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1 Sub Matter 8Ai Sussex Coast Role and Economy

We wish to support the general thrust of comments submitted to this Examination by East Sussex County Council. The views expressed in this statement are jointly held by Eastbourne and Wealden Councils and are prepared within the guidelines provided to participants for the submission of written statements. Lewes District Council have submitted separate representations on this sub matter.

Question 8Ai.1

What is the rationale for and role of the sub region? Does the Sub regional strategy strike an appropriate balance between economic and environmental objectives

- The Councils generally support the response to this question submitted by East Sussex County Council (ESCC) to the South East Regional Assembly (SEERA) .
- Considering the make up and location of the sub-region it needs to be acknowledged that there are significant environmental constraints which could present restrictions in achieving particular targets such as improvements to transport infrastructure within Policy SCT1.
- We support the need to focus strongly on economic development to secure sustainable economic growth and regeneration of the sub region, and this process should take into consideration the key challenges and objectives of SEEDA's Regional Economic Strategy; the detail of the Economic Blueprint for the Eastbourne – Hailsham Triangle, e.g: current low wage indices.
- Concern is expressed at the scale of housing development proposed by the South East Plan being not sustainable unless there is a guarantee of prior investment in the necessary infrastructure required. Furthermore, investment in infrastructure is required if the proposed level of development is to take place without adversely affecting the quality of life in the area. Hence, to ensure sustainable development a realistic balance between housing and employment needs to be determined e.g. There is a need for a moderation of housing provision and increased priority given to economic development and supporting infrastructure to strike an appropriate balance between economic and housing objectives. Also, economic value should be placed on retaining environmental quality within the sub region.

Question 8Ai.2

Is there sufficient provision for employment land throughout the sub region, particularly in West Sussex (Policies SCT3, SCT4) and is the Policy stance in Policy SCT4ii justified?

- We support the lead authority response, and it is agreed that whilst policies SCT3 and SCT4 are clear in the policy advice they contain, their stance is perceived more relevant for providing guidance.
- There is not sufficient provision for employment throughout the sub-region. Reference is made to there being 'insufficient property of adequate quality to encourage enterprise, enterprise growth and business development' in the East Sussex Economic Study 2005-2006. It further reports 'that property presently designated for business use should not be re-designated in Local Plans, Frameworks or planning permissions to have other uses than for business, and therefore retaining business space for commercial development and growth.
- The Councils are actively engaged in the LDF process which will require employment land reviews to be undertaken ensuring provision for robust, defensible and deliverable portfolios of a range of business sites, by size, type and location across the sub-region.
- Existing employment sites and commitments are also being assessed, including their suitability for future employment use via agencies such as Locate East Sussex, the inward investment service operating under the East Sussex Economic Partnership. The findings will feed into the LDF process.
- Connectivity with the Regional Economic Strategy is vital to support the development of commercial and industrial units across the sub-region especially in areas where key business sites are being pursued by developers for housing. Also, in terms of infrastructure improvements, eg: the upgrading of the A27 from Polegate to Lewes to unlock investment and support economic development.
- Concern is raised at the wording in policy SCT3iii regarding the permitting of mixed use schemes. This is considered too permissive and sends out the wrong message to investors, and can be perceived as indicating that all employment sites could be available to housing eventually. The Councils suggest that the word 'permit' should be replaced with 'identify and allocate mixed use sites through the LDF process'. If this cannot be amended, the Councils request that a strong criteria policy describing where it would be permissible should be endorsed.
- Concern again is expressed regards policy SCT4ii. The allowance for some infringement of environmental constraints on development in specific instances

is an unnecessary exception to existing national policy. This policy carries the potential to send out conflicting messages on environmental designations which already have recognised loopholes.

Question 8Ai.3

Is the right balance of emphasis between the coastal towns and does the Plan give enough recognition to their different regeneration needs? If not what more could be done (Policies SCT2, SCT6)

- All towns along the coast have pockets of deprivation. The larger the town/city the greater the depth of deprivation. However the smaller towns are also in need of regeneration. Some investment is planned in particular in Eastbourne but a more embedded entrepreneurial culture is required to make a significant and long term change to the economic development of the area.
- The area is heavily reliant on traditionally low skill employment (tourism, retail, healthcare) and needs to change. Skill development is key to this and needs greater encouragement
- There is some acknowledgement in policy SCT2 about targeting social and economic regeneration but this needs to link to known planned regeneration projects and also needs to ensure that any investment actually benefits the community rather than have the potential to be lost to national organisations with little local community commitment.
- Recognition of the positive impact of that local labour schemes on the local economy would encourage local authorities and regeneration partnerships to support such initiatives.
- A significant piece of economic research has taken place in the Eastbourne Hailsham Triangle area which has culminated in a 'blueprint' for action. This highlights a range of regeneration projects that will serve the needs of the area and deliver significant economic development benefits.
- Policy SCT2 recognises the need for north/south transport improvements but despite the likely improvements as a result of the new Bedingham crossing, east/west road links still require attention and improvements to the train service are required. Businesses consistently state the lack of adequate transport infrastructure as a barrier to business growth and inward investment.
- Policy SCT6 acknowledges the good practice being developed in a more strategic approach to regeneration and economic development. Local authorities are well placed to facilitate and assist in achieving this. However

the reference to the A22 in Policy SCT3 section ii, should be deleted as this too specific and could cause harm to the vibrancy of existing employment centres. Instead a sequential approach to site selection should followed, depending on need starting with retaining suitable and maximising existing employment sites through the redevelopment and density intensification; identifying enw sites within the Built up areas, and then working with the neighbouring authority Wealden District Council for sites along the A22 corridor.

- What is required is exactly what is set out in SCT6: a co-ordinated planned and resourced approach to regeneration. Greater support for and recognition of the results will aid sustainability of this.

Question 8Ai.4

Are economic development opportunities identified with sufficient clarity, for example Shoreham Harbour (Policy SCT3)?

- For those specific sites at Newhaven and Shoreham this policy sets out a clear direction that will protect these sites.
- The introduction to the policy may not be quite so directive as it states 'for business and other uses'. This may mean that sites that are questionable in their viability for business use on all of the site (i.e. are in need of enabling development) may find it hard to defend the type of enabling development needed. For example some sites where facilities that would attract businesses e.g. a children's nursery; a sports facility or small scale food outlet to provide; may not be able to defend the encroachment of housing.
- It would be helpful if there was a stronger encouragement to maintenance for business use and that public sector acquisition of sites would be a realistic option in order to ensure development for business use takes place. The Councils would like to see the word 'permit' in Policy SCT3 section iii, deleted and replaced with 'allocate through a structured review of sites in the LDF - Allocations DPD'.
- This policy needs to protect existing usage on sites which could come under pressure for residential re-development to provide the requisite housing on brown-field sites.
- Encouragement of a true redundancy policy needs to ensure that sites are not deemed unviable for development just because they have abnormal development costs. If a site cannot be developed an alternative one needs to be allocated.

- Land owners need to be engaged in the process to ensure that viability for development is not based on an unrealistic 'hope' value of a site for residential development.
- The policy needs to ensure that business development land is not lost to alternative uses without a full appraisal of the local need. Loss of business space to alternative uses may not be a sensible long term option.
- The area needs to provide a range of types of business space to retain and attract businesses. A check on the types of provision is required to ensure the market is not flooded with an oversupply of any one type of development.
- Viability has long been an issue for business land, we need to ensure allocations are appropriate. In the Eastbourne area local markets are dominant – there is pressure for growth but insufficient growth provision. The land is so valuable for housing that business space is squeezed out.
- Because the local market is buoyant there has been no need to attract large scale inward investment projects for commercial and industrial employment provision – however East Sussex and in particular the Sussex Coast needs to attract strong incoming businesses to diversify the local business base and to provide a level of sophistication currently missing.
- It would make sense to concentrate larger business development sites on existing urban areas rather than on greenfield and in rural areas. There is little point in creating major traffic problems on rural roads when increasing density levels on existing sites will not be a problem. It is important however to recognise that capacity on the existing road network is an issue but urban roads are better able to cope with greater amounts of traffic.
- It would make sense for urban areas through a sequential approach to site selection and mixed use allocations to help to provide business development space within built up neighbourhoods in order to protect local economic vibrancy as well as the rural hinterland. For example in the Eastbourne/Hailsham Triangle, there are currently unviable sites for business development in Eastbourne which could be transferred to being viable if they were worked into an overall plan to accommodate a balance of housing and business space for the area as a whole.
- The Eastbourne/Hailsham Blueprint can only be delivered by much greater multi-agency joint working and buy-in is needed for it to succeed. Specific reference and encouragement to this way of working in the South East Plan would be helpful.

2 Sub Matter 8ii Sussex Coast Housing and Infrastructure

We wish to support the general thrust of comments submitted to this Examination by East Sussex County Council. The views expressed in this statement are jointly held by Eastbourne, Wealden, and Lewes Councils and are prepared within the guidelines provided to participants for the submission of written statements.

Question 8Aii.1

Is housing provision set at the right level in the Sussex Coast, having regard to the assumptions about local employment, and does it 'help meet wider regional needs' (Policy SCT7, para 2.3)?

- The Housing provision for the Sussex Coast as set out in the South East Plan is strongly supported. It is set at the right level to achieve continued annual economic growth target of 3% per year with rising standards of environmental and urban management.
- The region continues to face pressure for residential / housing development. However the protection of Downland, flooding in the levels, and coastal zone are important physical constraints in the South East. At the same time, the coastal towns such as Eastbourne feature one of the highest areas of unfit dwellings and as a consequence has a high number of associated vacancies (ranging from 3.5 - 5.9%).
- Thus there are opportunities for urban management and regeneration. This will have benefits in terms of improving other social issues including overcrowding, poor educational achievement and access to employment.
- As a region many of the coastal towns are economically under performing. For example 5.7% of economically active population are unemployed in Eastbourne. The majority of employment is low skilled and low wage for example the median average wage in Eastbourne was £397.20 compared to £467.90 in the South East and £433.10 nationally. Inward investment is low and with current infrastructure is unlikely to meet the sustainable employment balance. Indigenous business is likely to continue as the majority demand for new business space. However the level of entrepreneurship is declining in the region. For example in 2004 there were 2,110 VAT registered businesses in Eastbourne. During the same year there were 185 registrations and 265 de-registrations.
- Census forecasts expect the total population in the region to continue to increase. Future population projections based on a continuation of current trends in fertility and mortality, migration in and out of the area suggest that Eastbourne's population will increase by 11.7% for the period 2001 - 2011.

(These do not reflect the change due to future housing development in the area.) However the Sussex Coast as a whole has virtually no locally generated requirement for additional housing and the majority of household growth is as a result of continuing net in-migration.

- 'Upping the housing numbers' at a higher rate than specified in the SE plan would therefore allow the 'workforce - job' gap to grow and perpetuate unsustainable development by increasing unemployment and increased distances travelled to work in other areas.
- The housing numbers for the Sussex Coast Sub region seek good balanced spatial planning for housing delivery in some of the region's most sensitive coastal and Downland areas.
- New housing in the region will also need to address the consequences as well as the causes of climate change. Such consequences include the impact of sea level rise, habitat change and associated implications for the natural environment such as low river water flows and extreme weather events.

Question 8Aii.2

Is a 40% affordable housing appropriate in the Sussex Coast (policy SCT8)?

- The need for affordable housing is acute in the SussexCoast sub-region: the recent sub-regional Housing Needs Survey demonstrates a projected need in Eastbourne for 369 + 230 affordable dwellings per year to 2011, and indicates no subsequent diminishing of this scale of need. *[David CouttieAssociates, 2005]*
- House prices have continued to rise well in excess of incomes, and this has significantly impacted upon the ability of local households to enter the housing market. It is therefore essential that the maximum amount of affordable housing is sought on all appropriate developments because:
 - As increasing numbers of local households are priced out of the housing market it becomes increasingly likely that new housing for the private market will be bought by people moving into the area. If 40% of these dwellings are managed by RSLs as affordable homes, the local authority can influence the letting of these homes to ensure they meet local housing needs.
 - There is a dearth of suitable residential development sites in many areas along the south coast, particularly in urban towns. This fuels competition between developers and RSLs find it increasingly difficult to compete. Developer contributions are therefore a significant factor in the supply of affordable housing.

- In areas of particularly high demand it will be necessary to set thresholds below 15 units. Eastbourne Borough Council is currently consulting on the preferred options for their Core Strategy and these include a sliding scale of affordable housing contributions in order to deliver contributions from all new residential development regardless of site capacity. The smallest schemes require a modest financial contribution and these sums increase logarithmically until sites reach 15 units or more, when on-site delivery will be required. This proposal will:
 - Ensure the accrual of resources to fund affordable housing that would otherwise be unachievable due to the predominance of small sites within the town
 - Limit the incentive for developers to restrict schemes to 14 units on sites that could potentially achieve higher densities.
- It may not be possible to achieve 40% affordable housing on all sites, particularly those in very high value areas, or where significant development constraints exist. In these circumstances it will be necessary to undertake viability appraisals to establish maximum level of deliverability, and we welcome the policy guidance that enables local authorities to set discrete thresholds and quotas where specific circumstances dictate.
- We welcome the recognition of the need to consider different sections of the community when establishing the type of affordable housing sought. It is also important to establish the relative scale of need for each section of the community locally. For example, in most districts the need for rented housing significantly outweighs that for shared ownership, particularly in high value areas where any shared ownership products are unaffordable to the overwhelming majority of local households. In these circumstances local authorities should have the ability to specify that the majority of affordable housing must be provided for rent.

Question 8Aii.3

Has the potential for additional housing in the areas identified for development in structure plans been fully explored (Policy SCT7)?

- Eastbourne, Lewes and Wealden Districts support the housing totals in policy SCT 7 as being realistic, but nevertheless very challenging allocations in relation to the major constraints on the future supply of land for development that now apply within the Sussex Coast Sub region.
- The extent of physical and environmental constraints that now apply is greater than existed at the time that previous structure plans and local plans were

prepared. Therefore it is not just that growth is reaching towards long established environmental and physical buffers, but those buffers are themselves now moving inwards to further reduce the pool of opportunity available now and for the future.

- In the past the majority of their Sussex Coast was recognised as being constrained by important constraints on development, principally:
 - The sea [which confines the area of search on the edge of coastal towns to only 180 degrees];
 - The Area of Outstanding Natural Beauty;
 - Sites of Special Scientific Interest;
 - River and coastal floodplains, and areas at risk of coastal erosion identified in the late 20th century.

- However in recent years constraints have been extended and/or reinforced, particularly as a result of:
 - The proposed South Downs National Park, which would include areas outside the AONB that had previously provided potential for expansion of towns [e.g. Seaford and Lewes];
 - The effects of climate change predictions and the 2000 floods, which has resulted in extension of many areas considered at risk of flooding by the sea and by rivers, or at risk of coastal erosion.

 - Furthermore, policy and financial constraints on development in these areas is now far more restrictive than in the past;
 - A raft of new designations and safeguards for the natural environment such as European wildlife protection designations, Appropriate Assessments etc.

- These increasing constraints strengthen the challenges in shaping sustainable settlements that provide space for business and employment, and social infrastructure, as well as for housing.
- Consequently In the longer term in areas such as ours the options to meet the Plan's current proposals may not be available from green fields on the edge of towns, but may need to come from the assembly of land in 1950's, '60s and '70s suburbs for higher density development.

Question 8Aii.4

Have the water supply and waste water treatment, flood risk and transport implications of the growth proposals been adequately considered?

- Whilst Policy SCT6 is clear in the policy advice it contains, the key reference to sustainably accommodating development in the area lies in reference to multi agency plans focused on provision of the necessary infrastructure facilities to support development. These are fundamental prerequisites to achieving regeneration.
- Serious concern is raised at the apparent lack of urgency in providing this infrastructure within a Sub Region that feels there has been a deficit of provision historically and where future development without this will lead to unsustainable solutions and a lesser quality of life for its communities.
- Disappointment is expressed at our understanding that the Implementation Plan is not part of the South East Plan. This weakens the commitment expressed at SCT9 Infrastructure and introduces potential uncertainties as to delivery.
- The revised Implementation Plan (September 2006) at para 5.6 identifies a preferred way forward by the Regional Assembly for Regional funding mechanisms to deliver necessary infrastructure to support growth. However there is concern that the plan whilst identifying a number of options for enhanced delivery does not appear to us to provide certainty of delivery and some of its suggestions, e.g. of Planning Gain Supplement are still at consultation stage.
- Water supply issues have become of increasing concern within the Sub region. Demand management through efficiency savings and behavioural change cannot be guaranteed to achieve particular targets within any given timescale and should not be overestimated – education can be a lengthy process.
- We support the advice already forwarded by East Sussex County Council regarding wastewater treatment/ quality issues at a number of prospective locations in East Sussex and the potential constraint issues e.g. where water discharges into the Pevensey Levels Ramsar site.
- Whilst LDF's will determine precise locations for development the quantum of this is known now, or can be reasonably anticipated from the submission South East Plan. Necessary budgets and timescales for steering major infrastructure projects through the planning process need to be properly addressed if Policy SCT9 is to mean anything.

- Given the very linear shape of the sub region and the broad areas for development identified at Policy SCT6, the A27 arterial route and parallel rail route, and any necessary improvements to these, are considered to be vital to achieving the co-ordination and promotion of the Sub Region's (SCT6) development.
- The need for improvements to increase efficiency of east west communications to enable the Sub Region to sustainably accommodate the development detailed at SCT6(I), (II) and (III) is considered vital as it is also to achieving investment and improvement of the Sub Region's economic potential.

Question 8Aii.5

Are the proposals in the implementation plan (including for social and green infrastructure) clear justified and well related to the spatial strategy? What are the priorities?

- The Councils support the general view expressed in the Implementation Plan that the Sub Region has suffered from a degree of under-investment. This has proved a constraint on maintaining a quality of life and upon inward investment / furthering of the Sub Region's economic potential.
- Generally speaking, the Implementation Plan has identified the broad range of infrastructure required to ensure a more sustainable way of managing growth. However, specific development locations, as identified through the emerging LDFs, will identify other specific schemes. It is imperative that SCT9 (in accordance also with over-arching Policy CC5) is implemented assertively if communities are not to feel short changed and see a lesser quality of life arising from new developments.
- Concern is again expressed that the Implementation Plan is not seen by GOSE as part of the South East Plan and would accordingly appear to be playing down its interconnectivity with the Plan.
- Without the necessary prior provision of the infrastructural requirements identified and the introduction of certainty into delivery mechanisms and timescales, concern must be expressed at the ability of the RSS and its constituent LDFs to sustainably deliver the strategy for the Sub Region.
- Actions identified at IMP7 especially, and IMP8 – 11 would appear to cover these concerns. Whilst these are seen as applying across the whole of the RSS, it is considered that all identified schemes are necessary to deliver the RSS in a sustainable manner and thus, to this degree, all should be seen as priorities and prerequisites to development coming forward.