

Sent by email to: LocalPlan@lewes-eastbourne.gov.uk

20/01/2023

Dear Sir/ Madam

Response by the Home Builders Federation to the consultation on the Eastbourne Growth Strategy

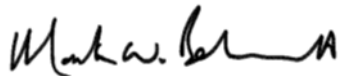
1. Please find below the Home Builders Federation (HBF) response to the consultation on the Eastbourne Growth Strategy. The HBF is the principal representative body of the housebuilding industry in England and Wales and our representations reflect the views of discussions with our membership of national and multinational corporations through to regional developers and small local housebuilders. Our members account for over 80% of all new housing built in England and Wales in any one year.
2. The HBF is broadly supportive of the development that is being proposed by the Council and the approach it is taking. We recognise the constraints faced by Eastbourne with regard to delivering new development. It has boundary that is tightly drawn to its urban area to the east and north with the west of the Borough falling under the responsibility of the South Downs National Park Authority. In addition, the Council have identified other “*showstoppers*” to development such as functional floodplain. On the basis of these constraints the Council state that there will be a shortfall of nearly 420 homes each year of the proposed plan period – a total shortfall of 8,359 homes.
3. Therefore, the key question for Council and its neighbouring areas in relation to housing supply is how these needs can be accommodated outside of Eastbourne. The Council note that discussions are on-going with Wealden District Council. These will be crucial in seeking to deliver more homes to meet the needs of Eastbourne given the limited opportunities for growth elsewhere. It will be necessary for Eastbourne to thoroughly challenge any assumptions made by Wealden with regards to capacity and the ability of the area to accommodate further growth, and in particular any extensions to the urban area of Eastbourne.
4. Whilst the area covered by the National Park is more restrictive the Council should also be in discussions with the National Park Authority and whether there are opportunities to the west of Eastbourne. It is important to recognise that the national park is not an absolute constraint. The NPPF recognises that the extent of development will be limited but it does not prohibit development. Given that a



significant proportion of Eastbourne falls within the NPA it will be important for the Council to work closely with them to try and identify sites on the edge of Eastbourne that may be suitable for further development. Whilst opportunities may be limited this will still need to be a key part of the preparation not only of this plan but also the review of the South Downs National Park Local Plan.

5. We hope these representations are of assistance in taking the plan forward. Should you require any further clarification on the issues raised in our comments please contact me.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Behrendt', with a stylized flourish at the end.

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