

EASTBOURNE'S DIRECTION OF TRAVEL:

ISSUES & OPTIONS FOR THE EASTBOURNE LOCAL PLAN



FULL COMMENT FORM

Eastbourne Borough Council has commenced preparation of a new Local Plan for Eastbourne, which will cover the period from 2018 to 2038. As part of this process, we would like to obtain views on how Eastbourne should change in the future, and to assist in this we have published [Eastbourne's Direction of Travel: Issues & Options for the Eastbourne Local Plan](#).

Eastbourne's Direction of Travel: Issues & Options for the Eastbourne Local Plan seeks views on how the Local Plan should be developed by asking for comments on:

- ❖ **Issues** – the matters that the Local Plan needs to address
- a) **Options** – alternative strategies for addressing an issue
 - **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

We are keen to receive views on any aspect of the Local Plan and you can provide your comments using this questionnaire. You are welcome to respond to any or all of the questions we have set out. 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 1st November 2019** and **Friday 10th January 2020**. All consultation responses should be received by 5pm on Friday 10th January 2020.

If you have any difficulties submitting your comments, please contact the Planning Policy team via planning.policy@lewes-eastbourne.gov.uk or 01323 415253.

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Submitting your comments54

Your Details

Data Protection and Privacy Notice

For further information about how the council uses your information and your rights, please read our privacy notice [here](#)

Name: [Laura Brook – Conservation Officer](#)

Organisation (if relevant): [Sussex Wildlife Trust](#)

Agent providing comments on behalf of (if relevant): [Click here to enter text.](#)

Email Address: swtconservation@sussexwt.org.uk

What type of stakeholder are you / who are you representing:

- Member of the public (Resident of Eastbourne Borough)
- Member of the public (Resident elsewhere)
- Local business/employer
- Neighbouring District/Parish Council
- Local group/organisation
- Residents Association
- National group/organisation
- Planning Consultant
- Landowner/Developer
- Infrastructure/service provider
- Other

Other - please describe:

[Click here to enter text.](#)



Context, Vision & Objectives

Functional Geography - Summary of Issue

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

Please enter comments:

We agree that the sphere of influence sits across boundaries and feel this is particularly relevant to matters relating to the natural environment. There is a need for the local plan to understand the natural assets that are providing the services and benefits the Borough utilises. It is important to recognise that the assets may sit within or outside your administrative boundary. It also has an important influence on the quality of surface water that flows from Eastbourne into the Pevensey Level SAC/RAMSAR site.

Question 1: Functional Geography

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

Please enter comments:

The functional geography of the area should consider the needs of the natural environment and the importance of landscape connectivity and functionality. The scale for delivery will vary but we encourage you to adopt consistent principles. The National Planning Policy Framework (NPPF) requires Local Plans to recognise the importance of connected landscapes with section 174.


Question 2: 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?

Please enter comments:

The vision could be more ambitious in its commitments to biodiversity within the Borough. The vision would benefit from the inclusion of wording to recognise the need to create a network for biodiversity to enable a resilient landscape that can adapt to climate change. This should be reflective of the marine, coastal and wider landscape influences shaping the Borough. The Borough has natural assets such as the downland estate that it should embrace for its biodiversity potential and public access to the South Downs National Park.

The Council should be clear on the need to deliver net gains to biodiversity and that the



natural capital it needs to deliver sustainable growth is embedded from the very beginning of the plan's development. This would be in line with section 174 of the NPPF.

Question 3: Objectives

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

Please enter comments:

We welcome the inclusion of objectives to recognise the environment.

Objective 3 highlights the importance green infrastructure can play in carbon capture. Given the Borough's coastal location, we encourage you to consider the influence the council may have to ensure that Blue Infrastructure can also play a role towards your goal of carbon neutrality.

We encourage the council to think carefully about the wording within objective 8.

The objective is specifically referencing trees to extend the network, however we are unclear if this underpinned by an evidence base. The suggestion is that this is the form of habitat creation/management that needs to be delivered in these areas. However it is not clear what knowledge has informed this. It maybe that other forms of habitat creation or management are required to create a network for biodiversity to enable a resilient landscape that can adapt to climate change.

We are supportive of objective 8 commitment to delivering a net gain for biodiversity.

The objectives relating to Thriving Communities could benefit from recognising the health and wellbeing aspects derived from high quality accessible natural green space for all.

Carbon Neutrality

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

Please enter comments:

An evidence base that informs the delivery of a coherent ecological network is required. The Council need to be able to identify locations for habitat management and creation that can offer a service of carbon sequestration. These areas for habitat creation may be varied and it should not be assumed that tree planting is the only or best approach. By identifying the need and location for these areas could help underpin projects that can be identified as key infrastructure within your Infrastructure Development Plans.


We encourage Eastbourne Borough Council to engage with the Sussex Local Nature Partnership who are developing an approach to identify areas for investing in services and benefits delivered by the natural environment.

Options A: Car Parking Provision

Should the Local Plan:

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

Please enter comments:



Sussex Wildlife Trust thinks that there needs to be a positive move from both Local Authorities to act towards reducing car use. Given the sphere of influence we suggest that for travelling into the Borough it might be necessary to consider standards for further afield.

Direction of Travel - CN1: Modal Shift

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

Please enter comments:

[Click here to enter text.](#)

Question 3: Walking and Cycling

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


Please enter comments:

When developments come forward, especially if they are phased, it will be important to ensure that the infrastructure and facilities required to encourage walking and cycling is created and functioning prior to occupation. This can help to ensure positive new patterns by new occupants are established at the start. The NPPF is clear that new development must be designed to prioritise pedestrians and cyclist, however in our experience this is rarely done. The local plan must include policies that make this clear. The council must be upfront about this requirement at an early stage of the design process and refuse planning permissions that do not prioritise active travel.

Direction of Travel - CN2: Walking and Cycling

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
- 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



Please enter comments:

[Click here to enter text.](#)

Direction of Travel - CN3: Public Transport

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

Please enter comments:

[Click here to enter text.](#)

Question 4: Modal Shift

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

Please enter comments:

In trying to establish sustainable transport it is important to first understand what people are trying to access. This can then help understand the requirements of a shift to a more sustainable form.

Modal Shift - Further work:


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

Please enter comments:

[Click here to enter text.](#)

Options B: 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)
 - b) Require that energy efficiency standards in new homes be increase to the maximum allowed (19% increase on Building Regulations)

Please enter comments:

[Click here to enter text.](#)

Question 5: Zero-carbon residential development

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

Please enter comments:

[Click here to enter text.](#)

Question 6: Energy efficiency standards in non-residential development

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

Please enter comments:

As high as possible.

Direction of Travel - CN4: Energy Efficiency

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

Please enter comments:

SWT are supportive of these measures. We would encourage EBC to ensure that green architecture is included at the very earliest stages of a developments design so that it is integral within a development and not an add-on that then becomes unviable.



Options C: Small-scale renewable energy generation in new development

Should the Local Plan:

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

Please enter comments:

We support the idea of on-site micro generation in new development, but it will be imperative that each case is looked at individually. The location and type of renewable energy will need to be considered. The proposed location may be environmentally sensitive and therefore careful consideration will be needed as to the type of energy generation and the impacts of any ancillary development required. However we do think it will need to be required on all new development if Eastbourne are to meet their aim of carbon neutrality.

Question 7: Large-scale renewable energy

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


Please enter comments:

Eastbourne Park is currently acting as an important strategic flood storage area. While we support renewable generation we are unclear of the detail of the renewable energy proposals for this area. We need to see clear evidence on how the proposals of the renewable energy could be delivered without compromising the functions for flood storage and biodiversity value. The location of renewable energy schemes, even large-scale ones, should always be prioritised on brownfield and existing structures rather than greenfield. We would like to see renewable energy incorporated into existing buildings rather than in open areas such as Eastbourne Park.

Question 8: Renewable energy requirements

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

Please enter comments:



It should be development dependent, which would take into account location, scale of proposal and existing ecological value of the site. All new buildings should include renewable energy processes where possible.

Question 9: Community-scale energy infrastructure

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

Please enter comments:

There should be a requirement to look at the feasibility of community energy infrastructure right at the beginning of the design process.

Direction of Travel - CN5: Renewable Energy

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

- Identify areas suitable for renewable energy in the local plan, including CHP
- Require 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

Please enter comments:

EBC must consider the capacity of the site. It is important to consider whether it is better to allow numerous exchange networks or whether one main hub is appropriate.

Renewable Energy - Further work:

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

Please enter comments:

If this work is undertaken we strongly advise the council to ensure that allocations are informed and selected using a sound evidence base of ecological information.

Direction of Travel - CN6: Carbon Off-set

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

Please enter comments:

It is important that the council are clear that if they are keen to adopt an approach of planting trees they ensure it is the right tree in the right place. It may be that that the location has existing valuable habitat that is delivering a carbon storage service.

We would support the council taking proactive steps in producing a strategic plan for tree planting, so they can adopt the approach of the right tree in the right place. This way the trees can deliver the best connectivity and function for biodiversity, while also capturing carbon for the Borough. The Council may also like to consider the approach of natural regeneration so less resources such as stakes and plastic tubing are used.

We feel the approach of including green walls and roofs in development is to be encouraged. This could also be extended to how green measures can be incorporated in to parking areas and especially any front garden conversions.

Question 10: Off-setting carbon emissions

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

Please enter comments:

We would suggest that robust information on the development site's existing habitats are always required as part of an application, so that the council can make informed decisions. This will enable the council to ensure that areas that are already acting as carbon sinks for the Borough are not lost.

Question 11: 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?

Please enter comments:

[Click here to enter text.](#)

Carbon Off-set - Further work:

- Investigate impact of tree-planting in Eastbourne Park
- Investigate potential for carbon off-setting schemes, including carbon costs



Please enter comments:

We strongly support the council gathering robust evidence on the impact of tree planting in Eastbourne Park. The area has significant areas of flood plain grazing marsh habitat which is a priority habitat, it may therefore not be suitable to deliver wide scale tree planting on this important habitat.

Question 12: De-carbonisation of existing housing stock

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

Please enter comments:

[Click here to enter text.](#)



Prosperous Economy

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

Please enter comments:

[Click here to enter text.](#)

Prosperous Economy - Further work

- Update the employment floorspace requirements for the plan period

Please enter comments:



[Click here to enter text.](#)

Direction of Travel – PE1: Employment Site Allocations

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

- Allocate sites for employment use

Please enter comments:

[Click here to enter text.](#)

Options D: Location of Office Development

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

Please enter comments:

[Click here to enter text.](#)

Question 13: 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?

Please enter comments:

[Click here to enter text.](#)

Options E: Protection for Office Space

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
- b) Seek to protect office space in specific areas (e.g. Town Centre)

- 
- c) Provide no specific protection against the loss of office space

Please enter comments:

[Click here to enter text.](#)

Question 14: Sovereign Harbour Site 6

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

Please enter comments:

Before allocating any site for development we urge the council to ensure that the allocation has consider the environmental capacity of the area. It is important to be aware of the ecological value as well as the wider environmental services and benefits that are being derived from that site, so that an informed decision can be made about the suitability and scale of any potential allocation.

Question 15: Sovereign Harbour Site 7a

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

Please enter comments:

[Click here to enter text.](#)

Options F: Industrial Estates

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

Please enter comments

[Click here to enter text.](#)

Direction of Travel - PE2: Industrial Estates

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

Please enter comments:

[Click here to enter text.](#)

Options G: Small employment locations within residential areas

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

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

Please enter comments

[Click here to enter text.](#)

Question 16: Business start-ups

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - PE3: Retail

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

Please enter comments:



[Click here to enter text.](#)

Options H: Impact of ‘out of centre’ retail development

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - PE4: Local Labour Agreements

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

Please enter comments:

[Click here to enter text.](#)

Options I: Primary Retail Area

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

Please enter comments

[Click here to enter text.](#)

Options J: Secondary Retail Area

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 requirement 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

Please enter comments:

[Click here to enter text.](#)

Option K: Zoning the Town Centre

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - PE5: Increasing the use of the Town Centre

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

Please enter comments:

[Click here to enter text.](#)



Options L: Residential development in the Town Centre

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
- b) Take a flexible approach to the location of new residential development throughout town centre

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - PE6: Residential development in the Town Centre

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

Please enter comments:

[Click here to enter text.](#)

Options M: Pedestrianisation

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

Please enter comments:

[Click here to enter text.](#)



Options N: Tourist Accommodation

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 within the tourist accommodation area

Please enter comments:

[Click here to enter text.](#)

Question 17: Tourist accommodation

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - PE7: Tourism

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
- Safeguard conference-related facilities

Please enter comments:

[Click here to enter text.](#)

Question 18: Location of new tourist attractions

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



Please enter comments:

[Click here to enter text.](#)

Question 19: Zoning of the Seafront

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

Please enter comments:

[Click here to enter text.](#)

Quality Environment

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 land for flood risk management
- ❖ How to achieve biodiversity net-gain on development, which is 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

Please enter comments:

We are pleased to see the breath of issues identified. Sussex Wildlife Trust thinks it is important that this section refers to the need to ensure that landscape/environment is resilient in order to adapt to climate change. The delivery of an ecological network will be fundamental to delivering the aim of carbon neutrality. How land is used directly correlates with climate impacts, which in turn means that climate change impacts on land use.

Question 20: Views from the South Downs National Park

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


Please enter comments:

[Click here to enter text.](#)

Direction of Travel - QE1: Landscape

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



Please enter comments:

[Click here to enter text.](#)

Question 21: Tall buildings

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

Please enter comments:

[Click here to enter text.](#)

Landscape - Further work

- Identify key views to and from the South Downs National Park

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - QE2: Landscaping in new development

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

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

Please enter comments:

[Click here to enter text.](#)

Flooding - Further work


- Update Strategic Flood Risk Assessment and functional floodplain designation

Please enter comments:

[Click here to enter text.](#)

Question 22: 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?



Please enter comments:

It is important to understand that flood risk zones do not take in to consideration surface water and ground water flooding. The supporting text for the plan indicates that surface water flooding is the biggest source of flooding and therefore the plan should really consider the wider implications of this in determining applications.

Direction of Travel - QE3: Flooding and Water

In order to ensure that new development is resilient to the effects 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

Please enter comments:

[Click here to enter text.](#)

Question 23: Sustainable Drainage Systems

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

Please enter comments:

The Direction of Travel document appears to be suggesting multiple delivery options on Eastbourne Park for example strategic SUD, renewable energy, development allocations. In order to understand the range of requirements and what is suitable and feasible we think EBC will need to look at this in much greater detail, so that there is a strategic plan for this area. We also would seek clarity on the influence of the Eastbourne Park SPD when considering the future of the site? We remind EBC that the park is currently in the process of being assessed by a technical panel for its suitability as a Local Wildlife Site (LWS).

Options O: Eastbourne Park

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

Please enter comments:

The Sussex Wildlife Trust, would propose that Eastbourne Borough Council ensure the park is protected, through all of the above mechanisms. We encourage this as all of the above options offer variations for the reason of protection. Given the multifunctional delivery of Eastbourne Park for biodiversity, flood storage, recreation and many more services, its role in providing essential infrastructure should be secured.

We are concerned that despite the above talk of protection of this site, its functionality and connectivity could be compromised through the potential housing allocations depicted on page 90 of this document. It appears to show that Eastbourne Park has 8 broad areas for development. We do not see how this possible development is compatible with the aspirations indicated in Question 23. The Sussex Wildlife Trust does not support the development of Eastbourne Park given the important role it plays in delivering Natural Services for the Borough.

Eastbourne Borough Council have an SPD in place for Eastbourne Park and we are keen to understand the influence this document has had on the direction of travel document.

Direction of Travel - QE4: Eastbourne Park

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

- Define an appropriate boundary for Eastbourne Park

Please enter comments:

While we support the approach of a boundary to allow certainty, we are unclear how this boundary will be defined and the evidence base used for making that decision. Therefore we reserve judgement on the suitability of the boundary, as we would want to see the boundary recognises the multiple reasons for its protection.

Direction of Travel - QE5: Biodiversity

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

- Provide 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.

Please enter comments:

We support the points made in the direction of travel document. We encourage the council to take on board the NPPF which requires local plans to safeguard components of wildlife rich habitats and wider ecological networks (174a)

The landscape needs to be functionally connected in order for biodiversity to be able to adapt to climate change and continue to deliver ecosystem services.

We also feel that the Local Plan must include a commitment to the delivery of measurable net gains to biodiversity as per NPPF 175d.

Options P: Biodiversity net gain

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

Please enter comments:

This question gives limited information, so the Sussex Wildlife Trust is not fully clear what these approaches would involve. Both approaches should be adopted given that each development will vary depending on the type and location of net gain required/delivered.

If net gain cannot be delivered on site we suggest that Eastbourne Borough Council look to adopt a strategic approach to net gain, so the maximum benefits for biodiversity can be achieved with a clear idea of connectivity, function and management requirements.

As part of a strategic approach it is important the Council ensure that their work is underpinned by a sound evidence base and that the most appropriate habitats are delivered.

We encourage the Council to open a dialogue with Sussex Local Nature Partnership, who are currently identifying areas for investment for biodiversity and their associated benefits and services.

Direction of Travel - QE6: Green Infrastructure

The Local Plan will seek appropriate protection for natural and semi-natural greenspaces 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

Please enter comments:

It is important for the council to also recognise the importance of their coastal location and the requirements of their blue infrastructure assets.

Given the multifunctional benefits that are derived from Green Infrastructure we suggest that the need council to be aware of the benefits and services that are derived from the Borough Green Infrastructure assets.

The council needs to map their natural assets, designated and otherwise, so that they can make informed decisions about the potential impact of any allocations/development. This sound evidence base will also help if allocations are proposed that require policy wording to be prescriptive in aspects of Green Infrastructure delivery or associated benefits and services.

Options Q: Non-statutory heritage designations

In order to ensure appropriate conservation of the historic environment, 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

Please enter comments:

[Click here to enter text.](#)

Question 24: Design codes

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

Please enter comments:

[Click here to enter text.](#)



Question 25: Views in the townscape

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - QE7: Conservation

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - QE8: Public Realm

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

Please enter comments:

[Click here to enter text.](#)

Thriving Communities

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

Please enter comments:

We would encourage this section to recognise access to the natural environment including the coastal and intertidal areas within this statement.

Question 26: Neighbourhood approach

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

Please enter comments:

[Click here to enter text.](#)

Question 27: Neighbourhood boundaries


- Are the neighbourhood boundaries, as identified in Map 10: Eastbourne's Neighbourhoods, still relevant?

Please enter comments:

[Click here to enter text.](#)

Options R: Children's Playspace

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - TC1: Open Spaces

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

Please enter comments:

[Click here to enter text.](#)

Open Spaces - Further work

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - TC2: Sovereign Centre

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

Please enter comments:

[Click here to enter text.](#)

Options S: Sovereign Centre

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)

Please enter comments:

[Click here to enter text.](#)

Options T: Extensions to Educational Establishments

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


Please enter comments:

We think these extensions should be considered individually. Where there is potential to lose school playing field this needs to be looked at in the context of the Borough's strategic green infrastructure to understand the role these sites play as a component of that network. We encourage the council to support schools in utilising their school fields for sports, but also to look at the diversity of educational opportunities they can provide, from on site food production and creation of natural play spaces, to habitat creation and to helping pupils understand they can help support pollinators etc.

We also highlight that the draft Infrastructure Development Plan does state on page 58 that there is a reliance on local schools to provide outdoor facilities as the existing facilities are fully used.

Education Provision - 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



Please enter comments:

[Click here to enter text.](#)

Direction of Travel - TC3: Health and Education

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

Please enter comments:

[Click here to enter text.](#)

Health Provision - 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

Please enter comments:

[Click here to enter text.](#)

Question 28: Health Impact Assessments

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

Please enter comments

[Click here to enter text.](#)

Question 29: Public houses


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

Please enter comments

[Click here to enter text.](#)

Direction of Travel - TC4: Community Facilities

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - TC5: Recycling

To encourage increase recycling rates, the Local Plan will:

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

Please enter comments:

[Click here to enter text.](#)

Options U: Local service centres

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

Please enter comments:

[Click here to enter text.](#)

Options V: Community Infrastructure

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

Please enter comments:

[Click here to enter text.](#)



Question 30: 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?

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - TC6: Access and Movement

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

Please enter comments:

[Click here to enter text.](#)



Housing & Development

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

Please enter comments:

An issue that is not reflected is the need for housing and development to ensure the landscape has the ability to be resilient to climate change.

Direction of Travel - HD1: Housing Site Allocations


To provide new homes, the Local Plan will:

- Allocate suitable land for housing development

Please enter comments:

We are concerned by this statement as we feel there is still limited information available to assess what 'suitable' is. The Sussex Wildlife Trust does not feel that is sufficient to proceed to the Regulation 19 consultation when no environmental information relating to allocated areas has come forward. Further to this we are unclear of the potential policy wording that may support the allocations.

We encourage Eastbourne Borough Council to consider the approach adopted by Lewes District Council who undertook a further Regulation 18 consultation following their issues and options paper. In Contrast Wealden District Council went straight to a Regulation 19



consultation and this caused a number of concerns and long delays relating to the suitability, relevance and deliverability of policies given the restrictions of the Regulation 19 process.

Having looked at the map on page 90 of the consultation document – Map 11 – Broad Location for potential future housing development. We feel it is difficult to give any detailed comments. We suggest that it would have been helpful to include references for each of the sites so when comments are made there is clarity on particular areas.

Table 4 on Page 91 of the document is clear that that significant areas of land within Eastbourne Park are classified as sites suitable or potentially suitable for housing development. The Sussex Wildlife Trust finds this very concerning given that earlier in the consultation document there appeared to be a clear acknowledgement of the important role Eastbourne Park plays for a number of environmental services. The large area outlined in the south of Eastbourne Park as a potential area suitable for development is very concerning given that it is known for its valuable Floodplain Grazing Marsh Habitat (priority habitat). This allocation also has the potential to sever the functionality and connectivity essential for this wetland.

The supporting SEA for the Local Plan talks about Eastbourne Park and states in section 4.64 One of the most important features of this extensive area of wetland is its habitat connectivity. We also remind EBC that the SEA states that Eastbourne Park is functionally linked to Pevensey Levels (4.61). Eastbourne Park is also undergoing formal selection as a Local Wildlife Site (LWS) and we will support any findings of the technical panel.

Given the above, the Sussex Wildlife Trust objects to the inclusion of this large potential allocation.


Table 4 within the direction of travel consultation document highlights areas suitable or potentially suitable for development on the Edge of East of Langley Levels. Again we raise concerns that there is insufficient information to give a detailed comment on the suitability of these areas, but they again fall with flood risk Zone 3, Floodplain Grazing Marsh Habitat and it appears partially within a Local Wildlife Site.

We reiterate the need for more detailed information relating to allocations before they proceed.

Options W: Strategy for delivering homes

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

Please enter comments:

We do not feel it is appropriate to select a preferred strategy when we are unclear of the impacts of these potential development areas on the wider environmental capacity of the Borough. What we can see from the very broad areas for some of the sites is that they appear to be in areas delivering ecosystems services, priority habitat and are functionally connected to the wider environmental assets. Further to this, information relating to green infrastructure seems to date back to 2007 or is not easily available. We do not feel it is possible to consider the preferred strategy when the approaches put forward fail to address the requirements of the NPPF such as section 174 which states:

To protect and enhance biodiversity and geodiversity, plans should:

- a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Question 31: 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?

Please enter comments:

[Click here to enter text.](#)

Options X: Housing Site Allocations

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

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

Please enter comments:

[Click here to enter text.](#)

Options Y: Affordable Housing

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

Please enter comments:

[Click here to enter text.](#)

Question 32: 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)

Please enter comments:

[Click here to enter text.](#)

Question 33: Starter Homes

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

Please enter comments:

[Click here to enter text.](#)

Question 34: Upward extensions to buildings

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

Please enter comments:

[Click here to enter text.](#)

Question 35: 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)?

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - HD2: Delivery of new homes

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


Please enter comments:

We have concerns about Backland development, as we have seen cases where habitats such as Ancient Woodland have been negatively impacted from such cases. Therefore if the Council are to pursue backland development within the Local Plan as a means of housing delivery, we encourage it set robust guidance and supporting policies. The Biodiversity and Green Infrastructure policies will need to be considered to ensure they are interpreted and relevant to all scales of development.

Options Z: Retirement Housing

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

Please enter comments:

[Click here to enter text.](#)

Question 36: Retirement housing allocations

- Should the Local Plan make specific allocations for retirement housing?

Please enter comments:

[Click here to enter text.](#)

Question 37: Retirement housing locations

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - HD3: Housing for people with specialist needs

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

Please enter comments:

[Click here to enter text.](#)

Options AA: Accessible and adaptable housing

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

Please enter comments:



[Click here to enter text.](#)

Options BB: Space Standards

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

Please enter comments:

[Click here to enter text.](#)

Options CC: Density Standards

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

Please enter comments:

[Click here to enter text.](#)

Options DD: Design of new housing development

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) Take a flexible approach to housing design/layout

Please enter comments:

[Click here to enter text.](#)



Question 38: Houses in Multiple Occupation

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - HD4: Student Accommodation

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

- Encourage the provision of purpose-built student accommodation

Please enter comments

[Click here to enter text.](#)

Options EE: Self-Build Housing

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

Please enter comments:

[Click here to enter text.](#)

Gypsy & Traveller Accommodation - Further work

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

Please enter comments:

[Click here to enter text.](#)



Effective Infrastructure

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

Please enter comments:

Would the council feel confident that the infrastructure for the Borough incorporates a robust landscape that is resilient to climate change? We feel that there a clear need to ensure they have an up to date evidence base in place to ensure that the requirements of hard infrastructure/development do not compromise the council's soft assets.

The SEA supporting this consultation states in section 4.66:

Climate change impacts upon biodiversity are regarded as being a major issue. The creation of a green network can address the impacts of climate change. In Eastbourne it will be important to link the 'islands' of biodiversity.

The need to recognise that the Infrastructure Table shown on pages 111-112 on the consultation document (Eastbourne's Direction of Travel) has the potential to use natural solutions in range of the infrastructure requirements, therefore the importance of Green Infrastructure should not be under played.

Direction of Travel - EI1: Delivery of infrastructure

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

Please enter comments:

[Click here to enter text.](#)



Direction of Travel - EI2: Infrastructure to support modal shift

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

Please enter comments:

[Click here to enter text.](#)

Direction of Travel - EI3: Telecommunications infrastructure

To improve telecommunications infrastructure, the Local Plan will:

- Support the expansion of the electronic communications network

Please enter comments:

[Click here to enter text.](#)

Question 39: Infrastructure Delivery Plan

- Have pressures on the existing infrastructure been adequately pinpointed?

Please enter comments:

We would question if the existing green infrastructure of the borough has been sufficiently assessed when the evidence base appears to be so old.

Direction of Travel - EI4: Community Infrastructure Levy

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

- Review the CIL Charging Schedule

Please enter comments:

Click here to enter text.

Question 40: 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?

Please enter comments:

Click here to enter text.

Question 41: Priorities for 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):

- Adaptable/Accessible Housing
- 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

Please enter comments:

We are concerned that EBC are suggesting that the above infrastructure is ranked. The evidence base for each infrastructure varies considerably and therefore is not possible to make a balance and informed decision on this question.

Question 42: Other infrastructure priorities

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

Please enter comments:

[Click here to enter text.](#)

General Comments

General comments and additional things that the Local Plan will need to address

Is there anything else that the Local Plan needs to contain or issues that it needs to address?

Please enter comments:

Comments relating to the Scoping Report for the Sustainability Report (SA)/ Strategic Environmental Assessment (SEA)

Sussex Wildlife Trust notes that table 4 –Sustainability Framework has sought to identify indicators on which the Local Plan will be assessed.

We propose that section 4 within Table 4, Biodiversity and Green Infrastructure, **would** benefit from a question that demonstrate that the approach has not negatively impacted on the connectivity and function of the Borough's natural assets. As mention previously this will be important for climate change adaptation and will be relevant to a number of natural processes as well as biodiversity specifically.

One of the question within section 4 asks: *Does the approach contribute to the achievement of net gains for biodiversity?* Sussex Wildlife Trust therefore suggest that perhaps one of the indicators should relate to the DEFRA metric that will be used to calculate the net gain. We acknowledge this metric is still at an early stage but given the longevity of the plan we feel it is relevant to include it.

We are pleased to see that the inclusion of the indicator which highlights planning applications affecting green corridors. We note that there is a footnote which states the viability of this indicator will be researched, we are keen to know what is required to consider it viable. We remind the EBC that NPPF 2019 states within section 174a:

To protect and enhance biodiversity and geodiversity, plans should:

a) Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and

Comments relating to the Draft Infrastructure Development Plan (IDP)

When we looked at the categories within the table on page 8 of the draft IDP It is clear that a range of the Infrastructure covered under the broad headings can be delivered through the use of natural green space/solutions, highlighting the multifunctional benefits to a green approach.

For example, under the heading of physical infrastructure, walking and flood defences could be delivered with natural solutions. While social and community infrastructure has the ability to incorporate green spaces through educational delivery, leisure facilities and burial space. Equally we should not dismiss the fact the green infrastructure in the form of allotments and parks has the potential to deliver social



benefits and community benefits. We support EBC taking a creative and progressive approach to natural solutions in their infrastructure delivery plan.

Page 31 of the document covers the Town Centre, we note that this covers a wide range of provision. We would be keen to see the council look at the ways they look to green these approaches. For example when incorporating new buses stops, give it an added benefit of a green roof, to offer pollination value, exposure to a greener area in town, helping to build appreciation of nature and an extra surface to absorb and slow run off from rain. All these small step can add up to a positive approach to the natural environment.

Sussex Wildlife Trust notes that the draft Infrastructure Development Plan covers strategic road networks. We note that the document discuss the online improvements to the A27 between Lewes and Polegate and that there are proposed offline improvements for that area. We strongly disagree with the statement highlighted under future provision. It states that there is a strong strategic case for an offline improvement to address current problems and to facilitate housing and economic growth in the area. We have seen no evidence that this is the case and we would not support a move to suggest this is pursued in policy with the Eastbourne's Local Plan.

The Green Infrastructure section, highlights Outdoor Children's play areas as having a shortfall and there is a need to for an additional 4.76 hectares. Sussex Wildlife Trust encourage the council to consider creative ways of delivering play areas that incorporate natural elements and offer habitats which offer carbon capture, pollination and combat urban heat island effects.

Within the allotment and community gardens section we support the suggestion that in future in order to meet the need for allotments they may be integrated with developments. This could be especially positive with dwellings without outside place and has the potential to cut down on the need to drive to an allotment.

The information within the section relating to Natural and Semi Natural Urban Green space is limited. Although the documents states that the borough will satisfactorily meet the needs up till 2038, this is related to area. Sussex Wildlife Trust feel that that the information does not consider the quality of the habitat. The quality of these habitats and the ability to connect and function is something that needs to be considered in the assessment.

Eastbourne Park is covered within the Draft IDP, is this compatibility with the SPD? This section also references BOA, the Sussex Biodiversity Partnership, is now no longer in existence and has been superseded by the Sussex Local Nature Partnership. We encourage EBC to engage with the Sussex Local Nature Partnership to discuss their approach to Natural Capital and how their approach of identifying Services and Benefits from the natural environment could help inform their local plan process.

Green Corridors: we feel it is imperative that the council invest time pulling together a clear strategic green network. This should include not only designated sites but the areas/provision need to deliver connectivity that delivers functionality. We note that the documents states that improvements will be sought through developer contributions. We encourage the council to ensure that the strategic vision is in place to ensure that this contributions can deliver clear and identified projects that can be identified in the IDP and deliver GI strategically.



Submitting your comments

Thank you for commenting on the Eastbourne's Direction of Travel: Issues and Options for the Eastbourne Local Plan. All comments made through the consultation will be carefully considered and used to inform the development of the new Eastbourne Local Plan.

You can submit your comments by:

- Uploading it to our Consultation Portal: <http://planningpolicyconsult.lewes-eastbourne.gov.uk/consult.ti/EBIOR/consultationHome>
- Emailing to planning.policy@lewes-eastbourne.gov.uk
- Posting to: Planning Policy, 1 Grove Road, Eastbourne, BN21 4TW.

If you would like to be kept informed about the next stages in the preparation of the new Eastbourne Local Plan, please make sure that you are [registered](#) on our Consultation Portal.

If you have any questions or experience any difficulty in submitting your comment form, please contact us, the Planning Policy Team, via email at planning.policy@lewes-eastbourne.gov.uk or by telephone on 01323 415253.