Wealden Local Plan Examination

This is the Position Statement from Eastbourne Borough Council (hereafter referred to as ‘the Council’) prepared in response to the Inspector’s Matters, Issues and Questions (version 1).

Matter 3: Objectively Assessed Needs for Housing and Employment Land

Housing

48. The Council do not consider that a 15-year plan period that includes a significant proportion of the plan period now already in the past, covers an appropriate time frame for the provision of housing.

The Regulation 18 Issues and Options consultation identified a plan period from 2013 to 2037. However, by March 2017 this had been reduced to a plan period from 2013 to 2028, and minutes from the Wealden Local Plan Sub-committee meeting in March 2017 suggested that this was a result of evidence gathered during the testing of the preferred option, which showed that development across the District and associated traffic movements had a more substantial impact on the air quality and ecology of the Ashdown Forest Special Area of Conservation (SAC) than previously understood.

The underlying assumption that there would be an adverse effect on Ashdown Forest SAC from air pollution from traffic arising from new development has been found to be incorrect. Therefore there is no justification for artificially limiting the plan period to just 8 years after adoption (assuming adoption in 2020).

The continuing use of a shortened plan period is not sufficient to allow the level of growth required to meet the needs arising, including unmet need from Eastbourne, to be planned positively. It does not allow full consideration to be given to the provision of infrastructure required to support growth, and particularly the importance of a comprehensive off line A27 solution between Lewes and Polegate.

The plan period is not consistent with national policy. The presumption in favour of sustainable development at para 14 of the 2012 NPPF requires local planning authorities to positively seek opportunities to meet the development needs of their area.

In addition, para 157 requires local plans to plan positively for the development and infrastructure required in the area to meet the objectives, principles and
policies of this Framework, and be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.

By artificially limiting the plan period, the plan does not positively seek opportunities to meet the development needs of the area and is therefore in conflict with the presumption.

Such a short plan period post adoption means that the development, and particularly the infrastructure, that is required in order to achieve sustainable development cannot be positively planned and properly considered. In addition, it does not allow full consideration to given to meeting the housing shortfall arising from Eastbourne.

Whilst the plan period does cover a 15-year period, the fact that half of the plan period will be prior to adoption of the plan is not in the spirit of the NPPF, and cannot take account of longer term requirements for the area.

Also, although it is acknowledged that the Wealden Local Plan is being examined against the NPPF 2012 through the transitional arrangements, it is relevant to take into account that the NPPF (2019) states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure (para 22). The current Wealden Local Plan period is in direct conflict with this.

The Council considers that WDC should have planned for a longer plan-period in line with that originally proposed at the Regulation 18 version in 2015 and sought to address Eastbourne’s unmet housing need in line with the Duty to Cooperate and NPPF requirements.

49. Planning Practice Guidance (PPG) associated with the NPPF 2012 provides a definition of housing market areas: “A housing market area is a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap” (Reference 2a-010-20140306).

The Eastbourne Strategic Housing Market Assessment (2016) confirms that evidence indicates that Eastbourne is part of a wider housing market area that extends into Wealden District; however the Council does not agree with the wider Wealden HMA that suggests Eastbourne is within the same housing market area as the north of Wealden and further afield.
It is unrealistic to suggest that Eastbourne, and even areas in South Wealden such as Polegate, have key functional linkages with areas in the north of Wealden and beyond as far as Tunbridge Wells and Haywards Heath.

According to East Sussex in Figures\(^1\), the average house price of the wards in the north of Wealden district (Crowborough East; Crowborough Jarvis Brook; Crowborough North; Crowborough St. Johns; Crowborough West; Frant/Withyham; Rotherfield; Wadhurst) is nearly twice the average house price in the wards comprising Eastbourne Borough plus Pevensey & Westham, Polegate North, Polegate South and Willingdon in the south of Wealden District. The difference in house prices between the north of Wealden and south of Wealden is acknowledged at para 3.7 of the Submission Wealden Local Plan (Submission Document A1).

Origin-destination data from the 2011 census shows that out of the 12,322 people who travelled into the Borough to their workplace, just 250 came from the wards in the north of Wealden district that are identified above. Of 12,883 residents of Eastbourne who travelled out of the Borough to their place of work, 127 travelled to work to these same wards.

Therefore the evidence suggests that the north and the south of Wealden District are in different housing market areas and a designation that covers such a wide area is unsuitable.

The draft Memorandum of Understanding between Eastbourne Borough Council and Wealden District Council that relates to future plan making in Eastbourne and South Wealden, recognises that there is a functional geography covering the Eastbourne and South Wealden area, although the exact boundaries are yet to be determined.

The Council agrees that it is within a shared HMA with part of Wealden District, but cannot see how a HMA that is drawn so widely can accurately reflect key functional linkages between different parts of the District and its neighbours. The Council therefore does not consider the wider HMA to be appropriately drawn.

50. The Council does not believe that an OAHN for the wider HMA should be set, as it does not recognise the wider HMA as an appropriate basis for planning given the significant differences between the north and the south of the Wealden District.

However the Council does consider that an OAHN should have been identified for the Eastbourne and South Wealden HMA.

\(^1\) Average and lower quartile house prices, 2018 – wards (ONS house price data)
The 2012 NPPF is clear that Local Plans should meet the full, objectively assessed needs for market and affordable housing in the housing market area (para 47). The Wealden Local Plan does not seek to meet any of the housing need shortfall from Eastbourne, and is therefore not in accordance with the NPPF.

The Eastbourne and South Wealden HMA does not appear to have influenced the setting of Wealden’s OAHN. In recent years, residential completions in Eastbourne have been formed by a high proportion of flats rather than houses. Many of these have involved the conversion or sub-division of existing properties and there has been an overreliance on windfall sites to meet Eastbourne’s annual housing target. It is likely that this pattern of development will continue and it is therefore considered to be sensible that the housing provision in Eastbourne and South Wealden area are not considered in isolation from one another.

Eastbourne Borough Council and Wealden District Council are looking to address this through a Memorandum of Understanding for future plan making, but the Council do not believe that these issues have been properly considered in this version of the Wealden Local Plan.

51. No comment

52. No comment

53. No comment

54. The Council considers that the level of housing planned should be increased in order to meet the housing shortfall arising from Eastbourne Borough being unable to meet the housing need within the Borough boundary.

The capacity of Eastbourne to accommodate housing growth is physically constrained by the South Downs National Park to the west, the sea to the south, the Mountney Levels/Pevensie Levels to the east, flood risk through the centre, and the boundary with Wealden District to the north. In addition, there are further development viability constraints in Eastbourne compared to Wealden, evidenced by the fact that the Eastbourne CIL Charging Schedule identifies a charge of £50 per sqm for residential (excluding apartments in Eastbourne), whilst just across the administrative boundary in south Wealden, the CIL charge for residential is £150 per sqm.
The Local Housing Need for Eastbourne, calculated using the standard methodology in April 2019, amounts to 668 homes per annum. The interim Eastbourne Strategic Housing & Employment Land Availability Assessment Update 2019 indicates that Eastbourne has capacity to accommodate 207 homes per year over a 20-year period. This results in a shortfall of 461 homes per year.

The level of housing planned in the Wealden Local Plan should be increased to accommodate the shortfall arising from the lack of capacity in Eastbourne to meet its local housing need.
Employment

55. The Council does not consider that the timeframe for the provision of employment and retail is appropriate. The period, 13 years and just eight post-adoption, does not allow for the consideration of long term employment needs, and particularly the long term needs arising from Eastbourne that cannot be met within the Borough boundary.

Viability issues associated with offices and industrial uses means that sites may not necessarily come forward immediately, but there is a need to safeguard appropriate sites through sufficient allocations to ensure that long term needs can be met.

This is particularly relevant due to the fact that the current state of the A27 acts as a constraint to business growth and inward investment into the Eastbourne and South Wealden area. Improvement to transport infrastructure, such as the dualling of the A27, will improve the attractiveness of the location for businesses, so it is important that sufficient employment land is safeguarded through employment land allocations to accommodate the demand for growth when it arises.

The plan period should be extended to ensure that an appropriate amount of employment floorspace is identified, including meeting the shortfall in class B8 floorspace arising from Eastbourne, and to ensure that provision of the infrastructure required to support growth, and subsequent growth arising from infrastructure improvements, is positively planned.

56. The Submission Wealden Local Plan (Submission Document A1) identifies that wider functional economic market area is consistent with the Wealden District Council’s identified housing market area (para 3.4).

The Eastbourne Economic Development Needs Assessment [EDNA] (2017) does not concur that Eastbourne is in the same functional economic market area as the north of Wealden District.

The EDNA shows that the most significant destinations for out-commuting from Eastbourne are the southern parts of Wealden, and there is also a concentration of workers travelling into Eastbourne from south Wealden. The EDNA identifies a local travel to work area for Eastbourne as being Eastbourne plus the southern areas of Wealden to Hailsham.

In addition, market intelligence shows that Eastbourne’s commercial market is defined comprising the greater Eastbourne urban area spanning Eastbourne
Borough and extending into adjoining Wealden, generally as far as the settlement of Polegate.

Therefore, the EDNA concludes that Eastbourne’s Core Functional Economic Market Area (FEMA) incorporates the Eastbourne and southern parts of Wealden, most notably the towns of Polegate and Hailsham.

This is further evidenced by the fact that employment space provided recently in Polegate has acted attracted businesses formerly located within the Borough due to the higher quality accommodation. The EDNA recognises that local Eastbourne businesses will generally consider relocating to Polegate if appropriate accommodation cannot be found within the town, given the relative proximity.

The EDNA identifies a need in Eastbourne for 70,090 sqm of class B floorspace up to 2035, based on a baseline jobs growth forecast. This includes a requirement for 50,770 sqm of class B8 floorspace, which cannot be met within Eastbourne due to a lack of suitable development sites. Not only is there insufficient capacity in Eastbourne for such a quantum of class B8 floorspace, it is considered that the provision of such industrial floorspace would be more sustainably located within Wealden District, closer to the A27 and A22, which would prevent unnecessary vehicles movements into Eastbourne and also be more attractive to potential occupiers.

The Wealden Local Plan does not appropriately consider these economic linkages between Eastbourne and south Wealden, and particularly the suitability of locations within the FEMA for different types of employment uses.

Wealden Local Plan Policy WLP1 makes provision for just 22,500 net additional sq. metres of employment floorspace (B1/B2/B8) on the basis that previous supply of employment space has outstripped economic forecasts and predicted population growth, and that there is a need to ensure that future growth can reflect the previous economic requirements and not unduly hinder economic provision (para 6.5).

This employment requirement does not have into account the need arising from the Eastbourne and South Wealden FEMA, and particularly the need for employment space that cannot be met within Eastbourne Borough, that should be met elsewhere in the FEMA (i.e. Polegate and Hailsham). This is inconsistent with 2012 NPPF para 160 that states that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area.
57. As previously stated, the EDNA identifies a need for 70,090 sqm of class B floorspace up to 2035, including a substantial requirement for class B floorspace that cannot be met within the Borough due to a lack of suitable development sites. It is considered that class B8 uses would be more sustainably located in south Wealden, closer to the A27 and A22, which would prevent unnecessary vehicles movements into Eastbourne and also be more attractive to potential occupiers. This would allow the employment space to be within the same FEMA, and therefore be suitable alternative locations for businesses in and around Eastbourne that are looking to expand.

Wealden District Council have previously indicated that they would be able to accommodate Eastbourne’s shortfall in terms of class B8 uses, but the Wealden Local Plan does confirm this, nor does it identify how much and where it will be delivered.

Although WDC suggests there is flexibility in land allocations to help meet needs if it is able to do so, it is not considered that this gives sufficient certainty that needs are being appropriately planned for.

Therefore, the level of employment provision made in the Wealden Local Plan should be increased to accommodate the class B8 employment space shortfall from Eastbourne.