1. Paragraph 21 of the NPPF states that local plans should set criteria or identify strategic sites for local and inward investment to meet anticipated needs over the plan period.

2. Paragraph 8.1 of the Economy Background Paper (document A17) states that the identified Jobs Growth capacity figures across the district (table in paragraph 7.7 and Policy WLP9) together with the A22 employment allocation will meet the business land requirements for the district and aligns with the testing for the transport assessment.

3. As stated in paragraphs 7.5 and 7.6 of the Economy Background Paper Policy WLP9 is a windfall based approach to employment development in the context of Policy EC2. Policy EC2 identifies where new employment land will be supported but it does not set policy criteria for assessing employment proposals.

4. The provision of jobs in Policy WLP9 is a capacity led approach largely related to an assessment of traffic movements across Ashdown Forest.

5. No account has been taken of the availability of employment land in each area, the type of sites that might be provided and how they might meet business need or the potential to deliver the floorspace equivalent which is a significant total of over 200,000 sqm.

6. For example it is very difficult to envisage how over 9,000 sqm of business floorspace could be provided through windfall sites in Polegate and Willingdon which the table in Policy WLP9 shows. (Middle Super Output Areas 019 & 021)

7. Indeed, at the time of the Core Strategy in order to deliver 8,600 sqm of employment floorspace in Polegate & Willingdon a strategic development area was identified (Policy WCS4/SD4). The strategic development area has been removed from the Submission Plan so it is unclear how over 9,000 sqm of floorspace could be delivered in Polegate and Willingdon without the identification of a similar strategic development area.

8. The Council has raised concern in paragraph 17 of its note that if more housing was provided in the south of the district without significant job increases in the same area it would result in longer distance traffic including on Ashdown Forest roads. This can be overcome by allocating land for mixed use development including both strategic housing and employment use.

9. This is particularly important with regard to Polegate and Willingdon. The census data for Polegate and Willingdon shows a significant draw from jobs in Eastbourne with only around 8% of the population employed in the MSOAs 019 and 021 combined whereas almost 50% are employed in Eastbourne. It is important therefore that the 9,000 sqm of business floorspace in Polegate and Willingdon (Middle Super Output Areas 019 & 021) is delivered in order to reduce commuter trips particularly traffic flows into Eastbourne. Similarly, providing more housing in Polegate and Willingdon would help reduce the length of commuter trips into Eastbourne and
with the availability of good quality bus and rail connections to Eastbourne the reliance of private cars would likely reduce.

10. Furthermore, there can be no certainty from the windfall approach in Policy WLP9 that the employment land need in the professional, scientific and technical sectors, identified in paragraph 5.1 of the Economy Background Paper, can be met in both quantitative and qualitative terms. This is important as travel for employment is partly dependent on socio-economic factors and the provision of jobs doesn’t necessarily reduce travel as it depends on jobs matching the available workforce and vice-versa. The demand for professional grade employment would be expected to increase travel distances compared to lower grade employment. In order to meet the needs of the professional, scientific and technical sectors and reduce the potential for longer travel distances a more positive approach should be taken to identify and allocate land for employment purposes having regard to needs of different business sectors and the type and location of sites required.

11. As currently drafted the plan has not been positively prepared and does not comply with paragraph 21 of the NPPF.

12. The approach taken in Policy WLP9 also raises an issue about the relationship with housing provision. Paragraph 8.2 of the Economy Background Paper states that the amount of proposed employment land is higher overall compared to calculated need and forecasts. There is a concern that this could fuel demand for additional housing. If there is sufficient ‘headroom’ in relation to vehicle trips over Ashdown Forest for additional employment then the question arises as to why not provide additional housing.