

<p>Lisa Rawlinson</p> <p>Eastbourne Borough Council</p> <p>68 Grove Road</p> <p>Eastbourne</p> <p>BN21 1DF</p> <p>March 24, 2016</p>	<p>Eastbourne Borough Council Employment Land Local Plan Examination</p> <p>Inspector Inspector Robert Mellor BSc DipTRP DipDesBEnv DMS MRICS MRTPI</p> <p>PROGRAMME OFFICER: Mrs Claire Jones-Hughes c/o 6 Brading Road Brighton East Sussex</p> <p>Tel: 01273 381518 Mobile: 07737 786425 Email: bankssolutionsuk@gmail.com</p>
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Dear Ms Rawlinson,

Duty to Cooperate

- 1.1 Section 33A of the P&CPA 2004 imposes a duty to cooperate with other local planning authorities and named bodies in the preparation of development plan documents such as a local plan. The Council has prepared a '*Statement of Compliance with the Duty to Co-operate*' [Document SD/10].
- 1.2 The *EBC Employment Land Supplementary Evidence Report (2014)*[Document SD/25] anticipated that over the life of the EELLP there would be future B1a office floorspace losses of 4,715sqm in the town centre and 768sqm outside the town centre.
- 1.3 Eastbourne's '*Local Monitoring Report 2014/15*' [Document SD/5] indicated B1a floorspace loses in 2014/15 alone of 3,718sqm in the town centre and 17,249sqm outside the town centre. These include losses of office floorspace to residential and education uses using permitted development rights. Those permitted development rights have recently been made permanent by the Government meaning that further losses can be expected to occur during the period of the Local Plan. There have also been changes of use of industrial/storage land to retail development including the Aldi store permission.

Qn 1 What account has been taken of these losses of business floorspace by EBC when concluding that Eastbourne can continue to meet its own employment land needs within its boundaries?

- 1.4 Wealden District surrounds the landward side of the Borough. The SD/10 statement acknowledges the close relationship with the southern part of that District. Both Districts are within East Sussex where there are additional arrangements for cooperation between authorities.

- 1.5 There was a joint *Employment Land Review* with Wealden in 2008 but subsequent Reviews have been for Eastbourne alone. There have been other joint studies including the *South Wealden and Eastbourne Transport Study (SWETS – 2010)*[Document SD/29].
- 1.6 The *Wealden District Local Plan Core Strategy* adopted in 2013 provides for 25,540sqm of employment floorspace in South Wealden between 2012 and 2027. This includes 16,890sqm of B1/B2/B8 floorspace (net) in the settlements of Polegate/Willingdon/Stone Cross which closely adjoin Eastbourne. That figure breaks down to 8,290sqm at Dittons Road, Polegate and 8,600sqm at South Polegate/East Willingdon). Detailed site allocations were to be left to subsequent documents. However the Core Strategy Inspector recommended an early review of the Core Strategy by 2015 as it did not meet the District’s housing needs.
- 1.7 Wealden is now preparing both a *Wealden Local Plan* and a *Hailsham Area Action Plan*. These will replace the Core Strategy as well as making site allocations. The Plans will review all Wealden Core Strategy policies including those for employment. These plans are at an early stage.
- 1.8 According to the SD10 Statement, Wealden District Council has confirmed to EBC that Wealden’s employment land requirement can be wholly met within that District with no shortfall to be met in Eastbourne. Neither has any other local authority sought that Eastbourne should provide additional capacity.

Qn 2 No employment land documents are yet included in the evidence base for the Wealden Local Plan as published on the Wealden website. Can EBC rely on the conclusion that Wealden’s employment needs can be met within the District if these have not been quantified in an up-to-date assessment?

- 1.9 *Issues and Options and Recommendations* for the Wealden Local Plan were published for public consultation between 19 October 2015 and 14 December 2015. Paragraph 9.6 of the consultation states that neighbouring authorities (which would include Eastbourne) have advised that they are able to meet their employment floorspace needs. However the same paragraph 9.6 also states that Wealden will be working with EBC on future employment land provision due to the strong workplace linkages.

Qn 3 How are cross border employment issues being addressed in relation to the emerging Wealden Local Plan and how might that affect the Eastbourne ELLP?

- 1.10 In the Wealden Local Plan Issues and Options document the preferred strategic economic strategy for Wealden refers to concentrating employment provision in the south of the District along the A22 corridor, in or near Hailsham town centre and then near new housing areas. There is also reference to creating engineering clusters and to intensifying and improving existing industrial estates. However the amount of employment provision is not quantified.

Qn 4 Has EBC made any representations on the employment provisions in the emerging Wealden Local Plan Issues and Options?

Yours sincerely,

Mr R Mellor

Inspector