



Eastbourne Food Partnership’s response to the “Growth Strategy” of Eastbourne Borough Council’s Local plan, 20/1/2023

Context:

Eastbourne Borough Council is preparing a new Local Plan, which will guide the type, amount and location of development in the borough up to 2039.

The public consultation to which the Eastbourne Food Partnership is responding concerns the ‘Growth Strategy’. This strategy sets out the level of housing and employment growth that can be accommodated in Eastbourne up to 2039, as well as appropriate sites for this development. The Eastbourne Food Partnership, as a platform for different stakeholders committed to creating more sustainable and inclusive local food systems, is responding to the ‘Growth Strategy’ by focussing on the need and opportunity for local food systems to sustain growth in the period outlined and beyond.

Do you agree with the ‘Growth strategy’ outlined in this document? If not, which elements do you disagree with?

Eastbourne Food Partnership represents stakeholders in the food system that work towards creating more resilient, inclusive and sustainable food systems in Eastbourne. This response was developed through consultation with our partners as well as an open meeting hosted online. Eastbourne Food Partnership agrees with the Growth Strategy’s goals of increasing the provision of affordable housing and employment opportunities in Eastbourne. Our organisation works with partners to build long-term food security in our communities. We recognise that food insecurity is linked with [inadequate access to affordable housing](#). In September 2022, [a study by the Food Foundation](#) showed that 53.8% of households in receipt of Universal Credit experienced food insecurity (as opposed to 15.6% of households not in receipt of Universal Credit), demonstrating the vulnerability of those in unemployment or working low income jobs to food insecurity. Eastbourne Food Partnership thus recognises the importance of accessible and fairly-remunerated employment opportunities in Eastbourne.

We agree with the principle of combining options D and E of the options for growth - “Option D: Providing taller residential buildings in Town Centre; Option E: 50% increase on the prevailing density on all sites within the existing built-up area”. However, we object to the consideration of greenfield sites for development, which expands the built-up area rather than increasing the density of the existing built-up area. This imperils the existing and future growing potential of the fertile lands of Eastbourne Park with key implications for the future health and wellbeing of Eastbourne communities.

We are concerned that food growing is not taken into account in the Growth Strategy, neither for its importance for supporting healthier, happier communities nor in its potential for creating sustainable future employment opportunities. Furthermore, the food supply is not taken into account in the “infrastructure” section, which means that food security cannot be guaranteed for new or existing developments. By failing to take the importance of food into account, the Growth Strategy lists sites that are vital to Eastbourne’s food-growing potential as development sites, which threatens to irreversibly destroy the fertility of these lands through the prospect of

development. It also fails to specify how new developments will have access to sustainably produced local food, for example through a community farm or by increasing the allotment provision. Eastbourne Food Partnership thus disagrees with the Growth Strategy and calls for it to be reconsidered by taking food into account. Please see below the supporting evidence for food-informed planning.

Food security is central to sustainable growth. A report entitled [Future food security](#) by the international research group Sustainable Healthy Food Systems underlines the importance of increasing UK fruit and vegetable production in the face of health recommendations to increase vegetable consumption and climate-related threats to global supply chains. In the UK, at least 31,000 premature deaths could be averted if vegetable consumption met recommended levels, but the current supply (totalling domestic production and imports) falls short by approximately 7.8million MT/year. Furthermore, the ability to access sufficient fruit and veg disproportionately impacts lowest income households, who get 1.5 times fewer portions of fruit & veg than highest income households.

According to the same SHEFS report, 32% of the UK's fruit and vegetable imports were from areas defined as "climate vulnerable", and this proportion is only likely to have increased in the intervening years. Furthermore, 54% of fruit and vegetable supply comes from countries likely to face high to extremely high water scarcity in the near future (2040).

A 2022 report by CPRE entitled [Building on our food security](#) demonstrated risks to domestic food production because of development on fertile agricultural lands. In the South East, over 3,000 (1.25%) hectares of Best/Most Versatile agricultural land has been developed since 2010, and 1.22% of the highest class (Grade 1) has been developed since 2010. In the absence of a shift towards domestic fruit and veg production, the health of the nation is thus imperiled, and models suggest that climate induced changes to fruit and vegetables availability would be one of the largest drivers of climate-related deaths by 2050. For the sake of the health of Eastbourne's communities, the preservation and increase of lands for growing has to be taken into account for the Growth Strategy.

Allotments and community gardens are key to supporting Eastbourne residents to access enough fruit and vegetables. There are currently 1,200 allotments across 14 sites in Eastbourne, which includes two community gardens. These sites enable residents to cultivate fruit and vegetables for themselves, their families and community food projects such as community fridges. Allotments can have a significant impact on local food security as well as community well-being. In the ESCC Healthy Weight Plan 2021-2026, the action area "Tackling food poverty and building food security", event level actions include "Provide a wide range of opportunities for individuals and families living in food poverty to learn about nutrition, growing your own, food shopping, healthier cooking on a budget and reducing food waste." Allotments and community growing spaces would respond to many of these aspects. [A recent study](#) commissioned by the Brighton & Hove Allotment Federation demonstrated that the 2,311 allotment plots across the nearby city Brighton & Hove produce 481 tonnes of produce with a supermarket value of £1.12 million a year. "Overall, the report estimates the cumulative benefits that allotments offer the city in health savings, carbon sequestration, and shortened supply chains to be around £385,567 per year, alongside a food worth of £1.12 million". There is significant demand for spaces for food growing amongst Eastbourne communities. There are 492 people on the allotment waiting list, which demonstrates that Eastbourne Borough Council is falling short on its provision of land for the community to grow food.

Food growing in and around urban areas also provides important opportunities for sustainable employment, and thus should be considered for the Growth Strategy. [A 2012 study by CPRE](#) showed that employment per hectare in Community Supported Agriculture Systems is five times

higher than the agricultural average. Producers involved in the local food economy employed on average 3.4 full-time workers compared to the regional average of 2.3 per farm, indicating the potential for a local food growing economy for job creation. Furthermore, a study by the University of Essex showed that there are 32% more jobs per organic farm than equivalent non-organic farms, showing that climate-friendly farming systems such as organic are also more beneficial for the economy. There is huge difficulty in accessing locally produced vegetables and fruit in Eastbourne, evidenced by the over-subscription of veg boxes such as those at Fanfield Farm which are at capacity. With the development of Food Street in the pipeline, the fertile land in Eastbourne is a key opportunity to create local supply chains for food businesses by making land available to local growing ventures.

Furthermore, the Growth Strategy should evaluate the potential for development of the independent food and drink based retail sector. The same 2012 study by CPRE demonstrated that smaller independent local food outlets create a job for every £46k turnover, which is three times the jobs of supermarkets, creating a huge pool of potential jobs by supporting local independent enterprises. Creating a vibrant local food and drink sector based on local supply chains and a local food identity also encourages sustainable tourism. A 2016 ICF study for Defra found that a localised food and drink offer increases the tourism expenditures, extending the tourism season and increasing the retention of tourism expenditures in the local economy. The historic and future potential of Eastbourne for tourism is well-documented, and a localised food offer would have a key part in maximising that potential.

Eastbourne Borough Council elsewhere recognises the importance of food for future development in Eastbourne. In the [EBC Climate Emergency Strategy](#), published in November 2020, the Vision for Eastbourne in 2030 includes a section on Food: “local food production has increased through development of a local food economy and a low carbon distribution network. We have reduced food packaging and reduced food waste. Residents are enabled to make healthy choices and food poverty has been eliminated”. Equally, the Council Action Plan lists food under Direct Action 5.1: “Support local food growing initiatives by making suitable land available and incorporating it into our work with social housing tenants as part of DOHS” along with the indicator: “Area of land that has been made available for food growing.” The provision of local land for food growing is thus part of the EBC’s obligation to its residents. This Growth Strategy which directly or indirectly threatens land suitable for growing thus contradicts EBC’s Climate Emergency Strategy.

2. Have we missed a spatial option to deliver new homes and employment space? If so, what is it, and what evidence would be needed to ensure its deliverability over the plan period?

Eastbourne Food Partnership supports high-density developments on brownfield sites that makes the most of existing infrastructure and protects greenfield sites that are essential to future food security in Eastbourne. As part of this, as well as the solutions proposed in the Growth Strategy such as the conversion of disused/underused brownfield sites, we suggest a strategy that incentivises dividing larger homes into smaller residential units and creating new dwellings above existing buildings, for example by providing council tax relief.

3. Is there any evidence to suggest that any of the key development sites should not be considered for allocation in the Local Plan?

Not only does the growth strategy propose to build directly on sites that are prime growing sites (**site 9**), it also proposes to build on sites adjacent to allotments (**sites 8, 9 & 15**) and sites of

biodiversity interest (**sites 9, 15, 17, 18**) that equally imperil the existing sites of food production in Eastbourne.

The proposed development to build up to 270 homes at **Site 9**, Land at Tutts Barn Lane must be reviewed. This development concerns prime horticultural land to the South West of Eastbourne Park, formed from fertile alluvial soils. The potential for food growing in this area is demonstrated by the flourishing 435 allotment plots available to the south of the proposed site. Given the demand for allotment space documented in our response to question 1 as well as the benefits to the community, we propose that this site be considered for increased allotment allocations. Further to this, we recommend that a full assessment of the horticultural potential of the site be carried out, in order to consider its lease to small-scale and/or community-based farms.

Furthermore, Tutts Barn Nursery is included within the perimeter proposed for Site 9 (to the South West). This former nursery is a historic site of horticultural interest, with an important surface of greenhouses that groups of interested Eastbourne residents have been restoring in the last years. The productive potential of such a site, as well as its value to the community, cannot be overstated. As well as removing it from the proposed site perimeter as an urgent priority, we suggest that the entire site of the former nursery be preserved as an asset of community value, to block any potential development and permit the community access to this site.

Developments on **sites 8, 9 and 15** would also pose a problem because they are adjacent to Eastbourne's allotments. As outlined in the response to question 1, the allotments provide an important source of support to Eastbourne residents, and it is in the interest of Eastbourne Borough Council to preserve and expand allotment spaces. As Dave Roberts of Gather Community Garden, located at the Churchdale Allotments site, said when consulted, "*The Southbourne site also gives the local authorities a significant opportunity to invest in the promotion of locally grown fruit and vegetables as part of an ecologically forward-looking planning policy. Its proximity to the Churchdale allotments and the expertise of the EAGS offers an opportunity for plots to be released that would then meet the proven demand that has led to a 490+ person waiting list for Eastbourne allotment plots at this time.*"

The development of land adjacent to the allotments would have adverse effects on the allotments, that could even compromise the ability of allotment holders to benefit from their allotment. As the council will be aware, a substantial drainage system was put in place to make the allotments at Gorringer Road and Churchdale Road possible. Even so, given the increasingly extreme weather we are experiencing, allotment holders at both sites are already struggling with the dampness of certain plots. The developments proposed at sites 8 and 9 and sites 15, adjacent to the Gorringer Road and Churchdale Road sites respectively would increase the run-off rate by converting greenfield sites into brownfield sites. This would have direct knock-on effects on the allotments, putting pressure on the drainage system and leaving plots more vulnerable to harvest-threatening floods. The impacts of the increased flood risk to these food-growing spaces must be incorporated into the flood-risk assessment of potential development. As Dave Roberts of Gather Community Garden, located at the Churchdale Allotments site, said "*The Churchdale allotments are already prone to flooding along the edge adjacent to local housing.*"

Development adjacent to food-growing spaces must also be evaluated in terms of the potential for water pollution from runoff from development sites. In the case of both the flooding and the water contamination potential, the total mitigation by the implementation of SUDS is not guaranteed considering the increasingly extreme weather events we are experiencing due to climate change. [Research by LSE](#) demonstrated that while the compulsory inclusion of SUDS in developments reduces flood risk levels, they also caution that encouraging SUDS also has the effect of increasing building on flood plains and areas of high flood risk, thus increasing flood risk levels overall.

Sites of high levels of biodiversity such as **sites 9, 15, 17 and 18** are also vital to supporting food production. [A report adopted by IPBES](#) indicated that key pollinating species are declining by 37% for bees and 31% for butterflies in Europe, which threatens food production. As well as for their multiple values in and of themselves, the preservation of biodiversity hotspots in Eastbourne are essential to making local food growing possible. [As research demonstrates](#), any development which decreases the area or fragments these habitats will threaten the biodiversity currently thriving there and the services they provide to communities, including pollination for food growing.

It is clear that any development on these sites listed above (**8, 9, 15, 17 and 18**) would be subject to tight restrictions related to flood management and biodiversity preservation. Such developments would also be obliged to take into account the landscape quality of the bordering allotments and/or green spaces, as well as food growing provisions that would support healthy development in the area. These requirements would necessarily result in lower density developments than the predictions laid out in the Growth Strategy. Eastbourne Food Partnership thus argues that such developments do not observe the stated aims of the Growth Strategy to strike a balance between providing new homes and other considerations such as employment opportunities, efficient use of land, protecting residential and environmental amenity of existing and future residents, mitigating climate change impacts, safeguarding the most valuable green spaces and habitats and ensuring adequate infrastructure for future growth.

Finally, we would like to comment on the development proposed at **site 10**, which currently includes two fresh seafood outlets, one of which in particular is a unique and valuable community resource that provides direct access to locally caught seafood. As outlined in our response to question 1, small-scale independent food outlets are key to creating local employment opportunities, as well as growth potential through a vibrant local food and drink sector that enhances opportunities for tourism. The seafood outlets at **site 10** are exactly the type of food outlets that contribute to the food culture and attractiveness of Eastbourne, as well as providing an important and historic resource for local residents.

5. Do you have any other comments / suggestions about what the Local Plan should contain?

As our response has laid out, the social, ecological and economic arguments for creating resilient local food systems are compelling. On this basis, Eastbourne Food Partnership urges Eastbourne Borough Council to work with us as representatives of local food stakeholders to produce a food-informed Local Plan. We call upon this plan to incorporate the value of spaces that allow residents and businesses to grow, cook and eat well in Eastbourne as an asset to community health and well-being, local economic development and environmental protection.