

Eastbourne Town Centre Local Plan Examination Statement

For and on behalf of Caffyns PLC

Matters 5 and 6

This statement has been prepared on behalf of Caffyns PLC in response to questions relating to Matter 5 of the Eastbourne Town Centre Local Plan Examination Hearing Programme. The statement addresses the ‘tests’ of soundness that, as described in paragraph 182 of the National Planning Policy Framework, underpin the testing of Local Plans during their preparation.

5.1 Are the DO sites intended to be site allocations and if so where are their boundaries/site areas and phasing defined?

The NPPF states that the purpose of planning is to contribute to the achievement of sustainable development (paragraph 6). It also identifies a presumption in favour of sustainable development (paragraph 14), which in relation to plan making means that Local Planning Authorities should, through their Local Plans, positively seek opportunities to meet the development needs of their areas and meet objectively assessed needs (paragraph 14).

This should be achieved partly through site allocations which should provide a clear steer for development to meet the objectively assessed needs. As stated within our representation letter the adopted Core Strategy identifies the town centre as the area that will meet the largest proportion of the Borough’s housing need to 2027. If the DO sites are to be considered as allocated areas for development within a proposed Local Plan Document then this strategy should be implemented through them so that they take account of the adopted policy and positively plan for the housing requirement.

As it stands the Town Centre Local Plan makes an allowance for up to 450 units to be accommodated as part of the development mix on the DO sites. However, these are required to be delivered through negotiation on each individual site. If considered to be site allocations the DO sites should be positively prepared in consultation with landowners and with proportionate evidence to reflect their potential capacity for housing from the outset. This is particularly important as a negotiation may not result in the most appropriate strategy for the sites.

Therefore in order for the DO sites to be considered as site allocations they would need to ensure, through proportionate evidence, that they meet the objectively assessed development requirements, contain the most appropriate strategy to meet these requirements, and are consistent with national policy.

However, as it stands, the DO sites cannot be considered as site allocations due to the uncertainty surrounding the housing requirements and distribution of this requirement across the sites.

Therefore the DO sites should either be made more prescriptive, supported by proportionate evidence to positively reflect all town centre requirements (for example by fixing phasing requirements in the policy in discussion with landowners), or they should be abandoned and a criteria-based policy should be installed across the whole of the town centre which would then be a framework for negotiation on sites to meet requirements.

5.4 issue 4. What evidence has been used to justify phasing assumptions for the DO sites?

The NPPF states that pursuing sustainable development requires careful attention to viability and costs in plan-making and that plans should be deliverable (paragraph 173). It goes on to state that because of this, sites and the scale of development identified in the plan should not be subject to so many policy burdens that their ability to be developed viably is threatened. Therefore, when prescribing phasing requirements in the DO sites it is important that they are justified to take account of viability.

DO Site Three is the subject of a loose phasing strategy which includes an initial phase to be delivered in the medium term, focusing on the Council-owned car park and former garage premises. This is followed by a second phase to be delivered in the longer term, focused on the development of the Post Office premises. The policy also states that although the site may be delivered in phases the Council will pursue a comprehensive master-planned approach that will require an implementation and phasing plan.

There seems to be little evidence to suggest why the Council-owned car park should be included within the same phase as the former garage premises before a comprehensive masterplan that sets out a phasing plan has been produced for the site. By including this in the policy, it links the two landownerships, which in turn could have a significant effect on the deliverability and viability of development at the site. The former garage premises is an existing building which has the potential for conversion or independent development. A masterplan would ensure that the site is comprehensively developed and there would be no need to restrict landowners by requiring their land to be brought forward under a specific phase. This approach would have an impact on the viability and deliverability of the sites and does not take into account the masterplan approach.

It is therefore considered that the phasing requirements should either be omitted from the Town Centre Local Plan or should be based on specific evidence, or through work undertaken through a masterplan to ensure that the plans are deliverable and viable.

6.5 issue 3. What is the justification for the Post Office (Royal Mail) site and the former Caffyn's garage site being placed in the second phase of development?

The Post Office site and the former Caffyn's garage site are now within separate development phases within the Town Centre Local Plan. However, they are still within the same DO. The NPPF states that Local Plans should include sufficient flexibility to adapt to rapid change (paragraph 14) and the former garage premises could be brought forward much more quickly than the Post Office site particularly as a stand-alone development.

The inclusion of the former garage premises within the DO and its phasing requirements could potentially stifle the delivery of the site which is located in an important gateway location to the town centre. It could also provide much needed residential development that is required in the area quickly, if it were not bound by the phasing requirements.