

Committee	Cabinet
Date	19 April 2005
Report By	Director of Transport and Environment
Title of Report	South East Plan
Purpose of Report	To set out proposals for the Council's formal response to the consultation draft South East Plan

RECOMMENDATIONS

The Cabinet is recommended to:

- 1. note the feedback from consultations with stakeholders and residents in East Sussex and to draw the Regional Assembly's attention to it (as summarised in Annexes D and E); and**
 - 2. send a copy of this report to the Regional Assembly as the Council's formal response to the draft South East Plan, and drawing attention to the comments in Annexes A and B.**
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1. Financial Appraisal

1.1 There are no direct financial implications but the South East Plan (SEP), once approved by government, will set the policy framework for the future development of the region and associated investment programmes.

2. Supporting Information

2.1 The Regional Assembly (SEERA) published the draft South East Plan (SEP) on 24 January 2005 for 12 weeks' consultation until 15 April. Its focus is on land use (including transport) activities but, as a new-style, statutory Regional Spatial Strategy (RSS), it is intended to be wider-ranging and better integrated with other issues (e.g. health, education and skills) than the old-style, non-statutory Regional Planning Guidance for the South East (RPG9) that it will replace. A copy of the draft SEP is available in the Members' Room.

2.2 Once the final version has been issued by the Secretary of State, it will provide the regional and sub-regional policy framework to guide all future development in the region up to 2026. Under the new planning system, Local Development Frameworks (and Minerals and Waste Development Frameworks) will have to be prepared in general conformity with it. As well as establishing the strategic framework for the development of local policy and service delivery having land use impacts, the SEP will also be a significant influence on investment programmes and priorities over the next 20 years. As such, it is very important to the county's future prosperity and the Council's service delivery. To promote the county's best interests, the authority has therefore played an active role in helping to shape the SEP process and emerging policy proposals – details of which are provided in Annex C.

2.3 Although the draft SEP does not yet contain district level housing targets, SEERA is currently looking to the principal authorities (county and unitary councils) to provide it with more detailed planning advice on district housing provisions and associated sub-regional issues. Subject to agreement on the timetable and process for submitting this advice, the final draft SEP should be submitted to government early in 2006. The subsequent

programme for statutory government consultations, including an independent 'examination in public', indicates that the final version of the SEP could be approved in early 2007.

3. Conclusion and Reason for Recommendation

3.1 A more detailed commentary on the draft SEP, including recommendations as to how the Council should respond to SEERA is set out in Annex A (in respect of the plan's overall strategy) and Annex B (in respect of key policies). The proposed responses take account of relevant recommendations arising from the Council's Best Value Review of Sustainable Communities. They are also informed by our discussions and consultations with other key partners, local stakeholders and residents. Further details of local consultation meetings and of a comprehensive poll of residents' views are given in Annexes D and E.

3.2 Key points it is recommended that the Council should make in its response are that:

- the RSS for the South East should be prepared within the context of a national spatial development strategy;
- in establishing the strategic spatial framework for the region's future sustainable development, the SEP needs to look far beyond its twenty year planning horizon in order to mitigate and adapt to the long-term effects of climate change;
- the plan needs to be simpler and shorter, with more 'flavour' of the region;
- the plan rather lacks any meaningful, overarching strategy or vision to guide its spatial and strategic development objectives, and focuses too much on housing numbers;
- policies needs further strengthening to make it absolutely clear that development will only be permitted when the infrastructure and services needed to support it are either already available or certain to become available in parallel, and are fully funded;
- it needs to be very clear that the focus in designated regeneration areas (like the Sussex Coast) will be on promoting sustainable economic development, and that this designation carries a requirement for all relevant agencies to give such areas real priority in their own investment programmes and associated business plans;
- the SEP should lend much greater support to achieving improvements in the strategic transport infrastructure serving East Sussex, recognising the crucial role that such investment must play in securing its regeneration objectives;
- the Council cannot support any regional level of housing provision that is higher than the current average development rate of 25,500 dwellings pa until it is clear that the necessary supporting infrastructure is being delivered and close monitoring (e.g. of access to housing and economic performance) indicates a firm basis for higher figures;
- the rationale for the two spatial options given for distributing prospective housing targets between the various sub-regions and residual county areas is inadequate and flawed. In particular, the 'sharper focus' option has taken insufficient account of factors such as environmental designations/constraints and economic capacity;
- a housing provision of around 3,000 dwellings pa is the maximum level of development that the Sussex Coast could sustainably absorb. This may not be achievable in the earlier years of the plan period before it is evident that economic improvements and necessary infrastructure provision to support a growing population are being realised;
- in the county's rural heartland (outside of the Sussex Coast and Gatwick Area sub-regions), housing provision levels above historic rates of around 380 dwellings per year would be neither justified nor sustainable.

BOB WILKINS
Director of Transport and Environment
8 April 2005: Cabinet C19 April SE Plan

Contact Officer
Paul Treadgold
Tel. No. 01273 481804

RECOMMENDED RESPONSES TO KEY STRATEGY PROPOSALS IN THE DRAFT SOUTH EAST PLAN

This annex summarises core elements of the draft South East Plan. *Comments here on SEERA's proposals are given in italics and recommended responses to the Assembly are also underlined.*

A1 The draft South East Plan

A1.1 The draft South East Plan (SEP) comprises a suite of documents:

- core document
- executive summary
- draft sustainability report
- implementation plan
- indicators and monitoring document.

A1.2 The core document is 268 pages long. This is considerably longer than the existing Regional Planning Guidance for the South East (RPG9), which is for a bigger region.

A1.3 *While recognising that the plan is a new-style Regional Spatial Strategy (RSS) covering a wider span of issues, and must provide sufficiently detailed advice for drawing up Local Development Frameworks (LDFs) to fill the gap left by the abolition of Structure Plans, the document's length and complexity detracts from its ability to provide effective guidance. The need for, and links between, such elements as the vision, core strategy (including the description and justification of development options, and its distribution) and other policies are difficult to follow and understand, even for those used to dealing with such documents. The plan needs simplifying and shortening to produce a clearer, readable and more focused document.*

A2 Vision

A2.1 The draft Plan's vision is for a "Healthy Region" and states that:

"Through the Plan and other measures, the South East will show a sustained improvement in its quality of life over the period to 2026, measured by the well-being of its citizens, the vitality of its economy, the wealth of its environment and the prudent use of natural resources."

A2.2 The vision is developed in a series of statements concerning, for example, reductions in intra-regional disparities, improving accessibility to services, providing more and better quality housing.

While the overall vision can be supported, it lacks regional specificity and has not been adequately carried through to provide a clear strategy and objectives for regional policy.

A3 The core strategy

A3.1 This comprises a core statement of policy and a set of proposals for development at the regional and sub-regional level, indicating potential scales and patterns of growth. The key elements are:

- a recognition of the tension between economic and environmental assets, and the need to strike a balance that increases prosperity and meets needs at a level and in

ways which maintain and enhance the region's assets and maintain its high quality of life;

- a substantial programme of housing development and economic growth, closely related to the availability of infrastructure, resulting in a healthier (in all senses) region.

A3.2 The above are predicated on a proposed level of economic growth equivalent to a Gross Value Added (GVA) increase of 3% per annum, in line with the Regional Economic Strategy. However, the strategic development options are expressed solely in terms of housing numbers. Although the draft SEP acknowledges that housing requirements are only one dimension of a range of development patterns and suggests these should be regarded as a relatively easily understood proxy, that can be translated into local guidance, the core strategy does focus very heavily on housing numbers.

A3.3 Despite the professed intention that the plan's strategy should be striking an appropriate balance between a range of considerations, and that economic growth at 3% GVA is the preferred rate to allow such a balance to be struck, it is regrettable that the choices to be made focus on housing, almost to the exclusion of other factors. This is not considered to be a satisfactory way of determining the strategy for the region for a 20-year period and fuels a concern that the plan is really just about delivering more housing. Another significant concern is the fact that the plan is being developed in the absence of any national spatial framework to reduce overall pressures on the South East and to promote more sustainable development by taking a much longer-term view.

A4 Regional levels of housing development

A4.1 Three options are set out for the regional level of housing growth. These are expressed as annual average figures but the SEP states that there is a strong case for increasing the pace of development up to 2016 and maintaining it at that higher level to 2021, before reducing it over the final five years of the plan period to 2026 "to reflect economic uncertainty and the long-term impacts of government regional policy".

A4.2 The three options for future housing provision at regional level are:

- i) 25,500 dwellings per year (equivalent to the annual average build rate actually achieved over the last five years);
- ii) 28,000 dwellings per year (equivalent to the existing RPG9 requirement and in line with the number of dwellings built last year – but excluding the additional housing development now proposed by government in the three identified Growth Areas of Thames Gateway, Milton Keynes and Ashford); and
- iii) 32,000 dwellings per year (reflecting the number of homes that would be required to match projected demands if net in-migration to the region were to continue at the same average level as experienced through the 1990s).

A4.3 There is an undoubted need for further housing provision in the region, particularly for significant amounts of affordable housing. This is not only to meet people's housing needs but also to ensure an adequate labour supply for a growing economy, so as to avoid any necessity for increasing levels of long-distance commuting from outside the region and/or economic stagnation.

A4.4 However, regionally, housebuilding has not been taking place at the rates prescribed by RPG9. There appear to be a number of reasons for this but a considerable difficulty in East Sussex (and elsewhere) for future development is that infrastructure has not been made available to the extent and at the times required. This is holding up development for both housing and employment. There is also a very strong public feeling that infrastructure provision has not been sufficient to service existing development.

A4.5 The Council's possible support for any future level of housing provision rate must be conditional on adequate levels of infrastructure being provided at the right times, in the right places. However, even if such an assurance is forthcoming, recent regional levels of development and the lead times to provide infrastructure do not suggest an annual average regional rate above 25,500 dwellings would be appropriate in the shorter term. Subject to such an infrastructure guarantee and evidence of its realisation, together with close monitoring of such factors as economic performance and access to housing, it may be more appropriate for the SEP to contemplate building up to a higher regional level of development in the medium to longer term.

A5 Regional housing distribution

A5.1 As well as setting out three options for the regional level of housing provision, two “spatial options” are also given for distributing these overall totals between the various sub-regions and the residual (“rest of”) county areas:

- i) the “existing policy” option essentially reflects the distribution of development as required by RPG9 (but only after the housing numbers earmarked for the growth areas have been subtracted); and
- ii) the “sharper focus” option which is intended to focus more of the development on both areas with strong economic potential and regeneration areas (such as the Sussex Coast).

A5.2 Two spatial options for three overall provision figures results in their being six different sets of housing figures for consultation. The figures relevant to East Sussex are set out below and relate to the net annual average dwelling requirement for the 20 years from 2006-2026.

(Net dwellings p.a.)	Existing policy			Sharper focus		
South East region	25,500	28,000	32,000	25,500	28,000	32,000
Sussex Coast	2,700	3,000	3,600	2,300	2,600	3,100
Gatwick Area	900	1,100	1,300	1,300	1,500	1,800
Rest of East Sussex	300	400	500	400	400	500

A5.3 The rationale for the regional distribution options is inadequate and flawed. The RPG9 distribution is familiar but appears to have no justification or relation to a SEP strategy, beyond the fact that it effectively mirrors the “existing policy”. The “sharper focus” distribution takes account of transport hubs in the Regional Transport Strategy (Brighton being the only one along the Sussex Coast and there are none in East Sussex) and towns with more than 10,000 residents to represent opportunities for greater focus on urban areas. The resultant distribution was then amended to recognise that Green Belt (of which there is none in East Sussex) limits development potential, thus reducing numbers in such areas and increasing them elsewhere. This is said to represent a sustainable distribution.

A5.4 Not only does the “sharper focus” option appear poorly related to any sense of a policy driven strategy for the region but it does not appear to take account of other important factors such as environmental designations (Ramsar sites, Areas of Outstanding Natural Beauty, Sites of Special Scientific Interest etc.), physical constraints (e.g. low-lying land at risk of flooding), the abilities of local economies to provide sufficient employment or the ability to deliver necessary infrastructure. Further work to determine the future scale and distribution of new housing development must also take proper account of the anticipated impacts of climate change on coastal erosion and flood risk, and reflect the approach taken in the new Shoreline Management Plans currently being prepared for South Foreland to Beachy Head and for Beachy Head to Selsey Bill.

A6 Housing provision levels for East Sussex

A6.1 There is no “natural” population growth among existing residents in East Sussex, because deaths exceed births. All population growth in the county therefore results from net inward migration made possible by an increasing housing stock. However, further housing provision is necessary in East Sussex for a number of reasons. This not only includes meeting affordable housing needs, replacing ageing stock and responding to changing household patterns but is also important to ensure that demand is not overly constrained, thus leading to wealthier in-migrants outbidding local people.

A6.2 However, a major flaw in the SEP, particularly in the “sharper focus” option, is the implicit presumption that housing development is necessarily a catalyst for regeneration. The advice from this Council, via the Sussex Coast strategy, is that history shows that economic regeneration does not spring from house building in this area. The consequence so far of increased housing levels along the coast has simply been increased commuting to jobs outside the area. The priority for the Sussex Coast must be economic regeneration to increase the number and range of jobs, so that many more residents have the opportunity to live and work locally. Any growth in housing provision, if it can be accommodated, must follow investment in infrastructure and economic improvements. This is not to say the area should not accommodate further housing provision but its scale and timing must respect, rather than undermine, the economic regeneration priority.

A6.3 In the advice provided to SEERA for the Sussex Coast, it has been indicated that an average annual housing provision of around 3,000 dwellings per annum could be appropriate, subject to a number of pre-conditions, including the importance of provision of infrastructure at the right times in the right places, the priority that must be given to the achievement of economic regeneration in advance of further housing provision, and with the proviso that the proposed strategy could not be adequately tested for deliverability in the short time allowed for its development. *The expectation is that 3,000 dwellings per annum is the maximum sustainable and that the pre-conditions for its achievement mean that, in the short to medium term, such levels are unlikely to be achievable or desirable for the Sussex Coast. This may also mean that an average of 3,000 is not achievable over the whole period of the plan but only later in the plan period. However, the advice given that a rate of 2,400 per annum is likely to be too low, with disadvantages for the sub region, is maintained.*

A6.4 Further advice will be provided to SEERA as a result of ongoing work refining the sub-regional strategy, particularly in respect of housing distribution, infrastructure needs, affordable housing targets and employment land requirements. Whatever the outcome of this additional technical work, *support at this stage for growth of up to 3,000 homes per year for the Sussex Coast should not be taken to imply support for any particular overall regional level of development and associated spatial option in the draft SEP.*

A6.5 SEERA are also seeking views on the Sussex Coast’s potential to absorb a development rate that is 20% higher than the principal authorities have advised. However, the principal authorities *earlier technical work and the associated sustainability appraisal of potential development options has made it clear that the sub-region could not possibly accommodate anything like 3,600 additional homes per year in a sustainable manner. Furthermore, to try to do so would be to completely subvert the clear needs of our coastal towns for an economic regeneration-led strategy.*

A6.6 *In the rest of the county (outside the Sussex Coast area and excluding a small area of Lewes District that is in the Gatwick Area sub-region), the SEP consultation options are for an annual average level of provision of between 300 and 500 dwellings per annum. This compares with an average rate of 380 dwellings per year provided between 1991 and 2004. In view of the significant environmental and other constraints on development, and the pattern of villages and smaller towns in the county’s rural heartland, previous investigations have not revealed any sustainable option (e.g. major town extensions or new settlements) that would make it possible to accommodate higher levels of provision. Therefore, levels of*

provision that are higher than have been achieved would neither be feasible nor sustainable.
Again, further advice will be provided to SEERA as part of the current work on housing distribution.

RECOMMENDED RESPONSES TO OTHER KEY POLICIES IN THE DRAFT SOUTH EAST PLAN

In this section, the key points that it is recommended should be fed back to SEERA are underlined.

B1 Cross cutting policies

General

B1.1 Many of the cross-cutting policies that cover themes that apply across the SE Plan (such as CC1 - active management, CC2 - climate change, elements of CC3 - resource use and CC6 - inter-regional connectivity) are no more than statements of principle/intent or objectives that might be better included as supporting text. Generally, many of the SE Plan policies suffer from a lack of clarity and a more region-specific dimension. As such, they often add little to national policy guidance and do not provide a sufficiently clear framework to guide the preparation of Local Development Frameworks. These shortcomings should be addressed in re-drafting and amending policies in the light of all the consultation responses received.

Infrastructure

B1.2 While infrastructure provision is identified as a cross-cutting issue that is central to the delivery of the SE Plan, and despite being bolstered by an amendment passed at Plenary last November, policy CC4 on infrastructure and implementation is still weak. A cornerstone of the new RSS must be that development can only be permitted when the infrastructure required to service it and meet additional demands is either available or will be made available in the right quantity at the right time.

B1.3 Past failures in this regard have led to a widespread perception that there is a current backlog in respect of infrastructure provision that may have helped to fuel increasing opposition to further development in some areas. In addition, the initial results of research being conducted by consultants for the South East counties suggests that, on average (and excluding land and revenue costs), infrastructure investment of around £38 million will be required for every 1,000 new houses to be built in the region – just over half of which will be needed for transport services and schemes.

B1.4 Policy CC4 should therefore be amended to:

- require other agencies to align their investment plans to help deliver the SE Plan;
- prevent any development from being permitted until local planning authorities are certain that the necessary supporting infrastructure is either already available or will be made available in parallel;
- make it clear that if the specific infrastructure and associated funding required to facilitate particular development is not forthcoming then, in some areas, it may be necessary to reduce (or phase back) associated housing targets;
- require Local Development Frameworks to include comprehensive policies on infrastructure and to prepare Supplementary Planning Documents, in partnership with other key agencies (such as county councils), setting out detailed guidelines and requirements in respect of developer contributions;

- assist in lobbying government to make available the extra resources needed to fund the infrastructure investment that will be required to maintain housing development rates at current levels.

B1.5 Policy CC4 referring to the preparation of an Implementation Plan to secure the timely delivery of necessary supporting infrastructure is warmly welcomed. However, considerable further work is required to complete the draft version of the Implementation Plan published for consultation (and maintain it thereafter) if the Assembly's ambitious aims for it are to be fulfilled.

B1.6 It is vital that the Implementation Plan is given high priority, kept under frequent regular review and used to marshal the commitment of all necessary agencies to deliver the SE Plan. Annex F2 is useful in indicating which agencies are expected to implement which individual policies. However, it is crucial that the (yet to be completed) Annex F1 truly identifies more precise information on the delivery mechanisms to be used, the lead agencies responsible and an indication of funding and phasing for meaningful policy areas.

B1.7 It is also not clear how the Implementation Plan will resolve any mismatch between funding levels, the phasing/timing of infrastructure and the expected delivery of development to deliver the strategy.

B1.8 The Implementation Plan indicates that the method of prioritising infrastructure requirements (Paragraph 8.5) is to be based on that developed for transport schemes and applied to other areas as appropriate. There are strong reservations about the mechanistic use of this technique as it is most sensitive to the value for money criterion and quite sensitive to assumptions about funding certainty and public acceptability, whereas it is least sensitive to policy compatibility. Therefore, the weighting of these three dimensions must be re-adjusted towards relating infrastructure provision more towards supporting the major policy shifts in economic performance the SE Plan seeks in the priority regeneration areas (such as the Sussex Coast) if it is to deliver its social and economic aims. Otherwise it will merely tend to perpetuate or even exacerbate existing economic disparities and social divisions.

Urban focus

B1.9 The Plan's urban focus is to be supported and will result in a more sustainable pattern of development that should aid access to essential services, help to reduce the need to travel by increasing opportunities for people to live and work in close proximity whilst making the most effective use of limited land resources. However, the capability to achieve 60% of new development on previously-developed land is quite likely to diminish over time (and as absolute targets and associated greenfield requirements increase) and more detailed assessments are needed of urban development potential in the longer-term.

Spatial emphasis

B1.10 Policy CC8 on spatial emphasis identifies:

- the nine 'sub-regions' for which a distinct approach is said to be required
- the Isle of Wight 'special policy area'
- the three major 'growth areas'
- nine 'regeneration areas'
- four 'areas of economic opportunity'

B1.11 Neither the policy nor the supporting text makes it clear what are the purpose and implications of the above designations. This lack of clarity is further confused by the fact that the above categorisations are not mutually exclusive so, for example, Milton Keynes is both a growth area and a regeneration area, and South Hampshire is both a regeneration area and an area of economic opportunity. Such deficiencies must be tackled and it is suggested

that areas should not be included in more than one category – presumably, the comprehensive strategy for the Milton Keynes and Aylesbury growth area will address its regeneration needs.

B1.12 As far as regeneration areas are concerned, policy CC8 should reinforce the primary economic renaissance objectives at the heart of the sub-regional strategy for the Sussex Coast and lend further force to the associated sub-regional policies. The Plan should make it clear that designated regeneration areas should receive priority for public funding through the investment plans and programmes of government agencies and, also, itself reflect such a priority in other key sections of the Plan – particularly with regards to communications and transport. However, identification of any regeneration area should not automatically carry with it any expectations as to higher housing provisions as such targets must be fully sensitive to infrastructure and environmental constraints and the realistic prospects for future employment growth.

Green Belt

B1.13 Following intervention at Plenary in November, policy CC9 was introduced into the SE Plan to retain existing Green Belt across the region. This protection has been further reflected in the methodology employed for calculating potential housing requirements under the ‘sharper focus’ option. Given that the Green Belt designation is a policy-driven mechanism to restrain potential urban sprawl etc. and does not relate to the intrinsic quality of the land being protected from inappropriate development, such a blanket approach tends to distort the overall picture of potential development opportunities across the region. If the policy is to be retained, at the very least it should cross-reference to other policies in the Plan that are concerned with the protection and enhancement of environmental designations of more intrinsic importance such as Areas of Outstanding Natural Beauty. The extent of such environmental constraints of national or international importance should also be taken properly into account in any methodology developed to amend or refine the existing spatial distribution options for future housing provision.

B2 Economy and tourism policies

B2.1 Given the relatively poor performance of the East Sussex economy, the SE Plan’s overarching aims to increase general prosperity and to reduce social and economic disparities across the region are to be welcomed. However, the draft policy framework advanced for achieving this appears rather weak, as is highlighted by the fact that the general employment policies are completely dwarfed by a further set of policies relating specifically to the relatively small, albeit important, tourism sector. The chapter also suffers from the fact that there are insufficient links given to other policies in the Plan (e.g. in respect of housing and transport provision etc.) that will provide the context for future sustainable economic growth and, in the sub-regions, more detailed guidance on such requirements.

B2.2 As currently drafted, the employment policies fail to provide sufficient guidance for the preparation of Local Development Frameworks. Policies RE1 on sustainable economic development) and RE4 on the supply of employment land should be brought together and rationalised. Further thought also needs to be given as to the most appropriate way of providing a clearer steer for local planning authorities on the nature and extent of employment land requirements. This should include consideration as to whether the Plan should include quantitative guidelines (for employment floorspace or jobs) and whether these would be best expressed at district, labour market and/or sub-regional level. It is also essential that the aspect of policy RE4 concerned with the protection of employment land and premises is strengthened to give as much support as possible to local planning policies aimed at protecting employment sites against their potential loss to other uses.

B2.3 Given the Assembly’s expressed concerns about a potential shortfall in labour supply, the SE Plan should also provide greater clarity on how best to encourage and support ‘smarter growth’ where increases in total Gross Value Added are achieved more

through increased productivity than employment growth per se. Similarly, clearer advice on how the development plan system can help to facilitate and promote the growth of certain important sectors (e.g. the 'knowledge industry') and clusters would be helpful, including the role of broadband provision etc. in enabling increased homeworking.

B2.4 Another serious gap in the current draft employment policies is the lack of a link to policy CC8 and any particular requirements associated with the designated areas of economic opportunity and regeneration areas.

B3 Housing

B3.1 Overall targets and their distribution aside, relatively few of the draft housing policies are very regionally-specific or add very much to national guidance, particularly policy H3 on the location of new housebuilding. However, this is not perhaps very surprising given the very prescriptive nature of government policy in this area.

B3.2 Policy H2 on delivering adequate levels of housing should either be deleted or comprehensively re-written. It is unclear what a 'housing allocation strategy' is and whether this is something that would ordinarily be contained within the Local Development Framework. The need to phase development of larger sites (in accordance with the 'plan, monitor and manage' approach) is supported as is the suggestion that such release should only proceed in tandem with the availability of necessary supporting infrastructure. However, as currently drafted, the policy appears to imply that it is within local authorities' own power to deliver all such infrastructure themselves.

B3.3 Policy H4 on affordable housing should be supported as it provides an appropriate framework for the further development of local policies aimed at increasing the provision of affordable housing. Particularly welcome is the statement that, where justified, local thresholds for negotiating affordable housing provision as part of private development schemes can be set below the levels outlined in government guidance. Local needs assessments should also be sensitive to the needs of different groups for subsidised housing, including key workers (a group that should be defined broadly to cover areas of local skill shortages).

B3.4 However, despite such best endeavours, the scale of affordable housing provision that can be realised through the planning system will by no means be equal to the overall scale of existing and emerging needs. This, again, is another area where the inadequate level of overall investment by government in our physical and social infrastructure is leading to a substantial and increasing backlog of unmet need. It should also be appreciated that the given regional targets for affordable housing provision do not appear directly related to a regional needs assessment. It is also the case that both the need for affordable housing and the extent of opportunities for negotiating such provision through the planning process will also be related to overall levels of new housing development.

B3.5 Given the existence of overall regional targets for affordable housing, and of more detailed local targets, a question must be raised as to the practical purpose of the additional affordable housing targets that the Assembly is requesting (as part of our further work) for each sub-region. Finally, as far as affordable housing is concerned, the Assembly should be made aware that the extent and pattern of need highlighted in Map H3 which shows the current 'affordability gap' would appear very different if that gap were measured in relative (to local earnings) rather than absolute terms. When the problem is viewed in this more usual way, the affordability gap can be seen to be much greater across East Sussex than any other part of the region.

B3.6 Policy H5 on housing density and design should help to increase the supply of smaller dwellings (in line with demographic projections of reducing household size) and reduce the overall requirement for development on greenfield sites. However, it does not really give adequate consideration to how achievable or desirable a target of 40 dwellings

per hectare may be in different circumstances, while rather loose drafting could make it possible for any local planning authority to simply disregard the requirement. The exhortation for local authorities to take account of changing lifestyles also highlights the needs of some households for more rather than less space in future - for example, to accommodate a home office and, for split families, visiting children.

B4 Communications and transport

B4.1 Generally, contrary to all requirements, the draft policies provide little encouragement to our prospects for achieving essential improvements to the strategic transport infrastructure serving the county. This is because the section largely duplicates the approved Regional Transport Strategy, including the associated scheme tables.

B4.2 However, preparation of the SE Plan does provide an opportunity to update, refine and clarify the overall transport strategy and associated investment priorities. As highlighted in the preceding commentary on the draft Implementation Plan, the Assembly needs to give much greater weight to its strategic policy objectives in prioritising transport schemes. This should be reflected in changes to policy T1 to make it clear that the determination of investment priorities will also reflect the fundamental importance of supporting the Plan's spatial emphasis by helping to realise its objectives for regeneration areas like the Sussex Coast. As the Plan is developed, this section should include appropriate links to the sub-regional strategies and, in the case of the Sussex Coast, reflect the highest priority that the strategy gives to improving the strategic transport infrastructure serving the sub-region, especially in respect of east-west communications.

B4.3 As presently drafted, the Plan's transport policies in T4 and T5 place an undue emphasis on the regional 'hubs and spokes' concept that tends to downplay the importance of the role of the south coast corridor. With its connections to the South West and to mainland Europe (via the Channel Tunnel and ports in Hampshire, East Sussex and Kent) this important corridor should be afforded enhanced status as an international and inter-regional corridor, with Hastings and Eastbourne also being identified as Sub-Regional Hubs, and Lewes as a Transport Interchange. At the same time, Newhaven should be shown on Map T3 as a TENS port.

B4.4 The Plan's proposals in respect of delivery partnerships in policy T18 appear rather vague and must be clarified. Also its proposals in respect of public transport in policy T9 could apply anywhere in the UK and offer very little to promote increased public transport provision and use as a much more viable to car-based travel. However, as far as key rail improvements are concerned, reinstatement of the Lewes-Uckfield line and the Willingdon Chord are vital elements of the transport strategy required to realise our ambitions for an economic renaissance of the Sussex coastal towns and, as such, must be included in Table 4 outlining the Sussex Coast and Towns Investment Framework.

B4.5 Another difficulty with this section is that it is difficult to relate the draft policies to the Plan's overarching vision which aims to increase the overall level of accessibility to essential services. Despite this lofty ambition, little strategic guidance is offered as to any more regionally-specific approach that might be taken towards addressing accessibility issues.

B4.6 Finally, policy T6 regarding airports should also provide guidance for smaller airports like Shoreham and Lydd.

B5 Sustainable natural resource management

B5.1 The draft policies provide a framework for the husbanding of natural resources within the context of a changing climate and the proposals for growth set out earlier in the SE Plan. A priority for the draft plan is to ensure that a sustainable water resource is maintained in the South East for both human consumption and to meet the needs of the natural environment. Whilst the draft policies seek to provide guidance to local planning authorities on the importance of water resource issues, it is not made clear to what extent these issues have informed or influenced the spatial strategies proposed within this draft Plan. This should be clarified in the final version of the Plan.

B5.2 Policy NRM1 provides advice to local planning authorities on maintaining water quality and quantity through policies in Local Development Documents. However, the wording of criterion (ii) of the policy is of particular concern in that it only seeks to ensure that the rate of development broadly accords with the capacity of existing water and waste water infrastructure. The policy should be re-worded to make it clear that the phasing of development will be strictly controlled to match the capacity of water supply and waste water treatment, also ensuring that amendments are consistent with those sought for policy CC4 (see paragraph B1.4 above).

B5.3 Policy NRM1, and its supporting text, pays no attention to the quality of coastal waters despite the requirements of the Water Framework Directive and the value of the coast and coastal waters to local economies and biodiversity. This must be reflected in the Plan.

B5.4 The issue of the development of strategic resources (i.e. reservoirs) is raised in policy NRM2, where the draft plan identifies a number of potential schemes that may be called upon over the coming twenty years, including the enlargement of Bewl Water and Darwell reservoirs. Bearing in mind the location of these reservoirs (in the High Weald AONB), the draft Plan should acknowledge that any proposals for their enlargement should meet the PPS7 national policy requirements governing major development in AONBs.

B5.5 Paragraph 1.15 identifies the need to protect the region's soil, emphasising the benefits for agriculture landscape and biodiversity. However, despite the importance of the regional soil resource there is no policy statement on the issue. This should be rectified with a policy statement on the need to protect and enhance the regional soil resource.

B5.6 Policy NRM7 provides a policy statement on air pollution, but succeeds only in outlining the most general of advice for planning authorities and fails to provide the added value and regional perspective government expects of regional spatial strategies. The policy should be revised to focus on the key air pollution issues facing the region, notably road transport and aviation. The impact of increasing air pollution arising from a growing aviation sector should also be acknowledged in the transport chapter (policy T6).

B6 Countryside and landscape management

B6.1 The plan separates policies for landscape management from that for development in rural areas even though small towns and villages and the urban/rural fringe might arguably be regarded as integral parts of the rural landscape. This section contains just three policies relating to the New Forest National Park, Areas of Outstanding Natural Beauty (AONBs) and the remainder of the countryside.

B6.2 Whilst the first two policies would appear to add little to national policy guidance, both policy C1 (relating to the New Forest National Park) and policy C2 (regarding AONBs) must be amended to correct a fundamental error and make it clear that the planning status of AONBs and the protection this affords is no less than that which applies to national parks. Also, the priority should be to "protect and enhance" not "protect and conserve" such areas.

B6.3 Generally, if policies in national policy guidance are intended to apply, this should be made explicit because otherwise there appears to be a complete absence of policy to deal with development in the wider countryside. Policies BE3 and BE4 (see below) assume that the urban/rural fringe will be the location for sustainable extensions to existing towns but no consideration appears to have been given as to what opportunities may remain for such development once opportunities within the Green Belt and in valued landscapes like AONBs are discounted. Similarly, the approach taken to developing the Plan's proposals in respect of housing provision appears to have precluded consideration being given as to whether focusing development on certain key rural settlements, or developing new settlements, could help to achieve a more sustainable pattern of development overall.

B7 Management of the built and historic environment

B7.1 The Plan adopts the concept of urban renaissance in its approach to this section. It defines this as amounting to more than just maximising densities and intensifying development, but rather seeking to make towns and cities places where people choose to live, work and spend their leisure time. The draft Plan also seeks to spread the principles of urban renaissance to suburban neighbourhoods and small towns. However, the government's own research suggests that the context for urban renaissance in the South East is very different from other areas, not least because most urban areas in the region have not been experiencing urban decline. There is nothing in the Plan that recognises the need for a regionally distinctive approach, other than the recognition that the pattern of settlements in the South East is polycentric, which itself suggests a mutually supporting network of settlements rather than a strict hierarchy. The Plan needs to justify and interpret the concept in ways appropriate to the South East and develop a policy more sensitive to the character of the region's urban areas.

B7.2 The Plan defines the urban/rural fringe as a complex, fragmented area of mixed land use and rapid change that is the subject of many competing pressures for land use. It identifies ten key functions such areas can perform including as a location for recycling centres, renewable energy facilities and sustainable new communities. In fact, the draft Plan relies heavily on the urban/rural fringe as a location for those uses which cannot be located within towns but are 'difficult' to locate in wholly rural areas. However, such a definition of the urban/rural fringe reflects a more national picture which fails to acknowledge that, within the South East, many towns are wholly or largely contained within AONBs etc. which limits their suitability or potential for the multi-functional role envisaged by the policy.

B7.3 The Plan supports sensitive use of historic assets to promote regeneration across the region. However, it should explicitly give priority to be given to opportunities to regenerate the historic environment in designated regeneration areas.

B8 Town centres

B8.1 The draft Plan emphasises the role of town centres as mixed-use, multi-purpose, accessible centres with a wide range of functions. It recognises that leisure, retail, service, commercial and some residential development should be focussed on town centres to regenerate and renew them. Policy TC2 (regional network of town centres) provides a provisional list of centres which are to be developed as a network in which large scale developments should be accommodated (but Eastbourne and Hastings are the only East Sussex towns included). However, the Plan also allows for development in middle or lower order centres to serve more local needs. The list contains centres of wide ranging sizes but no explanation of how they are intended to function as a network is offered. It does not resemble a true 'network' which is necessary to ensure that focus of development within town centres is of an appropriate scale and size. It is important at this regional level that a clearer hierarchy is established within this listed "network" of centres to offer clearer guidance and ensure that development is provided in town centres appropriate to their scale, functions and needs.

B9 Social, cultural and health dimensions

B9.1 Social, cultural and health dimensions are given some prominence in the Plan recognising the broader scope of a “spatial strategy” and their relevance to sustainability. The links between poor health and poverty and the beneficial relationship between participation in sport, recreation and cultural activities and overall fitness and quality of life are recognised. However the policies are generally too vague and provide no clear guidance on how they could be implemented through Local Development Documents which are seen as the key delivery mechanism. Although these issues represent new horizons for the planning system, much greater clarity of policy advice is needed if the aims are to be translated into meaningful action.

B9.2 Policies should also be formulated or expanded to include better access to the countryside and recreational facilities, protecting and improving the provision of recreational, cultural and community activities and the provision of childcare facilities.

B10 Sub-regional policy framework for the Sussex Coast

B10.1 The strategic option B, inserted into the draft Plan by SEERA, proposing a development rate of 3,600 dwellings a year (20% above existing policy requirements) should be firmly rejected as unsustainable. All the work undertaken so far has consistently advised SEERA that the environmental limitations, weakness of the economy and availability of infrastructure together could not sustain growth at this level.

B10.2 Future growth should be pegged to a maximum of 3,000 dwellings per year (option C), but this should be informed by further work (currently underway) to assess whether/how far this scale of development can be delivered in a sustainable way.

B10.3 It should also be stressed that complying with the draft Plan’s region-wide (and national) environmental protection policies severely limits the spatial choices available in the sub-region to those strategic locations identified in policies SCT6 and 7.

B10.4 In editing our original advice, the deletion by SEERA of the firm clear policy that sought to ensure that development takes place only where and when it is clear that all necessary supporting infrastructure is available or is firmly committed is regretted. However, it is acknowledged that such a policy should apply to the whole region (see comments on policy CC4 above). More detailed information on specific infrastructure requirements that are critical to the delivery of the sub-regional strategy will be added back in to policy in association with further work testing and refining our original proposals.

B11 Sub-regional policy framework for the Gatwick Area

B11.1 For the Gatwick Area sub-region, the SE Plan consultation options ask that ranges of 1,500 and 1,800 homes per year are tested while also ‘allowing’ a lower range of 900 homes to be tested. 1,500 per year homes reflects a continuation of RPG9 rates although the actual building rate achieved over the past few years has been lower than this.

B11.2 West Sussex County Council are leading on the Gatwick Area sub-region with the support of East Sussex and Surrey County Councils. The principal authorities agree that objectives for the region include the need to support the diversification of Crawley’s economy with the right amount of new homes, including affordable housing, as well as the need for housing development to meet local needs and to support economic growth more generally across the sub-region. Major growth is planned up to 2016 at Crawley, Horsham, East Grinstead, Haywards Heath and Horley. Beyond that, work is progressing on assessing the capacity of the towns within the main transport corridors to accommodate further development as urban extensions, along with taking a new look at the delivery of housing on previously-developed land, infrastructure requirements and environmental impacts. Previous work on the sub-region has suggested that the RPG9 rate of 1,500 dwellings per year is the

level of growth that will best meet the social, economic and environmental needs of the sub-region. This is likely to be the upper limit of the rate of development that could be consistently achieved in the sub-region over the plan period.

THE COUNTY COUNCIL'S ROLE IN THE SOUTH EAST PLAN PROCESS

Throughout the SEP process, the Council has worked very closely with other counties through the South East County Leaders (SECL) and Chief Executives (SECCE) groups, and with the local borough and district councils through the East Sussex Lead Members for Planning Network. It has sought to influence SEERA's formal decision-making processes through the Assembly's Plenary and supporting committees, and officers have actively contributed to the work of a number of SEERA's standing technical advisory groups.

Whilst we have contributed to the development of proposals for the Gatwick Area, the Council's most influential (and ongoing) role has been in leading the development of sub-regional strategy proposals for the Sussex Coast (from Chichester to Rye). These were submitted to the Assembly last October and followed the publication six months earlier of a comprehensive study that made the clear case for the SEP including distinct sub-regional policies to address the unique combination of issues and challenges facing the Sussex coastal towns.

Both the strategy and the earlier study for the Sussex Coast were prepared as openly and inclusively as possible to a very demanding timetable and have enjoyed widespread support across the sub-region. Although SEERA have edited certain aspects of the advice it received, our proposals for the Sussex Coast are largely reproduced in the draft SEP and, as such, also form part of the current consultations. As noted above, the Assembly is also commissioning the Council to lead further work on refining the sub-regional strategy for the Sussex Coast. As well as providing advice on district-level housing provisions (for all of East Sussex), this will provide us with the opportunity to refine our work on associated infrastructure provision, affordable housing targets and employment land requirements.

Another key role the Council has played, together with the local district/borough councils has been to raise awareness of the SEP and its importance amongst local residents and stakeholder groups. This has included organising four public consultation meetings across East Sussex in addition to the one event organised by SEERA in Eastbourne. We have also published a dedicated section about the SEP on the Council's website and have led discussions about it at a wide range of other meetings, including for Local Strategic Partnerships, the Sussex Association of Local Councils, the Rural Stakeholders Forum, the Rother Parish Conference and the Hastings & St. Leonard's Chamber of Commerce. Summary details of our local consultation meetings and the issues raised at them are given in Annex D.

The Council has also supported a major telephone poll of residents' views that has been carried out by a private market research company on behalf of all the South East counties. This included interviews with a representative sample of over 8,200 respondents and was specifically designed to produce valid results at county level. This survey also included five additional questions specific to each sub-region that were only put to respondents living in those particular areas. A summary of the main survey results for the South East, the Sussex Coast and for East Sussex is given in Annex E.

SOUTH EAST PLAN PUBLIC CONSULTATION MEETINGS

Four public consultation meetings were organised jointly by East Sussex County Council and the local Borough/District Councils. Meetings were held at Manor Barn in Bexhill, Uckfield Civic Centre, Eastbourne Town Hall and Lewes Town Hall. All went very well and ended with spontaneous applause at some venues. Unfortunately, following discussion with Lead Members, it was necessary to cancel the first meeting scheduled for Hastings as so few people booked to attend. Those that did want to go to Hastings were all contacted directly and encouraged to go to the Bexhill meeting a few days later instead. The County Council also offered to reimburse transport costs for community sector representatives to travel from Hastings to Bexhill.

Nearly 900 letters were sent out to local stakeholders with, generally, the local authorities also approaching their own members and officers separately. Posters were displayed in council offices and libraries and bookings were also possible via the new dedicated pages on the South East Plan on the County Council's website. Press releases advertising the meeting were sent to the local media for publication just prior to each event.

Details of each event, the number booking and the number attending each meeting as members of the 'audience' are given below. The attendance numbers in Eastbourne were unfortunately quite badly affected by the heavy snow and icy conditions in the area on that particular day.

Date	Place	Booked	Attended	Booked but didn't attend
28 Feb.	Bexhill – Manor Barn	54	41	18
1 March	Uckfield – Civic Centre	78	71	16
3 March	Eastbourne – Town Hall	61	27	35
9 March	Lewes – Town Hall	73	73	22
	Total	266	212	91

All the meetings were independently chaired and followed the same format. After three presentations on the South East Plan from regional, sub-regional and local perspectives, a local panel of six or seven experts (including local members and independent representatives of different sectors) responded to questions etc. raised by the audience. Different officers from the South East England Regional Assembly (SEERA) attended all the meetings except the one in Bexhill. SEERA's Chief Executive, Paul Bevan, had previously briefed Hastings and Rother members at an earlier meeting in February to which County Councillors were also invited.

Before the meetings started, those attending were asked to identify (on post-it notes) key issues for the South East Plan which the chairman, Alister Scott of the Knowledge Bridge, used to draw out issues for discussion. Summary analyses of the key issues are given below of each meeting with summaries of the main points raised by the audience during the evening.

Questionnaire results

People attending the local consultation meetings were also asked to complete a short survey with questions selected to reflect those being asked by the South East Counties in their ICM telephone poll and by SEERA in the 'Your Shout' leaflet. Key results are that:

- 91% believe it is 'very important' that new development should only be allowed when it is certain that the additional infrastructure and services needed to support it will be provided. A further 7% believe this to be 'quite important'.
- 85% think that transport improvements, particularly to major road and rail services, are 'very important' to the county's future economic prosperity and growth. A further 9% think such improvements are 'quite important'.
- Nearly two-thirds (64%) consider that the quality of the local environment should be protected at all costs, even if this means that some needs for housing and jobs will not be met. Just over one quarter (27%) would give greater priority to meeting local needs for homes and jobs even if this means some environmental loss in some areas.
- Only around 10% believe there is a lot of scope for further development on either previously developed land or greenfield sites in the county. About half believe there to be hardly any scope at all.
- 51% support an overall level of future housing provision across the South East that is lower than SEERA's lowest option of 25,500 homes per year, while another 19% would support that level of development (i.e. the annual average actually achieved over the last five years) continuing. Just 4% are in favour of making provision for 32,000 new homes per year, SEERA's highest consultation option.
- 70% would support a 10-20% reduction in future housing provision along the whole of the Sussex Coast (from Chichester to Rye) from the existing average development rate of around 3,000 homes per year.
- Just under half (46%) would also support a 25% reduction in housing development in the rest of East Sussex from the current average development rate of around 400 homes per year.

Meeting At Manor Barn, Bexhill – 28 February 2005

Summary of post it notes on key issues that the South East Plan should address

Transport

The key issue highlighted by the audience was transport. Particular concerns were the need for:

- greater investment in public transport – both bus and rail
- a bypass for Hastings
- improvements to the A21

Concerns over resource management issues

The next major issue was the need to manage resources efficiently. This included the need to:

- reduce the ecological footprint of the south east
- make more efficient use of energy and water
- minimise waste
- deal with flood risk

Housing

There was a general acceptance of the need for some more additional housing but conditional on necessary infrastructure also being provided. Housing needs to be concentrated on existing urban areas rather than greenfield sites and there needs to be a balance between competing needs.

Other issues raised

- post-16 education – location and access to the classroom/lecture hall
- ageing population
- skills for life – not just for jobs
- job creation and regeneration
- crime prevention
- social equity
- health care with an emphasis on mental health
- democratic deficit at the regional level

Issues raised in the discussion by the audience

General infrastructure

- poor performing economy orthodoxy challenged – infrastructure provision simply releases suppressed potential
- conflict/tension within the plan – traditional economic growth and “smart” growth – the sub region needs to aim for the latter
- eco footprint of the South East – water and energy seen as the primary resource issues
- how can the planning system deliver seemingly expensive middle class accessories such as solar heating, rainwater harvesting and other environmental technologies to minimise resource use to the less well-off?

Transport

- infrastructure (primarily transport) investment is essential to bring about economic growth – government agencies aren’t aware of local needs
- improved transport links are essential – London/Ashford/local
- which services need to be cut within ESCC in order to deliver the Bexhill-Hastings link road?

Social and local issues

- an ageing population within the Hastings/Bexhill area (and beyond) - what can the South East Plan do for the elderly?
- inadequate brownfield resource - plenty of cheap and cheerful sites for start ups but quality sites either absent or in the wrong location
- the plan should concentrate on access to local services it is not simply an issue of “transport”
- emphasise the local, plug the leaks in the local economy
- quality of life - issue of education and facilities for children and post-16. Location of services and opportunities are often distant and inaccessible to disadvantaged groups. This reinforces the cycle of deprivation
- need to involve young people in the consultation
- jaded Hastings population - little faith in the SEEDA (et al) Task Force and its ability to do the job

Other issues

- lack of faith in the conclusions of the sustainability appraisal of the draft plan

Meeting At Uckfield Civic Centre – 1 March 2005

Summary of post it notes on key issues that the South East Plan should address

Infrastructure

The main issue identified by the audience was infrastructure and many of the post it notes just had this one word. Particular concerns indicated in this area included:

- transport improvements for cars and all forms of public transport
- water supply to meet increased demand
- more community facilities including health and education facilities
- doubt as to whether improvements to infrastructure would be provided

Protecting the environment (a non-negotiable asset)

Main concerns were:

- protection of greenfield sites and designated landscapes
- limited water supply
- the risk of flooding

Administrative structures

Main concerns were:

- the democratic deficit of SEERA
- remoteness of Guildford (where SEERA offices are based)
- need for a bottom-up approach

Other issues

- the need for affordable housing was supported
- a few comments supported employment and regeneration
- the need for the rate of housing proposed was questioned

Issues raised in the discussion by the audience

Infrastructure

- services are overloaded, transport links poor, is SEERA confident the Government will commit to infrastructure and then honour its commitment?
- based on experience of past 20 years, scepticism was expressed about the delivery of infrastructure over the next 20 years
- sewerage and water are a major problem for this area, especially water supply – there is nothing in the South East Plan to provide comfort on this issue
- how can the rail infrastructure of the Uckfield Line be improved when so much is in the hands of private train companies?
- if infrastructure is improved, will it not just make the area more attractive for more housing?

Housing

- doubted the assumption that two-thirds of housing demand would come from the existing population – East Sussex has a surplus of deaths over births
- within the rural areas outside sub-regions there is a need to provide for some growth to allow people to settle locally
- there can be problems finding a willing landowner for affordable housing sites even when the parish council is fully involved
- social housing has all but disappeared from some villages, how can SEERA ensure affordable housing is achieved other than by having to accept a large amount of unaffordable housing?
- affordable housing should not generate the same infrastructure requirements of speculative housing as the potential occupiers are already living in the area

- should SEERA be considering a major new town rather than distributing too much development in areas like East Sussex?

Regional government

- given SEERA's democratic deficit will members vote tomorrow (2nd March) for dissolution of SEERA?
- no control over the Assembly because unable to vote for it, how much does the County Council pay towards it?
- massive imbalance between the aspirations of South East Plan and those of the people of East Sussex

Economic growth

- need to target economic regeneration carefully, if jobs are provided locally for those who commute it would pull even more people out of London, there are not enough nice places to live in Crawley and London
- London is where the jobs are, the South East is where people live, should we not be putting people where the jobs are?
- how does the South East Plan compare with other regional plans on the number of houses and economic regeneration?
- growth is not inevitable - why not go for zero growth?

Meeting At Eastbourne Town Hall – 3 March 2005

Summary of post it notes on key issues that the South East Plan should address

Transport

The main issue raised was transport. Key areas of concern were the need to

- improve strategic road links (A27 and A22)
- improve rail services especially to London
- manage transport demand
- provide adequate public transport for the increasing population

Infrastructure

There was a comment that no development should take place without sustainable infrastructure. Other infrastructure requirements specifically raised were for more:

- health facilities including hospitals and medical facilities
- social and community facilities

Resource management and environmental sustainability

Environmental management was another key area identified and included issues on the need to:

- manage water supply
- use renewable energy (zero-carbon housing)
- use alternative technologies specifically related to environmentally friendly housing
- consider the environmental impact of development and mitigate against it

Regeneration of Eastbourne

Some people highlighted the need to regenerate Eastbourne and suggested this through:

- promoting its heritage
- increasing tourism
- encouraging employment growth
- promoting 'Education for change'

Other issues of concern included

- fears of overcrowding within the region
- the number of houses that Eastbourne can 'stand'

- the need for more social housing
- the need to increase local food procurement
- the need to maintain the rural environment
- the need for sufficient waste facilities
- the role of London in the development of the South East.

Issues raised in the discussion by the audience

Transport

- improvements to the A27 are imperative if businesses are to be regenerated in Eastbourne
- there is no evidence that building roads improves the economy, there should be more of an emphasis on reducing the need to travel
- rail improvements are necessary
- trains should take bicycles, cycling and safe cycle routes should be promoted and lessons learnt from good practice in other countries
- Eastbourne used to have a good bus service which has much lower standards today, the level of service should be raised to what it used to be and employers such as the Local Authority should only use electric cars
- the pavements in Eastbourne are dangerous and there is no evidence in the South East Plan that the issue to improve walkways will be addressed

General infrastructure

- delivering infrastructure depends on a partnership approach, the Eastbourne Strategic Partnership has not been consulted on such issues and would welcome being involved in the future
- the need for cultural and educational meeting places is not addressed in the South East Plan, training and education is important for regeneration
- the emphasis should not only be on house building but the community infrastructure to support it and the delivery of both should be timed to coincide

Housing

- housing development should meet the needs of all people in the community, there is a need for affordable housing for essential workers but housing also needs to be provided at a range of costs to suit all sections of the community
- social housing is important for the economy

Environment

- the need for brownfield eco-friendly housing was highlighted including the examples of the "BedZED" and "Earth Ship" projects promoting a new environmentally sustainable way of living with a focus on recycling waste, alternative technologies for low environmental impact housing, promoting electronic industry and transport, the South East Plan should address these issues in its Renewable Energy Chapter
- agricultural and other policies in the South East Plan will change the landscape of the south east, the landscape should be protected as it is the South East's largest asset and a key factor for people and businesses locating here

Other

- why does the South East Plan cover such a wide area?

Meeting At Lewes Town Hall – 9 March 2005

Summary of post it notes on key issues that the South East Plan should address

Infrastructure

The main issue identified was the need for infrastructure, particularly transport but also wider infrastructure requirements. There were general concerns over improving and increasing services such as sewage treatment, power and social facilities. Finding additional water supplies for new housing was raised by many people as a key area of concern. Other issues concerning infrastructure included the need for:

- road improvements
- sustainable transport including countryside links
- improvements to infrastructure before more housing is built

Sustainable Developments

Many of the post it notes were concerned with the need to create sustainable communities. Issues raised included:

- encouraging localism
- promoting eco friendly housing
- balancing the environment and quality of life issues with population pressures on development
- meeting affordable housing needs

Environmental Issues

Issues raised included:

- reducing climate change
- protecting biodiversity
- maintaining rural town and village amenities and characters
- using more ecological fuels
- protecting agricultural areas
- preservation of the countryside
- more capacity studies to ensure development can be environmentally accommodated
- no zero option on housing numbers in “Your shout”

Government

Several post it notes were concerned over the un-elected nature of SEERA and questioned why SEERA should decide local issues. Others questioned the whole consultation process and felt that central government could over ride any LA decision.

Other issues

- regeneration of deprived areas especially Hastings
- need for jobs
- South East Plan needs to be employment driven not housing driven
- concerns over compulsory overdevelopment

Issues raised in the discussion by the audience

Transport and wider infrastructure needs

- the plan needs a similar commitment to infrastructure as there is to housing
- improvements to railways should focus on east west link not improving commuter links to London
- mismatch of timing of housing development and infrastructure, need to find a way of speeding up transport infrastructure delivery
- improve public transport services and better utilise existing services especially rural railways

Housing

- questioned whether housing numbers were sustainable due to concerns over lack of water to accommodate new housing levels
- housing development is only necessary because of inward migration, asked what is happening to regenerate other parts of the country to stop this migration?
- housing needs to be provided where the jobs are
- capacity studies required to find out if there are sufficient brown field sites to meet housing demands
- concerns over the scale of development, in the past new developments have been bolted on with no integration with the existing community
- development should be employment lead, concern that development of employment sites will not be delivered and housing sites will go ahead regardless

Environment

- the main issue is climate change and how we are going to manage resources, other issues such as population growth and housing follow on from tackling this main issue
- concern over the plan's emphasis on economic growth and its impact on global warming, felt economic growth would increase transport provision including flight numbers and this would increase environmental problems
- importance of countryside not reflected in the plan
- no policies regarding agriculture

**PUBLIC OPINION AND THE SOUTH EAST PLAN
A SUMMARY OF THE ICM TELEPHONE POLL RESULTS**

Main survey results for the South East

- ICM interviewed 8,238 South East residents by telephone between 11 February and 3 March 2005. The sample included 1,014 respondents in the East Sussex structure plan area – giving a weighted base for this area (used to analyse the regional level results) of 784.
- Of the 1,014 local respondents, 675 live in East Sussex and 339 in Brighton & Hove.
- The sample can also be disaggregated by gender, age, tenure, employment status, social class and type of location.
- 67% of respondents have lived in the SE for at least 20 years, and 33% have lived here their whole life.
- Where there has been development, 40% of SE respondents consider that the level of new homes built recently in their area had a positive effect on their community; 49% believe the opposite to be the case.
- 56% of SE respondents are aware that SEERA is currently seeking views on the number of homes to be built across the region over the next 20 years or so; 44% are unaware.
- 63% of SE respondents believe new housing development should be for people already living in the region; 29% believe it should also cater for people wanting to move into the region.
- Respondents were asked to indicate which one or two factors should be most significant in deciding which areas should get most new housing. The most important cited were where job prospects are strongest (36%), where there is least congestion (32%), where housing is in short supply (32%) and where regeneration is most needed (31%). 25% of SE respondents selected where fewest greenfield sites would be built on, and only 7% focused on where house prices are highest.
- 42% of SE respondents would be most likely to support a reduction in future levels of housing development to a rate that is lower than the annual average achieved over the last five years, whilst 21% favoured continuing development at that average level of around 25,500 homes pa. Another 21% would like to see housing development increase by a small amount to the average level set out in RPG9 at 28,000 homes pa. Only 11% were in favour of increasing future development rates any higher than this.
- Generally, local residents' attitude to existing infrastructure and the amount/availability of services is quite favourable. Power and water supply are seen as the best performing services with around 85% of SE respondents seeing these as (very or quite) 'good'; around 70% of respondents regard the following as good – green spaces, like parks; schools and colleges; local health services, like GP surgeries; and council facilities, like libraries and leisure centres. The services with the lowest good scores were major roads (58%); NHS hospitals (52%); flood defences (45%); and public transport, like trains and buses (47%).
- Respondents were also asked which two or three of the same eleven services they would most like to see improved. Just under half of SE residents (48%) identified improvements to public transport and to hospitals as their top priorities; improvements to major roads was the next most significant at 31%. Only 8% highlighted flood defences.
- SE residents are not very confident that the supply of infrastructure will keep pace with future housing growth. 60% are not very or not at all confident about this, compared to just 34% who are quite confident and only 4% who are very confident.

- When explicitly faced (in Q.12) with the prospect of infrastructure provision not keeping pace with further housing development, there was a slight shift in SE respondents' preferences towards lower levels of housing provision (compared with Q.8). Under this scenario, 49% favoured a future rate of development that would be lower than the average rate of 25,500 homes pa that has been achieved over the last five years, whilst 17% would support future development at that level. However, compared to Q.8, little or no change was apparent in the proportions supporting higher levels of future housing provision.
- Under an alternative scenario where infrastructure can be expected to keep pace with housing provision, potential support for higher levels of development does increase. However, even here, one-third of SE respondents would still like to see a reduction in actual levels of development and one quarter would prefer to see no increase in development rates above the recent annual average level of 25,500 homes pa. Another quarter would be prepared to support increasing the rate of development to the current RPG9 target of 28,000 homes pa but just one-in-eight (12%) would favour a future development rate of 32,000 pa or more.
- When it comes to paying for the costs of achieving new or improved infrastructure, the clear preference amongst SE respondents is for the option that would result in no increase in direct costs to themselves – with 69% supporting contributions from developers as a way of covering such costs. Around one-third support paying for such requirements through national taxation and by direct charges (such as road tolls) but only around one-in-five want to cover these costs through their Council Tax or higher utility bills.

Main survey results for East Sussex

- Of the 675 respondents living in East Sussex – 121 live in Eastbourne, 108 in Hastings, 128 in Lewes, 119 in Rother and 199 in Wealden.
- This produces a weighted base of 659 respondents in East Sussex with – 126 in Eastbourne, 112 in Hastings, 114 in Lewes, 122 in Rother and 185 in Wealden.
- 67% of respondents have lived in East Sussex for at least 20 years, and 33% have lived here their whole life.
- Where there has been development, 37% of East Sussex respondents consider that the level of new homes built recently in their area had a positive effect on their community; 51% believe the opposite to be the case.
- 60% of East Sussex respondents are aware that SEERA is currently seeking views on the number of homes to be built across the region over the next 20 years or so; 38% are unaware.
- 64% of East Sussex respondents believe new housing development should be for people already living in the region; 28% believe it should also cater for people wanting to move into the region.
- Respondents were asked to indicate which one or two factors should be most significant in deciding which areas should get most new housing. The most important cited were where job prospects are strongest (35%), where there is least congestion (29%), where housing is in short supply (31%) and where regeneration is most needed (33%). 25% of East Sussex respondents selected where fewest greenfield sites would be built on, and only 5% focused on where house prices are highest.
- 44% of East Sussex respondents would be most likely to support a reduction in future levels of housing development to a rate that is lower than the annual average achieved over the last five years, whilst 22% favoured continuing development at that average level of around 25,500 homes pa. Another 20% would like to see housing development

increase by a small amount to the average level set out in RPG9 at 28,000 homes pa. Only 9% were in favour of increasing future development rates any higher than this.

- Generally, local residents' attitude to existing infrastructure and the amount/availability of services is quite favourable. Power and water supply are seen as the best performing services with around 80-85% of East Sussex respondents seeing these as (very or quite) 'good'; nearly three-quarters of respondents regard the following as good – green spaces, like parks and local health services, like GP surgeries – as do around two-thirds of respondents for schools and colleges and for council facilities, like libraries and leisure centres.
- The services with the lowest good scores were NHS hospitals (57%); public transport, like trains and buses (41%); major roads (39%); flood defences (36%). The scores for these last three were significantly lower than the regional average and, for both major roads (49%) and public transport (43%), a greater proportion of respondents regarded these services as bad rather than good. In fact, nearly one quarter of East Sussex residents see the county's major roads as 'very bad'.
- Respondents were also asked which two or three of the same eleven services they would most like to see improved. Just under half of East Sussex residents identified improvements to public transport (47%) and to major roads (46%) as their top priorities for improvement, followed by NHS hospitals at 40%. Only 15% prioritised the need to improve flood defences.
- East Sussex residents are not very confident that the supply of infrastructure will keep pace with future housing growth. 65% are not very or not at all confident about this, compared to just 30% who are quite confident and only 4% who are very confident.
- When explicitly faced (in Q.12) with the prospect of infrastructure provision not keeping pace with further housing development, there was a slight shift in East Sussex respondents' preferences towards lower levels of housing provision (compared with Q.8). Under this scenario, 51% favoured a future rate of development that would be lower than the average rate of 25,500 homes pa that has been achieved over the last five years, whilst 17% would support future development at that level. However, compared to Q.8, little or no change was apparent in the proportions supporting higher levels of future housing provision.
- Under an alternative scenario where infrastructure can be expected to keep pace with housing provision, potential support for higher levels of development does increase. However, even here, 35% of East Sussex respondents would still like to see a reduction in actual levels of development and over one quarter (28%) would prefer to see no increase in development rates above the recent annual average level of 25,500 homes pa. Another quarter would be prepared to support increasing the rate of development to the current RPG9 target of 28,000 homes pa but only 8% would favour a future development rate of 32,000 pa or more.
- When it comes to paying for the costs of achieving new or improved infrastructure, the clear preference amongst East Sussex respondents is for the option that would result in no increase in direct costs to themselves – with 72% supporting contributions from developers as a way of covering such costs. Around one-third support paying for such requirements through national taxation and 28% by direct charges (such as road tolls). Only around one-in-five would support covering these costs through their Council Tax or higher utility bills.

Results for additional questions specific to the Sussex Coast (all respondents)

- 1,287 respondents were interviewed who are resident along the Sussex Coast giving a weighted base for this area (used to analyse the sub-regional level results) of 997.
- Of the 1,287 Sussex Coast respondents, 801 live in the East Sussex structure plan area and 486 in West Sussex.
- In terms of the weighted base, 616 live in the East Sussex structure plan area and 381 in West Sussex.
- 55% of all respondents believe that highest priority should now be given to using scarce development land to provide more local jobs, whilst 34% would give greater priority to housing.
- 91% of all respondents believe that improvements to the major road and rail links connecting the Sussex coastal towns will be vital to their future economic prosperity and growth. Over half (56%) of respondents consider such improvements to be 'very important'.
- 93% of all respondents believe that new development should only be allowed when it is certain that the infrastructure and services needed to support it will be provided. Nearly two-thirds (64%) consider this to be 'very important'.
- Only 20% of all respondents think there is a lot of scope for more development on previously-developed land within their own town or village. Another 35% believe there to be a little scope for this whilst 42% think there's hardly any.
- Slightly higher numbers of all respondents think there may be a bit more scope for further development on greenfield sites on the edge of their own town or village. 24% believe there to be a lot of scope, 34% a little and 38% hardly any scope.
- Protecting local environmental quality appears to be a high priority for residents along the Sussex Coast. When asked to indicate which of two statements they most agreed with, 58% of all respondents said that the quality of the local environment should be protected at all costs, even if this means that some needs for jobs and housing will not be met; 37% would give greater priority to meeting local needs for housing and employment, even if this would mean some environmental loss in some areas.

Results for additional questions specific to the Sussex Coast (East Sussex respondents)

- Of the 801 respondents resident in the Sussex Coast sub-region, 462 live in East Sussex with – 102 in Eastbourne, 97 in Hastings, 113 in Lewes, 63 in Rother and 87 in Wealden.
- In terms of the weighted base, 450 live in East Sussex with – 104 in Eastbourne, 103 in Hastings, 100 in Lewes, 65 in Rother and 78 in Wealden.
- 61% of East Sussex respondents believe that highest priority should now be given to using scarce development land to provide more local jobs, whilst 29% would give greater priority to housing.
- 94% of East Sussex respondents believe that improvements to the major road and rail links connecting the Sussex coastal towns will be vital to their future economic prosperity and growth. Nearly two-thirds (65%) of respondents consider such improvements to be 'very important'.
- 95% of East Sussex respondents believe that new development should only be allowed when it is certain that the infrastructure and services needed to support it will be provided. Over two-thirds (68%) consider this to be 'very important'.

- Only 19% of East Sussex respondents think there is a lot of scope for more development on previously-developed land within their own town or village. Another 36% believe there to be a little scope for this whilst 42% think there's hardly any.
- Similar views are apparent in considering what scope there might be for further development on greenfield sites on the edge of respondents' own town or village. 25% believe there to be a lot of scope, 29% a little and 42% hardly any scope.
- Protecting local environmental quality appears to be a high priority for residents along the Sussex Coast. When asked to indicate which of two statements they most agreed with, 59% said that the quality of the local environment should be protected at all costs, even if this means that some needs for jobs and housing will not be met; 37% would give greater priority to meeting local needs for housing and employment, even if this would mean some environmental loss in some areas.