



Sussex
Wildlife Trust

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Eastbourne Local Plan - Growth Strategy Consultation

Sussex Wildlife Trust (SWT) welcomes the opportunity to comment on Eastbourne Borough Council's (EBC) Growth Strategy.

Overarching Comments

We are disappointed by the limited scope of this consultation, as it has not enabled those commenting to clearly understand EBC's spatial aspirations for the Borough, particularly in the context of supporting spatial policies.

We acknowledge the Eastbourne Growth Strategy states that the consultation focuses specifically on housing and employment growth and that other issues, such as addressing climate change, encouraging regeneration, and protecting the natural, built and historic environments, will be included in the Local Plan once prepared, and that this will be subject to a future public consultation. However to consider the location of sites for development without clarity on EBC's plan for climate resilience and protecting the natural environment fails to enable effective consultation on the suitability of these sites.

Sustainable growth must be informed by evidence on the natural environment and as such, scenarios and options must not be looked at in isolation but be driven by our requirement to protect, enhance and restore our natural environment¹.

EBC must proactively consider its natural resources, the benefits they provide, and the need to protect them and enable those resources to adapt in the face of a changing climate. As acknowledged in the consultation document, Eastbourne Borough is subject to the Pevensey Bay to Eastbourne Coastal Management Scheme², which is seeking to deliver a £100 million coastal flood and erosion risk management project to ensure that the town is resilient to coastal flooding. Whilst we acknowledge that the document stipulates that this process will influence the on-going preparation of the local plan, what we are presented with is a consultation that appears to be looking at locations in silo without the bigger long-term vision for Eastbourne, as demonstrated by the location of some of the key development areas. The complex Hydrology of the Borough is also evident in the proactive steps being taken by the creation of the Blue Heart Project³. This project mentions the importance of Eastbourne Park for flood mitigation yet we see this consultation documents suggesting a significant number of houses for these locations, which has the potential to erode into the services these natural assets are providing.

¹ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

² <https://consult.environment-agency.gov.uk/solent-and-south-downs/pevensey-bay-to-eastbourne/>

³ <https://www.eastsussex.gov.uk/environment/flooding/blue-heart>

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Since the publication of this consultation there has been a ministerial statement in relation to planning. We ask that in light of the ministerial statement on 6th December⁴ regarding potential changes in respect of housing components of strategic plans, will EBC be seeking to reconsider the delivery of the housing target?

SWT supports the concept/statement on page 6 of the Growth Strategy which indicates EBC will be unable to meet its housing need and as such, states that:

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

In order to fulfil a vision for sustainable development it will require the capacity based target to be underpinned by proportionate and meaningful environmental evidence to demonstrate the capacity required. It must also be noted that not all environmental capacity required to deliver growth will be within the boundaries of the EBC authority.

The growth strategy mentions that the ecological impacts of development in particular areas, will be assessed in the ongoing preparations of the local plan. We can see no evidence presented with the consultation that indicates the environmental evidence being used to inform the growth strategy at this point. We also remind EBC that SWT support Local Authorities taking steps to ensure ecological evidence is present about sites prior to allocation. The ecological information should consider site level ecological value and also a site's place within the ecological network of the Borough. This is especially important considering the emergence of Local Nature Recovery Strategies as enacted by The Environment Act 2021.

The importance of valuing the natural environment in the local plan preparation process is clearly stipulated in the National Planning Policy Framework (NPPF) 2021.

The Eastbourne Growth Strategy recognises on page 5 of the consultation that *The number of homes and the amount of employment space that can be provided is heavily influenced by 'showstoppers'*. This list of showstoppers includes, but is not limited to:

- habitats sites and/or sites designated as Sites of Special Scientific Interest;
- irreplaceable habitats;
- areas at risk of flooding or coastal change.

The growth strategy goes on to say;

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

While page 8 goes on to state that *a balance for growth will be achieved by protecting the most valuable areas of green space*. SWT also feel this should extend to Blue infrastructure.

SWT question how and when in the local plan preparation process Eastbourne will adequately protect the showstoppers and valuable green space?

We feel that this question is pertinent, as it appears the key development sites coming forward in the growth consultation are within areas designated as Local Wildlife Sites (LWS). Sussex Wildlife Trust do not support development on local designated site such as, Local Wildlife Sites. We would consider some of the key development sites do have showstopper elements and as such should not be considered areas that have capacity to deliver development without impacts on the Borough's natural capital. We remind EBC that NPPF 2021 states under paragraph 179:

⁴ <https://questions-statements.parliament.uk/written-statements/detail/2022-12-06/hcws415>

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.

Planning Practice Guidance goes onto say:

'National planning policy expects plans to identify and map these sites, and to include policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.' (Ref ID: 8-013-20190721)

By proposing that some developments go on LWS's, Eastbourne's Growth Strategy does not comply with section 179 of the NPPF.

It is noted that the Eastbourne Growth Strategy does at least recognise this is an issue - Section 6.18 of Paper 1 – Housing states:

Local Wildlife Sites (LWSs) are areas with locally significant nature conservation value. There are a number of LWSs across Eastbourne, including most of Eastbourne Park and parts of East Langney Levels, and further work is being undertaken to understand whether the impacts of development on a Local Wildlife Site can be satisfactorily mitigated.

We will make comments in relation to the key development sites and the impact on Local Wildlife Sites below.

Overall, we are deeply concerned that key development sites are being considered with no clear understanding of the impact these will have on the Borough's natural capital or their resilience to future climate change. We do not believe this is a positive form of plan making that meets the requirements of the NPPF in terms of the three pillars of sustainable growth.

Key Development Sites

We note that page 10 of the growth strategy includes a map indicating the key development sites and we will provide further commentary on those based on the information available to us. However we also note that the map indicates a significant number of other small and medium sized sites identified in the Land Availability Assessments (LAA). There is currently no information to enable us to effectively provide commentary of these potential sites. However we highlight that sites with ecological value or on sites designated for biodiversity value should not progress to allocation without more detailed assessment and consultation.

SWT seeks clarity on the term 'key development sites', as we are unclear if further sites will be identified for growth/allocation in the Local Plan. For example how many further small and medium sites do EBC anticipate allocating from the Land Availability Assessments?

When being asked to provide comment on the key development sites in the growth strategy, we highlight that no ecological information has been presented in this consultation to demonstrate the current ecological value of the key development site on a site level or as part of the wider ecological network.

SWT have provided the following commentary in relation to some of key development sites put forward. These comments are not exhaustive and are based on our current access to desk based data. However we highlight concern in relation the potential allocation of development site with known biodiversity value and designations.

9 - Land at Tutts Barn Lane

From the desk top information we have available to us we can see that this site sits adjacent to the Eastbourne Park Local Wildlife Site. The key development site is also showing as a priority habitat and sits within the Eastbourne Marshes Biodiversity Opportunity Area⁵. We would prefer to see the local plan process safeguard this site for biodiversity. At the very least, evidence must be provided as to how impacts on the LWS will be avoided.

10 - Fisherman's Green

Given the significant investment coming to Eastbourne in the form of the Coastal Defence scheme, should this site even be considered for allocation when the progression of the scheme and the land required is unclear.

15 - Land at Southbourne

This key development site is suggested for 85 houses and 30,000m² of commercial space. It sits within the Eastbourne Marshes Biodiversity Opportunity Area and is within Eastbourne Park Local Wildlife Site. Eastbourne Park LWS is a large area of semi-natural habitat in the centre of Eastbourne, which supports high levels of biodiversity. Priority habitat flood plain grazing marsh is present and the majority of the area is in flood risk zones 2, 3a and 3b. As noted in the Growth Strategy this LWS is a functional flood plain. Sussex Wildlife Trust objects to the development of Local Wildlife Sites and as such, this site should be deleted from the plan. Progression of this site would fail to safeguard locally designated sites as require in paragraph 179 of the NPPF 2021. The local plan process should instead safeguarded this site for biodiversity and if suitable, options for natural flood management considered.

17 - Land off Pevensey Bay Road

This key development site for 375 houses is situated on the Langley Levels Local Wildlife Site. The Local Wildlife Site is designated for its network of drainage ditches rich in scarce waterside plants and clean water within an area of unimproved pasture and a broad water channel with rich flora. The development site also sits within an area of Flood Risk Zone 3. Sussex Wildlife Trust object to the development of this Local Wildlife Site and as such, this site should be deleted from the plan. Progression of this site would fail to safeguard locally designated sites as require in paragraph 179 of the NPPF 2021. The local plan process should instead safeguarded this site for biodiversity and if suitable, options for natural flood management considered.

18 - Land at East Langney Levels

This key development site for 212 houses is situated on Langley Levels Local Wildlife Site. The Local Wildlife Site is designated for its network of drainage ditches rich in scarce waterside plants and clean water within an area of unimproved pasture and a broad water channel with rich flora. Our data also shows us that the sites is covered by Flood Risk Zone 3. Sussex Wildlife Trust object to the development of this Local Wildlife Site and as such, this site should be deleted from the plan. Progression of this site would fail to safeguard locally designated sites as require in paragraph 179 of the NPPF 2021. The local plan process should instead safeguarded this site for biodiversity and if suitable, options for natural flood management considered.

⁵ http://sussexlnp.org.uk/wp-content/themes/twentytwentyone-child/BOAdocuments/Eastbourne_Marshes.pdf

20 - Land North East of St Anthony's Hill

This key development site for 35 houses is situated on the southern edge of Eastbourne Park Local Wildlife Site. The Local Wildlife Site is a large area of semi-natural habitat in the centre of Eastbourne supporting high levels of biodiversity. Priority habitat flood plain grazing marsh is present, while the majority of the area is in flood risk zones 2, 3a and 3b. As noted in the Local Growth Strategy this LWS is a functional flood plain. Sussex Wildlife Trust objects to the development of Local Wildlife Sites and as such, this site should be deleted from the plan. Progression of this site would fail to safeguard locally designated sites as require in paragraph 179 of the NPPF 2021. Instead, the local plan process should safeguarded this site for biodiversity.

The growth strategy includes key development sites that have the potential of delivering a minimum of 977 houses on Local Wildlife Sites and 30,000 m² of commercial space. In addition the LAA may have identified further potential of development on locally designated sites. This is unacceptable. We remind EBC that there is a need in the NPPF for Local Plan to map and safeguard locally designated sites (179 NPPF 2021). We do not feel that this has been consider or achieved by this growth strategy. We urge EBC to ensure that the progression of the Local Plan does not erode the natural resources fundamental to sustainable growth.

Yours sincerely,

Laura Brook
Conservation Officer
Sussex Wildlife Trust