

EASTBOURNE

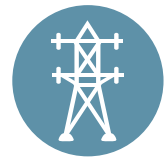
Borough Council



EASTBOURNE LOCAL PLAN

SUSTAINABILITY APPRAISAL REPORT:

GROWTH STRATEGY



NOVEMBER 2022



**Eastbourne Local Plan
Strategic Environmental Assessment /
Sustainability Appraisal**

**SUSTAINABILITY APPRAISAL
REPORT – GROWTH STRATEGY**

November 2022

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I. Introduction

I.1 Introduction

Eastbourne Borough Council (EBC) is preparing a new Local Plan for Eastbourne Borough outside the South Downs National Park. The Local Plan will set out the vision, objectives, planning policies and site allocations that will guide development over the next 20 years. Local Plans must aim to meet the objectives of sustainable development. To ensure this, a Sustainability Appraisal (SA) has been prepared.

The SA will appraise the environmental, social and economic performance of the emerging Local Plan by comparing likely effects of reasonable alternatives for these proposed objectives, planning policies and site allocations. This comparison will help to inform the selection of Plan options and identify measures to avoid, minimise or mitigate any potential negative effects that may arise from the Plan's implementation. At the same time the SA will advise on the opportunities to make the Local Plan more sustainable.

Preparing a Local Plan is an iterative process, and during the preparation of the Plan at each step an SA must be carried out. The SA should be interwoven in plan preparation to ensure that sustainability is promoted.

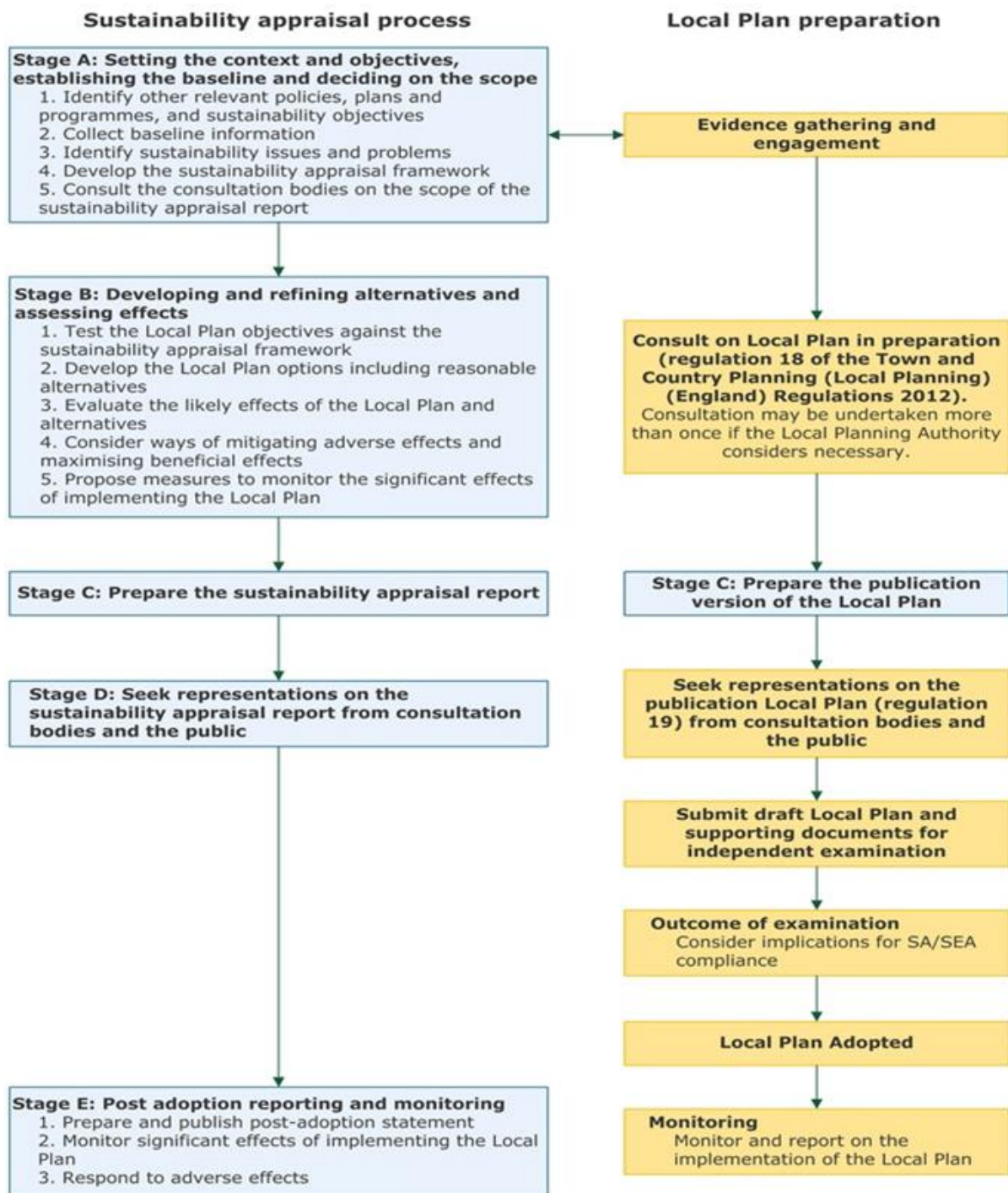
Together with the publication of the Local Plan Growth Strategy an SA was carried out: The Sustainability Assessment on the Local Plan Growth Strategy, in short: the SA Growth.

At the same time an SA on the Issues and Options is presented (in short: SA on I&O). In that report an update of the Plans, Policies, Programmes, Strategies, and Initiatives is included which also serves as background for the SA Growth. The update of the baseline will be formed by all the baseline evidence which will be produced during the Local Plan process. As the information of the 2021 Census is not yet available at neighbourhood level the baseline as presented in the Scoping Report is not updated.

I.2 SA background

The SA section of the National Planning Practice Guidance has been used to help structure the assessment. This guidance advocates a five-stage approach to SA as demonstrated in Figure 1.

Figure 1: Sustainability Assessment process



Stage B of the SA includes 5 steps. Firstly, the objectives of the Local Plan will be assessed. This will result in information on the compatibility of the plan with the sustainability objectives. This assessment is presented in the SA on I&O report.

In the following steps of this stage, the alternatives to Local Plan options are developed and assessed. This will result in recommendations for the preferred policy options and for mitigation of the likely negative impacts. The development of the growth options is carried out and published for public consultation as a separate step of the Local Plan production and is therefore accompanied by a specific SA Growth report.

The process of preparing a Local Plan involves several stages and in each stage an SA must be carried out. Stage B of 'Development and Refinement of Alternatives' is an iterative process.

Table 1: Steps in Stage B

	Stage B: Developing and refining alternatives and assessing effect	In this report	In other SA reports
1	Test the Local Plan objectives against the sustainability appraisal framework		SA on I&O
2	Develop the Local Plan options including reasonable alternatives <ul style="list-style-type: none"> - Growth options - Policy options 	Growth options: Section 3 Key development sites: Section 4	Policy options: SA on I&O
3	Evaluate the likely effects of the Local Plan and alternatives	3.2 and 3.3 4.4	SA on I&O
4	Consider ways of mitigating adverse effects and maximising beneficial effects	Section 3.3 & 3.4 Section 4.4	Broadly SA on I&O
5	Propose measures to monitor the significant effects of implementing the Local Plan		Scoping Report

1.3 Purpose of this report

Stage A of the sustainability appraisal process was undertaken in 2019 and resulted in the production of a Scoping Report that was subject to consultation on two occasions. The first consultation was directed to the Statutory Consultation Bodies and neighbouring Local Authorities. The report was then updated taking into account consultees' comments and an amended version was presented for a second consultation alongside the public Issues and Options Consultation June / July 2019.

The Stage A Scoping Report should be referred to for a description of the original baseline, relevant plans, policies and programmes and the justification for the sustainability objectives that are being implemented in this SA Growth. Updates to these descriptions are also provided in the SA on I&O report which is published together with this SA Growth.

Stage B of the sustainability appraisal process began in 2022 and was summarised initially with the production of the SA on I&O, which is the first step forward after the Issues and Options Consultation. The next step was to consider the growth strategy and key development sites. Alongside the Local Plan Growth Strategy the SA Growth was prepared.

A formal report is not a requirement for Stage B (see Figure 1). However, a report for consultation was prepared nevertheless, as it was felt to be a useful interim presentation of the application of the SA scoring methodology and a good opportunity for relevant organisations to provide opinions following the initial scoping stage and prior to the scoring being extensively applied to sites and policies.

1.4 Legal Compliance

Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out an SA of each of the proposals in a plan during its preparation, with the objective of contributing to the achievement of sustainable development.

The NPPF paragraph 32, states that “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).”

Strategic Environmental Assessment (SEA)

Strategic Environmental Assessment (SEA) is adopted into UK law by the Environmental Assessment of Plan or Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environment Assessment Regulations’.) The SA has a broader perspective: it ensures that the potential environmental effects are given full consideration, but social and economic issues are also included. Regulation 12 of the Environmental Assessment of Plan and Programmes Regulations 2004 sets out the formal requirements of an ‘environmental report’, which can form an integral part of the sustainability appraisal report. The sustainability appraisal report will need to show how these requirements have been met as well as recording the wider assessment of social and economic effects. In Appendix 2 identifies how this requirement has been complied with

Habitat Regulations

A plan or project may also require an appropriate assessment, as set out in the Conservation of Habitats and Species Regulations 2017 (as amended)¹, if it is considered likely to have significant effects on a habitats site. A sustainability appraisal should take account of the findings of an appropriate assessment, if one is undertaken.

An initial screening exercise has been undertaken to determine whether such appropriate assessment would be needed. The Habitats Regulation Assessment (HRA) will be presented as a separate ‘standalone’ document.

The conclusion of the initial screening exercise² is that it has not been possible to determine that the Local Plan would not cause a likely significant effect on the Pevensy Levels Special Area of Conservation (SAC) and RAMSAR site, the Ashdown Forest SAC and Special Protection Area (SPA) and the Lewes Downs SAC. The HRA process will be carried forward

¹ <http://www.legislation.gov.uk/uksi/2017/1012/contents/made>

² EBC Habitat Regulations Assessment – Screening Report, October 2019 <https://www.lewes-eastbourne.gov.uk/resources/assets/inline/full/0/283916.pdf>

for these sites, and the SA will take account of its findings in due course. This will be flagged up in the assessment of the key development sites.

Duty to Cooperate

Under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by section of the Localism Act 2011) and in accordance with the National Planning Policy Framework (NPPF) (July 2021), it is a requirement under the duty to cooperate process for local planning authorities, county councils and other named bodies to engage constructively, actively and on an on-going basis in the preparation of development plan documents and other local development plan documents. WDC and EBC share a common administrative border at the southern part of Wealden District, which surrounds Eastbourne Borough on all sides, albeit that the western boundary of Eastbourne Borough adjoins the South Downs National Park (SDNP).

In July 2022 Wealden District Council (WDC) and EBC signed a Statement of Common Ground³ with respect to key relevant strategic cross boundary matters such as housing need (including unmet housing need), housing distribution, gypsy and traveller provision, employment and retail needs, cross boundary infrastructure requirements, impacts upon natural environment, and fluvial flood risk. This Statement of Common Ground will be subject to revision as both Council's Local Plans progress.

Evidence from the emerging Eastbourne Land Availability Assessment (LAA) at the time that the Statement of Common Ground was prepared indicated that Eastbourne was unlikely to be able to have sufficient land available to meet its local housing need in full. It was estimated that the shortfall could result in an unmet need of between 7,822 and 8,720 homes over 20 years.

Eastbourne and Wealden commissioned a joint Employment and Economic Study (April 2022)⁴. The report aligns the Eastbourne Functional Economic Market Area (FEMA) with the existing Housing Market Areas (HMA) that includes Eastbourne and South Wealden (which includes Hailsham and some urban settlements surrounding Eastbourne). The identified employment need for Eastbourne (2021-2039) amounts to 76,184 sqm of employment land. At the time of the Statement of Common Ground it was considered that Eastbourne could potentially accommodate around 38,000 sqm, leaving an unmet need of 38,000 sqm.

Along with other Local Authorities in East Sussex, both WDC and EBC are working with ESCC and National Highways to develop a Shared Transport Evidence Base⁵ (STEB) model and a County Wide Transport Model to assess Local Plan impacts across East Sussex. The road network, particularly junctions on the A27/A22, is already in a situation of stress and has required interventions to improve capacity and reduce congestion. It is clear that junction improvements in South Wealden and Eastbourne are required to support housing and employment growth within the respective local authority areas. Both WDC and EBC will work alongside ESCC and National Highways (where applicable) to consider this issue within their respective Local Plans in order to support such infrastructure improvements. The delivery of

³ www.lewes-eastbourne.gov.uk/eastbournelocalplan

⁴ www.lewes-eastbourne.gov.uk/eastbournelocalplan

⁵ www.lewes-eastbourne.gov.uk/eastbournelocalplan

strategic highway improvements is dependent on the ability to secure substantial external funding. The STEB is taken up in the PPPSI and will inform the assessment of policies and options in the SA.

EBC and WDC have jointly commissioned a new Strategic Flood Risk Assessment⁶ (SFRA) Level 1 and fluvial modelling work for their respective Local Plans and this will ensure that both local authorities have a strategic and consistent approach to dealing with flood risk within their respective local authority areas, including mitigation where appropriate. This SFRA is identified in the PPPSI and will inform the assessment of policies and options in the SA.

Both EBC and WDC will continue to participate in the Ashdown Forest SAC Working Group which will seek to work with Natural England on addressing Air Quality issues in relation to Local Plan preparation and will endeavour to support wider initiatives to improve background air quality. And both authorities are committed to continue working together in partnership, alongside the SDNPA, to deliver the aims and objectives of the National Park including to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

⁶ <https://www.lewes-eastbourne.gov.uk/planning-policy/strategic-flood-risk-assessment-sfra/>

2. Methodology

2.1 Sustainability Assessment Framework

In the SA on I&O a final version of the SA Framework is presented which will be applied to the assessment of Growth options and key development sites. In the SA Scoping Report this SA Framework had been constructed and combined with a column with the indicators for monitoring. Although it is still important to be transparent about the monitoring of the Local Plan this column is not included here as at this stage the emphasis is on the “Questions to Consider”. The SA Framework is presented in Table 2.

Table 2: SA Framework

Objective	Questions to Consider
ENVIRONMENT AND CLIMATE CHANGE	
1. GREENHOUSE GAS EMISSIONS To promote and support the mitigation of climate change through a reduction in Eastbourne’s greenhouse gas emissions from all sources.	Will the approach contribute to reduction of carbon dioxide emissions? Does the approach support reduction of energy consumption? Will the approach increase the proportion of energy from renewable sources? Will the approach increase the use of heat networks?
2. FLOOD RISK AND WATER AVAILABILITY To reduce the risk to people and properties of flooding from all sources, and the risk of water scarcity in dry summers for people and the environment.	Will the approach impact on flooding – coastal, fluvial and surface water? Does the approach reduce the risk of flooding? Does the approach impact on the quantity of available water? Will the approach support the reduction the consumption of water (domestic and commercial)?
3. CLEAN ENVIRONMENT To reduce air, water, soil and noise pollution.	Does the approach reduce air pollution? Does the approach reduce surface or ground water pollution? Does the approach affect a Source Protection Zone? Does the approach reduce soil pollution or improve the conditions of the soil? Does the approach reduce noise pollution in residential areas?
4. BIODIVERSITY AND GREEN INFRASTRUCTURE To protect and enhance biodiversity and the networks of biodiversity and green infrastructure, achieve net gains for	Does the approach protect the areas of SSSI and ancient woodland? Does the approach protect and enhance natural and semi-natural habitats and species? Does the approach optimise opportunities to create a Nature Recovery Network?

Objective	Questions to Consider
biodiversity, and improve the access to nature. To make efficient use of land by developing brownfield area.	<p>Does the approach contribute to the achievement of net gains for biodiversity?</p> <p>Does the approach affect nationally important wildlife?</p> <p>Will the approach impact on green infrastructure?</p> <p>Does the approach contribute to the minimisation of impact on greenfield land?</p>
5. LANDSCAPE, TOWNSCAPE AND HISTORIC ENVIRONMENT To protect, enhance and manage archaeological, historical and cultural heritage and their setting and strengthening local distinctiveness and sense of place.	<p>Will the approach protect the character of the town and landscape and protect the key views?</p> <p>Will the approach contribute to the quality of the townscape?</p> <p>Does the approach have an impact on listed buildings and conservation areas?</p> <p>Does the approach have an impact on sites of archaeological interest?</p> <p>Does the approach have an impact on registered parks and gardens?</p>
6. WASTE To minimise waste generation and maximise recycling of waste.	<p>Will the approach reduce and minimise the generation of waste (household and Construction & Demolition)?</p> <p>Will appropriate recycling and storage facilities be provided?</p> <p>Will the approach increase recycling rates and use opportunities to manage waste?</p>
SOCIAL	
7. HOUSING To provide affordable, environmentally sound and good quality housing of types and sizes that meets the needs of the community.	<p>Does the approach help meet affordable housing needs?</p> <p>Does the approach meet the needs of all members of the community (ageing population, new families)?</p> <p>Does the approach encourage a mix of types and tenures to be achieved?</p> <p>Will the diversity of stock be improved?</p> <p>Does the approach lead to sustainably constructed homes?</p> <p>Will the approach contribute to quality design development?</p>
8. INFRASTRUCTURE To ensure the appropriate provision of infrastructure to meet needs arising from new and existing development.	<p>Does the approach provide for sufficient infrastructure to sustain accessible services? Or: is the capacity of existing infrastructure sufficient? With special attention to services for the elderly population of the Borough.</p> <p>Is the infrastructure easily accessible?</p> <p>Does the approach improve access to a range of facilities?</p> <p>Will there be sufficient capacity of utilities?</p>
9. RESILIENT COMMUNITIES To improve community health, safety and wellbeing and promote	<p>Will a sense of cultural identity, belonging and well-being be achieved?</p> <p>Does the approach support a healthy lifestyle and outdoor playing space? Does the approach optimise access to the town's green infrastructure and to the countryside?</p> <p>Does the approach encourage active transport modes?</p>

Objective	Questions to Consider
inclusive and vibrant communities.	Does the approach lead to a reduction of crime rates? Does the approach consider the needs of people with protected characteristics, and/or the needs of the ageing population? Does this approach benefit the most deprived areas of the district? Does the approach support social inclusion? Will the approach promote and support the empowerment and participation of local communities? Will the approach reduce the gap between the most deprived areas and the rest of the Borough?
ECONOMIC	
10. EMPLOYMENT AND BUSINESS GROWTH To promote economic growth in the Borough by supporting expanding businesses and encouraging creation of new jobs and businesses. Improve education and skills of the population.	Does the approach improve access to employment opportunities? Does the approach create and enhance support for existing businesses? Does the approach encourage the creation of new start-ups? Will the approach improve access to education and training for children, young people and adult learners?
11. LEISURE AND TOURISM To increase the number and spend of people visiting the town, and the town centre, for leisure and tourism purposes.	Does the approach create and enhance support for existing retail and tourism business? Does the approach encourage creation of new retail and tourism initiatives? Will the approach create jobs in the tourism sector?
12. TRAVEL AND TRANSPORT To provide a step-change in modal shift to sustainable forms of transport and reduce dependency on the private car.	Does the approach encourage sustainable modes of transport? Will the approach encourage a shift away from the private car and towards public transport and cycling? Will the approach ensure sufficient capacity of the highway and public transport network? Will the approach minimise the need to travel by car?

2.2 Scoring Method

The SA Framework provides the 'Questions to Consider' for each Sustainability Objective. The Questions to Consider are applied in the assessment of alternatives and options during the preparation of the Local Plan. By this the likely sustainability effects can be described, analysed and compared. The table below presents the symbols and definitions which will be used to assess and highlight impacts when the options and objectives are tested.

Table 3: Appraisal definitions

GRADE	Appraisal symbol
Strong positive effect	++
Positive effect	+
Neutral / no effect / no relationship	0
Negative effect	-
Strong negative effect	--
Uncertain effect or lack of information	?
Impact depends on implementation	i

The matrix of the assessment of the magnitude of effects will be accompanied by a commentary where the reasons for the scoping are explained. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent (irreversible) and temporary effects. The characteristics of likely significant effects are set out in Table 4.

The SEA Regulations require an assessment of secondary, cumulative and synergistic effects. Collectively secondary impacts are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity.

Based on the assessments there will be proposed measures to enhance beneficial impacts and reduce adverse impacts.

Table 4: Characteristics of likely significance

a	The probability, duration, frequency and reversibility of the effects
b	The cumulative nature of the effects
c	The transboundary nature of the effects
d	The risk to human health or the environment (for example due to accidents)
e	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
f	The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> - Special natural characteristics or cultural heritage - Exceeded environmental quality standards or limit values - Intensive land-use
g	The effects on areas or landscapes which have a recognised national, community or international protection status.

3. SA of the Growth Strategy

3.1 Background

In line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of reasonable alternatives considering the objectives and the geographical scope of the plan or programme whilst in line with Schedule 2(8), and there is a need to explain “the reasons for selecting the alternatives dealt with”. According to the guidance, options should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn.

Option scoped out:

Do Nothing

The “do nothing” option can be understood as the prolonging of the situation with a Local Plan that is declared out of date and where the ‘Presumption in favour of sustainable development’⁷ applies. Without a new Local Plan development of windfalls would continue and the low housing delivery of the last 10 years may continue, possibly increased by some more speculative development proposals, whereas the Council has less control to balance all planning matters. Apart from the impact on growth, without a Local Plan it will be very difficult to meet the Councils’ corporate objectives.

It is, however, a statutory requirement to have a Local Plan in place so on this basis it is considered that ‘Do Nothing’ is not a realistic option.

The Issues and Options consultation document and the SA on I&O document presented housing growth options based on the application of different densities and types of homes. The description of the options in the SA on I&O was illustrated with broad assumptions of the ‘yield’ of homes for the different options. These figures are no longer relevant, as there is now more reliable data based on the EBC Assessment of Residential Density, and the Land Availability Assessment 2022 (LAA)⁸. The table below summarises the 5 growth options which were appraised in the SA on I&O.

⁷ NPPF, para 11d

⁸ <https://www.lewes-eastbourne.gov.uk/planning-policy/strategic-housing-and-economic-land-availability-assessment/>

Table 5: Growth Options in the SA on I&O

Option	Details
1	Providing for the housing need calculated by the standard method.
2	Tall residential buildings in the Town Centre (Option D in I&O consultation document)
3	This option stands for increased density, with higher densities in town centre. This will imply more flats. Here options C, E and F of the I&O document are taken together as they do not seem to be significant distinctive. <ul style="list-style-type: none"> - C: increasing the proportion of flats - E: increased density on all new development sites - F: increased density on all new development sites > 0.5 hec.
4	According to prevailing densities within the area surrounding the site. This is Option A in the I&O consultation document.
5	Increasing the proportion of <u>houses</u> being delivered. This is the lowest growth rate. In the I&O consultation document it is Option B. Comparable to the average delivery in the last 10 years ⁹ .

The NPPF requires that local planning authorities promote a sustainable pattern of development that seeks to meet their full objectively assessed housing need as far as is consistent with other policies in the Framework. The most up-to-date assessment of objectively assessed housing need (based on the standard method as set out in national planning guidance and the 2014 household projections published in September 2016) is 14,760 dwellings over the Plan period (2019 to 2039) which equates to 738 per annum. Compared to the target mentioned in the Core Strategy (240) or the average delivery of housing over the last 10 years (191) this signifies a significant increase of development.

In Eastbourne, the physical, environmental, and geographical constraints limit the amount of land available to develop. The town is surrounded by the protected downland of the South Downs National Park to the west, the English Channel to the south, and the boundary with Wealden to the north and the east. Much of the land through the centre of the town in Eastbourne Park, and also to the east of the town in the Mountney Levels, has a high risk of flooding. The limited amount of land available means it is merely not possible to meet all the towns development needs.

Other option scoped out:

Meeting the Local Housing Need in full (option 1 / SA on I&O)

Various constraints limit the amount of land available to develop. If it were proposed to meet the full objectively assessed housing need, the functional floodplain would have to be included (which is contrary to national policy), and densities and height of building would increase significantly which would deteriorate the character of the town with possible impact on well-being of the residents, and or development of tourism.

⁹ EBC Authority Monitoring Report 2020, page 17

The townscape and landscape would be affected negatively as well. Possibly even employment land would have to be developed for residential uses as well, which would result in an unsustainable balance between residential and employment development. This option is considered not reasonable.

Compared to the rate of development of the last 10 year (191) it is also considered unrealistic to plan for such an increase.

In line with the NPPF, the Council has sought to plan positively to establish whether housing delivery could be increased significantly to help close the gap between the level of identified need and recent levels of housing delivery. It is therefore acknowledged that the definition of growth options should accept that “no stone must be left unturned” to achieve this.

More options scoped out:

Prolongation of growth rate (option 5/ SA on I&O)

Prolongating the current growth rate is not considered a positive approach to getting to the level of the identified need. It is not a realistic option.

Prevailing densities (option 4 / SA on I&O)

When prevailing densities will be respected it doesn't demonstrate that no stone will be left unturned.

There are few options for growth: all available land must be utilised, and densities should be maximised in a context of sustainable development. The options as they were presented in the Issues and Options consultation document and assessed in the SA on I&O are therefore no longer helpful distinctive options; they were not considered mutually exclusive and could be combined. To maximise growth, the growth strategy should include:

- Allocating tall buildings in the Town Centre and
- Flats in sustainable locations / increase on the prevailing density– defined by accessibility to services and facilities

The Council undertook the Land Availability Assessment (LAA) to estimate the capacity of growth. The LAA was used to determine the land available for housing development and no stone was left unturned to include sites for assessment.

The LAA is a technical assessment of the amount of land that is available and suitable to meet the Borough's needs. The purpose of the LAA is to identify sites with potential for development, estimate the amount of development that they can provide, and assess whether this land is suitable, available and deliverable. The LAA is considered to provide key evidence of land availability and provide justification for whether the local plan can meet the local housing needs. The LAA is prepared according to requirements set in Planning Policy Guidance on Housing and economic land availability assessment. According to the Planning

Policy Guidance a LAA methodology was prepared and the criteria to exclude land for assessment were set out as:

- Sites within the functional Flood plain:

Sites that are partly within Flood Zone 3b (functional flood plain) will be carried forward for more detailed assessment in Stage 2. Sites falling partly or entirely within Tidal Flood Zone 3a are also included in the assessment at Stage 2 as these areas are protected by flood defences that would be maintained throughout the Local Plan period. These sites would need to be subject to an 'exception test' as part of the local plan process.

- Sites within the following designations are excluded:

Statutory designated sites (SSSI, SAC, SPA, Ramsar sites, Scheduled Ancient Monuments, Historic Battlefields, Registered Park & Garden, NNR and Ancient Woodland). Where only part of a site falls within such designations, a judgement will be made whether to include the site and/or whether to reduce the developable area.

- Field in Trust QEII Status:

There are a number of sites in Eastbourne that have been given Fields in Trust QEII status, which provides a legal agreement between Fields in Trust and the landowner that the site will be used as green space and protected from development in perpetuity. These sites are therefore not legally available for development and are excluded from further assessment.

- Sites on area within the South Downs National Park Planning Authority

Based on the LAA the housing capacity of Eastbourne is estimated at 6,401 new homes which is equivalent to an average of 320 homes per year. This includes dwellings that are already committed (permitted but yet to be completed, on 1st April 2022), and a windfall allowance.

The LAA demonstrates that there are no other alternative sustainable developable sites that could be allocated within the Plan period. The LAA includes sites that were proactively identified by Officers, and sites submitted by Landowners or Site promoters over a number of 'call for sites' exercises. All potential sites have been positively tested and clear justification is given as to why some of these are or are not suitable for development.

3.2 Exploration strategy options: alternatives to key elements of the strategy

The growth strategy as set out in the "Local Plan Growth Strategy" is based on the housing delivery estimated by the LAA. It consists of making the most efficient use of the limited amount of land available by considering increased site capacity by tall buildings in the Town Centre and maximising density in other sustainable locations and balancing housing development with:

- Development of employment opportunities (according to LAA and Eastbourne and Wealden Economic Study);
- Avoidance of development within areas at the highest risk of flooding (SFRA, Level 1);
- Protecting and enhancing the borough’s high-quality environments and open spaces within and around the town;
- Increasing the number of homes within walking distance of services and facilities; and
- Ensuring that infrastructure can meet future demands from growth.

In the growth strategy it is perceived that the balance will be struck by weighing all elements when reviewing and planning for each housing development site. To explore how growth could be pushed to the maximum an explorative option with an unfavourable balance was carried out where residential dwellings may be developed over employment development. This assessment is set out in the next section/below.

3.3 Results

Explorative option: ‘less employment land’: Employment land could be used instead for housing, possibly with more space for amenity. However, not all sites identified in the Local Plan Growth Strategy can be taken into account in this option, e.g. Sovereign Harbour site 6 is already allocated and has consent for employment development. Information on viability of this alternative is not available and the assessment has therefore an explorative character.

Table 6: assessment explorative option

SA OBJECTIVES		Balance residential and employment land	Less employment land	Comments
		1	2	
1	GREENHOUSE GAS	?	?	Locations in the Town Centre are considered sustainable as modal shift can be achieved. The other locations are not on such sustainable locations. It is to be

SA OBJECTIVES		Balance residential and employment land	Less employment land	Comments
		1	2	
				expected that housing development on these sites will impact on traffic and increased greenhouse gas emission as they are not close to public transport hubs.
2	FLOOD RISK / WATER AVAIL	?	?	There is no differentiation in risk of flooding for residential development or employment land development. However, for businesses the risk may be easier to mitigate, or easier to show that the development would be safe for its lifetime as required in the exception test.
3	POLLUTION	?	?	Some industrial development may cause noise pollution. Increased traffic in locations where modal shift will be difficult to achieve may affect air quality, for both residential and industrial development. At this stage the impact of those effects is difficult to estimate.

SA OBJECTIVES		Balance residential and employment land	Less employment land	Comments
		1	2	
4	BIODIVERSITY / GREEN INFRA	?	?	There is no information to assess the effect of residential development instead of business development in this aspect. It is to expect that there is more green area in residential development with more opportunity for connectivity of species, but an office or business development may cater for green infrastructure as well.
5	LANDSCAPE / TOWNSCAPE	?	+	Any development on greenfield sites will affect landscape and townscape. Here we scored the <u>relative</u> effect for both options. It is to expect that the impact of residential development on the townscape (or the landscape) is more favourable than impact of industrial or office development. However, careful designed business space may level up the appearance of a residential development as well.
6	WASTE	?	?	It is to expect that for both types of development demolition will be needed, causing waste.
7	HOUSING	+	++	Housing on employment land obviously will increase housing capacity. The sites

SA OBJECTIVES		Balance residential and employment land	Less employment land	Comments
		1	2	
				might also permit a favourable housing mix given they are generally larger sites
8	INFRASTRUCTURE	?	?	It's not known how access to infrastructure might vary between the two uses?
9	RESILIENT COMMUNITIES	+	--	The effect for the option 2 is scored negative because the lost employment space potentially will affect employment opportunities and impact on deprivation. Another negative effect is that most sites designated for employment are on land less favourable for residents: further away from amenities, or public transport. Some employment land sites are relatively isolated and connecting to other residential areas might require investment.
10	EMPLOYMENT / BUSINESS GROWTH	+	--	The development needs for economic development are identified in the Eastbourne and Wealden Economic Study. Not planning for these needs will affect negatively on employment and business growth. Start-ups will have less opportunity; existing businesses cannot expand.
11	LEISURE AND TOURISM	0	-	Lack of employment space potentially will affect the leisure and tourism industry, due to decreased space for supply or service businesses.
12	TRANSPORT AND TRAVEL	?	-	There will be a negative effect on sustainable transport. The regained sites for housing are further away from

SA OBJECTIVES		Balance residential and employment land	Less employment land	Comments
		1	2	
				transport hubs, the need to travel further to work will increase as well if employment options are reduced.

Comments:

There are many unknowns when assessing these options as for the most SA objectives the appraisal depends on each site and on detail of the development.

However, on the SA objectives 9 (Resilient Communities) and 10 (Employment) the impact of the different options is evident and strong.

Whilst the high levels of housing needs have to be taken into consideration, this should not override the need to ensure that the town also provides the right balance of other uses (particularly for jobs, homes and community facilities).

4. SA of the Key Development Sites

4.1 Introduction

The Local Plan Growth Strategy consists of making the most efficient use of the limited amount of land available and balancing housing development with:

- Development of employment opportunities (according to LAA and Eastbourne and Wealden Economic Study);
- Avoidance of development within areas at risk of flooding (SFRA, Level 1);
- Protecting and enhancing the borough's high-quality environments and open spaces within and around the town;
- Increasing the number of homes within walking distance of services and facilities; and,
- Ensuring that infrastructure can meet future demands from growth.

The LAA identifies 197 sites that could deliver homes and employment space.

The Growth Strategy identifies 'Key Development Sites' which are large sites in an Eastbourne Context. These sites are generally those potentially capable of accommodating more than 25 homes and/or 3000sqm of commercial floorspace. The Key Development sites include those sites with extant planning permission at 1st April 2022 to give a complete picture of where development is expected to take place over the plan period.

4.2 Method

All key development sites are assessed according to the methodology set out in section 2.2.

The sites are grouped by area. There are sustainability impacts that may apply to sites in comparable circumstances and grouping sites helps to increase consistency in assessments. Additionally, it enables a transparent assessment of cumulative effects. The final column of the matrix is designated for this cumulative assessment.

Sites in the Town Centre:

- Land adjacent to Enterprise Centre and Railway Station
- Junction Road Car Park
- Former Debenhams
- Former TH Hughes
- Former Law Courts
- Former Police Station
- 56 Langney Road

Sites in Roselands and Upperton:

- Bedfordwell Road Depot

- Land at Tutt's Barn Lane
- 2-4 Moy Avenue
- ESK Courtlands Road
- Dairy Crest, Waterworks Road.

Sites in Meads:

- University of Brighton Sites (Welkin / Hillbrow / Aldro and Queenswood sites)
- Former Moira House School
- New Field

East of the Town (Mountney Levels):

- Land off Pevensey Bay Road
- Land at East Langney Levels
- Sovereign Harbour Sites 6 and 7a

Eastbourne Park:

- Land at Tutt's Barn Lane
- Land in Southbourne
- Land NE St Anthony's Hill

4.3 General assumptions

It should be noted that it does not necessarily follow that the sites with the most favourable SA score should be allocated for development, as there are other factors which must be considered. Caution is also given in respect of simply adding up respective scores, as they must be understood in the context of the site under consideration, as well as the overall strategy.

At this stage of the plan-making the level of detail of the assessment is limited due to the fact that much of the evidence base is still underway. There are question marks where there are unknowns or further information is required. At this stage of the plan-making the SA serves to appraise the general sustainability of the growth strategy and flags up where sustainability issues may arise and where mitigation might be required.

4.4 Results

Sites in the centre of the town

The assessment of the sites in the Town Centre are presented in table 5. The comments are set out after the table including the comments on the cumulative assessment.

Table 7: Assessment of sites in the centre of the town

SA OBJECTIVES		Land adj Enterprise Centre and Railway INCL. EMPLOYMENT	Junction Road Car Park	Former Debenhams INCL. EMPLOYMENT	Former T J Hughes site, Terminus Road	Former Law Courts, old Orchard Road	Former Police Station, Grove Road	56 Langney Road	Cumulative
		1	2	3	4	5	6	7	
1	GREENHOUSE GAS	+	+	+	+	+	+	+	
2	FLOOD RISK / WATER AVAIL	0	-	0	0	0	0	0	?
3	ENVIRONMENT	?	0	0	0	0	0	?	?
4	BIODIVERSITY / GREEN INFRA	+	+	+	+	+	+	+	+?
5	LANDSCAPE / TOWNSCAPE	-	-	-	-	-	-	-	?
6	WASTE	-	-	-	-	0	-	+	
7	HOUSING	++	++	++	++	++	++	++	
8	INFRASTRUCTURE	++	++	++	++	++	++	++	
9	RESILIENT COMMUNITIES	?	?	?	?	?	?	?	
10	EMPLOYMENT / BUSINESS GROWTH	++	+	++	+	+	+	+	+
11	LEISURE AND TOURISM	+	+	+	+	+	+	+	+
12	TRANSPORT AND TRAVEL	++	++	++	++	++	++	++	+

The numbers of the sites correspond to the site-numbers on the map in the consultation document, page 11.

Comments:

SA Objective 1- Greenhouse Gas

The sites in the town centre all score positively on reduction of greenhouse gas, this is due to their location close to public transport options. At this stage it is not clear how these sites will perform in terms of energy reduction and use of renewable energy given there are no detailed proposals.

SA Objective 2 – Flood Risk

The flood risk in the town centre is neutral being in flood zone 1. At Junction Road there is risk of surface water flooding and potential for ground water flooding to occur. It is recommended that surface water flooding be considered on all sites.

SA Objective 3 – Environment

There is potential presence of contaminated soils on sites 1 and 7, so it is recommended that this is investigated.

SA Objective 4 – Biodiversity / GI

All sites are brownfield sites and therefore score positively on this SA objective.

SA Objective 5 - Landscape

The negative assessment of impact on townscape is due to the proximity of listed buildings and / or conservation areas. It is assumed that the potential risk of tall buildings is greater. Requiring appropriate design may mitigate the effect.

SA Objective 6 – Waste

When the preparation of the site requires demolition there is a negative score for waste (sites 2 and 3), where derelict buildings are being reused (site 7) this is assessed positively. On site 5 demolition already took place.

SA Objective 9 – Resilient communities

The town centre is assessed as a sustainable location in terms of proximity of public transport, facilities & services, and offer of leisure provision. However, there is not enough information to assess the impact on the communities at this stage. All the Town Centre sites are within walking distance of green space (800m), though not all are within walking distance of children's play space. There is a potential benefit of active transport modes and leisure provision. The sites will potentially provide for mixed housing need, also for people with protected characteristics, but the viability should be investigated.

SA Objective 10 – Employment, and 11 – Tourism / Leisure

The increase of population in the town centre will increase vitality of the town centre and support viability of leisure provision. Two sites provide employment space (retail) and therefore score double positive on employment. It is assessed positive that the employment areas in the neighbourhood can contract employees from nearby.

SA Objective 12 - Transport

As stated above. Additionally, the development of retail space (at site 1 and 3) benefits from the sustainable transport location.

Cumulative assessment:

In the cumulative assessment the effects of realisation of all development are assessed. In general development proposed in the Town Centre is largely sustainable considering the scores. Where a cumulative effect of combined developments is expected this is scored (above, in the last column) and commented below.

SA Objective 2 (Flood Risk).

There is possibly an issue with the capacity of the sewage network which must be investigated with the provider.

SA Objective 3 (Environment).

Although each individual development will not have significant impact on air quality, the combination of all development and possible consequential increased traffic circulation may give rise to air quality issues. This effect will be minimal if the developments promote modal shift and/or are car free development as most of the residents would not depend on private cars.

SA Objective 4 (Biodiversity).

The cumulative effect of all the brown field developments is positive; however, the density of the built-up area may impact negatively on biodiversity and green infrastructure. This should be monitored.

SA Objective 5 (Townscape)

Considering the scores the main issue seems to be the Town Centre and Seafront Conservation Area and the many listed buildings in the area. High-quality design will be required to integrate the new development into the existing townscape. In the cumulative assessment on the townscape impact, development of all the sites together might generate a less negative effect with the reasoning that one isolated new high-quality design building might look incongruous, whereas in combination with other developments it can contribute to a new balance in the townscape.

SA Objective 10 (Employment)

The cumulative effect of redevelopment of retail area will contribute to vitalisation of the town centre.

SA Objective 11 (Leisure and Tourism)

The cumulative effect of increased population in the town centre will also contribute to the vitalisation and attractiveness of the town centre. It will also improve viability of the provision of all sorts of leisure offer.

SA Objective 12 (Transport and Travel)

The concentration of dwellings near a public transport hub will contribute to the viability of the offer of public transport.

[Sites in Roselands and Upperton](#)

The assessment of the sites in Roselands and Upperton are presented in T

able 6. The comments are set out after the table including the comments on the cumulative assessment.

Table 8: Assessment of the sites in Roselands and Upperton

		Bedfordwell Road Depot	Land at Tutts Barn Lane	2-4 Moy Avenue	ESK, Courtlands Road	Dairy Crest, Waterworks Road	Cumulative
SA OBJECTIVES		8	9	12	13	14	
1	GREENHOUSE GAS	+	-	-	-	-	
2	FLOOD RISK / WATER AVAIL	-	--	-	--	-	--
3	ENVIRONMENT	?	?	?	?	?	
4	BIODIVERSITY / GREEN INFRA	+	--	+	+	+	?
5	LANDSCAPE / TOWNSCAPE	0	-	+	0	0	+?
6	WASTE	0	0	+	-	-	
7	HOUSING	++	++	++	++	++	+
8	INFRASTRUCTURE	+	-	+	+	+	?
9	RESILIENT COMMUNITIES	?	?	+	?	?	
10	EMPLOYMENT / BUSINESS GROWTH	0	0	0	-	-	
11	LEISURE AND TOURISM	0	0	0	0	0	
12	TRANSPORT AND TRAVEL	+	-	-	-	-	--

The numbers of the sites correspond to the site-numbers on the map in the consultation document, page 11.

Comments:

SA Objective 1 – Greenhouse Gas

In most cases the scores on reduction of greenhouse gas are negative because the location is further away from public transport hubs and potentially modal shift is more difficult to realise. Sites 12, 13 and 14 are all outside of walking distance (1.6km) of the train station, with limited bus service in the vicinity (1 route). Only site 8 scores positive in this aspect, because key destinations (town centre, primary and secondary schools, GP surgery) are at a walkable distance. At this stage it is not clear how the sites will perform in energy reduction and use of renewable energy, which may influence the scores.

SA Objective 2 – Flood Risk

There is a significant flood risk to these sites and all sites score negatively. Sites 8 and 14 are partially within Flood Zones, 1, 2 and 3a, sites 9 and 12 are partially within Flood Zones 2 and 3a, whilst Site 13 is within Flood Zone 3a and 3c. On all the sites there is also potential risk of surface water flooding.

Flood zone 3c is defined in the SFRA as areas at very high risk of river flooding within the existing built-up area that can be considered as developed rather than functional floodplain. It is required to undertake a Level 2 SFRA which will further inform these potential risks and recommend mitigation measures to enable the application of the Sequential and Exception Test.

SA Objective 3 - Environment

There is no information to assess potential risk on the environment. There is potential noise pollution during the construction phase, noise pollution of traffic should be investigated further. Near the railway (Site 9) and at Site 14 there is the possibility of contaminated soils, this should be investigated further.

SA Objective 4 – Biodiversity / GI

The sites that involve brownfield development (Sites 8, 12, 13, 14) are assessed positively, on the contrary site 9 is mostly on greenfield land and involves Eastbourne Park LWS and Eastbourne Marshes Biodiversity Opportunity Area with Habitat of Principal Importance therefore this site is assessed negatively.

SA Objective 5 – Landscape / townscape

The development on greenfield land in Eastbourne Park (Site 9) has a potential negative effect on the landscape (SA Objective 5), which should be mitigated. The site on Moy Avenue (Site 12), involves the development of an unattractive site with derelict buildings; new development potentially will have a positive impact on the townscape in the area.

SA Objective 6 - Waste

On sites 8 and 12 the main building will be re-used which is scored positively on recycling, on site 8 this neutralises the demolition impact. On sites 13 and 14 potentially demolition will take place which will have a negative impact on waste reduction.

SA Objective 8 - Infrastructure

Apart from the site on Tutts Barn Lane (Site 9) with only a school at walking distance, all sites have potentially a satisfactory level of supply of facilities, services, and utilities: schools are at nearby distances, there are some services and there is a limited bus service (1 route). The constraint is the accessibility of walking routes.

SA Objective 9 – Resilient communities

The effect on the communities depends on the mix and design of the development. Circumstances for promotion of an active lifestyle are present, accessibility is the constraint. Although the sites are close to Eastbourne Park, especially Site 9, there is no public access

to the park. The nearest green space is on Hartfield road, which includes children's play space, this is just within walking distance (800m) of sites 8 and 14, however not easy to reach given the crossing of multiple roads, without dedicated crossings. Sites 12 and 13 are just within walking distance (800m) of Roselands Recreation and Playground. On Sites 12 and 13 there is potential to deliver a mix of housing. On Site 12 there is planned for a small amenity space, and the redevelopment of the disused area will potentially decrease crime attraction, therefore on this site the impact on is appraised positively.

SA Objective 10 - Employment

The negative scores of Sites 13 and 14 are due to the loss of employment land.

SA Objective 12 - Transport

Due to the accessibility of the sites the potential achievement of modal shift is assessed negatively. Whilst all sites are within walking distance (1.6km) of Eastbourne train station, the walk crosses several busy roads without pedestrian crossings making walking unattractive. Sites 12, 13 and 14 are close to the Horsey Sewer cycle path which links with National Cycle Network Route 21.

Cumulative assessment:

In the cumulative assessment the effects of realisation of all development are assessed. In general development proposed on the sites in Roselands and Upperton may encounter difficulties in realising a modal shift. Where a cumulative effect of combined developments is expected this is scored (above, in the last column) and commented below. Where it is considered that the combination of development doesn't have an extra effect there are no scores registered.

SA Objective 2 (Flood risk)

Developing on land in flood zone 3a may push the flood risk elsewhere. Site 13 falls partially into Flood Zone 3c and this may add to the need for compensation of flood capacity elsewhere. The flood risk of the sites needs to be assessed in SFRA Level 2 to enable to application of the sequential and exceptions tests.

SA Objective 4 (Biodiversity)

It is assessed that there may be potentially a loss of biodiversity. This may occur because all development sites are in proximity and development may affect the connection or habitat of species living on the derelict sites. This should be investigated.

SA Objective 5 (Housing)

The potential to achieve a mix of housing between the different sites in the neighbourhood is assessed positively.

SA Objective 6 (Infrastructure)

The cumulative number of dwellings on Sites 12, 13 and 14 may give rise to capacity issues of GPs and schools in the area. This will be investigated with infrastructure delivery partners.

SA Objective 12 (Transport)

The assessment of the sites flags up the difficulty to achieve a modal shift. Therefore, the cumulative assessment considers the increased traffic flow which will affect negatively on the highway network specifically in areas at or near capacity such as the Bedfordwell Road/Lewes Road junction and Seaside junctions/ roundabouts.

Sites in Meads

The assessment of the sites in Meads are presented in table 7. The comments are set out after the table including the comments on the cumulative assessment.

Table 9: Assessment of the sites in Meads:

SA OBJECTIVES		University of Brighton Welkin Site, Carlisle Road	University of Brighton Hillbrow Site, Denton Road	University of Brighton Aldro and Queenswood	Former Moira House School, Upper Carlisle Rd	New Field, Upper Carlisle Road	Cumulative
		26	27	28	23	25	
1	GREENHOUSE GAS	-	-	-	-	-	
2	FLOOD RISK / WATER AVAIL	0	0	0	0	-	
3	ENVIRONMENT	0	0	0	0	0	
4	BIODIVERSITY / GREEN INFRA	-	+	+	-	-	
5	LANDSCAPE / TOWNSCAPE	-	0	+	-	-	
6	WASTE	0	?	?	0	0	
7	HOUSING	++	+	++	++	+	+?
8	INFRASTRUCTURE	-	+	+	-	-	
9	RESILIENT COMMUNITIES	?	?	?	?	?	
10	EMPLOYMENT / BUSINESS GROWTH	+	0	0	0	0	
11	LEISURE AND TOURISM	0	+	0	0	0	
12	TRANSPORT AND TRAVEL	-	-	-	-	-	

The numbers of the sites correspond to the site-numbers on the map in the consultation document, page 11.

Comments:

SA Objective 1 – Greenhouse Gas

In all cases the scores on reduction of greenhouse gas are negative because the location is further away from public transport hubs and potentially modal shift is more difficult to realise. At this stage it is not clear how these sites will perform in energy reduction and use of renewable energy, which may influence the scores.

SA Objective 2 – Flood Risk

On site 25 there is a risk of surface water flooding which requires a further assessment through SFRA Level 2. On the other sites in Meads the potential flood risk is low although it is recommended to manage surface water on all sites.

SA Objective 4 – Biodiversity / GI

Sites 23 and 25 are located on grass playing fields with trees at the boundary which results in a negative effect on biodiversity and GI. Site 26 has a substantial number of protected trees spread over the site. The sites involving redevelopment (27 and 28) are assessed positively because of the use of previously developed land.

SA Objective 5 – Landscape / townscape

All sites are within the Meads Conservation Area, some sites are adjacent to listed buildings or contain listed buildings, Sites 26, 23 and 25 potentially risk deteriorating the townscape which should be mitigated. At this stage it is unknown what buildings would be retained/repurposed and therefore what the actual impact on the townscape would be, as some impacts may be mitigated through good design. Site 26 adjoins the South Downs National Park albeit due to the topography and the trees forming the boundary the site is limited in visibility from the SDNP, repurposing of existing buildings would likely have a neutral impact on the setting of the SDNP, any impact from redevelopment could be mitigated through careful design. On site 28 the majority of the current buildings do not add to the character of the Conservation Area, redevelopment of these buildings might improve this.

SA Objective 6 - Waste

This involves the appraisal of potential demolition waste. On Sites 23 and 25 there will be little or no demolition, whereas on sites 27 and 28 the residential development might include conversion of some existing buildings which should be promoted.

SA Objective 8 - Infrastructure

There is relatively poor public transport provision in the vicinity of the site. The nearest District Shopping Centre with services is on Mead Street which is within walking distance (800m) of Sites 26, 27, and 28 but this has a limited offer; the other sites are further away from services. The Hillbrow site is scored positively because of the to be retained sports facilities.

SA Objective 9 – Resilient communities

The effect on the community depends on the type of development. There is access to outdoor space with the South Downs National Park close-by. Promotion of active travel is

difficult because of the unsatisfactory public transport links and the hills in the area which for many makes cycling unattractive. The development will not benefit a deprived area because Meads is the more affluent neighbourhood. Site 25 is an outdoor playing space; however, the site is not publicly accessible. The Hillbrow site (27) may retain the existing sports and playing pitches. An Open Space Assessment should be undertaken to assess provision of playing space.

SA Objective 10 - Employment

The effect on Employment and Business Growth is assessed positively in the case of Site 26 (New Field) as the development may help funding of improved education facilities of Eastbourne College which will help to improve access to education.

SA Objective 12 - Transport

Due to the difficult accessibility of the sites the potential achievement of modal shift is assessed negatively. Provision of public transport is poor and key destinations are relatively further away.

Cumulative assessment:

In the cumulative assessment the effects of realisation of all development are assessed. Where a cumulative effect of combined developments is expected this is scored but where it is considered that the combination of development doesn't have an extra effect there are no scores registered. In general, there are no cumulative effects expected from the combined developments. Reasons for this are that the housing number planned for are not significant so that air quality issues or increased pressure on infrastructure provision is not to be expected. The impact on traffic is not expected to be greater than the impact the University had. The sites are not in close proximity of each other so that the impact on the townscape of the individual sites will not result in a cumulative effect. Careful design will assist with mitigating any impact on townscape and the Conservation Area.

However, there is a potential to achieve a mix of housing between the different sites in the area which might be assessed positively. At this stage there is no information about this.

Sites in the East of the town (Mountney Levels)

The assessment of the sites in the East of the town / Mountney Levels are presented in Table 8. The comments are set out after the table including the comments on the cumulative assessment.

Table 10: Assessment of the sites in the East of the town / Mountney Levels

		Land off Pevensey Bay Road	Land at East Langney Levels	Sovereign Harbour Site 6 EMPLOYMENT	Sovereign Harbour Site 7a	Cumulative
SA OBJECTIVES		17	18	21	22	
1	GREENHOUSE GAS	-	-	-	-	
2	FLOOD RISK / WATER AVAIL	--	--	-	-	--
3	ENVIRONMENT	0	0	-	-	
4	BIODIVERSITY / GREEN INFRA	--	--	?	?	-- - ?
5	LANDSCAPE / TOWNSCAPE	-	--	+	+	?
6	WASTE	0	0	0	0	
7	HOUSING	++	++	0	++	
8	INFRASTRUCTURE	0	0	0	0	?
9	RESILIENT COMMUNITIES	0	0	0	+	
10	EMPLOYMENT / BUSINESS GROWTH	0	0	++	+	
11	LEISURE AND TOURISM	0	0	0	0	
12	TRANSPORT AND TRAVEL	--	-	--	--	--

The numbers of the sites correspond to the site-numbers on the map in the consultation document, page 11.

Comments:

SA Objective 1- Greenhouse Gas

In all cases the scores on reduction of greenhouse gas are negative because the location is further away from public transport hubs and potentially modal shift is more difficult to realise. At this stage it is not clear how these sites will perform in energy reduction and use of renewable energy, which may influence the scores.

SA Objective 2 – Flood risk

All sites are located within flood zone 3a and will require a Level 2 SFRA assessment which will inform the Sequential and Exception Test. The sites are also at risk of surface water flooding. Pockets of Sites 17 and 18 are within Flood Zone 3b (Functional Floodplain). Flooding mitigation is expected to limit development, this will be confirmed through the SFRA Level 2. The Langney Sewer runs through the middle of Site 17. On Sites 21 and 22

(Sovereign Harbour Sites 6 and 7a) there is a risk of tidal flooding, however, the level of defence for this risk is greater.

SA Objective 3 - Environment

On Sites 21 and 22 there is potentially contaminated soil, there is a capped landfill site to the south of site 21. Impact of traffic noise from the near A259/ Pevensey Bay Road should be investigated.

SA objective 4 - Biodiversity

The assessment of sites 17 and 18 is negative. Both sites are on greenfield land classified as coastal floodplain grazing marsh (a Habitat of Principal Importance) and there are records of protected and notable species, part of the sites are within a Local Wildlife Site. The Langney Sewer on Site 17 is an important habitat corridor for biodiversity.

The impact on biodiversity on the sites in Sovereign Harbour (Sites 21 and 22) requires more investigation. There is potential for protected species (newts) and there are protected trees along the boundary with Pevensey Bay Road.

SA Objective 5 – Landscape/townscape

Both greenfield sites (17 and 18) will negatively affect the landscape, the impact caused by Site 17 is assessed less as this site is in a corner adjacent the built-up area. The other two Sites (21 and 22) are shingle areas between existing residential properties and the A259 and development could improve the townscape.

SA Objective 8 – Infrastructure

All sites can benefit from the existing infrastructure provision at walkable distance although not all footpaths are very attractive.

SA Objective 9 – Resilient communities

On Site 22 a mix of housing can be realised, including housing for elderly persons. The employment development will support social inclusion and considers the need of people with protected characteristics.

SA Objective 10 - Employment

Site 21 is employment land where new office floorspace will be realised, which is scored positively.

SA Objective 12 – Transport

The sites are relatively further away from key destinations such as the Town Centre. Availability of public transport is relatively poor for Sites 17, 21 and 22. Site 18 is within walking distance of Pevensey and Westham train station, however the footpath does not continue on one side of the road, so it is not an attractive route for pedestrians. The potential

of reaching a modal shift on these developments is assessed negatively and should be mitigated.

Cumulative assessment:

In the cumulative assessment the effects of realisation of all development are assessed. In general development on the sites on the Eastern side of the town may encounter flood risk issues and difficulties in realising a modal shift. Where a cumulative effect of combined developments is expected this is scored (above, in the last column) and commented below. Where it is considered that the combination of development doesn't have an extra effect there are no scores registered.

SA Objective 2 (Flood Risk)

Developing sites that are on land in flood zone 3a may result in flood risk being pushed elsewhere and this is greater on a cumulative basis. Cumulatively this could increase mitigation measures and/or add to the need of potential compensation land for flood storage elsewhere.

SA Objective 4 (Biodiversity)

The cumulative effect of the development on sites 17 and 18 which are part of the Local Wildlife Site may increase the chance biodiversity will be endangered. With the same reasoning there is a potential for impact on the habitats on sites 21 and 22, it should be investigated how a corridor may mitigate this effect.

SA Objective 5 (Landscape)

Site 17 may create a new edge to the town with a well-defined boundary of the built-up area. In combination with the development on Site 18 mitigation will be required to soften the impacts on the landscape.

SA Objective 8 (Infrastructure)

Infrastructure provision (particularly schools and GPs) in the neighbourhood of the sites may come to the limit of capacity, it must therefore be investigated what will be the impact of the cumulative development, to plan for timely adjustments if necessary.

SA Objective 12 (Transport)

As it is assessed that there will be difficulty to achieve a modal shift it is appraised that the cumulative increase in traffic circulation will result in capacity problems on the highway network.

Sites in Eastbourne Park

The assessment of the sites in Eastbourne Park are presented in Table 9. The comments are set out after the table including the comments on the cumulative assessment.

Table 11: Assessment of the sites in Eastbourne Park

		Land at Tutts Barn Lane	Land at Southbourne INCL EMPLOYMENT	Land North East of St Anthony's Hill	Cumulative
SA OBJECTIVES		9	15	20	
1	GREENHOUSE GAS	-	-	-	
2	FLOOD RISK / WATER AVAIL	--	--	--	--
3	ENVIRONMENT	?	+	?	
4	BIODIVERSITY / GREEN INFRA	--	--	-	--
5	LANDSCAPE / TOWNSCAPE	-	-	-	
6	WASTE	0	0	0	
7	HOUSING	++	++	+	
8	INFRASTRUCTURE	-	-	-	
9	RESILIENT COMMUNITIES	?	-	?	
10	EMPLOYMENT / BUSINESS GROWTH	0	++	0	
11	LEISURE AND TOURISM	0	0	0	
12	TRANSPORT AND TRAVEL	-	--	-	--

The numbers of the sites correspond to the site-numbers on the map in the consultation document, page 11.

Comments:

For consideration in the cumulative assessment Site 9 (Land on Tutts Barn Lane) is shown in the above table. For comments on the assessment of this site see section on 'Sites in Roselands and Upperton'.

SA Objective 1 – Greenhouse Gas

The scores on reduction of greenhouse gas for Sites 15 and 20 are negative because the location is further away from public transport hubs and potentially modal shift is more difficult to realise. At this stage it is not clear how these sites will perform in energy reduction and use of renewable energy, which may influence the scores.

SA Objective 2 – Flood Risk

On Sites 15 and 20 there is a potential significant flood risk. The sites are within flood zone 3a and there are also some small pockets with a risk of surface water flooding, which will

require investigation. A SFRA Level 2 assessment will be required for the site to inform the Sequential and Exception Tests.

Parts of Site 15 are in Flood Zone 3b (functional floodplain) and a main river (Lottbridge Sewer) runs through the northern periphery of the site. A level 2 SFRA will further inform these potential risks and recommend mitigation measures.

SA Objective 3 – Environment

The SW part of Site 15 contains a former landfill site, so land remediation would be required to take place to enable any development, therefore the environment assessment scores positively. On both Sites (15 and 20) there is a potential risk of noise pollution caused by nearby traffic using Lottbridge Drove, this should be investigated further.

SA Objective 4 – Biodiversity /GI

All sites are located within the Eastbourne Park LWS and Eastbourne Marshes Biodiversity Opportunity Area. The sites are classified as coastal floodplain grazing marsh (a Habitat of Principal Importance) and there are records of protected and notable species.

SA Objective 5 – Landscape /townscape

The development on greenfield land in Eastbourne Park has a potential negative effect on the landscape, which should be mitigated.

SA Objective 9 – Resilient Communities, and SA Objective 8 - Infrastructure

On Site 20 the impact on the community is assessed negatively as there is no access to Eastbourne Park for outdoor activity and because of the relatively isolated location active travel will be complicated. Bus stops are available within walking distance, however only 1 route serves the area, however there is a cycle path in close proximity (Horseley Sewer cycle path). Another effect is that residents may have easy access to employment opportunities which is positive. However, well-being also may be affected negatively by the industrial site itself, it is recommended that a clear (traffic) buffer is realised. For Site 20 possibilities to promote active travel are better as the cycle path and public transport are nearby. There may be possibilities to realise a mix of housing, but there is no information on provision for more deprived people or people with protected characteristics.

SA Objective 12 - Transport

Site 20 has relatively good access to public transport and is adjacent to the National Cycle Network route 21, meaning good opportunities for modal shift. On the contrary Site 15 is at an isolated location where modal shift will be difficult to realise. The capacity of the highway network is limited at Seaside roundabout.

Cumulative assessment:

In the cumulative assessment the effects of realisation of all development are assessed. As the sites are not in close proximity there is no reason to expect a cumulative effect on the environment, pressure on the infrastructure, or townscape/landscape. Where a cumulative

effect of combined developments is expected this is scored (above, in the last column) and commented below. Where it is considered that the combination of development doesn't have an extra effect (on top of the individual effects) there are no scores registered.

SA objective 2 (Flood risk)

Developing all sites that are on land in flood zone 3a may result in increased risk of flooding elsewhere while the space for flooding is diminishing. This adds to the need of compensation for flood storage elsewhere.

SA objective 4 (Biodiversity)

There is a cumulative effect of impact on the Eastbourne Park LWS and Eastbourne Marshes Biodiversity Opportunity Area, because the smaller the LWS the more difficulty species encounter, also habitat connectivity might be further endangered. This must be investigated and mitigated.

SA objective 12 (Transport)

As it is assessed that there will be difficulty to achieve a modal shift it is appraised that the cumulative increase in traffic circulation will result in capacity problems on the highway network.

Other sites

The assessment of sites that are not taken up in any cumulative assessment are presented in table 10. The comments per site are set out after the table.

Table 12: Assessment of the other sites

		Fishermans Green	East Sussex College Site, Cross Levels Way	Former Gas Works, EMPLOYMENT	Summerdown Field, Compton Drive	Woods Cottages, Swanley Close
SA OBJECTIVES		10	11	16	24	19
1	GREENHOUSE GAS	-	+	-	-	-
2	FLOOD RISK / WATER AVAIL	-	-	-	0	0
3	ENVIRONMENT	?	-	+	0	0
4	BIODIVERSITY / GREEN INFRA	?	+	+	-	-
5	LANDSCAPE / TOWNSCAPE	0	0	+	-	-
6	WASTE	-	-	-	0	0

		Fishermans Green	East Sussex College Site, Cross Levels Way	Former Gas Works, EMPLOYMENT	Summerdown Field, Compton Drive	Woods Cottages, Swanley Close
SA OBJECTIVES		10	11	16	24	19
7	HOUSING	++	++	0	+	+
8	INFRASTRUCTURE	-	++	0	-	+
9	RESILIENT COMMUNITIES	-	++	+	-	-
10	EMPLOYMENT / BUSINESS GROWTH	-	+	+	0	0
11	LEISURE AND TOURISM	+	0	0	-	0
12	TRANSPORT AND TRAVEL	-	+	-	-	0

The numbers of the sites correspond to the site-numbers on the map in the consultation document, page 11.

Comments:

These sites are assessed separately and will not be part of a cumulative assessment.

Site 10 – Fisherman’s Green

SA objective 1 – Greenhouse Gas, SA objective 12 - Transport

The scores on reduction of greenhouse gas and impact on transport for this site are negative because the location is further away from public transport hubs and potentially modal shift is more difficult to realise. At this stage it is not clear how the site will perform in energy reduction and use of renewable energy, which may influence the scores.

SA objective 2 – Flood Risk

The site is situated on the seafront, given the proximity to the sea there is a potential the site may be required for coastal defences in the future.

SA objective 3 – Environment

The site may contain contaminated soil due to previous industrious use; the land might be required to be remediated to enable any development.

SA objective 4 – Biodiversity / GI

The impact on biodiversity needs to be investigated further, as there is vegetated shingle on part of the site.

SA objective 9 – Resilient Communities, and SA objective 8 - Infrastructure

The impact on the community is assessed negatively because part of the development will affect the tennis courts and amenity space on the site.

SA objective 10 – Employment

The negative impact on employment is due to the fact that some shops/businesses will have to be removed.

SA objective 11 – Tourism

The impact on Tourism is potentially positive, because with the redevelopment this part of the seafront will become more attractive, and the promenade will be extended.

Site 11 – East Sussex College site, Cross Levels Way

SA objectives 1 - Greenhouse Gas, and 12 - Transport

The site is close to the hospital, a cycle path and bus routes. Hampden Park train station is at a walkable distance. There is the potential for generation of renewable energy nearby.

SA objective 2 – Flood Risk

The site is in flood zone 1, but there is potential for surface water flooding (SA objective 2) this will need to be assessed in an SFRA level 2.

SA objective 3 - Environment

The site is close to two busy roads and air quality and noise pollution may affect the environment.

SA objective 4 – Biodiversity / GI

The site involves brownfield development. There is an opportunity to improve biodiversity and habitat connectivity.

SA objective 6 – Waste

Demolition potentially will incur waste.

SA objective 7 – Housing

The site potentially could provide for more than 200 dwellings and mixed development. There is the potential for provision of care apartments.

SA objective 8 – Infrastructure and SA objective 9 – Resilient communities

There is infrastructure provision is at walkable distance. Hampden Park, railway station and the park are nearby, as well as shops. The site could involve a mix of housing including housing for older people.

SA objective 10 – Employment

With the development of this site Sussex College aims to consolidate the education provision and improve the educational buildings. This will improve access to education and training for children and young people which will create a positive impact.

Site 16 – Former Gas Works, Finmere Road

SA objective 1 – Greenhouse Gas, and 12 – Transport

As the realisation of modal shift at this site may be difficult, traffic will increase while the capacity of the highway network in this area is poor. There is the potential connection to a cycle path, without this connection walking in the area is not very attractive as this is through an industrial estate without pavements. Although the distance is not too far, the site can be considered isolated given the poor connection to existing residential area. The assessment is negative as public transport connections are limited by poor walking conditions and there are also issues with capacity on the highway network in this area. Improving the walking routes is a suggested mitigation measure that may help to improve some of these negatives.

SA objective 2 – Flood Risk

The site is in flood zone 1, but there is potential for surface water flooding (SA objective 2). This will need to be considered in a level 2 SFRA assessment.

SA objective 3 - Environment

The remediation of the site would improve the environment of the site therefore this objective score positively.

SA objective 4 – Biodiversity / GI

The impact on biodiversity and GI is assessed positively because this is a brownfield site.

SA objective 5 – Landscape / townscape, and 6 - Waste

The development will improve the townscape in the area by removal of the large gas storage structures, although some might consider them attractive. However, demolition will take place and remediation will create waste.

SA objective 9 - Resilient Communities

The impact on the community is considered positive because the redevelopment will result in employment opportunities.

SA objective 10 – Employment

The impact on employment is assessed positively as employment development would bring the site back into use, creating new jobs.

Site 24 – Summerdown Field, Compton Drive

SA objective 1 – Greenhouse Gas

Site 19 scores negatively on reduction of greenhouse gas because the location is further away from public transport hubs and potentially modal shift is more difficult to realise. At this stage it is not clear how the site will perform in energy reduction and use of renewable energy, which may influence the scores.

SA objective 2 – Flood Risk

The site is at low risk of flooding although it is recommended to manage surface water.

SA objective 4 – Biodiversity / GI

Summerdown Field is a grass fields and tennis courts with trees at the boundary, this might result in a negative effect on biodiversity and GI. The site is adjacent to a nature improvement area and an environmentally sensitive area (South Downs National Park). There is potential to improve biodiversity by improving connectivity to the SDNP.

SA objective 5 – Landscape

The site is bounded by the South Downs National Park to the south and is therefore within the setting of the SDNP. This location would require a sensitive design and appropriate landscape buffers.

SA objective 7 – Housing, and 9 – Resilient communities

The site will deliver less than 50 dwellings, mostly larger houses in lower density to respect the character of the area. It is not expected that the development on the site will contribute to the support of deprived people or people with special needs. The site is on a location where access to green area is nearby, but active travel will be difficult to achieve.

The loss of the playing fields will need to be considered through the Open Space Assessment; however, it is noted that the site is solely for the use of the private school and is not open to the public. Its location adjacent to the South Downs National Park results in a negative score on landscape and needs to be mitigated with careful consideration of the setting of the SDNP.

SA objective 12 - Transport

Due to the difficult accessibility of the sites the potential achievement of modal shift is assessed negatively.

Site 19 – Wood's Cottages, Swanley Close

This site is currently subject to planning permission for the construction of 51 homes.

SA Objective 1 – Greenhouse Gas

The site is adjacent to Langney District Centre, where a number of bus routes are available, along with routes along Langney Rise. There are amenities available within walking

distance, however 82 car parking spaces are provided for 51 dwellings, which is unlikely to encourage a shift away from the private car. Therefore, the site score neutral for Objective 12.

No on-site renewable sources of energy generation are proposed in the scheme, nor is a heat network proposed, therefore the site scores negatively in respect of SA Objective 1.

SA Objective 4 – Biodiversity / GI

The impact on biodiversity is negative, as the site was cleared including removal of a number of trees and the lakes to facilitate development, this will reduce biodiversity. The attenuation pond may serve biodiversity.

SA objective 5 – Townscape / Landscape

The houses are not visible from the street, there is one point of access. The boundary of the development should be sensitively designed to mitigate a negative impact on the townscape.

SA objective 6 – Waste

When the preparation of the site requires demolition there is a negative score for waste, however demolition of buildings on the site took place some time ago so the score is neutral for this objective.

SA objective 8 - Infrastructure

Langney District Centre and a primary school are at walking distance. There is planned a small amenity space on the site however the majority of this is an attenuation pond. There is an adjacent open space at Langney Lake.

SA objective 9 – Resilient Communities

The redevelopment of the disused area will potentially decrease crime attraction, which is a positive for the community. The scheme provides only 2 and 3 bed market dwellings, not a mix of types of tenures and the insular layout design with a single point of access is unlikely to promote social inclusion. Therefore, the site scores negatively in respect of this objective.

5. Consultation

This document is published for public consultation alongside the Eastbourne Local Plan: Growth Strategy. The consultation is open for a 10-week period between Friday 11th November 2022 and Friday 20th January 2023. All consultation responses should be received by 5pm on the closing date.

The core of this document is: Section 3 (SA of the Growth Strategy), and Section 4 (SA of the Key Development Sites). We are specifically interested in comments on the assessments. There is no need to repeat comments on the Local Plan Growth Strategy itself.

Consultees are welcome to comment or provide input on any aspect of the content outlined in this report and are asked in particular, to consider the following questions:

1. Do you consider there are other alternative growth strategies (to the two presented in Table 6) that we should have explored? Please explain.
2. Do you have any comment on the assessment in Table 6?
3. Do you have comments on the assessments of the Key Development Sites as they are presented in Section 4? Please give clear reference to the site with name and number.

The consultation, supporting documents and evidence can be accessed through the Council's on-line consultation portal (www.lewes-eastbourne.gov.uk/eastbournelocalplan). If you do not have internet access, this document is also available to read as a paper copy at Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

The easiest way to comment on the SA is via our consultation website: www.lewes-eastbourne.gov.uk/eastbournelocalplan

In order that your representation can be accurately recorded, please state which section in the document that you are commenting on. All representations could be published on the council's website and anonymous submissions cannot be accepted.

Other ways to respond to the consultation:

- Emailing comments to localplan@lewes-eastbourne.gov.uk
- Writing to Eastbourne Borough Council at the following address:

Planning Policy Team
Eastbourne Borough Council
Town Hall
Eastbourne
BN21 4UG

If you have any questions or experience any difficulty in submitting your representations, please contact us, the Planning Policy Team, via email at LocalPlan@lewes-eastbourne.gov.uk or by telephone on 01323-410000 quoting 'Eastbourne Local Plan'.