

Eastbourne Local Plan – Growth Strategy

Introduction

Eastbourne Borough Council is preparing a new Local Plan which will guide the type, amount and location of development in the borough up to 2039.

Following a previous consultation in 2019, the Council are now undertaking a public consultation on the level of housing and employment growth that could be accommodated in Eastbourne and where it might be located, in order to inform the next stage in the preparation of the Local Plan.

The Local Plan will seek to accommodate both housing and employment growth, and the purpose of this document is to seek your views on the way in which those growth needs should be met within the borough over the period to 2039.

This consultation focuses specifically on housing and employment growth, including key development sites, and as such is not a draft Local Plan. Other issues, such as addressing climate change, encouraging regeneration, and protecting the natural, built and historic environments, will be included in the Local Plan once prepared, and this will be subject to a future public consultation.

Further detail on the issues discussed in this consultation document is provided within a series of Background Papers and supporting documents available from the Council's website¹. Responses to 'Frequently Asked Questions' is also available.

We are asking for your views on the 'Growth Strategy' identified in this consultation document so that these can be considered before we determine how and where growth will be proposed in the Local Plan.

The consultation is being undertaken between Friday 11th November 2022 and Friday 20th January 2023.

Councillor Message

As the Cabinet Member with responsibilities for planning for Eastbourne Borough Council, I am pleased to introduce the Local Plan Growth Strategy for public consultation.

The Local Plan is an important document as it will set out a vision and a strategy for the borough to help shape growth to 2039, and this consultation is an important stage in identifying how much growth Eastbourne will be able to accommodate over the next 20 years.

¹ www.lewes-eastbourne.gov.uk/eastbournelocalplan

Whilst this consultation paper focuses growth, the final Local Plan aims to achieve a balance between new homes and jobs, in an environment where people wish to live and work and have a quality of life, for both current and future generations.

This is your opportunity, as residents and stakeholders, to help guide the future development of the borough. I believe that it is vital for as many of you to provide your views, comments and feedback on the proposals as possible, and I would urge you all to get involved in this consultation.

Cllr Colin Swansborough - Portfolio Holder for Climate Change, Place Services & Special Projects

Context

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

The Local Plan is used to guide decisions on the location, amount and type of development that 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.

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.

The new Local Plan will set out a vision, objectives and development strategy for the whole of the Borough covering the period 2019 to 2039, alongside a range of policies that will guide development and infrastructure requirements to ensure that it helps to deliver that vision and strategy.

The Local Plan will also include allocations for various land uses such as residential and employment. The Local Plan will help provide certainty to local residents, developers and other stakeholders about what will happen in the Borough up to 2039. Once adopted, it will replace the existing Local Plan that was adopted in 2013.

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.

Work on the new Local Plan commenced in 2018 when the current Local Plan (known as the Core Strategy) became five years old. In 2019, the Council undertook an 'Issues & Options'

consultation² to seek views on some of the initial options and ideas for the strategy for development and the 'direction of travel', including the vision and objectives, for the new Local Plan.

In relation to housing growth, the 'Issues & Options' identified six options for how new homes could be delivered in Eastbourne, based on different densities and the way sites could be used to deliver housing. The options were not considered to be 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.

Options for Growth identified in the 'Issues & Options':

- Option A: Densities based on the prevailing character of the area surrounding the site;
- Option B: Increasing the proportion of houses being delivered on sites;
- Option C: Increasing the proportion of flats being delivered on sites;
- Option D: Providing taller residential buildings in Town Centre;
- Option E: 50% increase on the prevailing density on all sites within the existing built-up area;
- Option F: 50% increase on the prevailing density on all sites of more than 0.5 hectares

A summary of responses made to the Issues & Options consultation relating to the questions on how Eastbourne will accommodate housing and employment land is provided as a supporting document to this consultation and is available on the website³. A full response to all comments received on the Issues & Options consultation will be provided at a later date alongside the draft Local Plan. It is important to note that this Growth Strategy consultation builds upon, rather than supersedes, the Issues & Options consultation, so all comments made will be addressed in the next stage of the Local Plan's preparation.

Having reviewed the comments received on the Issues & Options, it is clear that a single approach on its own is unlikely to be able to address issues of housing and employment growth across the borough.

Since the 'Issues & Options' consultation, further evidence has been gathered through new technical studies to inform the preparation of the Local Plan. This evidence has been used, along with the responses to the 'Issues & Options', the updated national planning policy and guidance and the Sustainability Appraisal process, to identify a 'Growth Strategy' that is the subject of this consultation. This Growth Strategy is based on a combination of Options D and E identified in the 'Issues & Options' consultation.

It is important to note that this consultation document does not contain draft policies and does not contain all of the detail that will eventually be included in the Local Plan. It is, however, an important step in policy development which builds on specific issues presented

² www.lewes-eastbourne.gov.uk/ebissuesandoptions

³ www.lewes-eastbourne.gov.uk/eastbournelocalplan

at the previous consultation stage to the draft plan which will be consulted upon next year, as identified in the Local Development Scheme.

The number of homes and the amount of employment space that can be provided is heavily influenced by 'showstoppers' that provide a strong reason for restricting the overall scale, type or distribution of development in the plan area, as identified in the National Planning Policy Framework [NPPF] (2021). These are:

- habitats sites and/or sites designated as Sites of Special Scientific Interest;
- land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast;
- irreplaceable habitats;
- designated heritage assets (and other heritage assets of archaeological interest); and
- areas at risk of flooding or coastal change.

These 'showstoppers' have been used at this stage in the process as the basis for assessing the potential developability of sites. However, evidence gathering is still on-going, and this may identify that some sites have some negative impacts that cannot be satisfactorily mitigated, and this could potentially result in some sites no longer being considered suitable for inclusion in the future draft Local Plan.

Flooding from the sea, rivers and surface water is a significant issue that will impact future development in Eastbourne. Parts of Eastbourne, particularly through Eastbourne Park, are classified as 'functional floodplain', which is defined as where water is stored in time of flood.

Whilst 'functional floodplain' is a showstopper for development, sites in areas with a lower risk of flooding have been identified in this consultation. Where sites have been identified as having a risk of flooding, further work is being undertaken to assess the detailed nature of any risk, taking climate change impacts into account, to ensure that any proposed development sites can be made safe from flooding for its lifetime and is designed so that it will not increase flood risk elsewhere.

In addition, the Pevensey Bay to Eastbourne Coastal Management Scheme, which is seeking to deliver a £100 million coastal flood and erosion risk management project to ensure that the town is resilient to coastal flooding in response to the current climate emergency, is also a key consideration and future decisions on how this will be delivered will influence the on-going preparation of the local plan, including the potential suitability of sites.

There are also other important considerations that will affect the developability of sites. Further detailed work is being prepared to inform the on-going preparation of the Local Plan, including assessing the ecological impacts of development in particular areas, identifying landscape and townscape impacts of development in different locations, and evaluating the financial viability of development to ensure that sites and policies are realistic and deliverable, including infrastructure necessary to support their development.

Growth Strategy

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 needs of a changing population, to help address the housing affordability crisis and to attract and retain working age households that will contribute to the local economy.

Similarly, the provision of new employment development provides more jobs and greater opportunities, especially for younger people and business start-ups, which increases the worth of the local economy and attracts value to the town.

The NPPF requires that local plans have an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, employment, retail, leisure and other commercial development needs. This means that the Local Plan must set out a housing requirement for the plan period, identifying the number of homes that are required to be delivered each year. The Government checks delivery of housing in each planning authority through the Housing Delivery Test and there are sanctions if the requirement is not met.

The Government determines that the number of homes needed in Eastbourne is 738 homes per year, or 14,760 homes over the plan period. This is calculated using the 'Standard Method' that is set out in national policy.

Whilst there is no equivalent to the 'Standard Method' for calculating employment needs, the Eastbourne and Wealden Employment and Economic Study (2022)⁴ identifies a need for at least 76,184 sqm of employment (office, industrial and warehouse) floorspace to be provided in Eastbourne between 2021 and 2039.

The NPPF expects local plans to meet their identified need for housing and employment uses, unless there are strong reasons 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 is unable to meet its development needs 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, and much of the land through the central area known as Eastbourne Park is functional floodplain. These physical and environmental constraints limit the amount of land that is available to develop. As such, the town does not have sufficient land to meet development needs in full, even at significantly increased densities. This means that the Government will require us to consider all sites with potential for development and to ensure that all opportunities are maximised so as many new homes and employment spaces are accommodated as possible in a sustainable way.

⁴ www.lewes-eastbourne.gov.uk/eastbournelocalplan

This means that the housing requirement for the local plan will be a capacity-based target, rather than a needs-based target.

Under the Localism Act 2011, Eastbourne Borough Council currently has a duty to co-operate with neighbouring authorities and statutory organisations. Discussions are on-going with Wealden District Council regarding how much, if any, of Eastbourne's unmet need can be accommodated outside of Eastbourne's boundaries.

The majority of new homes will be delivered by making the most efficient use of previously developed land within the built-up area through increasing the density of new development in locations that are highly accessible to services and public transport, whilst also respecting the character of the local area. This would include seeking higher densities on sites in the town centre through the provision of taller buildings.

In identifying a capacity-based target for Eastbourne in the Local Plan, the following have been taken into account:

- Sites that have already been completed within the first three years of the plan period
- Sites that have a current planning permission where development has not yet been completed
- An allowance for the delivery of homes on sites that cannot be identified in advance, which is based on past trends and adjusted to take into account on-going circumstances
- Sites identified as being suitable, available and achievable for future development through the Land Availability Assessment (LAA).

A total of 557 new homes were built in the first three years of the plan period (2019 - 2022) and there are 1,090 homes that have an existing planning permission across 135 sites (as at 1st April 2022).

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, but it is a consistent source of supply that is expected to continue. Therefore, an allowance has been made for 1,260 new homes being delivered through conversions and changes of use over the plan period, based on past trends and how these are expected to change in future.

The Land Availability Assessment (LAA) has identified 197 sites that could deliver homes and employment space. This includes:

- 137 small sites (providing less than 10 homes each) within the existing built-up area that have the potential to provide 407 homes via 'infill' or redevelopment of existing sites
- 38 medium-sized sites (providing between 10 and 25 homes each) within the existing built-up area that have potential to provide 564 homes via 'infill' or redevelopment of existing sites

- 22 large ‘strategic’ sites that have potential to accommodate 2,523 new homes and 53,000 sqm of employment space through redevelopment of existing sites and extensions to the built-up area

This means that the Eastbourne Local Plan will make provision for 6,401 new homes (equivalent to an average of 320 new homes per year) and 53,000 sqm of employment floorspace (consisting of 13,000sqm of office use, and 40,000sqm of industrial and warehouse uses) over the plan period between 2019 and 2039.

This ‘Growth Strategy’ aims to ensure a balance between:

- Providing housing and employment opportunities for future generations
- Making the most efficient use of the limited amount of land available for development by increasing the density on sites in the most sustainable locations within walking distance of services and facilities (where local character and townscape allows), thereby reducing the need to travel and supporting local businesses
- Protecting the residential and environmental amenity of existing and future residents
- Mitigating the impacts of climate change by avoiding development within the areas at the highest risk of flooding
- Safeguarding the most valuable green, open spaces and habitats
- Ensuring that infrastructure can meet future demands from growth

This means that growth is mainly focused on previously developed land, mainly within the Town Centre and immediately surrounding neighbourhoods such as Seaside, Upperton and Meads. There are also a number of former industrial sites in Roselands & Bridgemere that can provide new homes. The distribution of homes by neighbourhood is identified in the graph below. Overall, in excess of 80% of the new homes provided would be on ‘brownfield’ land.

However, not all new development can be accommodated on ‘brownfield’ land. The ‘Growth Strategy’ also includes the development of ‘greenfield’ sites where there are no ‘showstoppers’ to development. This includes three sites located on the fringes of Eastbourne Park that will provide 390 new homes, and the expansion to the east of the town into the East Langney Levels, which will provide 587 new homes.

Issues around affordable housing and the type, size and mix of homes will be addressed at the next stage in the local plan process.

New industrial and warehouse space amounting to 30,000 sqm will be provided via expansion adjacent to the existing designated industrial estates off Lottbridge Drive. Office provision will be mainly focused on development at Sovereign Harbour (Site 6), which will provide 10,000 sqm of office floorspace and is carried forward from the previous Local Plan, with some additional office space (3,000 sqm) being provided as part of a mixed-use development on land adjacent to the Enterprise Centre and Railway Station in the Town Centre.

This 'Growth Strategy' represents an overall increase of 13% in the existing number of homes in the town, and an increase of 15% in the existing employment floorspace in the town, between 2019 and 2039.

It is important to understand that this level of growth would be provided in Eastbourne over 20 years. The potential complexity of some of the sites means that there are likely to be lower levels of housing delivery in the short-term, with the number of new home completions increasing later in the plan period.

Key Development Sites

A number of 'key development sites' have been identified that could accommodate relatively large-scale development for Eastbourne. These are generally sites identified in the Land Availability Assessment as being potentially capable of accommodating more than 25 homes or 3,000sqm of commercial floorspace, but also includes large sites that have an extant planning permission to provide a full picture of where development is expected to take place over the plan period. Further detail on these sites is provided in the Housing Background Paper.

These 'key development sites' are not currently subject to any 'showstopper' constraints and are likely to be considered for allocation in the Local Plan. However, it is recognised that a number of these sites do have issues that would require mitigation if they were to come forward for development, and further work is being undertaken to understand these.

1 – Land adjacent the Enterprise Centre and Railway Station

Currently allocated in the Town Centre Local Plan, this site is a previously developed site, consisting of a surface car park serving the Enterprise Centre and the Railway Station. The site could provide around 5,000sqm of retail space and 3,000sqm as an extension to the Enterprise Centre, and around 192 homes through the provision of a tall building with replacement parking provided on the lower floors.

2 – Junction Road Car Park

The site consists of a 6-storey multi-storey car parking, located within the Town Centre. The current condition of the building means that it is unlikely to re-open as a car park, which means it would have the potential for redevelopment to provide around 80 homes through the provision of a tall building.

3 – Former Debenhams site, 152-170 Terminus Road

The site is a vacant 3-storey retail building within the Town Centre, and size and layout of the existing building means that it is unlikely to be reused for retail use as it currently is. The site has the potential to accommodate around 120 homes through the provision of a tall building with approximately 1,000sqm of retail and leisure space on the ground floor.

4 – Former TJ Hughes site, 177-187 Terminus Road

The site is a former 4-storey retail building and is currently subject to a proposal for the redevelopment of the site to provide 65 homes and around 700 sqm of retail space on the ground floor. The development of the site is proposed to retain the existing façade. The site is located in a sustainable location in the Town Centre, with good access to services and facilities and accessibility to public transport.

5 – Former Law Courts, Old Orchard Road

The site of the former law court on Old Orchard Road is currently subject to a proposal for redevelopment to provide 35 homes, including provision of affordable housing. Being within the town centre, the site is in a sustainable location with good access to services and facilities and access to public transport, and it is also adjacent to an existing residential area.

6 – Former Police Station, Grove Road

The former Police Station on Grove Road has been vacant for a number of years since the Police reception moved to 1 Grove Road. The site currently has planning permission of a change of use to create 50 homes in a sustainable location close to services and facilities with good access to public transport.

7 - 56 Langney Road

The site is a 2-storey retail unit in the town centre that is expected to become available for redevelopment later in the plan period. The redevelopment of the site, which could incorporate a taller building, could provide an additional 47 homes within a sustainable location.

8 – Bedfordwell Road Depot

The site is a former depot located off Bedfordwell Road alongside the railway line. There is a proposal for a mixed-use development providing a total of 100 homes, which would include the conversion of the existing listed Pump House building to residential and commercial use. The site would also include green infrastructure, and has the potential to facilitate access to the western part of Land at Tutts Barn Lane (Site 9).

9 – Land at Tutts Barn Lane

This site on the edge of Eastbourne Park could be considered in two parts: the former railway sidings to the east of the site adjacent to the railway line and north of the Bedfordwell Road development site, which could accommodate around 150 homes; and the western part of the site adjacent to the existing allotments (which would be retained) along Tutts Barn Lane, which could accommodate a further 120 homes.

10 – Fisherman's Green

The site currently consists of surface car park, tennis courts and community and commercial uses. There is redevelopment potential for the site, and one option could be the provision of

around 80 homes. Any loss of existing community uses and sports courts as a result of development should be re-provided. The site could be impacted by proposed solutions to coastal flooding defences as part of the Coastal Management Scheme, which could mean it may be unavailable for development in future.

11 – East Sussex College site, Cross Levels Way

East Sussex College is seeking to rationalise the use of its Eastbourne campus which will release surplus land, thereby releasing capital for investment into the educational provision at the campus. The surplus land could accommodate approximately 200 - 275 homes, including the potential for extra-care provision, in addition to enhanced educational accommodation for the college.

12 – 2-4 Moy Avenue

Consisting of a derelict warehouse building adjacent to a residential area, the site has planning permission for the refurbishment of the existing building including a change of use to residential, and the development of two further blocks to the rear of the refurbished building to provide a total of 72 homes.

13 – ESK, Courtlands Road

The ESK site on Courtlands Road consists of a retail warehouse and surface car park, located between an industrial area and a residential area. There is a proposal for the redevelopment of the site to provide 136 homes through a mix of houses and flats, with around 300 sqm of commercial space also being provided.

14 – Dairy Crest, Waterworks Road

The Dairy Crest site on Waterworks Road, a former warehouse building located on the edge of an existing industrial estate and adjacent to a residential area, has a current planning permission for the comprehensive redevelopment of the site to provide 60 new homes.

15 – Land at Southbourne

The site is a greenfield site within Eastbourne Park but adjacent to the current built-up area. The northern part of the site adjacent to Lottbridge Drove has potential for the development of around 30,000 sqm of industrial and warehouse space. The southern part of the site adjacent to the existing residential area could be suitable for around 85 homes, with a clear buffer provided between residential and employment uses.

16 – Former Gas Works, Finmere Road

The site is a former gas works, located between residential and industrial uses. The site has been decommissioned, but its former use as a gas storage facility means that it will require demolition, decontamination and remediation. Once this has taken place, the site could potentially accommodate approximately 10,000 sqm of industrial and warehouse space, subject to alternative access arrangements being made.

17 – Land off Pevensey Bay Road

The development of this site would be part of an extension of the existing urban area into the East Langney Levels. Development would be focused towards the southern part of the site adjacent to Pevensey Bay Road and could accommodate around 375 homes. The site would be required to provide appropriate open space and flood, landscape and ecology mitigation, and maintain adequate buffers from existing watercourse.

18 – Land at East Langney Levels

The development of this site would be part of an extension of the existing urban area into the East Langney Levels. The site would require flooding, ecological and landscape mitigation, but if these issues can be overcome it is considered that the site could potentially accommodate 212 homes.

19 – Wood's Cottages, Swanley Close

The site of two former residential properties within extensive grounds, previously used as a brickworks that operated up until the 1940s. It is currently subject to planning permission for the construction of 51 homes with parking, access and landscaping.

20 – Land North East of St Anthony's Hill

This is a greenfield site on the fringe of Eastbourne Park, adjacent to the Langney roundabout. The site is not part of the functional floodplain, but does have potential flooding issues that need further investigation. The site could accommodate 35 homes, taking into account the irregular shape of the site and the need to provide on-site mitigation.

21 - Sovereign Harbour Site 6

Currently allocated for employment (office) use, this sites currently contains one office building (Pacific House) and the Sovereign Harbour Community Centre. The site could accommodate an additional 10,000 sqm of office floorspace.

22 – Sovereign Harbour Site 7a

An area of scrub / shingle located between a doctor's surgery and newly established park, the site is currently allocated for employment (office) use, but the high need for homes means that different uses now need to be considered. The site should still provide some employment-generating uses, but could also provide around 40 residential units.

23 – Former Moira House School, Upper Carlisle Road

The Former Moira House School site currently has planning permission for the change of use of some existing school buildings to residential use, and the new build development of additional houses within the site. The site would accommodate 52 homes plus amenity space and playspace.

Eastbourne College sites:

24 - Summerdown Field, Compton Drive

25 – New Field, Upper Carlisle Road

Eastbourne College Incorporated is seeking to consolidate their operations around College Field, including the potential disposal of some outlying sites in order to fund the development of new and improved educational facilities. Playing Fields at Summerdown Field, Compton Drive and New Field, Upper Carlisle Road are located some distance from the main campus and there is potential, through better use of existing sites, for these playing fields to be made available for development. The sites could both accommodate approximately 35 homes each, but may be subject to alternative provision being made to compensate loss of existing playing pitches.

University of Brighton sites:

26 – Welkin site, Carlisle Road

27 – Hillbrow site, Denton Road

28 – Aldro and Queenswood sites, Darley Road

The University of Brighton have confirmed their intention to relocate their Eastbourne facilities to Brighton, meaning that their current locations may become available for redevelopment.

The Welkin site contains relatively new purpose-built student accommodation that could be converted to self-contained flats, with potential for additional development to the front of the site. In total, the site could provide around 113 homes.

At the Hillbrow site, the buildings currently used for offices and teaching accommodation could be converted or redeveloped to residential use to provide around 25 homes whilst also retaining the existing sports centre and facilities.

The Aldro and Queenswood sites, located adjacent to each other on Darley Road, could be suitable for future residential use. The size of the Aldro site would lend itself to a mixed development of flats and houses providing around 154 homes, whilst Queenswood could also provide a further 57 homes.

Infrastructure

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

Population forecasts indicate that the Growth Strategy identified in this consultation document would result in a population increase of around 8,300 people (8%) over 20 years.

Proposals for growth and development often raise concerns about the capacity of the existing infrastructure. The NPPF requires the Local Plan to make sufficient provision for infrastructure and we are working with infrastructure providers to assess the quality and capacity of infrastructure and its ability to meet forecast demand.

It is important to remember that development will still come forward and will still create impacts on infrastructure even if a Local Plan is not put in place. Through a Local Plan, we can identify where and when development is likely to take place, and therefore plan for cumulative infrastructure impacts and requirements in advance.

An Infrastructure Delivery Plan (IDP) is being prepared alongside the Local Plan to provide a comprehensive understanding of existing infrastructure capacity and provision of services across the Borough and to identify any existing deficiencies and where improvements are needed to overcome constraints.

The current understanding in terms of infrastructure capacities and constraints is identified below, and further engagement with infrastructure providers will be undertaken through the course of local plan preparation.

Transport

An early assessment of the likely transport impacts of future growth has been undertaken to understand the need for improvements to transport infrastructure to accommodate growth from Eastbourne and from the wider area.

Transport modelling indicates that Local Plan growth could have severe impacts on the borough road network, but this is not a constraint to growth as the impacts can be mitigated. The preferred approach for mitigation is to firstly reduce the number of car trips by encouraging modal shift to more sustainable travel options, before considering options for increasing capacity on the road network.

The 'Issues & Options' identified modal shift as a key priority for Eastbourne, so a framework of sustainable transport solutions that explore the potential for modal shift and reduce forecast levels of car use has been identified. This includes initiatives such as:

- planning for '15-minute' neighbourhoods with easy access to key services, public transport and active travel networks
- providing 'car-free' development in accessible locations to reduce car ownership
- Moving away from car dominated roads to create safe and connected sustainable travel corridors
- Increasing capacity for public transport, including bus priority routes and junctions, and integration between bus, rail and sustainable travel.

These measures could result in a 15% reduction in car use. However, some junction improvements will also be required, particularly on the A259 and A2021, to create some additional road capacity.

Further modelling will be undertaken as the preparation of the Local Plan continues to provide more detailed analysis of how specific measures, journey-purposes and corridors will create greater modal shift on the network.

Health

GP practices work together with community, mental health, social care, pharmacy, hospital and voluntary services in their local areas in groups of practices known as primary care networks (PCNs).

There are three PCNs covering Eastbourne, each of which is responsible for identifying future need for primary care health infrastructure provision in their areas through the production of an 'Estates Strategy'. The Eastbourne PCNs are currently preparing their Estates Strategies, and Eastbourne Borough Council will work with the PCNs to ensure that they take into account future growth from the Local Plan.

Education

Forecasts based on the level of growth identified indicate that there is unlikely to be a need for additional early years, primary or secondary school places in Eastbourne beyond the capacity that is presently available. This is due to birth rates predicted to continue to fall over the plan period.

However, there may be a future need for additional school places for pupils with Special Educational Needs and Disabilities to be created over the plan period. Further work and engagement will be undertaken with East Sussex County Council to understand how this would best be provided.

Flood Defences

The Environment Agency, East Sussex County Council and the Pevensey Levels and Cuckmere Water Levels Management Board maintain a complex system of water flows and flood defences across Eastbourne.

Blue Heart Project, led by East Sussex County Council, is currently seeking to better understand the local water catchment and mitigate the impact of flooding caused by climate change through technology to manage and monitor water levels in Eastbourne, which will better protect local homes and businesses from flooding in future.

Pevensey Bay to Eastbourne Coastal Management Scheme is a partnership between the Environment Agency and Eastbourne Borough Council to manage the risk of coastal flooding and erosion from sea level rise over the next 100 years. The scheme will reduce the risk of flooding and coastal erosion to an estimated 10,000 residential properties, plus key infrastructure, businesses, heritage sites and nature conservation areas.

As the project is in the early stages, there have been no decisions made about the future options for the coast. The current programme indicates that a more refined list of management solutions will be subject to consultation in summer 2023.

Sewerage

The Eastbourne Wastewater Treatment Works (WTW), which is administered by Southern Water, treats wastewater arising from Eastbourne. In conjunction with this, there are currently 52 wastewater pumping stations throughout the Borough, which help to convey the wastewater to the WTW.

Southern Water are currently preparing an updated business plan to determine where investment will need to be made in infrastructure such as WTWs to accommodate growth. However, it is currently understood that the Eastbourne WTW is likely to have sufficient capacity to accommodate growth identified in the Local Plan.

Water Supply

South East Water is responsible for providing the Borough with a clean, safe supply of drinking water. As a 'water stressed area', South East Water have prepared a Water Resources Management Plan, which estimates the amount of water needed from 2020 to 2080, and how those water needs can be met.

In addition to leakage reductions and water efficiency measures, the Water Resources Management Plan identifies that demand for water in Eastbourne will be met through an extension to the existing reservoir at Arlington, as well as transferring water from an improved Bewl water treatment works.

Questions

1. Do you agree with the 'Growth Strategy' outlined in this document? If not, which elements do you disagree with?
2. Have we missed a spatial option to deliver new homes and employment space? If so, what is it, and what evidence would be needed to ensure its deliverability over the plan period?
3. Is there any evidence to suggest that any of the key development sites should not be considered for allocation in the Local Plan?
4. Are there any key development sites that have not been identified in this document?
5. Do you have any other comments / suggestions about what the Local Plan should contain?

How to Respond

We are keen to receive views on the Growth Strategy and you are welcome to respond to any or all of the questions we have set out. Your input will help in the preparation of the Eastbourne Local Plan, and will be really important in determining how the borough grows and develops in the future.

The consultation is open for a 10-week period between Friday 11th November 2022 and Friday 20th January 2023. All consultation responses should be received by 5pm on the closing date.

The consultation, supporting documents and evidence can be accessed through the Council's on-line consultation portal⁵. If you do not have internet access, the Growth Strategy Consultation is also available to read as a paper copy at Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

You can respond to the consultation by:

- Submitting comments directly via our on-line consultation portal
- By sending comments either by email to: LocalPlan@lewes-eastbourne.gov.uk, or post to: Planning Policy, Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

Please note that although the consultation will be publicised using social media, comments made via these routes cannot be considered as a formal response to the consultation. Therefore you are encouraged to make your comments via the 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 LocalPlan@lewes-eastbourne.gov.uk or by telephone on 01323 410000 quoting 'Eastbourne Local Plan'.

Next Steps

Whilst this document focuses on housing and employment growth, work is also progressing on the other policy issues to be covered by the Local Plan. For example, a series of evidence base documents are currently being prepared covering a range of policy areas. This work, alongside the outcomes of this consultation, will feed into the development of the next stage of the Local Plan.

A draft Local Plan will be published that sets out the preferred strategy for growth, site allocations and policies, and it is expected that this will be subject to public consultation in late 2023. Following this the plan will be submitted to Government to commence the examination process, and it is anticipated that the Local Plan will finally be adopted in late 2024.

⁵ www.lewes-eastbourne.gov.uk/eastbournelocalplan