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Eastbourne Draft Land Availability Assessment Methodology - Consultation March 2022

The Sussex Wildlife Trust (SWT) wishes to submit the following comments to Eastbourne Borough Council's Land Availability Assessment Methodology (LAA) - Draft for Consultation

Stage 1 Site identification

Task 2: Review of Desktop Information

SWT seeks clarity on Section 4.11 and what this bullet point means:

- *Surplus public sector land including land likely to become surplus in future*

We unclear from the document how surplus will be defined or determined. This should be set out, particularly in terms of how long into the future will be considered.

A further bullet point indicates:

- *Sites where an application was submitted and withdrawn, where planning permissions has been refused and sites subject to appeal.*

SWT would expected the reasons for refusal to be clearly stated in the LAA.

Task 4: Urban Capacity Survey

We note this task discusses the urban capacity approach and section 4.18 states:

The process will involve identifying via GIS mapping and aerial photographs all undeveloped land within each neighbourhood that could be capable of accommodating any net gain in residential dwellings. This would include, but not limited to, land being used as amenity space, car parks, garages and playing pitches, as well as land in commercial/employment uses within and adjacent to predominantly residential areas that may be suitable for redevelopment for housing.

SWT acknowledge that section 4.19 goes on to state *that Identification of sites at this stage does not suggest that they would necessarily be realistically considered for development*

We highlight that this approach has the potential to identify significant areas for development that provide current natural capital resource in urban locations. We therefore ask the council to ensure that the lands existing functions within those communities is determined. Sites in these urban areas should

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not be considered in isolation, but in terms of their cumulative impact on access to natural spaces, use of natural resources and ecosystem services they provide to the local community.

PPG states in Paragraph: 007 Reference ID: 3-007-20190722

It is also important to involve land owners and promoters; local property agents; developers; local communities; Local Enterprise Partnerships; businesses and their local representative organisations; parish and town councils and neighbourhood forums preparing neighbourhood plans.

With this in mind, we ask the council to ensure they engage with the Sussex Nature Partnership¹ throughout the process about the Natural Capital Investment Strategy and future Local Nature Recovery Strategies.

Task 5: Site Survey

Section 4.24 of this task outlines the information recorded as part of the site surveys. We note one of the bullet points listed is environmental constraints. We seek clarity if this includes or is limited to site designations or covers other environmental elements.

Whilst we expect to see international and national designations identified as indicated in Table 1 - Exclusions, SWT encourage the council to identify sites that may be within or adjacent to locally designated sites such as Local Nature Reserves (LNRs) and Local Wildlife Sites (LWS). How potential site allocations contribute or detract from current ecological networks and the emerging Nature Recovery Network requirements would be valuable information for the council to consider.

Given the current emerging work around nature recovery networks, the survey information should also be considering lands **environmental potential**, as well as constraints. We are aware that Eastbourne Borough Council launched a Biodiversity Net Gain Technical Advice Note in August 2021 that seeks to deliver a minimum of 10% BNG, in line with the Environment Act 2021.

Further to this, we encourage the council to be progressive in its thinking about a climate resilient landscape, especially given the coastal nature of the Borough. Future allocations should be considered alongside the requirement for nature's recovery and areas that may be vital in re-establishing natural processes and enabling the landscape to function in a changing climate. This will be imperative for the long-term sustainability of the area.

Stage 2: Site Assessment

Task 6: Estimating development potential and capacity

We note at the beginning of the draft document in section 1.4 it states: *extend the scope of the assessment to include other land to support future development, such as renewable energy generation and green infrastructure.*

However, SWT is unclear where further information/explanations relating to this have been captured within the methodology. We note that section 5.17 covers other uses, but we see no specific mention of Green Infrastructure or Renewable Energy.

Task 7: Suitability Assessment

Section 5.2 references Appendix 2. Having looked at Appendix 2 we observe the following points. It may be relevant to consider that site designations should be considered as potentially policy and physical constraint depending on the designation. We also seek assurance that site designation also considers locally designated sites such as Local Wildlife Sites.

¹ <http://sussexlnp.org.uk/>

The document does not make clear in section 5.24 what the route will be for sites categorized as unknown. Despite this table being consistently used through the document we could see no information relating to clarity on this category.

Stage 5: Final Evidence

SWT think it would be useful for the monitoring and review of the LAA to incorporate percentage of Biodiversity Net Gain delivered as part of the allocation on sites under construction or completed.

Appendix 2

We believe that environmental designations should also be noted under policy constraints given the requirements of paragraphs 175 and 179 of the NPPF. In the future, it would also be useful to include reference to the Local Nature Recovery Strategy. We would also encourage the council to ask if there is any potential for BNG identified through either the site information or local plan supporting evidence documents.

SWT would be happy to meet with the council to discuss any of the points we have made within our consultation response.

Yours sincerely,

Laura Brook
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