

## EMPLOYMENT LAND LOCAL PLAN

# Statement of Compliance with the Duty to Co-operate

*February 2016*



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#### **1.0 Introduction**

- 1.1 The Localism Act 2011 and the National Planning Policy Framework (NPPF) creates a duty on local planning authorities and other bodies to cooperate with each other to address strategic issues relevant to their areas. The duty requires ongoing constructive and active engagement on the preparation of development plan documents and other activities relating to the sustainable development and use of land, in particular in connection with strategic infrastructure.
- 1.2 The NPPF (para 181) states that 'Local planning authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination'. This Statement of Compliance with 'Duty to Co-operate' accompanies the Submission of the Employment Land Local Plan and outlines the key activities undertaken by Eastbourne Borough Council in preparing the Eastbourne Employment Land Local Plan with regard to, and the spirit of, the Duty to Co-operate.
- 1.3 Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 sets out the other prescribed bodies for the purposes of implementing Section 33A of the 2004 Act. Of those bodies listed in the Regulation, it is considered that the following bodies are relevant to Eastbourne Borough Council:
- The Environment Agency
  - Highways England
  - Natural England
  - Historic England
  - East Sussex County Council (Highway authority)
  - Clinical Commissioning Group
  - The Marine Management Organisation
  - Homes and Community Agency
  - South East Local Enterprise partnership (SELEP)
  - Sussex Local Nature Partnership

## 2.0 Context

- 2.1 The 'duty to co-operate' is set out in Section 110 of the Localism Act 2011 which amended the Compulsory and Purchase Act 2004, introducing Section 33A. This applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The duty:
- relates to sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council;
  - requires that councils set out planning policies to address such issues;
  - requires that councils and public bodies to 'engage constructively, actively and on an ongoing basis' to develop strategic policies; and
  - requires councils to consider joint approaches to plan making.
- 2.2 The National Planning Policy Framework (NPPF), which was published in March 2012, describes the 'duty to co-operate', sets out strategic issues where co-operation might be appropriate, and highlights the importance of joint working to meet development requirements that cannot be wholly met within a single local planning area.
- 2.3 Paragraphs 178 to 181 of the NPPF identify that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those related to strategic issues, and joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. It also identifies that co-operation should be a continuous process of engagement to ensure that plans are in place to provide the infrastructure necessary to support current and projected future levels of development.
- 2.4 Paragraph 156 of the NPPF identifies that strategic priorities where public bodies have a duty to co-operate include:
- the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

- 2.5 The duty to co-operate also covers a number of public bodies in addition to councils. These bodies are required to co-operate with councils on issues of common concern to develop sound local plans.

### 3.0 Eastbourne Context

- 3.1 Eastbourne is located on the south coast of East Sussex. The Borough is surrounded to the north, east and west by Wealden District Council.
- 3.2 Eastbourne is a two-tier area, with East Sussex County Council providing most public services including education, highways and social services. Eastbourne is a predominantly urban area but the Borough also includes part of the South Downs, which is administered by the South Downs National Park Authority. A map showing the location of the Local Authorities in East Sussex is provided as Figure 1.

**Figure 1 - Local Authorities in East Sussex and Brighton & Hove**



- 3.3 Eastbourne has close linkages with the south of the Wealden District, particularly Polegate and Hailsham. Eastbourne forms part of the Eastbourne and South Wealden Housing Market Area (HMA), and there is an important relationship between Eastbourne and settlements in Wealden including Willingdon, Polegate, Pevensey and Hailsham. Many of the residents of these areas use services and facilities within Eastbourne. A well-integrated housing

and labour market operates across Eastbourne and the southern part of Wealden. There are also high volumes of household migration and travel to work movements that take place between Polegate, Pevensey & Westham and Hailsham in Wealden, and the Eastbourne urban area.

- 3.4 A masterplan for the area was prepared in 2008 by the South East England Development Agency (SEEDA), in conjunction with East Sussex County Council, Wealden District Council and Eastbourne Borough. The area has been identified as a key strategic location on the Sussex Coast with considerable potential for economic and sustainable development.
- 3.5 The Wealden Core Strategy was adopted in February 2013 and makes provision for 25,540 sqm of employment floorspace in South Wealden. In addition, around 5,000 new homes are allocated or committed in the South Wealden area. This will have implications for the local markets and demand for employment floorspace across the Eastbourne and South Wealden area.

#### **4.0 Background**

- 4.1 The Eastbourne Employment Land Local Plan (ELLP) is a planning policy document that will guide job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a town where people want to live and work. It will relate to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes.
- 4.2 The need to produce an Employment Land Local Plan results from concerns raised by the Planning Inspector during the Public Examination of the Eastbourne Core Strategy Local Plan, which was adopted in February 2013.
- 4.3 The Eastbourne Core Strategy Local Plan underwent Examination in Public during the spring of 2012. The Core Strategy identified an employment floorspace requirement of 33,205 m<sup>2</sup>. In addition to this, a number of existing employment sites were identified as being suitable for residential development, which would result in a loss of 22,225 m<sup>2</sup> of employment floorspace. This loss was taken into account in the employment floorspace requirement, resulting in an overall requirement of 55,430 m<sup>2</sup>.
- 4.4 Core Strategy Policy D2: Economy proposes that this requirement is delivered through densification and redevelopment of existing Industrial Estates (30,600 m<sup>2</sup>), redevelopment opportunities in the town centre (3,000 m<sup>2</sup>) and development of land at Sovereign Harbour (30,000 m<sup>2</sup>). The Core Strategy also de-allocated a number of sites that were formerly allocated for employment development; the majority of which were located within

Eastbourne Park and were de-allocated on the grounds of unacceptable flood risk.

- 4.5 In the report, the Inspector considered that the policy to deliver of 30,600 m<sup>2</sup> of employment floorspace through densification of industrial estates and redevelopment in the town centre is positively prepared and justified by evidence that demonstrates that there is capacity in these locations to accommodate the requirement. However, concerns were raised over the delivery of 30,000 m<sup>2</sup> of employment floorspace at Sovereign Harbour, particularly relating to the prospect of such a substantial amount of office space being delivered at Sovereign Harbour, the effect that this would have on the town centre, and the overall quantum of office floorspace was based on accurate and up to date evidence.
- 4.6 The Inspector concluded that the evidence on employment land supply lacks clarity and does not demonstrate that Policy D2 is the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne. Furthermore she considered that uncertainty about the viability of directing 30,000 m<sup>2</sup> of employment floorspace to Sovereign Harbour cast doubt on whether the strategy is deliverable during the Plan period. This raised the question of whether the quantum of office development proposed in the Plan is based on accurate and up to date evidence.
- 4.7 The Inspector considered that if the adoption of the Plan were to be delayed to allow for the Plan to be revised, Eastbourne would be left without an up-to-date local plan and the Council would be unable to take a proactive, plan led approach to delivering development. To avoid such a delay the Inspector recommended that Policy D2 be the subject of an early review, leading to its replacement with an additional Local Plan to deal specifically with employment land supply.
- 4.8 In relation to the duty to co-operate, the Inspector concluded that *'it is clear from the Statement of Compliance that the Council's approach to preparing the Plan has been underpinned by collaborative working, that it has co-operated with all the relevant bodies and has met both the spirit and the letter of the duty to cooperate' (para 7).*

## **5.0 General Co-operation**

- 5.1 Eastbourne Borough Council is involved in a continuous process of co-operation and engagement with surrounding Local Authorities and other public bodies, from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.

5.2 A summary of activities that have taken place as part of the Duty to Co-operate are provided below. This includes activities that took place prior to the Duty being introduced, and in the preparation of the Core Strategy, as well as the Employment Land Local Plan. Working with neighbouring local authorities and other relevant stakeholders has been an on-going process which has not simply started at the point of formal consultation on planning policies.

#### On-going Co-operation

5.3 Eastbourne Borough Council has undertaken a wide range of engagement and discussion with local authorities, particularly Wealden District Council and East Sussex County Council, and other public organisations to ensure that there is a high level of co-operation. In addition to on-going discussion and engagement, Eastbourne Borough Council engages via the following formal groups:

- the Eastbourne Strategic Partnership;
- East Sussex Local Plan Manager Group meetings;
- East Sussex Strategic Planning Members Group; and
- East Sussex Infrastructure Delivery Groups and CIL working groups

5.4 Eastbourne Borough Council, via the Eastbourne Strategic Partnership, has been involved in the production of the East Sussex Integrated Sustainable Community Strategy, which was developed by the six local strategic partnerships within East Sussex. The Eastbourne Strategic Partnership has also had the opportunity to discuss planning policy documents. It includes the following organisations: Sussex Police; 3VA, East Sussex County Council, NHS East Sussex Downs and Weald Primary Care Trust, East Sussex Adult Learning and Skills Partnership, East Sussex Fire & Rescue.

5.5 Eastbourne Borough Council participates in regular East Sussex Local Plan Manager Group meetings, which includes all local authorities in East Sussex, plus Brighton and Hove, and the South Downs National Park Authority. These meetings of lead planning policy officers take place on a quarterly basis and are used to discuss strategic issues that affect more than one local authority, such as housing, employment, transport, waste, environment and biodiversity and provision for gypsies and travellers.

5.6 An East Sussex Strategic Planning Members Group was created in 2013 to boost the political dimension of co-operation. The Group is comprised of Planning Portfolio Holders or equivalent from all the authorities in East Sussex including the South Downs National Park Authority. The group considers cross-boundary strategic issues in the preparation of authorities Local Plans, and provides a framework for ensuring that the key infrastructure to support sustainable growth in East Sussex is available in a timely manner.

- 5.7 There have been on-going discussions with the South Downs National Park to discuss the issue of the relationship of the urban area of Eastbourne to the adjoining part of the Park within Eastbourne Borough.
- 5.8 Eastbourne Borough Council has also participated in the East Sussex Infrastructure Delivery Groups and CIL working groups, which included all local authorities in East Sussex and the South Downs National Park Authority. The purpose of these meetings was to co-ordinate information gathering from infrastructure providers to ensure that information being given to each authority is consistent, and to advise on the development of Infrastructure Delivery Plans and implementation of Community Infrastructure Levy (CIL).

#### Co-operation undertaken in preparation of the Core Strategy

- 5.9 At the Preferred Options stage in the production of the Core Strategy, a series of background papers were prepared on a number of different topics. Stakeholders were invited to be part of the working groups that prepared these background papers, and this included other local authorities and public bodies. This engagement took place prior to the formulation of the Core Strategy policies.
- 5.10 The Core Strategy Spatial Development Options were subject to targeted confidential consultation with key partner organisations to seek their input and co-operation before the documents were published for public consultation. These key partner organisations included Wealden District Council, East Sussex County Council, the Environment Agency, the Highways Agency, Southern Water, South East Water, South East England Partnership Board, Government Office for the South East, and the Mobile Operators Association.
- 5.11 As key stakeholders, all relevant local authorities and public bodies were contacted and invited to submit representations during statutory consultation on the Draft Core Strategy (December 2010 – March 2011) and the Proposed Submission version (September – December 2011).
- 5.12 In the preparation of the Core Strategy, Eastbourne Borough Council commissioned various reports from consultants; a number of which were carried out jointly with Wealden District Council where the issue was strategic and crossed the administrative boundary.
- 5.13 These joint evidence studies included:
- Strategic Housing Market Assessment (2009)
  - Financial Viability of Affordable Housing Assessment (2010)
  - Employment Land Review (2008)

- Eastbourne and Hailsham Triangle Economic Blueprint (2009)
- South Wealden and Eastbourne Transport Study (2010)
- Strategic Flood Risk Assessment – Level 1 (2008) and Level 2 (2009)

### Co-operation on Infrastructure issues

- 5.14 Eastbourne Borough Council has worked with infrastructure providers, regulators and local authorities regarding the infrastructure needs of the Borough and surrounding areas arising from development proposed in the Core Strategy and the Employment Land Local Plan. This detailed work is contained within the Infrastructure Delivery Plan. The Infrastructure Delivery Plan is a 'living document', and has gone through a number of iterations during the development of both the Core Strategy and the Employment Land Local Plan as a result of continuous engagement with neighbouring district and other stakeholders. It was most recently updated in February 2016 via a questionnaire that was completed by infrastructure providers and consultees.
- 5.15 For future co-operation, Core Strategy Policy E1: Infrastructure Delivery sets out the Council's commitment to continue to work closely with public agencies, utility companies and infrastructure providers to ensure that the necessary infrastructure is available or will be provided to support future housing and employment development.

## **6.0 Co-operation on the Employment Land Local Plan**

- 6.1 Aside from the general co-operation identified above, the details of the consultation that was undertaken on the Employment Land Local Plan is identified within the *Statement of Consultation and Representations (February 2016)*.
- 6.2 In June 2013, a pre-production engagement questionnaire was sent out to all stakeholders, inviting stakeholders to make representations about what the Employment Land Local Plan ought to contain. The questionnaire was available for a six week period between 21 June and 2 August 2013, and a total of 22 questionnaire responses were received during the pre-production representation period, including one from Wealden District Council.
- 6.3 In December 2013, a Proposed Draft Employment Land Local Plan was published for consultation for a 12 week period in order to obtain the public and stakeholder's views on what the ELLP ought to contain. The Draft Employment Land Local Plan asked consultees to comment on the proposed approach, whether they consider that the correct option has been taken, and whether there are any other options that should have been considered in the formulation of the Plan. A total of 33 representations were received from 10 organisations and individuals.

- 6.4 In December 2014, a Proposed Submission Employment Land Local Plan was published to receive representations on issues of soundness. A total of 38 representations were received from 13 individuals or organisations and individuals.
- 6.5 In December 2015, a Revised Proposed Submission Employment Land Local Plan was published to receive additional representations on issues of soundness. A total of 43 representations were received from 16 individuals or organisations.
- 6.6 The table below summarise how Eastbourne Borough Council has co-operated with other authorities and public bodies in the preparation of the Employment Land Local Plan.

**Table 1 - Co-operation in preparation of the Employment Land Local Plan**

<b>Organisation</b>	<b>Nature of Co-operation</b>
Wealden District Council	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• Response on pre-production engagement questionnaire</li> </ul> <p>On-going engagement at East Sussex Local Plan Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p> <p>Regular officer meetings to discuss cross-boundary issues</p> <p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p> <p>Worked in partnership in developing evidence base to inform the Core Strategy, including housing, employment, transport and flooding.</p>
East Sussex County Council	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• Response on Draft Employment Land Local Plan</li> <li>• Response on Proposed Submission Employment Land Local Plan</li> </ul> <p>On-going engagement at East Sussex Local Plan Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p>

<b>Organisation</b>	<b>Nature of Co-operation</b>
	<p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p> <p>Worked in partnership in developing the transport evidence to inform the Core Strategy.</p> <p>Regular officer meetings to discuss infrastructure issues</p>
South Downs National Park Authority	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• Response on Revised Proposed Submission version</li> </ul> <p>On-going engagement at East Sussex Local Plan Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p> <p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p>
Lewes District Council	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• No responses</li> </ul> <p>On-going engagement at East Sussex Local Plan Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p> <p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p>
Rother District Council	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• No responses</li> </ul> <p>On-going engagement at East Sussex Local Plan Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p> <p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p>
Hastings Borough Council	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• No responses</li> </ul> <p>On-going engagement at East Sussex Local Plan</p>

<b>Organisation</b>	<b>Nature of Co-operation</b>
	<p>Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p> <p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p>
Brighton & Hove City Council	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• No responses</li> </ul> <p>On-going engagement at East Sussex Local Plan Managers Group</p> <p>On-going engagement at East Sussex Strategic Planning Members Group</p> <p>Ongoing Engagement at the Planning Liaison Group (chief officers).</p>
Environment Agency	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• Response on Proposed Submission Employment Land Local Plan</li> </ul> <p>On-going liaison regarding infrastructure provision.</p> <p>Engaged in preparation of Strategic Flood Risk Assessment</p>
Highways England	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• Response on pre-production engagement questionnaire</li> <li>• Response on Draft Employment Land Local Plan</li> <li>• Response on Proposed Submission Employment Land Local Plan</li> <li>• Response on Revised Proposed Submission Employment Land Local Plan</li> </ul> <p>Engaged in preparation of South Wealden and Eastbourne Transport Study</p> <p>On-going liaison regarding infrastructure provision.</p>
Clinical Commissioning Group	<p>Formal Consultation</p> <ul style="list-style-type: none"> <li>• No responses</li> </ul> <p>On-going liaison regarding infrastructure provision.</p>

<b>Organisation</b>	<b>Nature of Co-operation</b>
Natural England	Formal Consultation <ul style="list-style-type: none"> <li>• Response on pre-production engagement questionnaire</li> <li>• Response on Draft Employment Land Local Plan</li> <li>• Response on Proposed Submission Employment Land Local Plan</li> <li>• Response on Revised Proposed Submission Employment Land Local Plan</li> </ul>
Historic England	Formal Consultation <ul style="list-style-type: none"> <li>• No responses</li> </ul>
Marine Management Organisation	Formal Consultation <ul style="list-style-type: none"> <li>• Response on pre-production engagement questionnaire</li> <li>• Response on Draft Employment Land Local Plan</li> <li>• Response on Proposed Submission Employment Land Local Plan</li> </ul>
Homes and Community Agency (HCA)	Formal Consultation <ul style="list-style-type: none"> <li>• No responses</li> </ul>
South East Local Enterprise Partnership (SE LEP)	Formal Consultation <ul style="list-style-type: none"> <li>• No responses</li> </ul> Ongoing officer and Member liaison via Team East Sussex (a local federated board that has seats on the LEP)
<i>* Where the summary states "Formal consultation", this means that the authority / body were notified and invited to make comments on consultation undertaken on the Employment Land Local Plan.</i>	

6.2 It should be recognised that the co-operation undertaken and detailed above is not the full extent of cooperation and engagement that has been undertaken in preparing the Employment Land Local Plan. Eastbourne Borough Council have worked closely with other local planning authorities as well as liaised and co-operated with a large number of organisations that are not on the prescribed list for the Duty to Cooperate. This has included a number of key infrastructure providers, such as Southern Water, South East Water, Network Rail and energy suppliers and local amenity groups.

- 6.3 During the formal consultation, there have been no major objections raised by authorities / bodies engaged in the Duty to Co-operate.

#### Outcome of Cross-Boundary Employment Land Provision

- 6.4 The purpose of the Employment Land Local Plan is to identify the requirement for employment land in Eastbourne and how it can be delivered. It also provides the necessary policies to achieve sustainable development, in conformity with the Core Strategy and the NPPF. Once adopted, it will supersede Core Strategy Policy D2: Economy.
- 6.5 Through the Employment Land Review undertaken to inform the Employment Land Local Plan, the level of employment need, and in turn land requirements, has been established. The Eastbourne Employment Land Review (2013) identified the need for 43,000 sqm of employment floorspace to be delivered in Eastbourne between 2012 and 2017. The Employment Land Local Plan makes provision for this requirement to be made within the Borough, and therefore there is no shortfall to be made up by other local authorities.
- 6.6 Through discussions at officer meetings to discuss cross-boundary issues, East Sussex Local Plan Managers Group meetings and East Sussex Strategic Planning Members Group meetings, Wealden District Council have confirmed that Wealden's employment land requirement can be wholly met within the District, and there is no shortfall to be accommodated by Eastbourne Borough Council.
- 6.7 No other local authorities have indicated that they do not have sufficient capacity to accommodate their employment land requirements and require Eastbourne Borough Council to provide additional capacity.

#### Other Cross Boundary Issues

- 6.8 In terms of the content of the Employment Land Local Plan, and the development of the Plan, it is considered that the main strategic matter that would have an impact on other local authority areas relates to transport infrastructure.
- 6.9 Eastbourne Borough Council and Wealden District Council worked with East Sussex County Council to produce the transport infrastructure evidence base for the respective Core Strategies. The evidence is entitled South Wealden and Eastbourne Transport Study (SWETS) (2010).
- 6.10 The Transport Study forecast future highway demand and assessed the highways impacts of a range of development options for Eastbourne and

South Wealden in order to advise on whether housing growth could be accommodated within the existing highways network, and identify a range of packages of transport measures required in order to accommodate future highway demand. The study was guided by a steering group that also included the Highways Agency and South East England Partnership Board (which has now been disbanded).

- 6.11 The Transport Study tested a higher quantum of employment land through the Core Strategy than is proposed in the Employment Land Local Plan, and concluded that a package of transport measures would be required in order to accommodate development. These transport measures have been taken into account through the Infrastructure Delivery Plan. This means that there is no additional requirement for additional highway infrastructure or transport measures in order to accommodate the quantum of employment land identified in the Employment Land Local Plan.

## **7.0 Conclusion**

- 7.1 Eastbourne Borough Council has had a high level of co-operation with other authorities and public bodies, particularly Wealden District Council and East Sussex County Council, and has participated in a number of joint projects prior to and throughout the preparation of the Core Strategy (adopted 2013) and the Employment Land Local Plan.
- 7.2 This approach has resulted in a robust and solid evidence base for the Employment Land Local Plan, which is reflected in the largely positive reception that the plan has received from authorities / bodies engaged in the Duty to Co-operate. Eastbourne Borough Council is not aware of any fundamental objections to overall soundness by district or county councils in or adjoining Eastbourne (as reflected in public representations or subsequent discussions).
- 7.3 The strategic matters dealt with by the Employment Land Local Plan relate mainly to employment land provision and transport infrastructure that would have an impact on two or more areas. The Employment Land Local Plan identifies sufficient land to meet the town's employment needs over the plan period, and there is no requirement from surrounding local authorities to meet any shortfalls in employment land. Eastbourne Borough Council has engaged and continues to engage with strategic and cross boundary infrastructure provision relevant to this plan. The policies within the Employment Land Local Plan seek to address cross boundary issues relevant to the scope of the Plan.