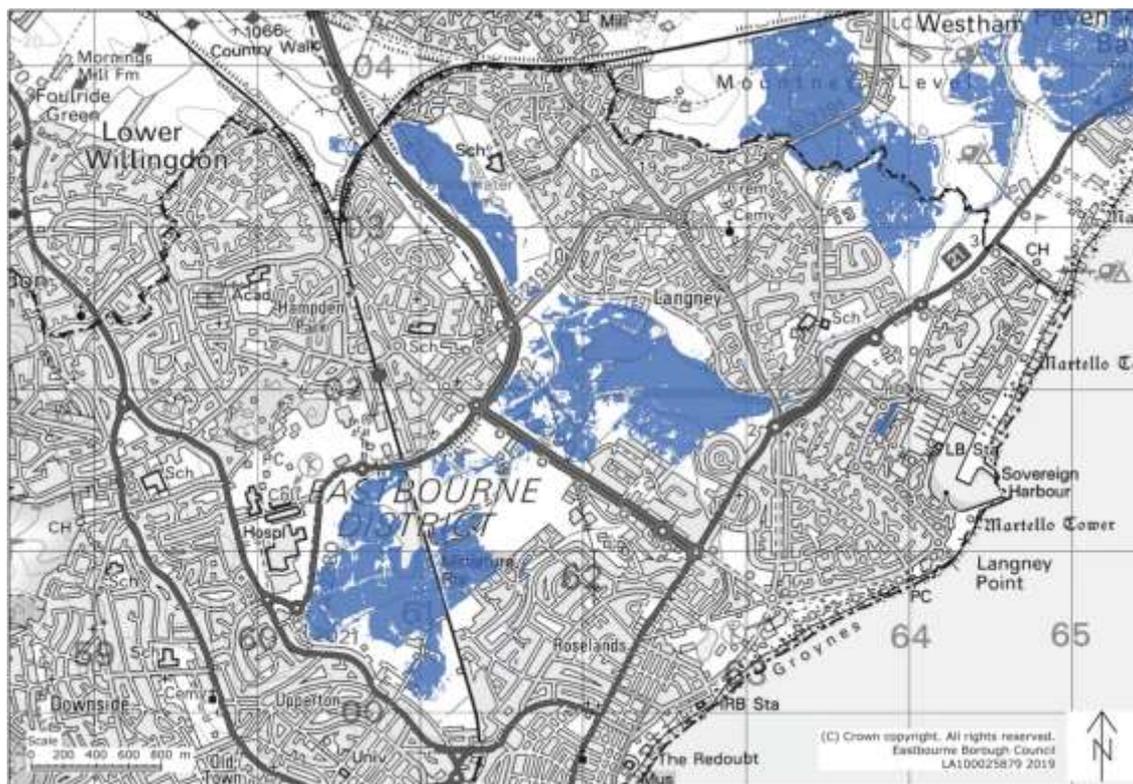
#### Water and Flooding

Flooding is a particular issue for Eastbourne. Eastbourne is acknowledged as having high levels of surface water, groundwater, coastal and fluvial flood risk, and this is an important issue that needs consideration through the Local Plan, especially in light of sea level rise as a result of climate change.

It is estimated that there are around 6,000 properties that are at risk of flooding during a 1 in 200 year event. Several areas were identified as being particularly vulnerable to surface water flooding, and there is a particular problem with combined surface and foul water sewers, which means that capacity is more limited and can cause flood events. This could be a constraint to new development in some areas, and further work will be undertaken with East Sussex County Council, Environment Agency and Southern Water to identify infrastructure constraints and improvements that are required.

There are parts of Eastbourne that are designed to flood from fluvial surface water sources in order to protect the urban area. These areas are known as functional floodplain, and are mainly concentrated within Eastbourne Park in the centre of the town. National policy restricts development that is not water compatible from taking place in the functional floodplain (Flood zone 3b), and as it is so important for Eastbourne that these areas are safeguarded for flood risk management reasons, this restriction will be reiterated in the Local Plan. The extent of the functional floodplain is identified in Map 6.

**Map 6: Eastbourne's functional floodplain**



Further work will be undertaken to update the Strategic Flood Risk Assessment (SFRA) to ensure that the functional floodplain is accurately defined, taking into account the impacts of climate change.

**Further work:**

- Update Strategic Flood Risk Assessment and functional floodplain designation

Although large parts of Eastbourne would be at risk of tidal inundation, these areas are protected from flooding by sea defences that are maintained to a 1 in 200-year standard. However, as there is a residual risk of flooding behind defences due to a breach or overtopping, flood risk mitigation measures should be incorporated into development.

Because such a large proportion of Eastbourne is within the flood zone, it would not be possible to accommodate all development within areas that have the lowest risk of flooding. As such, new development will need to mitigate the risk of flooding and demonstrate that it will be safe, without increasing flood risk elsewhere.

Within development sites, vulnerable buildings should be located in areas where there is the lowest risk of flooding.

Vulnerable development in flood risk zones need to provide mitigation within the development, which would include ensuring that there is access to higher floors above the flood level (i.e. no self-contained ground floor only accommodation), increasing floor levels, and using flood resilient materials. However, in light of rising sea levels, consideration needs to be given to whether the

Local Plan can require that mitigation be applied to all development across the plan area, or just within the designated flood zone.

Question on flood risk mitigation:

- Should policies that resist basement residential development and self-contained ground floor accommodation apply across the whole plan area; or just within the designated flood zone?

The Local Plan will also contain policies that help to ensure that new development is resilient to flooding by requiring development that involves land raising to make compensatory provision for the loss of flood storage, restricting the amount of underground development in areas of high groundwater and requiring the use of permeable surfaces within development.

Direction of Travel

In order to ensure that new development is resilient to the affects of climate change in relation to flooding, the Local Plan will:

- Prevent new non-water compatible development within the functional floodplain
- Require development that involves the raising of land to make compensatory provision for loss of flood storage
- Allow no underground development (e.g. car parks) in areas of high groundwater
- Require all development that is located within a certain distance from seafront to be designed to withstand a tidal flood event
- Require use of permeable surfaces when creating hard standing as part of development

Sustainable Drainage Systems (SuDS) should be incorporated into new development to efficiently manage the drainage of surface water and help to prevent flooding. SuDS uses techniques to deal with surface water runoff locally, through collection, storage, and cleaning before allowing it to be released slowly back into the environment. However, incorporating SuDS into small development can be problematic and therefore other methods of reducing the risk of flooding need to be considered. The use of Eastbourne Park as a 'Strategic SuD' for flood water attenuation could be a solution, where contributions would be made in lieu of on-site SuDS to provide flood storage capacity, either in the form of lakes or improvements to the efficiency of the system.

Question on Sustainable Drainage Systems:

- Can Eastbourne Park be used as a 'Strategic SuD' to reduce the risk of surface water flooding, with new development required to make contributions to an Eastbourne Park Flood Storage Scheme?

## Eastbourne Park

Eastbourne Park is a large area of coastal and floodplain grazing marsh that provides a 'green heart' for the town (Map 7). Its primary role is as an essential flood storage area, but it also has ecological, archaeological and recreational importance to the town.

Eastbourne Park helps to prevent the urban area from flooding by storing water run-off, in lakes, in the ground and on the surface, and allowing it to flow out to sea at a controlled rate. Therefore it is important that the functional floodplain in Eastbourne Park is safeguarded for flood risk management purposes.

Eastbourne Park has a similar habitat to and is hydrologically linked with the Pevensey Levels, which has national and international environmental designations. Surveys have identified that part of Eastbourne Park contain a number of notable plant species, both in the ditches and the grazing land, and animal species that are protected by national legislation. This makes it ecologically important on a local level (it is currently being assessed for designation as a Local Wildlife Site) and there may even be potential for it to be recognised at a national level.

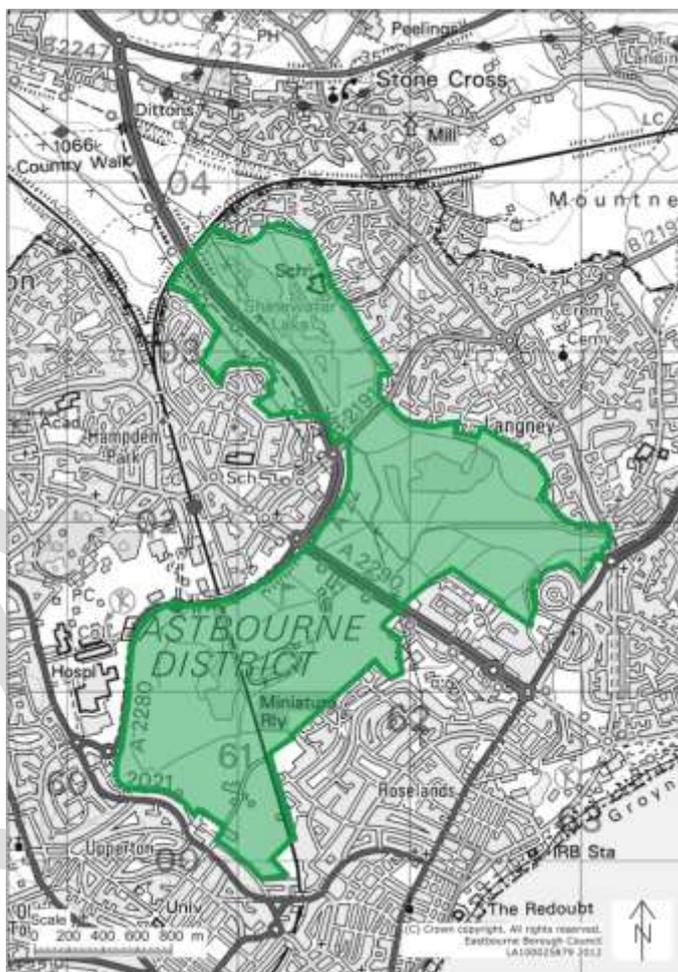
Eastbourne Park is already nationally important in terms of archaeology, particularly due to the discovery of a Bronze Age causeway in Shinewater Park that is now designated as a Scheduled Ancient Monument, and gives a firm indication that there could be important archaeology elsewhere in Eastbourne Park.

Consideration needs to be given to how the ecological, archaeological and recreational role of Eastbourne Park can be maintained and enhanced through the planning system.

A Local Nature Reserve (LNR) designation could facilitate a protection policy in the Local Plan, although the local authority must control the land, either through ownership, a lease or an agreement with the landowner.

A Local Green Space is a planning policy designation to provide special protection against development for green areas of particular importance to local communities. The NPPF sets out criteria against which a Local Green Space designating should be judged.

**Map 7: Eastbourne Park**



Alternatively, the Local Plan could include a protection policy without the back-up of any formal designation. As part of this, it will be important that an appropriate boundary for Eastbourne Park is defined, and this will be done through the Local Plan.

#### Options

In order to provide suitable protection for Eastbourne Park, should the Local Plan:

- a) Seek Local Nature Reserve designation for Eastbourne Park
- b) Seek to designate Eastbourne Park as a Local Green Space
- c) Provide protection for Eastbourne Park through a stand-alone policy

#### Direction of Travel

In order to ensure that Eastbourne Park has suitable protection, the Local Plan will:

- Define an appropriate boundary for Eastbourne Park

#### Biodiversity

Eastbourne's natural environment provides a home for plants and animals that are important locally, but also vital for a healthy and resilient planet. Many different issues facing the Borough can have an impact on Biodiversity and small changes can have a large impact on delicate ecological structures.

Within Eastbourne there are 19 discrete Local Wildlife Sites (LWS) within the Borough, which total 78 hectares. This amounts to 1.7% of the total area of the Borough, and includes chalk grasslands, coastal & floodplain grazing marsh, reed beds, woodland, waterbodies and vegetated shingle.

The NPPF requires the Local Plan to identify a hierarchy of international, national and locally designated sites of importance for biodiversity. The Local Plan will seek to put in place criteria based policies for development affecting these sites, particularly Local Wildlife Sites, which are most prominent in the Borough.

The Local Plan will seek to implement a hierarchy for development requirements in terms of biodiversity, on the basis that it should first look to avoid harm, then minimise the impact, mitigate the negative effects, and finally provide compensation elsewhere.

#### Direction of Travel

To ensure the protection of biodiversity and habitats, the Local Plan will:

- Criteria-based policies for proposals affecting different levels of the biodiversity hierarchy (i.e. higher protection at the top of the hierarchy)
- Establish a hierarchy for development affecting habitats that seeks to avoid, minimise, mitigate, and then compensate.

Although it is already encouraged through the NPPF, the Government's 2019 Spring Statement confirmed the intention to use the forthcoming Environment Bill to mandate 'biodiversity net-gain' in new development, which means that habitats for wildlife need to be enhanced and left in a measurably better state than they were pre-development.

This issue will need to be addressed in the Local Plan, and it is intended that biodiversity net-gain should be provided on-site and within the development in the first instance. However, due to the small size and scale of the majority of development sites in Eastbourne, it may not always be possible to achieve this on-site and therefore a mechanism for habitat creation or improvement elsewhere needs to be put in place. Consideration needs to be given to whether the biodiversity net gain should be provided locally to the development, or if improvements can be made to a more central area such as Eastbourne Park in order to achieve a biodiversity net-gain.

#### Options

Where biodiversity net gain cannot be provided on-site, should the Local Plan:

- a) Require development to contribute to Eastbourne Park as biodiversity net-gain area
- b) Require development to provide biodiversity net-gain on neighbourhood scale in local area

#### Green Infrastructure

Eastbourne has a large amount of natural greenspaces, from the South Downs to the west of the town, to Eastbourne Park through the centre and Mountney Levels to the east.

There are more than 180 hectares of accessible natural and semi-natural greenspaces in Eastbourne. This is equivalent to 1.75 hectares per 1,000 population, which exceeds the standard that was identified as being appropriate through the 2007 Open Space Assessment. This means that the current provision of accessible natural & semi-natural areas will be sufficient to provide for the needs of Eastbourne's population over the plan period. However, further investigation will be undertaken into how other natural and semi-natural greenspaces can become accessible in the future.

The Local Plan needs to strike an appropriate balance between meeting needs through development and ensuring the protection of natural and semi-natural greenspaces, which will mean that in sustainable locations land with the least environmental or amenity value may be allocated for development.

Development pressures means that smaller green spaces, often used for their amenity value, are at risk of being developed. Not only does this halt the public's use of these places, but it also impacts the green corridors that exist in the Borough. The network of green infrastructure, including the important green corridors that link them across the town, will be identified. The Local Plan should seek to resist the disruption of connectivity between green areas, through the layout and design of any new development.

Direction of Travel

The Local Plan will seek appropriate protection for green infrastructure through:

- Providing policy for the protection of identified natural and semi-natural greenspaces
- Identifying and protecting the network of green infrastructure and the green corridors linking them

Historic Environment and Townscape

Eastbourne is recognised for its finely preserved Victorian and Edwardian townscape and it's well maintained and managed urban heritage. The major reconfiguration of the town by the Duke of Devonshire in the mid-19<sup>th</sup> century formed the template for much what we still see today. The planned nature of the town and the consideration given to the quality of materials and standards of design are especially noteworthy, underpinning traditional reputation as a 'high end' resort.

Eastbourne has 12 Conservation Areas and over 300 Listed Buildings. These are designated heritage assets therefore have statutory protection and under the NPPF their conservation should be given great weight in determining planning applications. The condition of the historic estate within some of the Conservation Areas is variable. A systematic review of all 12 conservation areas over the coming years will audit the state of the protected estate, allowing for contraction and expansion as appropriate.

In addition to these designated heritage assets, Eastbourne also currently has five areas that have been designated as Areas of High Townscape Value and around 150 properties identified as Buildings of Local Interest. Although these are not considered worthy of statutory designation, their character and appearance is considered to be of sufficient local interest to warrant differentiating from their surrounding area.

However, these non-statutory designations do not allow a level of protection similar to that of Conservation Areas or Listed Buildings, despite the implication that there are much stronger

Map 8: Conservation Areas



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protections. As such, consideration should be given to whether the non-statutory designations of Areas of High Townscape Value and Buildings of Local Interest should continue to be differentiated through Local Plan policy, or if they should be considered for statutory designation if quality allows.

### Options

In relation to non-statutory heritage designations, should the Local Plan:

- a) Continue to identify non-statutory assets through Local Plan policy
- b) Remove policy protection from non-statutory heritage assets, and seek statutory designation for the assets that are of sufficient quality

All heritage assets have the potential to be negatively affected by inappropriate development, and the Local Plan will contain policies to ensure that this is considered as part of new development, including the protection of the setting and character of heritage assets. 'Backland development' (i.e. additional buildings within the curtilage of an existing building) is considered to have a significant impact on the character of Conservation Areas and therefore will be restricted through the Local Plan.

It is important that Eastbourne's built heritage is conserved, but this does not necessarily mean that the urban area must be 'preserved'. Change should be managed appropriately so that areas can adapt to circumstances in a way that keeps its heritage value intact.

Within these areas, good design will be key for new development. Development should seek to promote character in townscape by responding to and reinforcing locally distinctive patterns of development. However, this does not mean that new development should seek to replicate existing buildings. Successful integration of new development can be achieved through the use of materials, methods and details as part of new and innovative design.

The Local Plan could set out design expectations through design codes or urban design frameworks. These are detailed design guidance that comprises a set of written and graphic rules for design of new development, and can help achieve consistency across particular areas or provide a framework for Eastbourne distinctive development across the whole town. However, it is important that they are not used to stifle development or restrict innovation.

### Question on the use of design codes:

- Should the Local Plan create urban design framework/design codes, and for which areas of the town would these be appropriate?

### Question on views in the townscape:

- Are there any key views of important buildings that need to be protected?

Decisions relating to the conservation of the built environment should be pragmatic and regeneration-focused. It is important to recognise that times change and that there is a need to balance the demands of today with respect for the built heritage. This means allowing adaptable

where it does not have a significant impact on the significance of a building, and protecting those elements that make a building important.

Eastbourne has a large amount of architecture from the Victorian period, but maintaining heritage buildings in good condition usually relies on the building being in a viable use. Whilst the important urban heritage needs to be protected, the Local Plan should not encourage 'overprotection' of these assets, which can stifle development and potentially leave Eastbourne as a "Victorian Theme Park". Therefore, the Local Plan should take a proportionate approach to allow suitable development of heritage assets of low significance, particularly where it will enable a building to be retained in a viable use.

A building's windows is an area where there is often pressure to change, but the one that has most impact on the look and feel of our streets.

The Local Plan will seek to keep as much original fabric as possible in most visible and protected locations, whilst allowing for greater choice and flexibility elsewhere. Specifically, it will attempt to safeguard the presence of original timber windows on front elevations, and any new windows should mirror the design and form of the originals, thereby minimising disruption to the local street scene. At rear and side elevations, more relaxed approach to the use of materials will be taken, although all new windows should mirror the design and detail of the original windows.

Reducing carbon emissions from historic buildings presents more challenges than for more modern buildings. Changes in construction techniques means that traditional buildings tend to perform differently to more modern builds. In addition, individual and collections of historic buildings may be of architectural importance or create an important character that may not suit modern energy efficiency measures.

It is important that the historic character and appearance of these buildings is maintained. Inappropriate alterations or installations of energy- efficient equipment could compromise historic character and appearance. Once lost, historic fabric cannot be replaced, so careful consideration of alterations is important and should focus on works which are easily 'reversible'.

What constitutes an 'acceptable change' to Historic Buildings is whether it has an impact on the significance of the designated heritage asset, with particular focus on changes to improve energy efficiency, which is creating a roadblock to improvement.

#### Direction of Travel

In order to provide appropriate conservation and management of the town's historic environment, the Local Plan will:

- Provide a policy to address the issue of replacement windows in Conservation Areas
- Require consideration of visual and environmental amenity through new development
- Provide policy on development within the setting of a heritage asset
- Resist backland development within Conservation Areas where visible from the Conservation Area

- Require development that impacts a heritage asset to define impact/contribution to local character and setting of Eastbourne

### Public realm

The public realm is the 'face' of the town and is an important part of the civic experience. The spaces between buildings affect people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. As such, it is important that the public realm is distinctive, attractive and of the highest quality, allowing people to meet, congregate and socialise.

The Local Plan will include policies that encourage the use of gateways, focal points and landmarks to make the public realm legible to encourage walking and cycling. It will also require landscape treatments, street furniture and infrastructure to be designed to maintain an uncluttered space. Treatment of the public realm should be informed by the heritage value of the place.

The pleasant appearance of the tree lined avenues is a key feature of the public realm in Eastbourne. However, the majority of the trees originally planted were Elms that have suffered from attack by Elm Disease over recent years, resulting in their removal. The Local Plan should seek to take all opportunities to 'green' the area through the planting of new and replacement trees and other soft landscaping in the public realm.

The design of shopfronts has an important role to play in the urban environment. Their position on the ground floor means they are very visible to users and passers-by. The Local Plan will expect shopfronts to be well designed in the context of the host building in terms of its design, materials and signage. New shopfronts should be designed to be easily accessible to people with disabilities.

### Direction of Travel

To enhance the quality of Eastbourne's public realm, the Local Plan will:

- Encourage the creation of tree-lined streets
- Provide policy and guidance on the design of public realm
- Seek design standards for new shopfronts

## Thriving Communities

### Summary of Issues:

- ❖ The provision of outdoor sport and recreation facilities falling below quantity standards
- ❖ Resisting loss of existing outdoor sport and recreation facilities
- ❖ The need to retain allotments provision
- ❖ The need for additional provision of indoor sport and recreation facilities
- ❖ Inequalities across town in access to children's playspace
- ❖ How the future need for school places should be accommodated
- ❖ Significant health issues in the parts of population
- ❖ Retaining the vitality of local service centres
- ❖ The impact of crime on living environments
- ❖ Ensuring accessibility and ease of movement around neighbourhoods

Thriving Communities are communities where people are healthy, safe and have access to activities and opportunities to help them thrive. They encourage active and healthy lifestyles, and create living environments that support social interaction for people of all ages.

Eastbourne has an older age profile, and the average age of the population has been rising over recent years to 45.3 in 2017. 24.9% of Eastbourne's population is aged over 65, and there is a particularly high percentage of people aged over 85 compared to regional and national averages. In 2018, there were approximately 18,000 children under the age of 15, which at 17.3% of the population is a lower proportion than average. 3,685 children live in low-income families (those with incomes of less than 60% of the national median income).

The evolution of Eastbourne over the last 200 years from small fishing hamlets to a town with a population of over 100,000 people has resulted in the diverse pattern of communities which exists today. Eastbourne's neighbourhoods each have their individual strengths, opportunities and identities, but each also faces a variety of specific challenges.

Eastbourne is ranked 120th (of the 326 local authorities in England) in terms of deprivation, but deprivation is localised. Two out of 61 local areas in Eastbourne are within the 10% most deprived in the country, whilst three are in the 10% least deprived in the country. Eastbourne appears to suffer relatively more from deprivation relating to employment and income, and relatively less from deprivation relating to crime and barriers to housing and services.

The life expectancy for men living in more deprived neighbourhoods is 6.9 years lower than the expectancy for men in less deprived areas. For women this difference is 6.3 years.

Eastbourne's population suffers more than average from poor health, with 6.1% of Eastbourne's population describing themselves as having bad or very bad health. There are over 20,000 people with a limiting long-term illness, representing 21% of the total resident population, of which 46%

have their day-to-day activities limited a lot by their illness. 10.6% of Eastbourne’s population provides unpaid care for others.

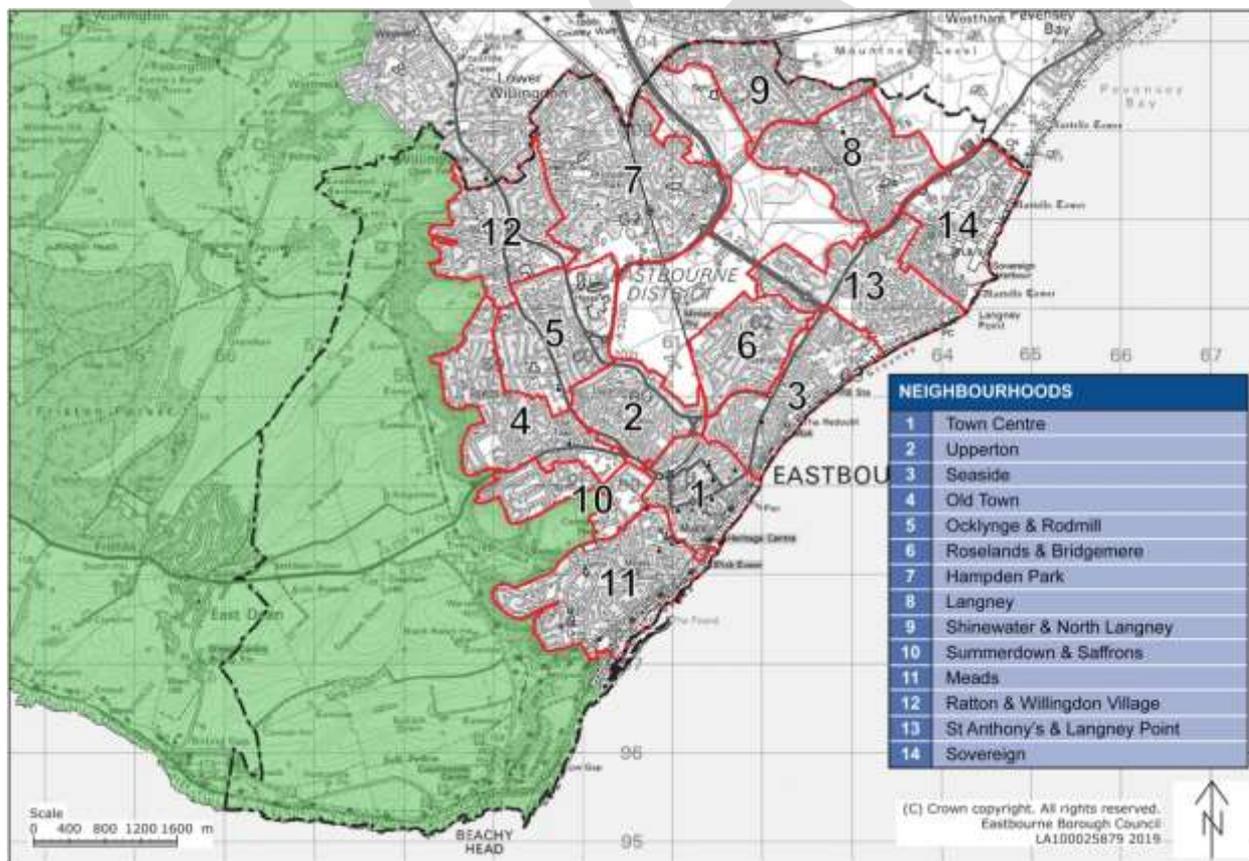
In addition, 46.1% of the adult population is overweight or obese, and just 56.1% of the population are estimated to eat at least 5 portions of fruit and veg a day.

People’s quality of life is related to the quality of the environment. In promoting healthy communities, access to high-quality open spaces can make an important contribution to health and wellbeing. Eastbourne has a generous quantity of outdoor recreational and amenity open space, with Eastbourne Park as a green open space in the centre of the urban area. Eastbourne also has three parks with Green Flag awards and 20 fields protected in perpetuity through Fields in Trust QEII status.

Sustainable neighbourhoods

The current Eastbourne Core Strategy 2006-2027 decided to follow a ‘Neighbourhood’ approach to the future planning of the town. It divided the town into 14 neighbourhoods that were defined in consultation with local communities and based on resident perception and an analysis of the built character. The Core Strategy set out separate visions for each neighbourhood that were intended to allow local residents to find out and influence what is likely to change in their area. A map of the neighbourhoods is provided at Map 9.

**Map 9: Eastbourne's neighbourhoods**



Eastbourne's neighbourhoods each have their individual strengths, opportunities and identities but each also faces a variety of specific challenges. The Core Strategy seeks to preserve and enhance each neighbourhood's unique identity and help each grow positively and sustainably over the course of the plan period whilst contributing positively towards meeting the overall needs of Eastbourne.

Since the Core Strategy was prepared, the Localism Act 2011 has introduced rights and powers for communities to enable them to get more involved in planning for their areas through the production of Neighbourhood Plans or Orders, or Community Right to Build Orders. In non-parished areas such as Eastbourne, this neighbourhood planning is undertaken by Neighbourhood Forums, which require a minimum of 21 people who live in the neighbourhood area, or work there, and/or who are elected members for any ward of Eastbourne Borough Council.

In order to encourage and facilitate neighbourhood planning in our communities, it would be useful to understand if a neighbourhood approach to the Local Plan would be helpful, particularly to those who are considering preparing their own neighbourhood plan, and if this approach should be continued in the new Local Plan.

Question on the neighbourhood approach:

- Should the Local Plan continue with the neighbourhood approach from Core Strategy?

Question on the neighbourhood boundaries:

- Are the neighbourhood boundaries still relevant?

Sport and Recreation

Eastbourne is well provided for in terms of green spaces with 1,140 hectares of accessible and usable open space, which equates to over a quarter of the total area of the Borough and around 11 hectares per 1,000 population.

Eastbourne has particularly strong provision of Parks and Gardens, equivalent to 0.9 hectares per 1,000 population, which exceeds the standard in many other places comparable to Eastbourne. This means, from a quantitative point of view, there is no additional need for parks/gardens to be delivered in the plan period.

However, there is likely to be a quantitative shortfall in the provision of sports pitches and children's play areas in the town at the end of the plan period if no further provision is made.

In order to achieve a standard of 1.5 hectares of sport pitch per 1,000 population, in quantitative terms, we require the provision of an additional 25 hectares over the plan period. However, there are circumstances that may affect the amount of sports pitches required. These include:

- The decline in sports participation as a result of ageing population
- The promotion of small-sided team games resulting in a growing need for smaller pitches

- The provision of more artificial surfaces can sustain significantly higher usage meaning less physical space would be required

Further work will be undertaken to assess the qualitative aspects of open space provision, including the availability and accessibility of existing facilities, to provide a more accurate picture of the amount of additional space required over the plan period.

In terms of children's play space, current provision equates to 0.06 hectares per 1,000 population, which is considered to be a relatively low standard of provision. In order to maintain this level of provision, an additional 0.5 hectares would be required, which equates to around 12 new play areas.

There is an uneven distribution of children's play space across the town with areas such as Old Town, Meads, Ratton, Upperton and the Town Centre particularly deficient, whilst Hampden Park and Langney appear to be well provided for.

Consideration needs to be given to whether to require all housing developments over a certain size threshold to make on-site provision for additional children's play space, or if this requirement should be made only in areas that have been identified as having deficiencies in play space provision.

Areas that have been identified as being deficient in play areas tend to be the areas with higher land values, meaning development is more likely to be able to afford to make such provision.

Alternatively, the Local Plan could require financial contributions towards new play space that could be provided in suitable and appropriate locations in lieu of on-site provision.

#### Options

How should the Local Plan require new provision of children's playspace:

- a) On-site provision of playspace on sites above a certain threshold in deficient neighbourhoods only; or
- b) On-site provision of playspace on sites above a certain threshold across the whole town; or
- c) Financial contributions from developments above a certain threshold rather than on-site provision

In addition to identifying sufficient new outdoor sport and recreation space to meet minimum needs, the Local Plan will also support improvements to existing recreational facilities, including through the use of developer contributions where appropriate.

Eastbourne is well provisioned in terms of allotments, particularly due to recent extensions to allotment areas in Hampden Park, Bridgemere and Upperton. Eastbourne Allotments & Garden Society (EAGS) manages 1,178 allotment plots on behalf of Eastbourne Borough Council. EAGS affirm that around 400 persons are on the waiting list for allotments, considering it more popular than ever. In quantitative terms, there is a need for a small increase in the amount of allotments to achieve a standard of 0.2 hectares per 1,000 population over the plan period. It is important that the existing allotment provision is retained through the Local Plan, particularly to increase opportunities for urban food production that could help to reduce carbon emissions through reducing food miles.

### Direction of Travel

In order to ensure sufficient open space provision, the Local Plan will:

- Deliver sufficient outdoor sport and recreation space to meet local provision standards
- Support improvements to existing recreational facilities
- Require contributions to improving outdoor sports pitches
- Seek to retain all existing allotments
- Encourage an increase in opportunities for urban food production

### Further work:

- Update Open Space, Sport and Recreation Needs Assessment to take into account quality and availability of existing facilities

### *Sovereign Centre*

The Council has committed to the construction of a new leisure centre to replace Sovereign Centre, which was originally opened in the 1970s. The Centre is now aged and requires substantial reinvestment, and the Council has decided that a replacement would provide greater long term value for money. The Local Plan will allocate land adjacent to the existing Sovereign Centre for a new leisure facility.

### Direction of Travel

To improve the provision of indoor leisure and recreation space, the Local Plan will:

- Allocate site adjacent to the Sovereign Centre for new leisure facility

This means that the site of the existing Sovereign Centre will become available for redevelopment. The Council has explored options for the site and considers that a mixed use would provide flexibility to attract the right level of interest from the private market and operators whilst creating sustainable communities and economic growth. The Local Plan will seek to allocate the site for the type and mix of development is considered to be most appropriate.

### Options

What types and mixes of uses would be considered as most appropriate for the redevelopment of the existing Sovereign Centre site:

- a) High quality residential development
- b) Affordable housing
- c) Retirement homes / village
- d) Beach front leisure/water sports

e) Convenience Store (under 5,000 sq ft)

### Education

East Sussex County Council's Education Commissioning Plan 2017-2021 forecasts that generally there will be sufficient capacity in the existing primary schools, many of which have been expanded over recent years, to meet the forecast demand for primary school places over the next few years due to the falling birth rate in the town. The planned capacity at secondary level should also be sufficient although a shortfall could materialise, and may require expansion of existing establishments.

The Council will continue to work with East Sussex County Council to identify the need for additional provision of school places in light of the amount of housing growth that will be provided through the Local Plan.

Many recent school places have been delivered through permanent expansions to existing schools. The Local Plan will consider appropriate sites for the allocation of a new school, however this may not be necessary and additional school place provision could be made through further expansions to existing schools. However, one potential consequence of this may be that it results in a loss of school playing fields. Consideration needs to be given to the balance between how additional school capacity can be provided and the potential loss of playing fields resulting from extensions to existing establishments.

### Options

What level of support should be given to extensions to educational establishments in the Local Plan:

- a) Support all extensions to educational establishments
- b) Restrict extensions to education establishments where they encroach on school playing fields

Access to primary schools in Eastbourne is good, with 90% of children across town being within a 15 minute walk or public transport journey to their nearest primary school. The location of secondary schools in Eastbourne, mainly to the north and east of the town, means that a lower proportion of children across Eastbourne (46%) are within 15 minutes walk/public transport of a secondary school. However, 86% are within a 15 minute cycle of a secondary school.

Regular journeys to school have significant potential for modal shift to sustainable forms of transport, and it is important that infrastructure and other measures are put in place to facilitate this.

### Further work:

- Work with East Sussex County Council to identify school provision needs as a result of growth in the Local Plan over the plan period

In the Eastbourne locality, 34% of children aged 10-11 are classified as overweight or obese. In order to help to address these issues, the Local Plan will restrict the opening of new hot food takeaways within walking distance of primary and secondary schools.

The Local Plan will also encourage the relocation of colleges and universities into the town centre in order to generate more footfall and support the vitality and viability of the town centre, and also allow more students to access their education by sustainable transport modes.

#### Direction of Travel

In order to provide education facilities and support the health of young people, the Local Plan will:

- Consider the allocation of a site for a new school if necessary
- Restrict hot food takeaways within walking distance of school
- Encourage the relocation of colleges/university into town centre

#### Health and Community

Eastbourne has 11 GP practices and 77 doctors, which equates to around 1 doctor per 1,340 people. The Council will work with the Eastbourne Hailsham and Seaford Clinical Commissioning Group to identify future need for GP surgeries, and will allocate land for new facilities if there is a need to do so.

#### Further work:

- Work with Eastbourne Hailsham and Seaford Clinical Commissioning Group to identify GP provision needs as a result of growth in the Local Plan over the plan period

National planning guidance refers to the use of Health Impact Assessment (HIA) that can be used to assess how development proposals will contribute to improving the health and wellbeing of the local population. They can be used to identify the potential for health improvements and risks to health, and help to identify additional measures to reduce or avoid these risks. Consideration needs to be given to whether this is an appropriate requirement to make of development on strategic sites.

#### Question on Health Impact Assessments:

- Should the Local Plan require Health Impact Assessments for new strategic sites development?

Public houses within local communities are part of the town's social and cultural heritage and can play an important role as a meeting place and venue for community events. However, over recent years a number of public houses outside of the town centre have been lost to other uses such as shops and homes. Consideration needs to be given to whether there is justification for a policy that protects public houses from being lost, and what would need to be taken into account within such a policy.

Question on public houses:

- Should the Local Plan contain a policy to protect public houses?

Community facilities – venues or meeting places that can be used or hired by the public or community organisations for meetings and events – play a vital role in a community and contribute to the social health and wellbeing of individuals. Community facilities allow for social interaction between people and can support the development of new community groups.

Eastbourne has 65 community facilities, and the majority of the urban area is within a 10-minute walk of such a facility. This equates to a standard of 1 community facility per 1,640 population, which is comparable with locations such as Hastings and is a better level of provision than best practice guidance suggests. The Town Centre has a very good provision, which is particularly relevant as it is the location most easily accessed by public transport.

In order to ensure that the town is adequately provided with community facilities, the Local Plan will seek to protect the current provision, especially in light of the increasing pressure to deliver residential development within the built-up area. Any new community facilities should be capable of providing a floorspace extension of 50% in order to cater for increased community need in the future.

Communities have the right to ask the Council to designate assets that further the social well-being or social interests (cultural, recreational, or sporting interests) of the local community as an Asset of Community Value. Once designated, the owner cannot dispose of the asset without giving the local community six months to raise funds to bid for the asset. It also removes certain permitted development rights and is a material consideration in determining a planning application. The Local Plan will seek to go further and provide a policy on resisting the loss of community uses that have been designated as an Asset of Community Value.

Direction of Travel

To ensure appropriate provision of facilities for the community, the Local Plan will:

- Resist developments that would result in the loss of a community facility
- Require new community facilities to design in ability for possible future expansion
- Resist the loss of buildings and land designated as an Asset of Community Value

There has been a general trend of increased recycling and composting of household waste, with 8,457 tonnes of waste being recycled (22.7%) in 2017/18. However, the amount of household waste per head in Eastbourne has remained at a similar level over the last 10 years.

There are a range of facilities that can be included within new development to minimise the amount of domestic waste, including facilities for source separation and storage of waste for collection or on-site re-use, and greater home composting can also make a valuable contribution.

In order to encourage recycling, it is important that new development, particularly residential and development employing or attracting a large number of people, makes suitable provision for recycling facilities.

The presence of bins on the street can have a significant impact on the street scene and also cause a safety issues for pedestrians, so the Local Plan will require new development to make appropriate provision for bins.

#### Direction of Travel

To encourage increase recycling rates, the Local Plan will:

- Require appropriate recycling facilities in new development
- Require provision of suitable bin space

#### Local Service Centres

Local Service Centres, usually in the form of District, Local and Neighbourhood Shopping Centres, provide an important function for local communities by providing services and facilities in close proximity to where people live.

Most district, local and neighbourhood centres have a high proportion of retail uses, and the predominance of retail has been enforced by planning policy over recent years. However, there has been an increase in the amount of non-retail uses that have been seeking to locate to these centres.

Consideration needs to be given to whether these local service centres should retain a predominance of retail in order to reduce the amount of 'dead frontage' that would make the centre less attractive to shoppers so that ultimately it becomes less viable. Alternatively, a more flexible approach could be taken to uses in these centres to allow other employment and community uses to be located there to provide an increased range of services and facilities in an accessible location.

#### Options

What approach should the Local Plan take to local services centres:

- a) Provide policies that retain a predominance of retail in local service centres
- b) A flexible approach to employment and community uses in local service centres

It is important that any new community infrastructure – doctors surgeries, dentists – are located in locations that are particularly accessible by sustainable modes of travel. Local Service Centres provide suitable locations for the grouping of a variety of uses in the heart of community, which could make sustainable transport provision more viable. However, there are limited opportunities for new development within and on the edge of these existing centres, which means that requiring community infrastructure to be located here could stifle additional provision or mean that they are located in unsuitable premises. Alternatively, such provision could be required to be located within walking distance of a bus stop, or a more flexible approach could be taken to allow community infrastructure on the most available sites.

### Options

Where should new community infrastructure be provided:

- a) New community infrastructure located within walking distance of a bus stop
- b) New community infrastructure located with designated local centre
- c) Flexible approach to location of new community infrastructure

### Crime

The level of crime in Eastbourne had fallen quite significantly over the last 15 years, although it has increased recently in line with national trends.

The overall crime rate per 1,000 population (all recorded offences) in Eastbourne is higher than the national average. The majority of offences are related to theft, however the rate of theft offences (with the exception of shoplifting) are lower than national average.

According to a resident survey<sup>21</sup>, 52% of people think that the level of crime is important in making somewhere a good place to live. However, just 18% think that the level of crime is an issue for their local area. The survey also indicates that the feeling of community safety in Eastbourne is increasing, with 91% feeling safe when outside in their local area during the day and 62% after dark in 2015, compared to 88% and 50% respectively in 2008.

The NPPF requires planning policies to create healthy, inclusive and safe places where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion. Appropriate planning and the design of development can help to prevent certain types of crime and disorder, but it is important that the requirements made of development are proportionate and based on a clear understanding of the local situation. Consideration needs to be given to whether there needs to be specific policies that place a higher emphasis on requiring 'designing out crime principles' in new development.

### Question on designing out crime in new development:

- Should the local plan place a higher emphasis on crime reduction and have locally relevant policies and criteria for designing out crime?

### Access and Movement

It is estimated that there are 19,800 people with a disability in Eastbourne, which equates to approximately 20% of the total population. Therefore it is important that inclusive environments acknowledge diversity and difference that are created through good design, where the needs of everyone are considered.

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<sup>21</sup> Eastbourne Borough Council, Eastbourne Resident Consultation Survey, 2015

In order to create safe and inclusive spaces, it is important that priority is given to pedestrians within all new development, and the Local Plan will require this. Policies will also be prepared to ensure that development is in close proximity to public transport and is fully accessible by other forms of sustainable travel, that public spaces are designed to ensure they meet the needs of people with mobility problems and visual impairments, and that gradients within development are restricted to make it easier for people to access them.

#### Direction of Travel

In order to ensure new development is accessible, the Local Plan will:

- Require pedestrian priority as part of all new developments
- Require safe pedestrian access to bus stops
- Restrict gradients in new development
- Encourage opportunities to improve disabled access to buildings and public spaces
- Ensure that new development is fully accessible by sustainable forms of transport

DRAFT

## Housing & Development

### Summary of Issues:

- ❖ The need to accommodate new housing in the context of physical and environmental constraints
- ❖ Availability of suitable land for development
- ❖ Lack of strategic land/proliferation of small sites
- ❖ Ensuring an appropriate mix of types and sizes of accommodation to suit population needs and the town's aspirations
- ❖ Need for affordable housing and impact that this has on development viability
- ❖ The need for older people's housing
- ❖ Adaptable homes and the ways that this could be provided
- ❖ Ensuring sustainable design and layout of residential areas
- ❖ Pressure to reduce size of accommodation
- ❖ The potential impacts of Houses in Multiple Occupation
- ❖ Requirement to help facilitate self-build and custom housebuilding
- ❖ Need for Gypsy and Traveller accommodation

Eastbourne's resident population of over 103,000 people is accommodated in fewer than 49,000 homes. Around 39% of Eastbourne's existing housing stock comprises of flats, with terraced housing making up 25%, semi-detached 20% and detached 16%. There are around 6,000 affordable homes provided by the Council or by registered providers of social housing.

Since 2006, over 2,800 new homes have been built in Eastbourne at an average of 218 new homes per year. However, this record is influenced by high levels of delivery in the early years of the plan. Delivery since the recession has reduced significantly and in the last five years, just 832 new homes have been built at an average of 166 homes per year.

Housing delivery has been reliant on small sites. Nearly 75% of the homes delivered since 2006 have been on sites accommodating less than five units. Just 64 out of the 576 sites that have been developed for housing have delivered 10 or more homes.

Housing developments in the Borough have been delivered through new build, redeveloping existing sites, subdividing existing housing and changes of use from non-residential uses. Over the plan period, new build schemes have contributed the highest number of homes (31%); however the majority of these were early in the plan period. In recent years, there have been higher numbers of homes delivered through subdivision and change of use. Since 2006, 80% of the new homes that have been delivered have been in the form of flats.

Access to safe, secure and affordable housing is fundamental to supporting the health and independence of residents, creating sustainable communities and promoting economic growth. This

means delivering new homes is necessary to meet the growing population and help attract new working age households that will contribute to the economy.

The number of homes needed in the plan area is determined through a local housing need assessment, which is conducted using a standardised methodology that is set out in national policy. The Local Housing Need for Eastbourne is calculated as 668 homes per annum over the plan period.

The NPPF requires local plans to meet the Local Housing Need, unless there is a strong reason for restricting the overall scale, type or distribution of development in the plan area; or the adverse impacts of meeting the need would significantly and demonstrably outweigh the benefits when assessed against the NPPF as a whole.

There are strong reasons why Eastbourne cannot meet the Local Housing Need in full. The town is surrounded by the protected downland of the South Downs National Park to the west, the English Channel to the south, and the boundary with Wealden District to the north and east. Much of the land through the centre of the town in Eastbourne Park, and also to the east of the town in the Mountney Levels, has a high risk of flooding. These physical and environmental constraints limit the amount of land that is available to develop. As such, the Local Plan is unlikely to be able to meet the local housing need requirement, but it should still ensure that as many new homes are accommodated as possible in a sustainable way.

Based on the profile of households and how this is expected to change over time, the greatest need in future is expected to be for 3-bed houses, with 2-bed flats also having a high level of need, along with 1-bed flats and 2-bed houses<sup>22</sup>.

### Housing Numbers and Distribution

The amount of land within Eastbourne that is potentially suitable to provide additional homes has been identified through the Eastbourne Strategic Housing & Employment Land Availability Assessment [SHELAA].

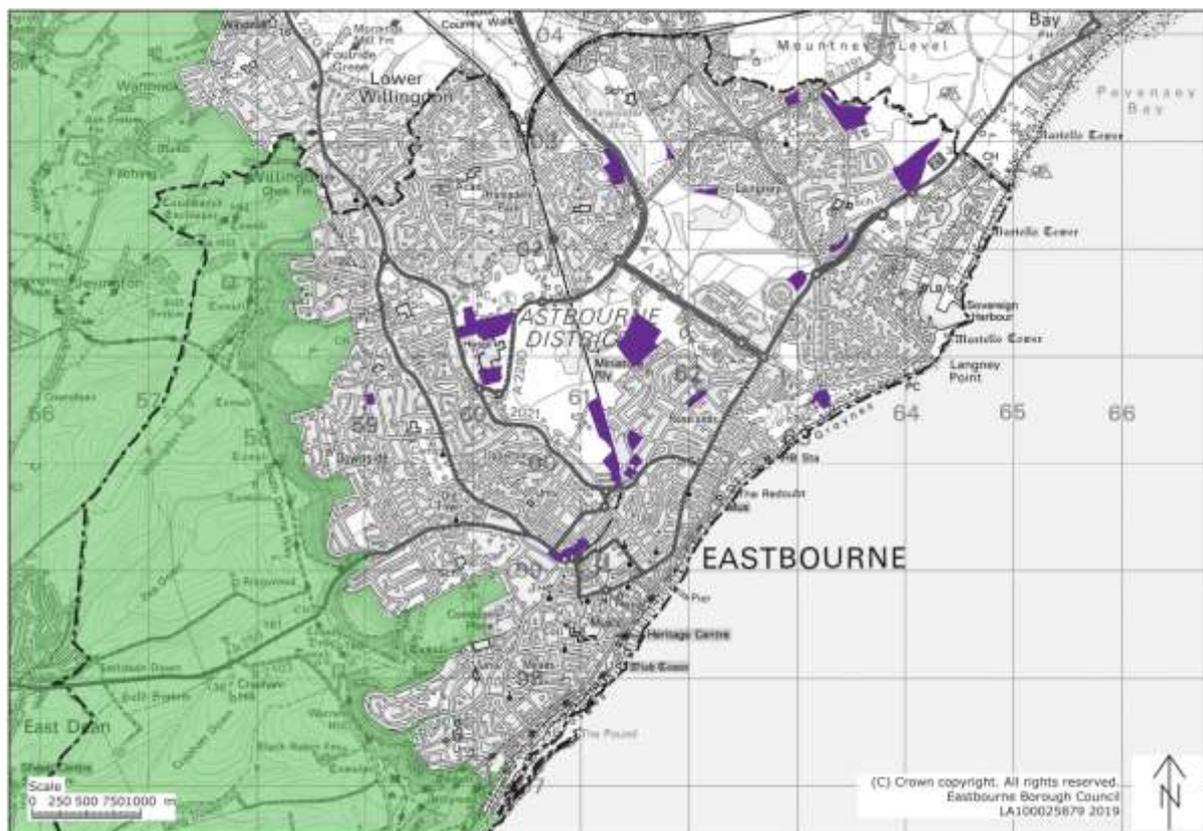
This indicates that there is around 60 hectares of land in Eastbourne that could potentially be developed for housing over the next 20 years. The majority of the sites are previously developed land within the existing built-up area; however the Local Plan will have to consider greenfield sites that are outside of the functional floodplain and that have been assessed as being suitable for development.

The broad locations where residential development could be expected to come forward over the plan period is identified in Map 10.

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<sup>22</sup> The Eastbourne Strategic Housing Market Assessment (2017)

**Map 10: Broad locations for potential housing development to 2038**



The number of sites within each neighbourhood that have been identified as being suitable for housing development, and the amount of developable land in those neighbourhoods, is identified in Table 3.

**Table 3: Number of sites and amount of land identified as being suitable for residential development by neighbourhood**

Neighbourhood	Number of Sites	Identified Land (hectares)
Town Centre	21	3.0
Upperton	3	2.5
Seaside	26	3.3
Old Town	21	1.5
Ocklynge & Rodmill	5	11.0
Roselands & Bridgemere	13	4.0
Hampden Park	22	1.7
Langney	15	1.8
Shinewater & North Langney	11	1.4
Summerdown & Saffrons	5	0.9
Meads	4	0.6

Neighbourhood	Number of Sites	Identified Land (hectares)
Ratton & Willingdon Village	5	0.9
St Anthony's & Langney Point	1	0.2
Sovereign Harbour	1	0.2
Fringes of Eastbourne Park	8	15.9
Edge of East Langney Levels	6	11.9

The number of homes that this land can provide will depend on the density of development, which will be influenced by the types and sizes of new homes that will be provided.

In addition to the sites that have been identified, the amount of housing that could provide over the plan period (2018-2038) will be influenced by:

- The number of units already delivered in the first year of the plan period (2018/19)
- The number of units already committed through permissions; and
- A windfall allowance based on past trends.

A total of 130 new homes were built in the first year of the plan period (2018/19) and there are 804 homes that have planning permission across 125 sites (as at 1<sup>st</sup> April 2019). Of these, 42 sites (contributing 363 units) are currently under construction. 73% of the total numbers of units committed are flats.

Since 2006, a significant number of homes have been delivered through the sub-division of existing dwellings and the change of use of buildings from non-residential uses. It is not possible to identify where and when these developments will come forward, and as such they are known as 'windfall'.

As 'windfall' has been a consistent source of supply for Eastbourne over previous years, a future allowance for housing delivery through windfall sites has been included based on past trends. The Local Plan will assume that 72 new homes will be delivered per year through conversions and changes of use that cannot be specifically identified in advance.

### *Housing Options*

The Local Plan will be required to set a housing target, which will be the number of homes that should be built over the 20-year plan period. This housing target will be informed by the strategy for how housing land is used and what types of homes will be delivered.

Six options for how the sites could be used to deliver homes, and the resultant differences in the distribution of those homes, are presented below.

The options will inform the specific allocations for sites in the Local Plan in terms of how they should be developed. The options are not necessarily mutually exclusive and could be combined if this would form the most effective and sustainable strategy for the number and distribution of housing over the plan period.

A range of other options have also been considered, but these were assessed as being less suitable and sustainable.

### Options

What strategy should the Local Plan take forward for the development of sites for homes:

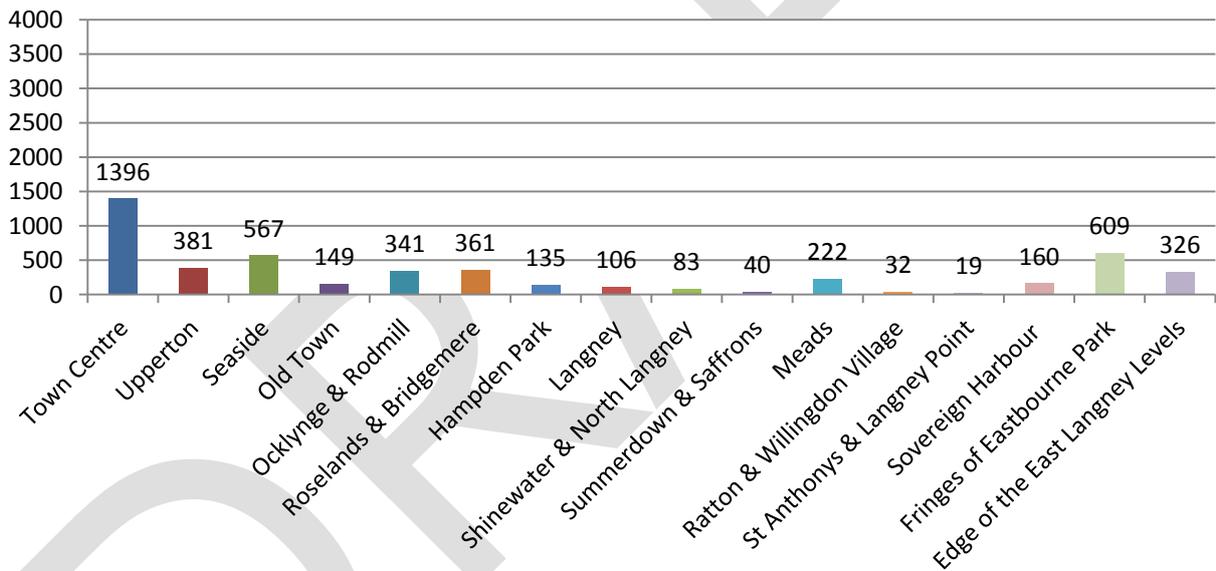
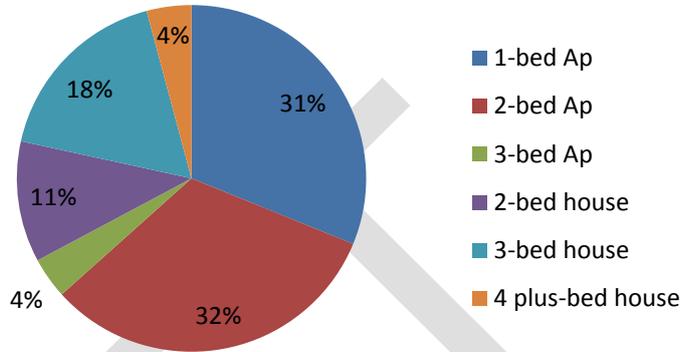
- a) Density based on the prevailing character of the area surrounding the site
- b) Increasing the proportion of houses being delivered on sites
- c) Increasing the proportion of flats being delivered on sites
- d) Providing taller residential buildings in Town Centre (10 storeys)
- e) A 50% increase on the prevailing density on all sites within the existing built-up area
- f) A 50% increase on the prevailing density on all sites of more than 0.5 hectares

It is important to recognise that the housing numbers that are identified will change as the understanding of constraints to development evolves and a result of additional work and information that comes to light on currently identified sites, or as new sites are identified.

Option A: Density based on the prevailing character of the area surrounding the site

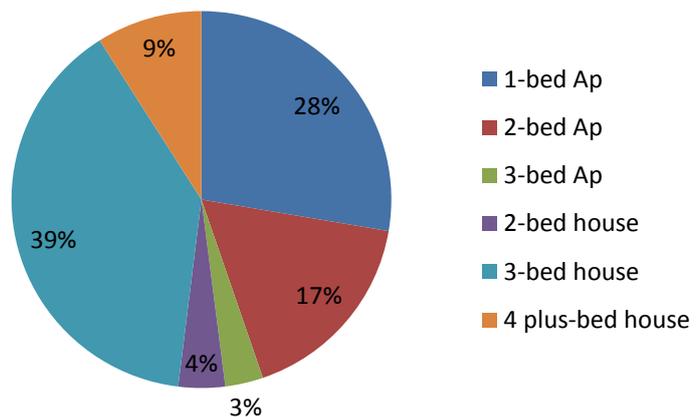
Option A is based on housing sites being developed at the prevailing density within the area that the site is located. The prevailing densities were assessed through the identification of character areas where areas show similar characteristics in terms of the type, size, style and age of residential development

Option A would delivery **4,927 homes** over the plan period at an average of **247 homes per year**. This would equate to a 10.1% increase in the total number of dwellings in Eastbourne to 2038. This option would result in development that most reflects the character of the existing urban area, but would not necessarily make the most efficient use of land.

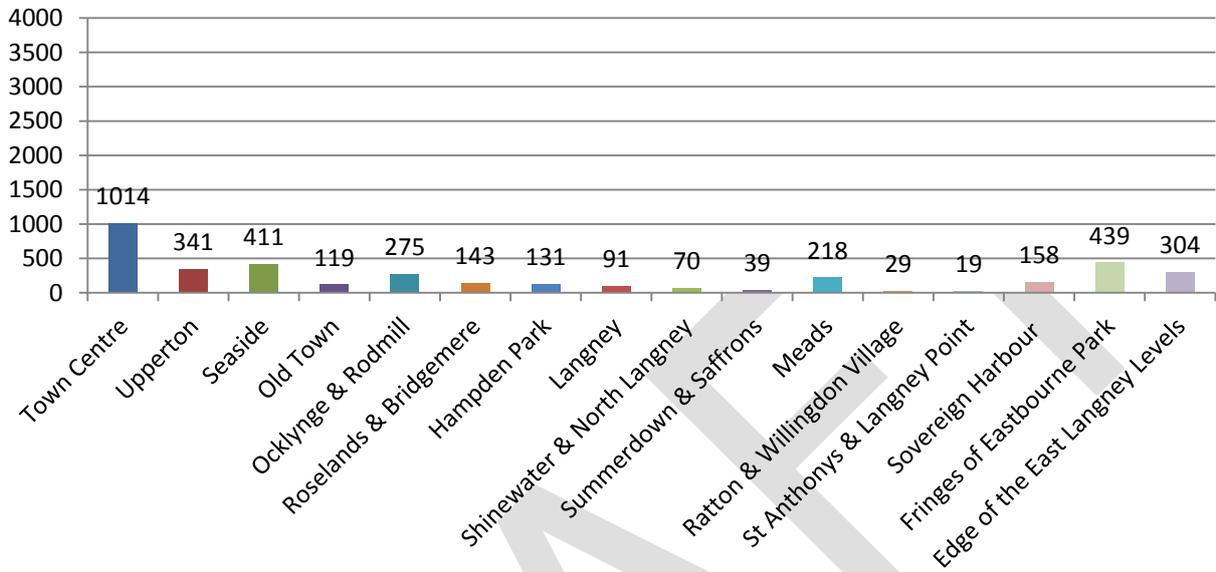


Option B: Increasing the proportion of houses being delivered on sites

Option B would deliver houses (with a particular focus on 3-bed houses) on all sites with the exception of a small number of sites that could only be considered suitable for flatted developed. This is based on a density of 35 dwellings per hectare, which is the average density of sites that have delivered purely 3-bed homes since 2006.



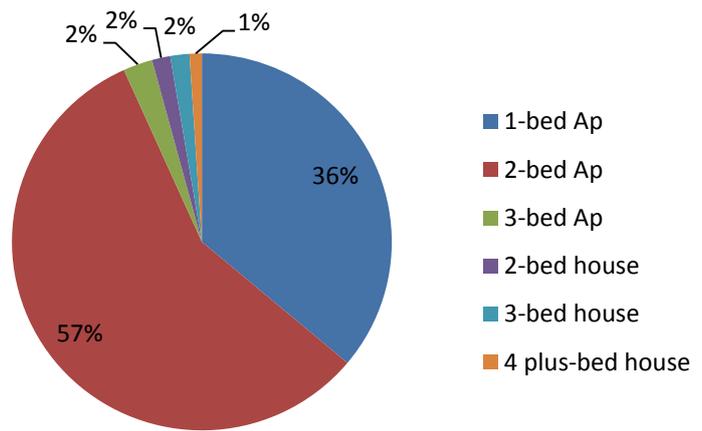
Option B would deliver **3,801 homes** over the plan period at an average of **191 homes per year**. This would equate to a 7.8% increase in the total number of dwellings in Eastbourne to 2038. This option would most closely align to the types of housing that is needed in Eastbourne, particularly in terms of the delivery of 3-bed homes. This option would mean development at lower densities, and therefore would not make the most efficient use of land, especially in locations that might lend themselves to taller buildings

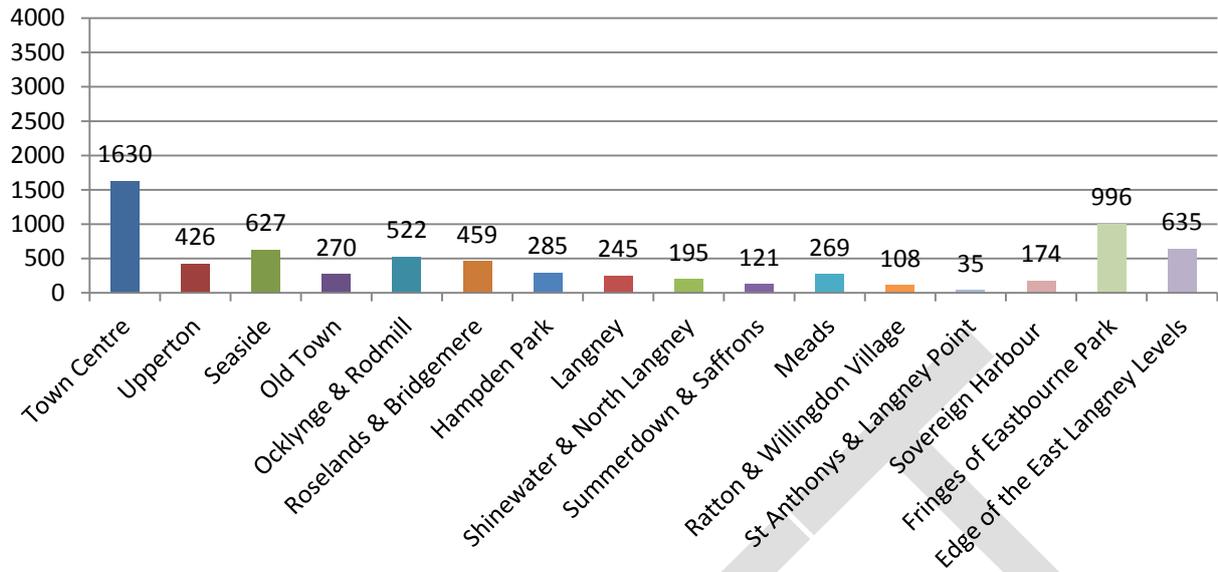


Option C: Increasing the proportion of flats being delivered on sites

Option C would deliver more flats with a particular focus on delivering 2-bed flats. This is based on densities of between 107 and 156 dwellings per hectare in non-town centre locations (reflecting past trends) and between 197 and 225 dwellings per hectare in the town centre.

Option C would deliver **6,997 homes** over the plan period at an average of **350 homes per year**. This would equate to a 14.4% increase in the total number of dwellings in Eastbourne to 2038. This option would provide a significant number of new homes across the town and would make the most efficient use of land available. However, it would result in a significant oversupply of flats that doesn't meet the needs of the local community and could saturate the market, ultimately meaning that fewer homes will be delivered.

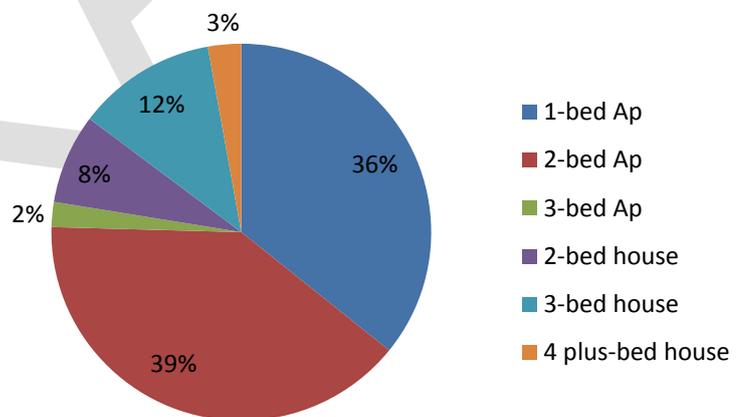


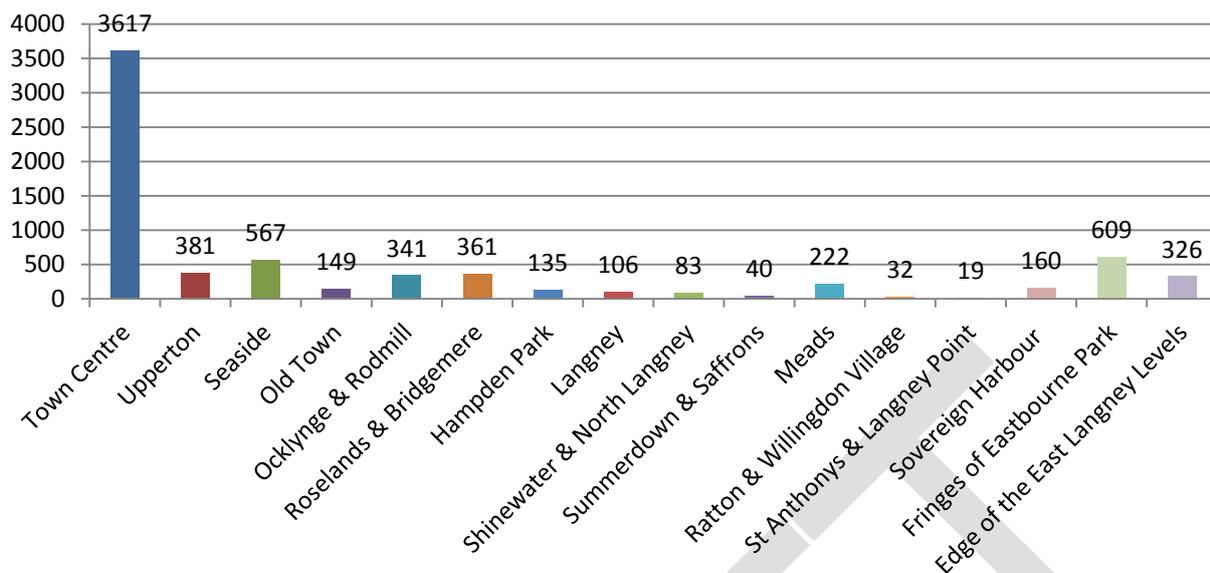


Option D: Providing taller residential buildings in Town Centre

Option D delivers taller buildings in the Town Centre in flatted development of ten storeys. This option assumes that the prevailing density would be used on sites outside of the town centre. The tallest purpose-built block of flats in the Town Centre is the nine-storeys but the majority of the purpose-built blocks of flats in the Town Centre are between five and seven storeys. The tallest purpose-built block of flats in Eastbourne is the 19-storey South Cliff Tower.

Option D would deliver **7,148 homes** over the plan period at an average of **358 homes per year**. This would equate to a 14.7% increase in the total number of dwellings in Eastbourne to 2038. This option would help to revitalise the town centre by providing more customers to local businesses. The town centre is the location where the tallest buildings tend to be located currently, which should limit the impact on the National Park. There may be issues with infrastructure capacity, particularly relating to sewerage, through having such a significant number of additional people living in an already densely populated area.

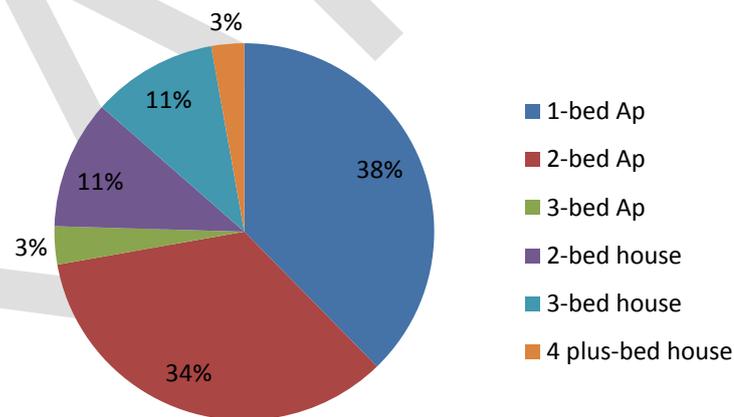


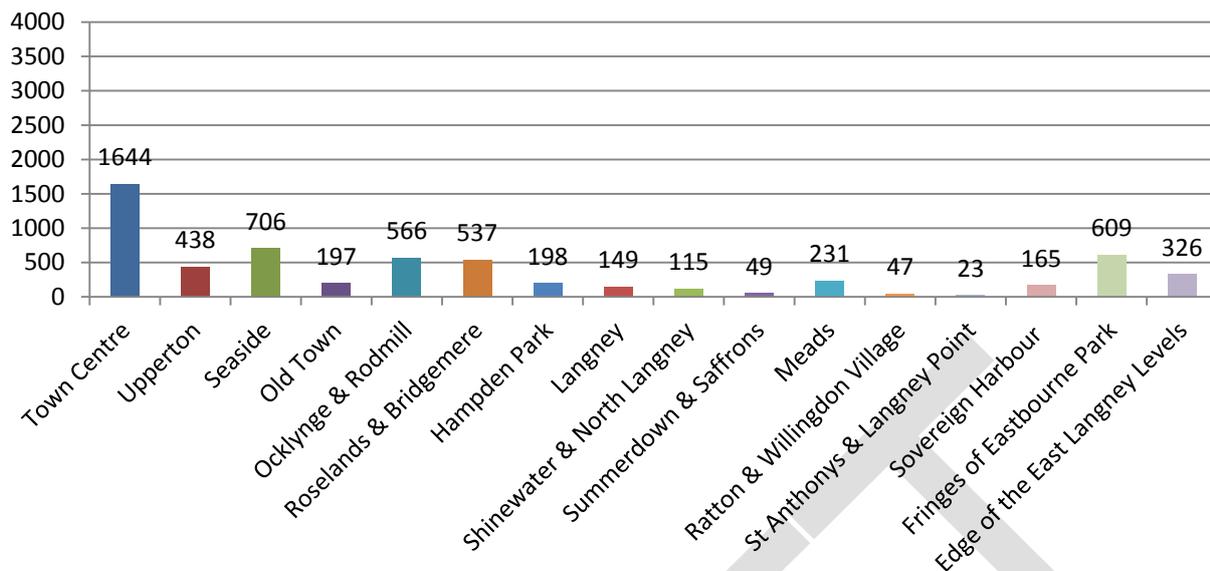


Option E: A 50% increase on the prevailing density on all sites within the existing built-up area

Option E increases the density of sites by 50% on the prevailing density on all sites within the built-up area boundary.

Option E would deliver **6,000 homes** over the plan period at an average of **300 homes per year**. This would equate to a 12.4% increase in the total number of dwellings in Eastbourne to 2038. This option would make more efficient use of previously developed sites within the existing urban area. However it would result in development of a higher density than its surroundings, which may impact on the character of the urban area.



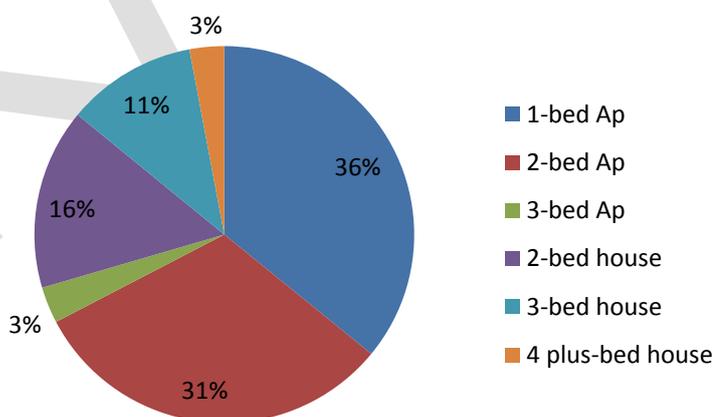


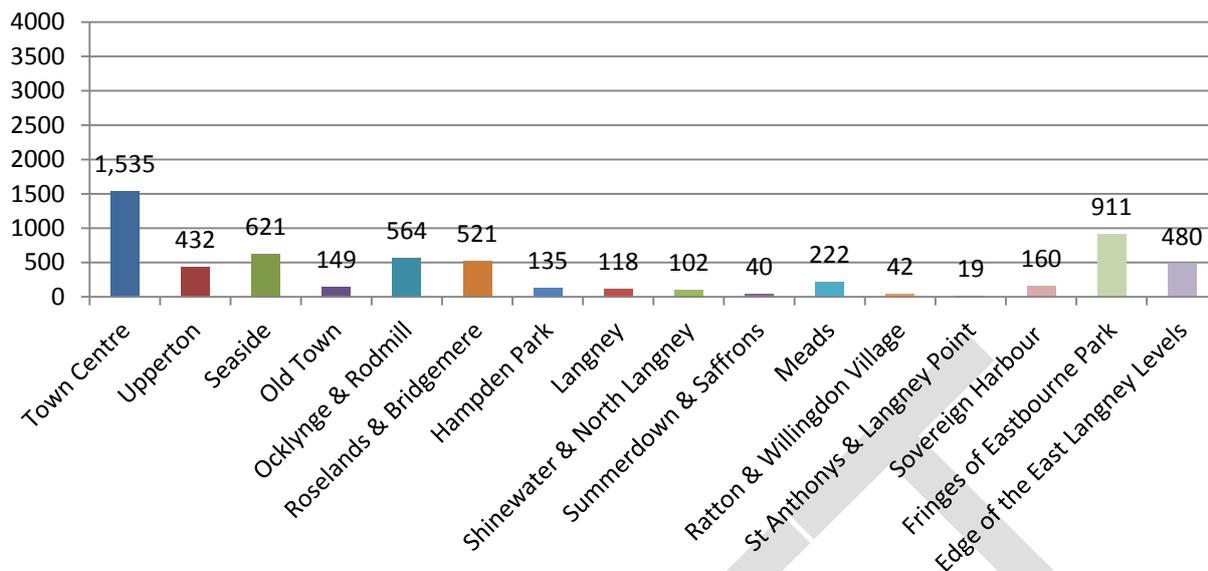
Option F: A 50% increase on the prevailing density on all sites of more than 0.5 hectares

Option F increases the density of all large sites in Eastbourne (more than 0.5 hectares) by 50% on the prevailing density. The prevailing density would be used for all other sites less than 0.5 hectares. There are 20 sites identified that are more than 0.5 hectares in size, of which half are previously developed and half are greenfield sites. A threshold of 0.5 hectares is relevant because the majority of sites in Eastbourne are small, and 0.5 hectares is a relatively large site in the context of development in Eastbourne.

Option F would deliver **6,501 homes** over the plan period at an average of **303 homes per year**. This would equate to a 13.4% increase in the total number of dwellings in Eastbourne to 2038.

This option would allow smaller sites to better fit into their surroundings, and make more efficient use of larger sites. However, it may not result in the most efficient use of the smaller sites, and would over-provide flats compared to the local need.





Question on other housing options:

- Are there any other options for the way that housing sites should be developed to deliver new homes that need to be considered?

Due to the majority of development sites in Eastbourne being relatively small, all development sites that can accommodate 10 or more homes will be identified in the plan. However, the large sites are likely to have specific policies identifying detail requirements for how they should be developed. Consideration needs to be given to the threshold for the size at which development sites should have specific allocation.

Options

What size of site should have a specific allocation in the Local Plan:

- Specific allocations for all residential development sites over 50 units
- Specific allocations for all residential development sites over 25 units

Housing Mix

*Affordable Housing*

There are around 6,000 social rented homes in the town, but turnover is low and the supply of new homes has not kept up with demand. There are almost 1,000 households with the highest levels of need on the Eastbourne housing register, but the wider demand for affordable homes, from single and family households living in the private rented sector, is much greater.

In order to address the scale for the full need for affordable housing in the Borough, it is estimated that there is a need for 430 new affordable homes to be provided per year, which is greater than the

total amount of homes (private and affordable) that the town is likely to be able to sustainably accommodate.

Current policy requires new housing development to make a contribution towards affordable housing at the cost of the developer. This affordable housing should be provided on-site, unless it can be proven that this is not possible, in which case a financial contribution is made towards provision elsewhere. The requirement for affordable housing is set at different levels in different areas of the town due to differences in land values and how much the development can afford to provide.

In reality, very few developments make full provision for affordable housing to meet the policy requirement, particular on-site, due to issues relating to the viability of development.

Over recent years, Eastbourne Borough Council has invested in the delivery of new affordable housing and will continue to do so in the future. In the past five years, 165 new affordable homes have been delivered in Eastbourne, the majority of which have been built by the Council.

The Local Plan could require new development to provide as much affordable housing as possible without making the development unviable. However, reducing the affordable housing requirement could allow greater contributions to be made towards infrastructure provision instead, with the Council delivering affordable housing instead.

Consideration needs to be given to the balance between the provision of affordable housing and the ability to secure contributions towards other types of infrastructure, especially in light of future provision of affordable housing by the Council.

#### Options

What approach should the Local Plan take to balancing affordable housing provision with other infrastructure contributions:

- a) Set affordable housing requirement to maximum that viability will allow
- b) Reduce affordable housing requirement to allow increase in infrastructure contributions
- c) No affordable housing requirement for private housing development to maximise infrastructure contributions and rely on EBC to deliver all affordable housing

National guidance indicates that planning obligations for affordable housing should only be sought for residential developments that are major developments (i.e. 10 homes or more). However, given that the majority of housing development in Eastbourne is on small sites, consideration should be given to whether a lower threshold for affordable housing than that in national guidance can be justified.

#### Question on threshold for affordable housing contributions:

- Should the Local Plan set a lower threshold for affordable housing contributions than required by national guidance? (i.e. less than 10 units)

### *Starter Homes*

Starter homes are new dwellings that are available for purchase by people aged under 40 who don't already own a home, that are sold at a discount of at least 20% of their market value, and always for less than £250,000 (outside of London). The NPPF allows starter homes to be provided as part of affordable housing requirements, however given the importance of providing homes for young families in Eastbourne, consideration needs to be given to whether there should be a specified requirement for starter homes to be provided within major housing developments.

#### Question on the requirement for Starter Homes:

- Should the local plan require all major housing developments to include an element of starter homes?

It is important that new development provides acceptable living standards, for future occupiers of the development and surrounding occupiers, so it must take into account its effect on its neighbours and wider surroundings.

It is fundamental to proper planning that proposals should not have an unacceptable impact on surrounding properties. However, such consideration should not be used to stifle development or make inefficient use of sites where such issues can be overcome by good design.

The NPPF requires that a flexible approach is taken to applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site, as long as the resulting scheme would provide acceptable living standards.

The Local Plan will contain policies that seek to ensure high quality design of new development that protects residential, environmental and visual amenity whilst also ensure that development makes the most effective use of the site.

There are opportunities to use the airspace above existing residential and commercial premises to provide new homes. Upward extensions (i.e. the addition of more storeys on top of existing buildings) would not only create new accommodation, but could potentially increase the size and mix of accommodation available, particularly for families. However, such development could have impacts on the character and 'sense of place' of an area, and would need to be well-designed and maintain safe access and egress for occupiers.

#### Question on upward extensions to buildings:

- Should Local Plan support upward extensions to buildings to create more accommodation?

A significant amount of homes are delivered through the conversion of a large house into smaller units, and the change of use of non-residential uses into homes. This tends to mean that the homes provided are in the form of small, often 1-bed flats. Larger family housing is a valuable resource to meet the needs of larger families and provide housing choice. At the same time the conversion of larger properties into smaller residential units plays an important role in increasing housing supply,

contributes toward the provision of a wider range of housing and helps to meet the needs of a growing number of smaller households, and as such should be generally supported.

Consideration needs to be given to whether restrictions should be put in place on conversions and changes of use to ensure that a mix of sizes are provided and the standard of accommodation is high.

Question on subdivision of existing residential buildings:

- Should the Local Plan contain a policy that requires subdivisions of existing residential buildings to retain units of certain size (i.e. not all 1-bed flats)?

In addition to general support for conversions, the Local Plan will also encourage the redevelopment of garage courts into homes. A number of garage courts across the Borough are in a state of disrepair, and garages are most commonly used for storage purposes as they are often too small to accommodate modern cars. It is considered that the need for more homes should prevail over the use for storage.

The construction of a home on parts of large back gardens attached to existing houses is a common form of development and can provide a useful source of new homes. However, it can create issues in terms of access and parking, the amenities of neighbouring properties, and the character and quality of the local environment. The Local Plan will support such development where appropriate and set out criteria against which such proposals will be assessed.

In seeking to promote residential development within the existing built-up area it is important to maintain existing dwelling stock numbers and resist the loss of residential commitments to other uses, as diminution of these would require replacement dwellings which it may not be possible to provide in such sustainable locations.

Direction of Travel

To ensure appropriate provision of quality new homes, the Local Plan will:

- Resist the net loss of existing residential accommodation
- Support conversion of residential into smaller units under certain criteria
- Protect the residential amenity of future and existing occupiers (e.g. privacy/overlooking; outlook/overshadowing; sunlight/daylight)
- Support for the redevelopment of garage courts into residential use
- Provide guidance on Backland development

Homes for the ageing and disabled population

A strategic challenge for the Council is to ensure a range of appropriate housing that is suitable for Eastbourne's ageing population. There are different types of specialist housing for older people, including age-restricted general market housing, retirement/sheltered housing, extra-care housing

and residential care and nursing homes, with increasing levels of care provided on-site throughout the different types.

It has been identified that the majority of older people want to stay in their own homes with help and support when needed. It is important that councils continue to diversify the range of older persons' housing provision.

There is a recognised need for more retirement housing, which usually consists of purpose built flats where limited communal facilities such as a lounge, laundry room and guest room are provided, with emergency assistance available with the option of additional care packages being brought in. This type of housing provides support for older residents and assists them to live independently. It also provides opportunities for older people to downsize, thus freeing up larger family accommodation.

However, there is a concern that the provision of additional retirement housing will be taken up by people from outside of the area and Eastbourne's age profile will get older still, putting more pressure on social care and health infrastructure and services. Consideration needs to be given to the extent to which new retirement housing developments are supported in light of these issues.

#### Options

How should the Local Plan address the issue of retirement housing:

- a) Support and encourage the development of retirement housing
- b) Restrict the amount of retirement housing that should be provided

The location of any future retirement housing is important to ensure that the development is sustainable and that residents are provided with opportunities to engage in the local community and not be 'shut off' from the outside world.

In order to ensure that retirement housing is located in close proximity to good public transport, local amenities and health services, the Local Plan could consider allocating specific sites, which will provide greater certainty for developers and encourage the provision of sites in suitable locations.

There may be locations around the town that are not suitable for additional retirement housing, and consideration needs to be given to whether to identify specific areas where additional retirement housing would not be permitted.

#### Questions on retirement housing:

- Should the Local Plan make specific allocations for retirement housing?
- Should the Local Plan designate zones where no further retirement housing should be located?

The provision of residential care homes and nursing homes that provide a high level of care to meet all activities of daily living are important for caring for the elderly and those with disabilities who find it difficult to look after themselves. The Local Plan will support the development of specialist housing in appropriate locations to meet this need.

### Direction of Travel

To encourage suitable provision of housing for people with specialist needs, the Local Plan will:

- Support the development of housing for people with disabilities/specialist housing

The provision of suitable and adaptable housing can enable disabled people to live more independently and safely, with greater choice and control over their lives. It is often easier and more cost efficient to build accessible housing or homes that can be adapted in future, rather than retro-fit accessibility measures into existing buildings.

Accessible and adaptable housing will provide safe and convenient approach routes into and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens within the home. Wheelchair user dwellings include additional features to meet the needs of occupants who use wheelchairs, or allow for adaptations to meet such needs.

National guidance allows Local Plans to contain a policy to provide enhanced accessibility or adaptability, and requires that Local Plans should clearly state what proportion of new dwellings should comply with the requirements. A balance needs to be struck between the provision of accessible and adaptable housing and the associated costs of these requirements.

### Options

What requirements should the Local Plan make in terms of specific accessible and adaptable housing within new development:

- a) Require all housing to be accessible and adaptable
- b) Require a proportion of new homes be accessible and adaptable
- c) No specific requirements for housing to be accessible and adaptable

### Design of Housing

The size of accommodation is a key issue for Eastbourne. Recently, it has been identified that accommodation is getting smaller, and this has the potential to have adverse impacts on the living environment and quality of life of occupiers.

The *Technical housing standards – nationally described space standard* sets out guidance for the minimum sizes for different types of accommodation. The NPPF identifies that Local Plan may make use of the nationally described space standards, where the need for an internal space standard can be justified.

It is recognised that in Eastbourne, many homes are created through the conversion of existing properties where it might be more difficult to design accommodation to meet minimum space standards due to existing limitations of the property. However, new build development should always be capable of meeting minimum space standards.

The Local Plan will contain a policy on space standards for new homes, but consideration needs to be given to whether the nationally described space standards are sufficient, or if new locally specific housing space standards should be created for Eastbourne.

#### Options

In order to provide new homes of sufficient quality, should the Local Plan:

- a) Adopt the national housing space standards to assess new residential development
- b) Create locally specific housing space standards to assess new residential development

It is important that the most efficient use of sites is made to provide an appropriate supply of housing. The NPPF requires that where there is a shortage of land for meeting identified housing needs, such as in Eastbourne, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site.

The use of minimum density standards are one way to ensure that efficient use is made of all sites. The Local Plan could apply minimum density standards across the whole town, or on specific developments depending on their size or location.

#### Options

How should the Local Plan use minimum density standards for new residential development:

- a) Apply minimum density standards across the town
- b) Apply minimum density standards according to specific location (e.g. neighbourhoods)
- c) Apply minimum density standards on sites over a certain size threshold
- d) Do not apply minimum density standards

Good design will be very important in ensuring that efficient use is made of development sites, whilst still respecting residential, visual and environmental amenity considerations.

The Local Plan could provide additional guidance on the design of new residential development through design codes which are a set of written and graphic rules that provide specific, detailed parameters for the design of new development. These could be prepared on a Borough-wide basis for all new residential development, or design codes could be prepared that are specific to particular parts of the town. Alternatively, a more basic level of design guidance could be provided either through general policies applying across the whole town or through allocation policies on specific sites.

### Options

In order to ensure quality design of new homes, should the Local Plan:

- a) Create a Borough-wide design codes for new residential development
- b) Create specific design codes for new residential development in certain areas
- c) Set basic design principle through housing site allocations
- d) Flexible approach to housing design/layout

### Houses in Multiple Occupation

Houses in Multiple Occupations (HMOs), where multiple people live in one property as separate households who share facilities such as bathrooms and kitchens, form an important part of the housing mix within an area as they increase the range of accommodation, especially for young professionals, students and people on low wages who are unable to afford a 1-bedroom flat. However, they can have negative impacts on communities in terms of the standard of living environment for neighbouring occupiers, particularly where there is a high concentration of HMOs.

Consideration needs to be given as to whether the Local Plan should introduce a policy that limits the provision of new HMOs in areas where there is already a high concentration or where additional HMOs would create an imbalance in the local community.

### Question on HMOs:

- Should the Local Plan contain a policy that limits the creation of new HMOs in areas where there is a high concentration?

Several institutions in the Borough provide student accommodation, including dedicated accommodation in halls of residence at the University of Brighton sites in Meads, and there is accommodation for staff at the District General Hospital. Aside from this, students rely on the private rented sector for accommodation, often in Houses of Multiple Occupation. In order to reduce the strain on the private rented sector and support the continued presence of the university in Eastbourne, the Local Plan will support and encourage the provision of additional purpose-built student accommodation, particularly within the town centre.

### Direction of Travel

To provide appropriate housing for students, the Local Plan will:

- Encourage the provision of purpose-built student accommodation

### Self-Build Housing

Self-build and custom-build housing offers the opportunity for residents to be involved in the design and construction of their own homes. The benefits include increasing the supply of housing,

enabling more people to get onto the property ladder (through the delivery of lower cost housing), and providing a greater mix and variety of homes.

Since 2015, various duties have been placed on local authorities to help promote self-build and custom housebuilding, including a requirement to keep a register of people interested in self-build, a requirement to have regard to the register when carrying out their functions, and a requirement to grant suitable permissions in respect of serviced plots of land to match demand on their self-build and custom build register.

A total of 63 people have expressed an interest in self-build housing through the Council's Self-Build and Custom Housebuilding Register, which can be accessed via the Council's website, since it was introduced in April 2016.

The Local Plan will contain policies that promote self-building by requiring new development sites to provide plots. This could be done in a number of ways.

The Local Plan could include a policy whereby residential development sites that are over a certain size threshold are required to make a certain proportion of their plots available for sale to self-builders or custom housebuilders.

A policy could be introduced to allow development to provide self-build plots in lieu of a proportion of the affordable housing requirement. This is an approach that is supported by the NPPF.

The Local Plan could make specific allocations to require certain sites to make provision for a specified number of self-build plots. This approach would provide more certainty in terms of the number of self-build plots coming forward.

Self-build plots could be required from development through a residential mix policy that requires new development to maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities,

#### Options

To support self-build housing, should the Local Plan:

- a) Require a certain percentage of units on sites over a certain threshold to be made available for self-build
- b) Encourage self-build in lieu of affordable housing
- c) Allocate specific requirements for self-build on specific sites
- d) Require self-build to be provided on sites as part of the housing mix policy

#### Gypsies & Travellers

As part of supporting mixed and sustainable communities, national policy requires that Local Plan provide suitable and sufficient sites to meet the need for Gypsies and Traveller. Additional work will be undertaken to identify whether there is a need for gypsy and traveller pitches in Eastbourne.

Further work:

- Identify the need for Gypsy and Traveller pitches over the plan period

DRAFT

## Effective Infrastructure

### Summary of Issues:

- ❖ Road network at stress due to increased reliance on car
- ❖ Variable capacity of the sewer network
- ❖ The likely significant impacts of substantial planned development in the South Wealden area on the Borough’s infrastructure
- ❖ The effectiveness of the current arrangements to allow funding infrastructure through development contributions
- ❖ The viability of development in Eastbourne is marginal and there is a limit to what the Local Plan can expect from development whilst ensuring that it is deliverable

The provision of effective infrastructure alongside new housing and employment development is crucial in helping to create and maintain sustainable communities.

Infrastructure refers to the provision of facilities, services and installations that are required to make development acceptable and sustainable, support the needs of the community, enable our local economy to thrive and help to ensure that those living, working in or visiting Eastbourne Borough experience a good quality of life. It includes:

PHYSICAL INFRASTRUCTURE	TRANSPORT	Trunk Road Capacity
		Local Road Capacity
		Rail Services
		Bus Services
		Community Transport
		Walking
		Cycling
		Parking
		UTILITIES
	Gas	
	Water Supply	
	Sewerage	
	Telecommunications	
	COASTAL DEFENCES	Waste/Recycling
		FLOOD DEFENCES

<b>SOCIAL AND COMMUNITY INFRASTRUCTURE</b>	<b>EDUCATION</b>	Early Years and Childcare
		Primary Schools
		Secondary Schools
		Further Education
		Higher Education
		Adult Learning
	<b>COMMUNITY FACILITIES</b>	Indoor Sports/Leisure Facilities
		Community Centres/Meeting Hubs
		Cultural Facilities
		Libraries
		Place of Worship
		Burial Space
	<b>HEALTHCARE FACILITIES</b>	Primary Care
		Secondary Care
		Social Care
	<b>EMERGENCY SERVICES</b>	Fire and Rescue
		Police
Ambulance		
<b>AFFORDABLE HOUSING</b>		

<b>GREEN INFRASTRUCTURE</b>	Outdoor Sport Facilities
	Outdoor Children’s Play Areas
	Parks and Gardens
	Amenity Green Space
	Allotments and Community Gardens
	Green Corridors
	Natural and Semi-Natural urban green Spaces
	Accessible Countryside
	Eastbourne Park

Proposals for growth and development often raise concerns about the capacity of the existing infrastructure. It is important to have realistic expectations about what can be achieved via the planning system and prioritise what is necessary, both to facilitate new development and to sustain it in the longer term.

It is also important to be clear about what we cannot do, which is to expect developers to fund solutions for existing infrastructure problems or seek provision of new infrastructure over and above that necessary to make the impacts of the planned development ‘acceptable’ and the development sustainable on balance.

The National Planning Policy Framework requires local planning authorities to work with other authorities and providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand. Local Plans must identify priority areas and ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion.

An Infrastructure Delivery Plan (IDP) is being prepared alongside the Local Plan. It is an essential background evidence document to achieve a comprehensive understanding of existing infrastructure capacity and provision of services across the Borough and to identify any existing deficiencies which are likely to be a significant constraint to new development.

Ultimately the IDP will include defined infrastructure projects considered necessary to make new development sustainable, based on robust evidence. The Infrastructure Delivery Schedule will identify the costs, funding, timescales for delivery and responsibilities for provision.

#### Direction of Travel

To help create sustainable communities, the Local Plan will:

- Support development by ensuring that infrastructure is provided in a sustainable, co-ordinated and timely manner to meet the needs of new development

In recognising that the infrastructure requirements will change over the Plan period, the Council will work with service and infrastructure providers, East Sussex County Council and neighbouring local authorities to identify and deliver the required infrastructure for proposed development. As part of the preparation of the Local Plan, evidence is continually being gathered on what new infrastructure will be needed and what priority should be accorded to each piece of infrastructure.

#### Infrastructure pressures and requirements

A summary of areas of concern and the main issues identified in the IDP can be found below. For further information, please refer to the IDP report.

##### *Cross-boundary infrastructure*

Any scheme, whether it is for the delivery of new homes or new jobs, will inevitably have some impact on the existing infrastructure, and it is the responsibility of the planning system to identify what is needed to support a particular development. Often the impacts extend beyond the immediate surrounding area where development has occurred and into neighbouring authority areas.

The Borough Council works co-operatively with East Sussex County Council and neighbouring authorities, Wealden District Council and the South Downs National Park Authority, on areas of common interest and cross-boundary issues to ensure that these are effectively dealt with and opportunities are taken to work together where it is beneficial to do so.

Throughout the preparation of the IDP, transport has been identified as the prevailing cross-boundary infrastructure issue. In order to assess the impact of planned growth on the transport infrastructure, a number of cross-authorities transport studies have been undertaken since 2010.

They identified packages of transport interventions required to support the level of housing and employment allocated within the local plans, including through the improvement of alternative modes of transport to the private car.

### *Transport*

Transport issues will need to be considered and addressed to support growth and to bring forward sustainable development. While the Borough is generally relatively well served by public transport, the use of private car remains the main mode of transport in Eastbourne putting significant pressure on the road network and accounting for a large share of the carbon emission.

Improvement projects have been identified on the road network in the South Wealden area including on the A27 east of Lewes, which should alleviate the current hotspots and facilitate acceptable operating conditions on these roads. However to date, there is no planned project for road or junction improvements within the Borough despite the acknowledgment that the network is under pressure.

The Council's desire to provide strong measures to address climate change in particular by aiming at reducing carbon emissions provides an unprecedented opportunity to initiate modal shift, which will also help to alleviate the pressure on the road network. This will be achieved by prioritising measures that will deliver low carbon and ultimately carbon neutral infrastructure to serve the Borough.

These measures will need to be reflected in new development to ensure that they offer realistic, safe and easy access by a range of transport modes. The Local Plan can help to provide good accessibility and enable people to make sustainable travel choices by shaping the pattern of development and influencing the location, scale, density, design and mix of land uses.

It is vital that the decisions on the location and scale of all types of development are integrated with the availability of the appropriate infrastructure to cope with the additional travel, and that this travel be of a sustainable nature. Safe and attractive infrastructure for cyclists and pedestrians as well as good connections to the wider walking and cycling network, and good quality public transport, are essential to achieving this.

#### Direction of Travel

Ensure that all development promotes modal shift by including policies to:

- Favour development in locations with existing walking, cycling and public transport routes
- Make sure that development is designed to give priority to walking, cycling and public transport over cars, ensure maximum convenience for these modes and safeguard land for future and existing walking, cycling and public transport routes
- Help to provide viable, sustainable alternatives to the car on both ends of journeys
- Secure the availability of sustainable non-car travel options to all users of development
- Design new roads within development to accommodate modal shift

The Borough benefits from a generally good public transport provision. The two railway stations in the Town Centre and at Hampden Park, and the further three stations in the functional geographic area, provide regular and direct services to Brighton, London and Hastings with spare capacity to absorb further development. Network Rail and local authorities are looking at options to deliver high speed rail services from Eastbourne to London through Ashford International.

The town is served by a number of commercial bus services providing good daytime accessibility within the Borough and surrounding area, particularly to Polegate, Hailsham and Brighton. In addition, community transport operator Cuckmere Buses provides a number of local bus services in Eastbourne and immediate adjacent area. Whilst these enhance accessibility, they operate on limited days of the week with very limited evening services.

In partnership with Stagecoach, East Sussex County Council continues to work on a range of initiatives to make bus travel more appealing and improve access to the Town Centre and key service destinations. Encouraging greater use of bus services, instead of car journeys, will improve the local environment and contribute to tackling climate change. Reduced traffic congestion and more bus passengers will also lead to improved bus services as their provision becomes more financially sustainable.

In order to provide greater accessibility on the key corridor between Hailsham, Polegate and Eastbourne, East Sussex County Council are conducting a feasibility study to improve movement and access for all road users, with an emphasis on access to public transport, cycling and walking.

There is significant need for an expanded cycle network for short local journeys within Eastbourne, but also for longer journeys linking the Borough to South Wealden and providing access to the National Cycle Network (NCN). This is alongside measures to improve inclusive pedestrian access along specific corridors of movement and within the town centre.

Substantial investment has been secured to develop the cycle and walking network over recent years. In line with Department for Transport recommendations, East Sussex County Council is currently developing a county wide Local Cycling & Walking Investment Plans (LCWIP) which will be published for consultation by the end of 2019. This will integrate and update existing policies and strategies and provide a list of schemes indicating opportunities to support access to key trip attractors within the town and beyond the Borough.

### *Health*

Health services in Eastbourne are provided by the East Sussex Healthcare NHS Trust, the Eastbourne, Hailsham and Seaford Clinical Commissioning Group (CCG), and East Sussex County Council through East Sussex Better Together (ESBT).

East Sussex Healthcare NHS Trust provides acute hospital and community health services for the people of Eastbourne, mainly through the Eastbourne District General Hospital (DGH). The Council will work with the East Sussex Healthcare NHS Trust to ensure that sufficient facilities are delivered to ensure that the service can cater for growth in the Eastbourne and South Wealden area.

The Eastbourne, Hailsham and Seaford CCG is responsible for the commissioning and delivery of the majority of health services for local people, particularly those relating to GP surgeries. Through

the preparation of the Local Plan, the Council will work with the CCG to assess the need for additional health infrastructure provision, as well as identifying how existing facilities can be improved in order to provide increased services.

### *Education*

The East Sussex Education Commissioning Plan 2017-2021, which is based on the housing provision in the current Core Strategy, predicts a decline in demand for school places at Reception age in Eastbourne. However, peaks in birth rates are now working their way through the primary school system. In order to ensure a margin of spare capacity, additional primary school places have been provided through a new primary school at Cavendish School, expansions of existing schools and temporary 'bulge' classes.

There is currently capacity in secondary schools; however as increasing numbers of children come through primary school, there will be a need to increase capacity at Year 7 (first year of secondary school).

The Education Commissioning Plan is currently being updated to identify future capacities and need for future years. The Local Plan is still at an early stage of preparation, and details on the amount and location of additional education provision will be refined as the plan progresses.

### *Sewerage*

The Eastbourne Wastewater Treatment Works (WTW), which is administered by Southern Water, treats wastewater arising from the whole of Eastbourne and for an increasing number of properties in the South Wealden area. Based on current Southern Water design standard, Eastbourne WTW has capacity for an additional 10,000 dwellings, and as such should have sufficient capacity to accommodate growth identified in the Local Plan. Local infrastructure to service individual developments will need to be planned for and delivered in tandem with developments as they come forward.

Southern Water has outlined that capacity in the sewer network is variable and would be assessed in accordance with the provision of specific information such as housing numbers and location as the production of the Local Plan progresses. At the current time, limited capacity is not considered a constraint to development, provided it is coordinated with the delivery of network reinforcement. However, it is understood that there may be wider capacity issues in the town centre that may need to be addressed and may limit the amount of additional development that can be accommodated there.

### *Telecommunication*

Superfast broadband (24+Mbps) is accessible to 98.94% of properties within the Borough, and mobile phone service provision for voice or data is generally good in Eastbourne. Advanced, high quality and reliable telecommunications infrastructure is essential for economic growth and, subsequently brings improvement to residential networks.

For the Borough to become a digital hub, we need to support the expansion of electronic communications networks, including next generation mobile technology and high speed broadband connections, especially if we want to encourage growth within the Borough's economy.

#### Direction of Travel

To improve telecommunications infrastructure, the Local Plan will:

- Support the expansion of the electronic communications network

#### *Gas & Electricity*

New development is unlikely to have a significant direct effect upon National Grid's electricity and gas transmission infrastructure. Generally, network development to provide supplies to the local gas and electricity distribution networks are as a result of overall regional demand growth rather than site specific development.

If new infrastructure is required in response to an increase in demand across the local electricity network, the operator, UK Power Network, may request improvements to an existing National Grid substation or a new grid supply point.

Although there are no specific capacity issues for the provision of gas at the current time, each new development will need to be assessed both individually and cumulatively along with any other development in the area and where necessary reinforcement of the gas system may be required. This may occur towards the west side of the Town Centre.

#### Question on the Infrastructure Delivery Plan:

- Have pressures on the existing infrastructure been adequately pinpointed?

#### Infrastructure funding

Developers may be asked to provide contributions for infrastructure in several ways. They may be required to provide certain types of infrastructure on-site, depending on the size and scale of the development. They may be asked to provide funding for specific off-site infrastructure provision through a legal agreement (Section 106 agreement). Developers may also contribute towards infrastructure through the Community Infrastructure Levy (CIL), which is a non-negotiable payment made by development towards infrastructure provision determined by the Council. Funding from Section 106 agreements and CIL can be pooled from different developments to deliver a large piece of infrastructure.

The Council adopted a CIL Charging Schedule in April 2015. This sets out the CIL charges that development is expected to pay. Viability evidence showed that only new residential development (excluding apartments) and retail development could be required to pay a charge proportional to the size of the development to help deliver infrastructure to support development within the Borough.

Since the implementation of CIL in Eastbourne, 30 individual developments have provided around £270,000 of contributions. The fact that 80% of homes over recent years have come forward in the form of flats, which are not liable for CIL, means that the majority of residential development has not contributed towards the provision of infrastructure.

CIL charging authorities can review their charging schedule and national guidance says that they should ensure that the levy charges remain appropriate over time. A review of the CIL Charging Schedules should take account of market conditions and infrastructure needs, as well as changes in development requirements the Local Plan. Therefore, the CIL Charging Schedule will be reviewed alongside the preparation of the new Local Plan.

#### Direction of Travel

To ensure that new development is making an appropriate contribution to infrastructure provision, the Council will:

- Review the CIL Charging Schedule

Recent changes to the regulations governing developer contributions should also increase opportunities for local authorities and developers to address infrastructure requirements associated with individual planning applications where such activity has previously been constrained.

#### *Viability*

The amount of on-site infrastructure and developer contributions that the Local Plan can require of development are affected by the financial viability of development – what the development can afford to provide. The NPPF expects Local Plans to set out what contributions are expected from development. However these contributions should not undermine the deliverability of development.

The viability of development and the amount that it can afford to contribute towards infrastructure improvements are affected by a number of issues including: the cost of construction; the type and number of specific on-site requirements for development to meet; the value of land that is being developed; and the sale price of the development once it has been completed.

Developments in Eastbourne often have viability issues, which are particularly impacted by the small size and scale of development sites in the Borough, the fact that many of the development sites are previously developed sites, which means that they have a higher existing use value and potential issues of remediation to address, and the low sales prices relative to the wider area, particularly for residential development.

This leaves small margins to allow for financial contributions towards infrastructure improvements. Viability Assessments will be undertaken as part of the preparation of the Local Plan to assess the margins of development generally to meet on-site requirements and contribute towards infrastructure.

Consideration needs to be given to where the balance should lie between the on-site requirements that could be made of development and the amount of developer contributions that could be gained for infrastructure, whilst ensuring that development remains deliverable.

Question on making appropriate requirements of new development:

- Where should the balance be drawn between making on-site requirements from development and the amount of developer contributions that could be gained for infrastructure?

Question on priorities for new development contributions:

- What are the priorities for development contributions, either on-site provision or off-site/financial contributions? How should the following types of infrastructure or requirement be ranked in terms of their priority (with 1 being highest priority):
  - Affordable housing
  - Children's play areas
  - Community facilities
  - Cycling and walking
  - Education
  - Energy efficiency
  - Flood storage and mitigation
  - Green Infrastructure
  - Health
  - Local Labour Agreements
  - Public transport
  - Public realm
  - Renewable Energy
  - Road network
  - Sewerage

Question on other infrastructure or requirements:

- Are there any other infrastructure or requirements that should be prioritised?