

Wealden District Council

(incorporating part of the South Downs National Park)

Local Development Framework

Core Strategy

Examination in Public

Written Response to 'Matters Issues and Questions'

BY
EASTBOURNE BOROUGH COUNCIL

Matter 3: Housing (Wednesday 18th January) am

Whether the overall level of housing provision and its distribution are justified and appropriate

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CONTENTS

		Page No
A.	CONFORMITY WITH THE SOUTH EAST PLAN	3
B.	LEVEL OF HOUSING PROVISION	4
C.	HOUSING NEED	5
D.	DISTRIBUTION OF HOUSING	8
E.	REASONABLE ALTERNATIVES	8
F.	5 YEAR LAND SUPPLY	9
G.	OVERALL LAND SUPPLY	9
H.	PREVIOUSLY DEVELOPED LAND	9

CONFORMITY WITH THE SOUTH EAST PLAN

A. Does the overall scale and distribution of housing provision accord with the requirements of the South East Plan (SEP) having regard to policies relating to infrastructure and the environment as well as those for housing? Is the Core Strategy in general conformity with the SEP in this regard?

Eastbourne Borough Council [hereafter referred to as EBC] supports Wealden District Council's approach to delivering its spatial development strategy. The Core Strategy sets out a clear vision for growth and having considered a range of different options represents an appropriate and desirable approach to the future of Wealden. It is not in conformity with the South East Plan (SEP) in terms of the numbers specified, but by focusing marginally more of its growth in the Southern parts of the District, it does strike the right balance with the principles set out in the 'Sussex Coast' sub regional spatial strategy, with its needs in the north of the district. For instance, the SEP ambitions to regenerate coastal area and address the economic challenges as set out in para 17.2 (p201) and Policy SCT1 of the SEP. Para 17.2 adds "The Policy recognises that locally sensitive solutions will be necessary to respond to the different needs and opportunities in the sub-region".

It is also implicit from the other wider priorities and explanations given in the Wealden Core Strategy that the strategic objectives for the Wealden and the SE Plan are synchronistic. For example, Wealden's desire to protect and enhance the sub regions high environmental quality, whilst at the same time recognising the importance of promoting the economic success and quality of life of its towns and villages (SEP Policy SC1 i.- vi. , p202).

LEVEL OF HOUSING PROVISION

B. Is there evidence since the SEP was adopted that would support a different level of housing provision in the Core Strategy from that in the SEP?

The scale and pace of development proposed, reflects the aspirations of SEP Policy CC7 (p37). This Policy advises that the scale and pace of development needs to reflect that there is sufficient capacity in the infrastructure likely to be available.

The Wealden Core Strategy explains that the setting of housing targets is clearly made up of a detailed and complex mix of "environmental, social infrastructure and community aspirations that shape the amount of growth that can be accommodated" – this represents a pragmatic approach which EBC supports.

HOUSING NEED

C. How does the overall level of housing provision in the Core Strategy relate to the need for both market and affordable housing in the District?

Both the Eastbourne and Wealden Core Strategies have been shaped over the last 5 years by close partnership working on a number of cross-boundary technical studies for both of the neighbouring Eastbourne and South Wealden administrative areas.

One of the earliest of these studies was the Eastbourne and South Wealden Housing Market Assessment (SHMA) which was completed in 2009.[1] Started in 2007, the study recognised the strong cross boundary inter-relationships in the everyday lives of residents in both administrative areas.

Overall the study found a well integrated housing and labour market across Eastbourne and the southern part of Wealden, demonstrated by high levels of movements between people. (Fig 1 p6 Eastbourne and South Wealden SHMA 2007). A copy is attached for your information.

When it comes to the mix and type of housing needed, the SHMA recognised that there is a relatively strong bias in Eastbourne towards building smaller homes, including a high proportion of flats. In order to improve its economic performance and the quality of life on offer in the sub region, the sustainable urban extensions proposed in South Wealden, offer opportunities for larger family housing that could help not only provide more homes for the local people but complement the flatted developments in Eastbourne. New flatted developments in Eastbourne are also attractive to residents across the Housing Market Area.

[1] The SHMA was prepared in accordance with emerging the draft best practice guidelines and the requirements set out in PPS3: Housing (para 22).

Figure 1 of the SHMA reveals the high levels of household movements that took place between Wealden settlements of Polegate, Pevensey, Westham and Hailsham and the Eastbourne Inner and outer coastal areas in 2000 and 2001.

EBC[2] plans to meet its own total housing target as set out in the South East Plan of 240 new homes per year to 2026. The plan period of the Eastbourne Core Strategy has been extended to 2027 and an annual target of 228 new homes per year (from 1 April 2011) has been set for the remainder of this extended period. This is a slightly reduced annual requirement because of higher levels of housing provision in earlier years of the Plan period from 2006. Although this may be challenging in the current economic climate, with the physical constraints faced by Eastbourne (a coastal town surrounded by the Downs, the sea and Pevensey Levels), there are no plans for seeking to meet Eastbourne's housing provision outside its administrative area. Para 13 (p2) of the SHMA Executive Summary advised that "there appear to be sufficient opportunities for development on either allocated or identified sites (particularly when taking into account Windfall) in Eastbourne and South Wealden for the next 5 years. "

Para 1.20 (p9) of the SHMA explains the initial calculations behind the coastal sub-region SEP housing targets based on projected household growth trends 2006 – 2026 and policy based forecasts 2001 - 2026. The predicted growth of 1,040 new households per annum (2007) was almost twice the target rate of new dwelling provision proposed in the SE Plan (590 units per annum). This illustrates that some crude assessment of the physical / environmental constraints had already been taken into account in the SEP targets. However the SEP target setting work predated the subsequent land supply appraisals (Strategic Housing Land Availability Assessments) as well as local community engagement, which refined its estimated capacity to

[2] EBC is also at an advanced stage of preparing its Core Strategy - and plans to submit its Core Strategy for Examination in February 2012.

accommodate growth in the sub regional coastal area. This is explained in the series of documents and background papers that followed which collectively provide a justification for the housing and employment land provided.

DISTRIBUTION OF HOUSING

D. Has the distribution of housing between the different types of settlement been justified by the evidence base and does it accord with national and regional policy?

The proposed distribution focuses development in the principal towns and on the urban fringe of Eastbourne is considered to represent an appropriate balance within the district on the basis that it is supported by the key infrastructure requirements established in the Infrastructure Delivery Plan.

The Wealden Core Strategy could be clearer in its distinction between North and South Wealden Housing targets and proposed deliverability in relation to the SEP Eastbourne / South Wealden Housing Market Area.

REASONABLE ALTERNATIVES

E. Have reasonable alternatives to the distribution and location of housing development been considered? Has it been demonstrated that there are no reasonable options that would avoid the infrastructure and environmental constraints indentified in the Core Strategy?

The Core Strategy sets out a clear vision for growth having considered a range of options and represents an appropriate and deliverable approach to the future of Wealden. This is subject to the redistribution of land east and south east of Stone Cross (SD6 residential). [*See Matter 8:Polegate, Willingdon and Stone Cross Area Strategy*].

5 YEAR LAND SUPPLY

F. Does the Core Strategy assist in providing a continuous supply of deliverable sites so that the housing requirements of the next 5 years can be delivered?

Yes.

OVERALL LAND SUPPLY

G. Is the Core Strategy likely to result in an adequate supply of developable sites in the plan period beyond 5 years.

Yes.

PREVIOUSLY DEVELOPED LAND

H. Is there an adequate strategy for bringing previously developed land into housing use? Should there be a local previously developed land trajectory? Is the Core Strategy sufficiently clear about an overall target for the proportion of new housing on previously developed land and should this be included in a policy?

The Core Strategy would benefit from a previously developed land target and trajectory to maintain its market towns and villages. Brownfield opportunities can often be identified within rural districts and their redevelopment can contribute significantly to the continued vitality of market towns and villages.