

Non-Technical Summary

Sustainability Assessment on Issues and Options

I. Purpose of the Initial Sustainability Assessment

This document is the Non-Technical Summary of the Eastbourne Borough Local Plan Sustainability Appraisal on the Issues and Options as they were presented in the Issues and Options consultation document. It summarises how sustainability has been considered during the process of preparing the Local Plan for Eastbourne Borough. The most widely used definition of the concept of sustainability is: “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”.

The legal requirement to undertake a Sustainability Assessment is set out in the Planning and Compulsory Purchase Act 2004. In the National Planning Practice Guidance, it is further set out how the assessment should be prepared. There is also the requirement of a Strategic Environmental Assessment which is adopted into UK law by the Environmental Assessment of Plan or Programmes Regulations 2004.

In an earlier phase of the SA a Scope for the assessment was developed. This was done on the basis of a comprehensive review of policies and issues pertinent to the borough and it culminated in the formation of 12 sustainability objectives in a SA framework covering the environmental, social, and economic themes that are relevant for sustainable development.

Between the consultation of the Issues and Option Local Plan and the consultation on the Local Plan Growth Strategy a relatively long period passed. The Sustainability Report on Issues and Options (SA on I&O) links to the next step in the plan-making process. The SA on I&O is published together with the Local Plan Growth Strategy and the SA on the Local Plan Growth Strategy (SA Growth).

Abbreviations

Acronyms are avoided as much as possible, but to improve readability the following acronyms are used.

CIL	Community Investment Levy
EBC	Eastbourne Borough Council
LP	Local Plan
NPPF	National Planning Policy Framework
SA	Sustainability Assessment
SA on I&O	Sustainability Assessment on the Issues & Options (published in the Issues & Options consultation document in 2019).

SA Growth	Sustainability Assessment on the Local Plan Growth Strategy.
SEA	Strategic Environmental Assessment

2. The Eastbourne Local Plan

The Local Plan will set the levels of housing and economic development that should be provided over the period to 2039. It will set policies to ensure that development is of high quality and will meet the challenges the Borough faces with a changing climate.

The proposed vision for Eastbourne is set out in the Issues and Options consultation document and summarised in the box below.

Summary of the vision for Eastbourne

Eastbourne is visualised as the coastal town at the eastern gateway to the South Downs National Park.

- Growth is contributing towards carbon neutrality through green infrastructure provision, renewable energy generation and energy-efficient development
- embracing modal shift,
- with a predominantly car-free town centre with excellent connectivity by cycle, foot, and public transport to all of our communities.

The neighbourhoods are inclusive with community cohesion and

- varied housing mix,
- provide attractive places for larger families, smaller households, and first-time buyers.
- Residents have access to services and facilities, including health, recreation, shopping and community space.

A sense of greenness persists in the town

- due to the tree-lined streets,
- green spaces and
- the nature reserve at the heart of the Borough, which with its lakes also helps protect us from flooding.

There is a diverse range of employment and training with

- a hi-speed digital hub,
- infrastructure and workspace for existing employers and new business creation,
- alongside a high-quality service and retail offering, complimented by a café and restaurant culture and a vibrant night-time economy.

The town is particularly attractive to tourists,

- with more overnight stays than ever before due to the well-maintained built heritage, flagship conference facilities,
- international sports and high-quality events.

- Guests can stay in fashionable tourist accommodation and enjoy the award-winning beach that stretches from Sovereign Harbour to Holywell, taking in the historic Pier and stunning backdrop of the South Downs.

The preparation of the Local Plan is influenced by other plans and programmes. Particularly significant is the National Planning Policy Framework (NPPF), published in 2021. This includes a ‘presumption in favour of sustainable development’, and it will be for the Local Plan to guide what is considered sustainable in the context of Eastbourne.

Sustainability Assessment

Sustainability Assessment is a process which takes place alongside plan making, to assess the extent to which the emerging policies and proposals will help to achieve ‘sustainable development’. It also looks at the potential adverse effects and suggests how plans and policies can be improved. The figure below shows how the steps in the plan-making process are linked to the sustainability assessment.



Preparation of the SA Framework

The first stage of the Sustainability Assessment process has been to produce a SA Scoping Report. It provides the context for the assessment and identifies issues of particular importance to the borough.

Summary key concepts in the Scoping of the SA

The Scoping Process
What is the policy context?

Identifies the objectives and requirements of other plans policies and strategies ranging from national to local level that will influence development of the plan.

What is the situation now?

Existing characteristics of the Borough.

What will the situation be without the plan?

Considers what the Borough would be like if the Local Plan was not prepared.

What are the Key Sustainability Issues and Problems?

Identifies key sustainability issues for the Borough to be considered through plan making and the sustainability appraisal.

What are the Sustainability Objectives?

Using the sustainability issues identified above, establishes a framework for testing policies and proposals.

What indicators will be used to monitor significant effects?

Considers what issues should be monitored in future to establish the actual impacts of the new plan.

The outcome of the Scoping Stage is the Sustainability Assessment Framework. (SA Framework). The purpose of this framework is to create a consistent and robust basis for assessment of all elements during the preparation of the Local Plan. The Scoping of the Sustainability Appraisal was agreed with Historic England, the Environment Agency and Natural England, and the amended version was published again alongside the Issues and Options Local Plan consultation in 2019.

With the preparation of the SA on the I&O a review of the plans, policies, and strategies was carried out to update the SA Framework. In Section 2 of the SA on I&O a comprehensive list of new documents is set out. In this Non-Technical Summary some of these are flagged up to illustrate the magnitude of changes in the policy context.

Summary of a selection of newly published policy documents

Climate

A Climate Emergency had been declared by the Council, the Sea Level Rise Allowances were updated by the Environment Agency and a Strategic Flood Risk Assessment was carried out by Eastbourne Borough Council and Wealden District Council.

Design

The new version of the NPPF introduced Design requirements, Health Assessment for building, and the Biodiversity Net Gain requirements. The Environment Act was adopted publishing binding targets for Air Quality, waste management, water management. A National Design Guide was published.

Biodiversity

The Environment Act set out the new targets for Biodiversity Net Gain (BNG) and a Nature Recovery Network.

The Sussex Local Nature Partnership developed a Natural Capital Investment Strategy, and the East Sussex Environment Board published the Environment Strategy 2020.

Considering the update of the plans, policies and strategies the SA Framework was amended. The matrix below presents the SA Framework.

Table 1: The 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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.	<ul style="list-style-type: none"> • 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 biodiversity, and improve the access to nature.	<ul style="list-style-type: none"> • 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? • Does the approach contribute to the achievement of net gains for biodiversity? • Does the approach affect nationally important wildlife? • Will the approach impact on green infrastructure?

Objective	Questions to Consider
	<ul style="list-style-type: none"> 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. To make efficient use of land by developing brownfield area.</p>	<ul style="list-style-type: none"> Will the approach protect the character of the town and landscape and protect the key views? Will the approach contribute to the quality of the townscape? Does the approach have an impact on listed buildings and conservation areas? Does the approach have an impact on sites of archaeological interest? Does the approach have an impact on registered parks and gardens?
<p>6. WASTE To minimise waste generation and maximise recycling of waste.</p>	<ul style="list-style-type: none"> Will the approach reduce and minimise the generation of waste (household and Construction & Demolition)? Will appropriate recycling and storage facilities be provided? Will the approach increase recycling rates and use opportunities to manage waste?
SOCIAL	
<p>7. HOUSING To provide affordable, environmentally sound and good quality housing of types and sizes that meets the needs of the community.</p>	<ul style="list-style-type: none"> Does the approach help meet affordable housing needs? Does the approach meet the needs of all members of the community (ageing population, new families)? Does the approach encourage a mix of types and tenures to be achieved? Will the diversity of stock be improved? Does the approach lead to sustainably constructed homes
<p>8. INFRASTRUCTURE To ensure the appropriate provision of infrastructure to meet needs arising from new and existing development.</p>	<ul style="list-style-type: none"> 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. Is the infrastructure easily accessible? Does the approach improve access to a range of facilities? Will there be sufficient capacity of the highway and public transport network? Will there be sufficient capacity of utilities?
<p>9. RESILIENT COMMUNITIES To improve community health, safety and</p>	<ul style="list-style-type: none"> Will a sense of cultural identity, belonging and well-being be achieved? Does the approach support a healthy lifestyle and outdoor playing space? Does the approach optimise

Objective	Questions to Consider
<p>wellbeing and promote inclusive and vibrant communities.</p>	<p>access to the town's green infrastructure and to the countryside?</p> <ul style="list-style-type: none"> • Does the approach encourage active transport modes? • 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 borough? 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	
<p>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.</p>	<ul style="list-style-type: none"> • 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?
<p>11. LEISURE AND TOURISM To increase the number and spend of people visiting the town, and the town centre, for leisure and tourism purposes.</p>	<ul style="list-style-type: none"> • 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?
<p>12. TRAVEL AND TRANSPORT To provide a step-change in modal shift to sustainable forms of transport and reduce dependency on the private car.</p>	<ul style="list-style-type: none"> • 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?

3. Methodology for testing and indicators

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 SA will identify and consider reasonable alternatives that take into account the objectives and scope of the plan. 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 2: 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 SEA1 Regulations require an assessment of secondary, cumulative and synergistic effects. Collectively these effects 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. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the area too small to support the species at all. In Table 3 the characteristics of likely significance to be considered are set out.

Table 3: 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:

¹ Strategic Environmental Assessment

	<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.

Monitoring is a key mechanism to ensure that the implementation of the policies and proposals is consistent with the sustainable aspirations of the Local Plan. Monitoring indicators can be included within the SA Framework to explain how they relate to the SA, although this is not a requirement from the guidance. The monitoring indicators are included in the SA Framework in the SA Scoping Report.

The key components of the SA Framework form the 'Questions to Consider' which specify all aspects of each SA-Objective.

4. Assessment of the compatibility of the Local Plan

The assessment of the compatibility of the sustainability objectives with the Local Plan objectives is presented in Table 4. The high number of compatible objectives shows that the Local Plan is being prepared positively with regards to solving some of the sustainability issues. However, it is shown that few areas are not compatible and that there are many question marks.

In many cases it is inevitable that growth of housing or employment conflicts with e.g., biodiversity, historic environment, or flooding. Some policies can in fact mitigate the negative impacts of others.

Plan-making is about striking the most optimal and sustainable balance and incorporating mitigation measures when negative impacts are flagged up. It is the role of the SA to signal where sustainability issues may arise.

Table 4: Compatibility Local Plan and Sustainability Objectives

SA Objectives	Local Plan Objectives														
	Carbon Neutrality				Prosperous Economy			Quality Environment			Thriving Communities			Housing	
	1. Carbon neutral develop	2. Modal shift	3. Carbon capture	4. Renewable energy	5. Growth of Economy	6. Town Centre	7. Tourism	8. Network	9. Flooding	10. Townscape, Landscape	11. Services and Facilities	12. Deprived areas	13. Revitalisation	14. Meet housing needs	15. Infrastructure
ENVIRONMENT CLIMATE															
1. GREENHOUSE GAS	√	√	√	√	?	?	-	√	0	0	0	0	?	-	?
2. FLOOD RISK WATER AVAIL	0	0	√	0	-	?	-	√	√	0	0	0	0	-	0
3. CLEAN ENVIRONMENT	√	√	√	?	?	-	-	√	0	0	?	√	0	-	?
4. BIODIVERSITY AND GI	√	√	√	?	?	?	-	√	√	√	0	0	0	?	?
5. LANDSCAPE, TOWNSCAPE	0	√	?	?	?	√	√	√	0	√	0	√	√	?	?
6. WASTE	√	0	0	√	?	-	-	0	0	0	0	0	0	-	0
SOCIAL															
7. HOUSING	?	0	?	?	√	?	?	?	-	?	?	0	0	√	?
8. INFRA-STRUCTURE	?	?	?	?	?	?	?	?	?	?	√	√	√	?	√
9. RESILIENT COMMUNITIES	√	?	?	√	√	√	?	√	√	√	√	√	√	?	√
ECONOMIC															
10. EMPLOYMENT BUSINESS GROWTH	?	?	?	?	√	?	√	?	0	-	√	√	?	?	0

SA Objectives	Local Plan Objectives														
	Carbon Neutrality				Prosperous Economy			Quality Environment			Thriving Communities			Housing	
	1. Carbon neutral develop	2. Modal shift	3. Carbon capture	4. Renewable energy	5. Growth of Economy	6. Town Centre	7. Tourism	8. Network	9. Flooding	10. Townscape, Landscape	11. Services and Facilities	12. Deprived areas	13. Revitalisation	14. Meet housing needs	15. Infrastructure
11. LEISURE TOURISM	?	?	0	0	√	√	√	?	?	√	?	?	√	0	0
12. TRAVEL TRANSPORT	0	√	0	√	?	√	?	?	0	?	√	?	√	?	√

Comments per theme:

Environment and Climate

The most striking feature within this theme is the number of negative scores for the Local Plan objective on Tourism as this may result in more water, air or noise pollution, more travel needs and more waste production.

All development that results in building on green fields will impact on biodiversity and green infrastructure. However, in Eastbourne most development will be on brownfield, and redevelopment may even help to improve the townscape or the landscape.

Not all 'Climate and Environment' Local Plan objectives are compatible with the 'environmental' SA objective, in particular the LP objective on Renewable Energy will affect SA objective on landscape, biodiversity, or environment.

Social

At this stage of plan-making the impact of the Local Plan on the social SA objectives is difficult to predict. In particular, the number of question marks for the SA objective on Infrastructure stands out. Development of infrastructure is very much related to the viability and sometimes will 'compete' with the delivery of other aspects of the Local Plan. Additionally, infrastructure delivery also depends on investments of other stakeholders and of the CIL schedule.

It is apparent that the provision of infrastructure requires much attention during the entire plan-making.

As there is a huge constraint of area to develop housing the Local Plan may be required to plan housing on less favourable sites. If this implies risk of flooding mitigation is required when avoidance is not possible.

Economic

The SA objective on Employment and Business Growth aims to achieve the economic development to facilitate employment and through this reduces deprivation within the Borough. For many local plan objectives, it is difficult to predict how they affect employment. Promotion of carbon reduction may increase employment; modal shift may decrease accessibility to commercial or industrial areas. It all depends on how the policy is implemented.

The only negative assessment in the Economic theme is noted for the policy on town or landscape, although the redevelopment of some derelict sites may even result in improvement of the townscape. The economic development will need to consider the character of the town.

The ambitions of the Local Plan to realise a modal shift are compatible with the SA objective on Sustainable Transport. The 'question mark' for the Local Plan Objective of deprived areas requires more research on accessibility of key destinations.

5. Appraisal of the growth options

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 District to the north and east. Much of the land through the centre of the town in Eastbourne Park, and to the east of the town in the Mounthey Levels, has a high risk of flooding. These physical and environmental constraints limit the amount of land that is available for development.

In the Issues and Options consultation document in the Section on Housing and Development 6 different options for Housing Delivery were identified. These 6 options were summarised to 4 distinctive alternatives and the option of providing the need as calculated by the Standard Method was added. In Table 5 the options assessed in the SA on I&O are set out.²

² In the SA on Growth Strategy, it is explained further how these options are taken forward in the plan-making process.

Table 5: Growth Options for SA

Option	Total number	Yearly	Details
1	14,760	738	Providing the housing need calculated by the Standard Method
2	7,148	358	Tall buildings in the Town Centre (Option D in I&O)
3	6,500	325	Here Option C, E and F are merged. This option stands for increased density, with higher densities in town centre. This will imply more flats.
4	4,927	247	According to prevailing densities within the area (Option A in I&O).
5	3,801	191	Increasing the proportion of houses, thus densities may decrease. This is the lowest growth number in the I&O document (Option B). This is also near the average delivery in the last 10 years. ³

These options are assessed as presented in Table 6.

Table 6: Appraisal of the Growth Options

		Growth Options (yearly increase)					Comment
		Housing need (738)	Tall buildings in centre (358)	Increased density (325)	Prevailing densities (247)	Continue as last 10 years (191)	
SA OBJECTIVES		1	2	3	4	5	
1	GREENHOUSE GAS	?	?	?	?	?	The impact is unknown and will depend on construction techniques and implementation of renewable energy measures. Housing on locations with difficult public transport links will result in increased emission.
2	FLOOD RISK / WATER AVAIL	--	-	-	-	-	All options are likely to increase surfaced area and by this runoff. For Option 1 it is likely that land at risk of flooding must be included for

³ EBC Authority Monitoring Report 2020, page 17.

		Growth Options (yearly increase)					Comment
		Housing need (738)	Tall buildings in centre (358)	Increased density (325)	Prevailing densities (247)	Continue as last 10 years (191)	
SA OBJECTIVES		1	2	3	4	5	
							development. Option 2 could impact upon the town centre's sewage network which has limited capacity.
3	POLLUTION	--	?	?	?	?	<p>If neighbouring LAs will grow with comparable numbers, Option 1 potentially will contribute to exceed the critical load of NO_x for the Pevensey Levels (Ramsar site). This will be determined through the Habitat Regulations Assessment (HRA).</p> <p>For options 2,3,4,5 air quality may deteriorate because of traffic increase, on location where modal shift may be achieved this impact will be less.</p>
4	BIODIVERSITY / GREEN INFRA	--	0	-	0	0	<p>Option 1 is likely to affect green areas, as all areas need to be developed to achieve the required need.</p> <p>Concentration of development in the town centre (option 2) will decrease pressure on other green areas in the town.</p> <p>Option 3, where density is increased all over the borough may result in affecting green areas.</p>
5	LANDSCAPE / TOWNSCAPE	-	?	?	0	0	<p>The effect on townscape or landscape of higher growth (options 1,2,3) could possibly be negative, because densities will need to increase, and low value amenity areas might need to be developed. To achieve option 1, it might be</p>

SA OBJECTIVES		Growth Options (yearly increase)					Comment
		Housing need (738)	Tall buildings in centre (358)	Increased density (325)	Prevailing densities (247)	Continue as last 10 years (191)	
		1	2	3	4	5	
							required to develop green amenity spaces. An assessment of the impact of tall buildings will be carried out.
6	WASTE	-	-	-	-	-	All options are likely to generate construction waste and when the development is occupied, household waste. This could be mitigated by requiring waste management on construction sites.
7	HOUSING	++	+	+	?	?	Options 1,2,3 are expected to deliver a significant amount of housing, probably flats Options 4 and 5 are expected to deliver more 3 bed houses, and because of better viability more affordable houses may be delivered as well. In option 4 and 5 housing delivery will be far beyond requirement and these options don't demonstrate that the council is doing a serious effort to maximise delivery.
8	INFRASTRUCTURE	?	?	?	?	0	All options are supposed to be close to health and education facilities. Viability may threaten contribution to improvement of infrastructure through Section106 or CIL, while pressure on e.g. green space or community facilities will increase. For option 5 this increased pressure is minimal.
9	RESILIENT COMMUNITIES	-	?	?	0	0	Options 1, 2 and 3 could make assimilation of new residents within

		Growth Options (yearly increase)					Comment
		Housing need (738)	Tall buildings in centre (358)	Increased density (325)	Prevailing densities (247)	Continue as last 10 years (191)	
SA OBJECTIVES		1	2	3	4	5	
							the old community more difficult, because of densities. Option 1 could also affect provision of green areas and playing pitches. Whereas at the same time could make provision of other services more viable.
10	EMPLOYMENT / BUSINESS GROWTH	--	+	+	+	0	For option 1 it is likely that all employment land must be reassigned for housing. For option 2, 3, 4 the growth of population potentially will lead to more jobs in construction and the service industry.
11	LEISURE AND TOURISM	0	0	0	0	0	There are no impacts expected for this objective.
12	TRANSPORT AND TRAVEL	+	++	?	0	0	Options 1 is expected to have positive effects because the high number of potential users will make sustainable (public) transport options more viable. However, in areas where modal shift is more difficult to achieve circulation will increase and emission and congestion may arise, therefore impact of option 3 is unsure. Option 2 is expected to have a very positive effect because town centre residents will be close to existing public transport options. Options 4, and 5 are not likely to have any impact upon the sustainable transport and travel objective.

Comments

All growth options score negatively on the 'Environmental' SA Objectives. This is in line with findings in Table 4, where the compatibility of Local Plan Objectives and SA-Objectives is assessed. However, Option 1, based on the Standard Method Local Housing Need figure scores strongly negative in 3 of the 6 Environmental SA-Objectives.

All options are seeking to provide housing, which can have secondary impact on other social SA objectives. However, at this stage of plan-making it is unsure what this impact will be. Viability threats might undermine contribution to infrastructure provision. Only the options with highest growth concentration might have a negative influence on community cohesion.

On the economic objectives Option 2 stands out because the concentrated growth will sustain employment opportunities and help viability of sustainable transport options. Option 1 scores negative on employment opportunities because it may be required to use employment land for housing.

6. Appraising the policy options

The SA is not supposed to and will not weigh the objectives of the plan but will recommend the preferred policy options. It will be the job of the appraisal to identify where conflicts occur, minimise adverse impacts by promoting the most suitable policy options, and identify mitigation where adverse impact cannot be avoided. At this stage of the Initial SA preferred policy options are not yet recommended.

Carbon Neutrality

The options and policies assessed in the theme of 'Carbon Neutrality' are listed below. In table 7 the assessment is set out.

Carbon Neutrality	
CN1	Modal Shift / Moving away from the private car
Option A	Continue to rely on the ESCC car parking standards
Option B	Set up new car parking standards
CN2	Modal Shift / Walking and Cycling
Option	no policy
CN3	Modal Shift / Public Transport
Option	No policy
CN4	Sustainable Design / Energy Efficiency
Option A	Follow Building Regulations
Option B	Require additional climate measures
CN5a	On-site Renewable Energy

- Option A Require small-scale renewable energy generation
- Option B Require a set % to be sources from on-site generation

CN5B Large Scale Renewable Energy Generation
This is not assessed, as there are no alternatives sites known yet.

- CN6 Carbon Offset**
- Option A Encourage on-site off setting
- Option B Encourage off-site off setting

Table 7: Assessment Carbon Neutrality options

OPTIONS	1. GREENHOUSE GAS	2. FLOOD RISK / WATER AVAILABILITY	3. POLLUTION	4. BIODIVERSITY AND GREEN INFRA	5. LANDSCAPE / TOWNSCAPE WASTE	6. WASTE	7. HOUSING	8. INFRASTRUCTURE	9. RESILIENT COMMUNITIES	10. EMPLOYMENT / BUSINESS GROWTH	11. LEISURE AND TOURISM	12. TRAVEL/TRANSPORT
CN1 A	+	0	+	0	0	0	0	0	0	0	0	+
CN1 B	++	0	+	0	0	0	0	0	?	?	?	+
CN2	+	0	+	0	0	0	?	?	+	0	?	+
CN2 No policy	-	0	-	0	0	0	0	0	0	0	0	0
CN3	+	0	+	0	0	0	?	?	0	0	0	+
CN3 No policy	-	0	-	0	0	0	0	0	0	0	0	-
CN4 A	+	0	0	0	0	0	0	0	+	0	0	0
CN4 B	++	0	0	0	0	0	?	?	+	0	0	0
CN5a A	+	0	0	0	?	0	?	?	?	0	0	0
CN5a B	++	0	0	0	?	0	?	?	+	0	0	0
CN5a No policy	--	0	0	0	0	0	0	0	?	0	0	0
CN6 A	+	+	0	+	+	0	?	?	?	0	0	0
CN6 B	+	?	0	?	?	0	?	?	?	0	0	0

Comments:

It is obvious that the policy options on Carbon Neutrality score positively on the first SA objective (greenhouse gas) and at the same time highlight the unsustainability of the 'no policy' options.

At this stage of plan-making there are many unknowns; the question marks in the columns of housing and infrastructure are related to potential viability issues. In other columns the effect is unsure and the assessment flags up possible negative or positive effects.

- New parking standards may affect negatively accessibility of businesses and tourist and leisure provision (CN1 Option B).
- Promoting walking and cycling may become an asset for tourism development in the town.
- In case of the option of 'Encourage off-site off setting' (CN6 B) uncertainty is flagged up because planting trees may cause reduced infiltration capacity or disturb existing habitats or landscape.

Cumulative Effects of the 'Carbon Neutrality' policy options:

In Eastbourne, historically, housing delivery has been reliant on small sites. Nearly 75% of the homes delivered since 2006 have been on sites accommodating less than five units. New homes have been delivered through new builds, redeveloping existing sites, subdividing existing housing and changes from non-residential uses. Development of small sites, redeveloping existing sites, subdividing existing homes and changes from non-residential sites in general encounter greater challenges in terms of viability.

All preferred policy options in Carbon Neutrality will have a rising effect on development costs, and the cumulative effect of all these requirements has therefore the potential to affect the viability of housing development and the contributions to infrastructure.

The NPPF requires a proportionate viability assessment that considers all relevant policies, and local and national standards, including the cost implications of CIL and section 106. This Viability Assessment will be prepared in due course

Prosperous Economy

The options and policies assessed in the theme of 'Prosperous Economy' are listed below. In table 8 the assessment is set out.

Prosperous Economy

PE1	Employment Site Allocations / Area
Option A	Sufficient employment land to meet forecast needs
Option B	Prioritise housing instead of employment
Option C	Seek more mixed-use development

Option D	Employment space for higher value jobs
PE2a	Office Development
Option A	Preferred location in Town Centre
Option B	In Town Centre and Sovereign Harbour
Option C	Preferred location in Sovereign Harbour
PE2b	Industrial Estates / Existing Estates
Option A	Restriction of non-B use and supporting intensification of existing sites
Option B	Class E
PE3	Retail
Option A	NPPF threshold
Option B	New low threshold
PE4	Local Labour Agreements
Option A	Require Local Labour Agreements on major developments
PE5	Increasing use of the Town Centre. <i>The options will be assessed when there is more information coming forward from the Town Centre Needs Assessment.</i>
PE6	Residential development in the Town Centre. <i>The option is not assessed pending the results of the tall buildings assessment.</i>
PE7	Tourism
Option A	Restrict changes of use of properties on the seafront

Table 8: Assessment Prosperous Economy options

OPTIONS	1. GREENHOUSE GAS	2. FLOOD RISK / WATER AVAILABILITY	3. POLLUTION	4. BIODIVERSITY AND GREEN INFRA	5. LANDSCAPE / TOWNSCAPE WASTE	6. WASTE	7. HOUSING	8. INFRASTRUCTURE	9. RESILIENT COMMUNITIES	10. EMPLOYMENT / BUSINESS GROWTH	11. LEISURE AND TOURISM	12. TRAVEL/TRANSPORT
PE1 A	?	-	0	?	-	-	0	0	+	++	?	+
PE1 B	?	-	0	?	-	-	++	0	?	--	0	-
PE1 C	?	-	0	?	-	-	+	0	?	-	0	+

PE1 D	?	-	0	?	-	-	0	0	?	+	0	?
PE2a A	+	-	?	0	?	-	0	?	?	+	?	++
PE2a B	?	-	?	0	?	-	0	0	?	?	0	+
PE2a C	?	-	?	?	?	-	0	0	?	+	0	-
PE2b A	?	0	?	0	0	?	0	0	0	+	0	+
PE2b B	?	0	?	0	?	?	0	0	0	+	0	?
PE3 A	0	?	?	0	+	?	0	0	?	+	+	?
PE3 B	0	?	?	0	+	?	0	0	?	+	+	?
PE4 A	0	0	0	0	0	0	?	?	+	+	0	+
PE4 No policy	0	0	0	0	0	0	0	0	0	0	0	0
PE7A	?	-	?	0	+	?	0	0	?	+	++	?
PE7 No policy	?	?	?	0	-	?	0	0	?	?	-	?

Comments:

As is commented in the compatibility assessment of the Local Plan objectives (Section 6), the development of employment is likely to have negative impact on the environmental SA objectives. Although for the impact on Biodiversity (4) the impact is difficult to foresee as it depends on whether development is realised on previously developed land or not.

Development of employment land located in flood zone 3a, will affect negatively on the assessment of flood risk. Many of the sites presented in the I&O document are on greenfield land and development could impact negatively on landscape. The effects on biodiversity are uncertain, it is required to achieve net gain. But the impact on green field is assessed negatively. No designated sites will be affected.

The results from the Employment and Economic Study, Eastbourne and Wealden⁴ show there is an evident undersupply for industrial & warehouse employment land. For offices there is a broad balance moving to some undersupply. In this study it is assumed that growth occurs mainly (80%) in population driven sectors, a so-called endogenous growth. The exogenous sectors are ICT, professional services, construction, and accommodation & food.

The study presents the forecasts for net growth in employment floorspace by use classes. The study shows the need is highest for Class B2 General Industrial employment land.

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

Option PE1 A will provide employment according to the need (on both class B and class E land); it is likely this will reduce local unemployment and will affect the community positively (9).

For option PE1 B increased housing delivery may impact positively on the community, but the lack of employment alternatives may cause unemployment or need to commute. In mixed development (option PE1 C) the effect for some residents will be positive as they may find employment nearby, others may consider their amenity affected negatively (9). And in this it is possible likely less space for employment will be realised (8).

Option PE1 D will deliver employment. Most higher value jobs possibly will be located on use class E land.

Many policy options presented in the I&O consultation document are of a level of detail not easy to assess at this stage. These are: use class restrictions on industrial sites (PE2b), the threshold of impact assessment for out of centre stores (PE3), Local Labour Agreements (PE4) and the changes of use on the Seafront (PE7).

Cumulative effect of development in the Town Centre:

Increased housing development, housing for students, and office development in the Town Centre seems a sustainable choice as public transport and infrastructure facilities are available. The vitality and viability of the Town Centre can be sustained further by supporting the retail and tourist sector.

The effect of increased pressure on the sewage network in the Town Centre will be investigated taking into account the cumulative effect of all policies on housing and economic development.

Quality Environment

The options and policies assessed in the theme of ‘Prosperous Economy’ are listed below. In table 9 the assessment is set out.

Quality Environment	
QE1	Landscape
Option A	Protection of the setting of the South Downs National Park. <i>A Tall Buildings / Townscape study has been commissioned and once completed will feed into the SA assessment</i>
QE2	Landscaping in new development
Option A	Protect and enhance landscape within new developments
Option B	Protect and enhance, but with priority to climate measures
QE3	Flooding of Water.
	Set all measures that are already required by other policies. <i>No alternative options.</i>
QE4	Eastbourne Park Suitable protection and appropriate boundary.

<i>The options for different designations cannot be assessed at this stage.</i>	
QE5	<p>Biodiversity</p> <p>Avoid, minimise, mitigate and compensate, and after this requiring to provide Biodiversity Net Gain and help to establish a Nature Recovery Network.</p> <p><i>No alternative options.</i></p>
QE6	<p>Green Infrastructure</p> <p>Protecting and enhancing the network of GI and the green corridors.</p> <p><i>No alternative options.</i></p>
QE7	<p>Conservation</p> <p>Option A Appropriate conservation and management of the town's historic environment.</p> <p>Option B All aspects of conservation and management but not for the non-statutory heritage assets and seek statutory designation for the assets that are of sufficient quality.</p>
QE8	<p>Public Realm</p> <p>Seek to enhance the quality of public realm.</p> <p><i>No alternative options.</i></p>

Table 9: Assessment Quality Environment options

OPTIONS	1. GREENHOUSE GAS	2. FLOOD RISK / WATER AVAILABILITY	3. POLLUTION	4. BIODIVERSITY AND GREEN INFRA	5. LANDSCAPE / TOWNSCAPE WASTE	6. WASTE	7. HOUSING	8. INFRASTRUCTURE	9. RESILIENT COMMUNITIES	10. EMPLOYMENT / BUSINESS GROWTH	11. LEISURE AND TOURISM	12. TRAVEL/TRANSPORT
QE2 A	?	+	0	+	+	0	0	0	0	0	0	0
QE2 B	+	+	+	+	+	0	0	0	0	0	0	0
QE3	0	++	0	+	0	0	+/-	0	0	0	0	0
QE4	0	++	0	+	0	0	+/-	0	0	0	0	0
QE5	+	+	+	++	+	0	-	0	+	-	+	0
QE6	+	+	+	+	++	0	-	0	+	-	++	0
QE7 A	0	0	0	0	+	0	0	0	0	?	+	0

QE7 B	?	0	0	0	?	0	?	0	0	0	+	0
QE8	+	0	0	+	++	0	0	0	0	0	+	0

Comments:

A policy to ensure resiliency to flooding and climate change (QE3) will reassure that all new vulnerable development such as housing (7) is safe and sustainable. Obviously, the space for new housing development will be limited. Safeguarding land for (future) flood management may have a positive effect on biodiversity (4).

Suitable protection of Eastbourne Park (QE4) obviously will have a positive effect on biodiversity (4), landscape (5), and provision of open space for recreation (11). This will result in more unsurfaced area to help absorption of surplus water (2). More area for recreation will support a healthy lifestyle. There are some relatively large sites potentially suitable for housing development in Eastbourne Park; when these are excluded for further development (7, 10) it will significantly diminish land for housing and employment.

The policies on delivery of Biodiversity Net Gain (QE5) and Green Infrastructure (QE6) are assessed negatively on the SA objectives on Housing (7) and Employment (10). This is because protected or enlarged green space will decrease opportunity for residential or business development. Their positive impact on resiliency (9) of the community is due to the fact that access to green space has a positive effect on physical and mental health.

The policy options for Conservation (QE7 A and B) are detailed and involve protection status of existing buildings and areas; the effect on any of the SA objectives is limited.

The positive impacts on tourism (11) of policy options QE5, QE6, QE7, QE8 is caused by the increased attractiveness of landscape and townscape.

Thriving Communities

The options and policies assessed in the theme of ‘Thriving Communities’ are listed below. In table 10 the assessment is set out.

Thriving Communities	
TC1	Open Spaces
Option A	Ensure sufficient open space provision and require on-site provision for play space or financial contribution for developments above a certain threshold.
Option B	As above, but without the requirement of contribution to play space.
TC2	Redevelopment Sovereign Centre
Option A	Residential development
Option B	Beach front leisure / water sports
Option C	Convenience Store
TC3	Health and Education

Option A	Consider the allocation of a site for a new school if necessary and support extension only when they do not encroach the playing field. Restrict hot food takeaways within school walking distance.
TC4	Community Facilities
Option A	Ensure appropriate provision of facilities for the community
TC5	Recycling
Option A	Require recycling facilities and bin space in new development
Option B	As above, but require Site Waste Management Plans for major developments, consider the Waste Hierarchy, and encourage design for recoverability/longevity and locally sourced materials.
TC6	Access and Movement
	<i>Assessment of the options on 'Access and Movement' is addressed in the assessment of the Modal Shift policies (CN1, CN2, CN3).</i>

Table 10: Assessment Thriving Communities options

OPTIONS	1. GREENHOUSE GAS	2. FLOOD RISK / WATER AVAILABILITY	3. POLLUTION	4. BIODIVERSITY AND GREEN INFRA	5. LANDSCAPE / TOWNSCAPE WASTE	6. WASTE	7. HOUSING	8. INFRASTRUCTURE	9. RESILIENT COMMUNITIES	10. EMPLOYMENT / BUSINESS GROWTH	11. LEISURE AND TOURISM	12. TRAVEL/TRANSPORT
TC1 A	+	+	+	+	+	0	?	?	+	0	+	0
TC1 B	+	+	+	+	+	0	0	?	?	0	0	0
TC2 A	?	-	0	0	?	-	+	+	?	0	0	0
TC2 B	?	?	?	0	?	-	0	0	0	+	+	?
TC2 C	?	-	-	0	-	-	0	0	0	+	0	-
TC3 A	0	0	0	?	?	0	?	+	+	0	0	?
TC3 No policy	0	0	0	?	?	0	0	0	-	0	0	?
TC4 A	0	0	0	0	?	0	0	?	+	0	0	0
TC4 No policy	0	0	0	0	?	0	0	-	-	0	0	-

TC5 A	+	0	0	0	?	+	0	0	0	0	0	0
TC5 B	++	0	0	0	?	++	?	?	0	0	0	+

An Open Space and Playing Pitch Assessment will be undertaken to understand impact and compensatory provision. Growth of the population will increase the need for sports and recreation facilities; this will improve people’s physical and mental health (9). Not requiring contributions to improving outdoor sports pitches or children’s play areas will therefore increase the pressure on the actual playing space, while the provision is already lower than national standards.

The negative scores on the environmental SA objectives for the options on redevelopment of Sovereign Centre (TC2) are standing out. The location is in flood-zone 3a, and with redevelopment waste will be generated.

The negative scores on having no policy for ensuring community facilities (TC4) are because when this provision will be affected residents may have to travel further. The absence of community facilities will negatively impact on the sense of cultural identity, belonging and well-being (9).

The question mark – scores on the SA objective on Landscape / Townscape (5) flag up the uncertainty of how developments will impact on the townscape. The new requirements set by the NPPF on quality of design will help to mitigate possible negative impacts.

Viability issues which might arise by policy options (TC1A and B, TC4A and TC5B) these can have an impact on the delivery of infrastructure.

Housing Development

The options and policies assessed in the theme of ‘Housing Development’ are listed below. In Housing Development’ in the Issues and Options consultation document the main part is explanation of the options for growth strategies. These growth strategies are assessed separately in section 7 of this Non-technical Summary (and in section 6 of the main SA on I&O document). There are however, two other aspects of Housing and Development where different options were presented.

In table 11 the assessment is set out.

Housing and Development	
HD1	Affordable Housing
Option A	Set a maximum requirement for Affordable Housing
Option B	Allow reduced requirement to allow increase in infrastructure contribution
Option C	Rely on EBC to deliver affordable housing and don’t have any requirement for affordable housing
	Housing Development
HD2	Redevelopment

	Support conversion of residential into smaller unites, protect the residential amenity, support redevelopment of garage courts and provide guidance on back-land development
HD3	Housing for people with special needs Support housing for people with special needs
HD4	Housing for student / HMO Provide appropriate housing for students <i>Withdrawn because out of date.</i>

Table 11: Assessment Housing and Development options

OPTIONS	1. GREENHOUSE GAS	2. FLOOD RISK / WATER AVAILABILITY	3. POLLUTION	4. BIODIVERSITY AND GREEN INFRA	5. LANDSCAPE / TOWNSCAPE WASTE	6. WASTE	7. HOUSING	8. INFRASTRUCTURE	9. RESILIENT COMMUNITIES	10. EMPLOYMENT / BUSINESS GROWTH	11. LEISURE AND TOURISM	12. TRAVEL/TRANSPORT
HD1 A	?	0	0	0	0	0	+	-	-	0	0	0
HD1 B	?	0	0	0	0	0	?	+	?	0	0	0
HD1 C	?	0	0	0	0	0	?	+	?	0	0	0
HD2	0	0	0	?	0	0	+	0	?	0	0	0
HD3	0	0	0	0	0	0	+	0	+	0	0	0

The requirement for Carbon Neutrality measures may have a reducing effect on viability. Maximising affordable housing or infrastructure contribution competes with reduction of greenhouse gas (1). Maximising requirements for affordable housing (Option HD1A) competes with infrastructure delivery and carbon neutrality measures.

The delivery of affordable housing will have a positive impact on reduction of deprivation. Option HD1A aims to maximise affordable housing and the effect on resiliency of the community is assessed negatively. When this is not maximised (options HD1B and C) the contribution to infrastructure may increase (8), but it is unknown how this will result for the community's resiliency (9).

Housing development for people with special needs (HD3) will obviously increase inclusivity of the community (9). Housing development on back-land (HD2) may affect

Green Infrastructure and biodiversity (4). It is required this is avoided, mitigated, compensated and that after this a Biodiversity Net Gain (BNG) should be delivered.

During preparation of the Local Plan a viability assessment will be undertaken, this will help to appraise the policy option for Affordable Housing.

Effective Infrastructure

The options and policies assessed in the theme of ‘Thriving Communities’ are listed below. In table 12 the assessment is set out.

Effective Infrastructure	
EI1	Infrastructure to support modal shift
Option A	Infrastructure to support modal shift (e.g. favour developments in locations with walking, cycling and public transport routes, priority to walking, cycling and public transport in new development)
Option B	Support car transport
EI2	Support the expansion of the electronic communications network <i>The assessment of this policy is considered premature and too detailed for the stage of the planning process.</i>
EI3	Review the CIL Charging Schedule <i>The definition of alternatives for this policy depends completely on the viability assessment and therefore a sustainability appraisal is not carried out yet.</i>

Table 13: Assessment Effective Infrastructure

OPTIONS	1. GREENHOUSE GAS	2. FLOOD RISK / WATER AVAILABILITY	3. POLLUTION	4. BIODIVERSITY AND GREEN INFRA	5. LANDSCAPE / TOWNSCAPE WASTE	6. WASTE	7. HOUSING	8. INFRASTRUCTURE	9. RESILIENT COMMUNITIES	10. EMPLOYMENT / BUSINESS GROWTH	11. LEISURE AND TOURISM	12. TRAVEL/TRANSPORT
EI1A	++	0	+	?	0	0	?	?	+	?	?	+
EI1B	--	0	-	0	-	0	?	?	0	?	?	--

Road transport is a major source of CO2-emission and air-pollution, which a modal shift will help to decrease. (1). The need for parking spaces and roads will undermine the land

and townscape (5) and potentially may conflict with viability of housing (7) and infrastructure.

The impact on biodiversity is uncertain. A modal shift and achieving less car traffic will improve environmental conditions (3) and potentially biodiversity (4). Reduction of parking places may increase green spaces.

The need for parking space and roads will undermine the land and townscape (5) and potentially may conflict with viability of housing (7) and infrastructure (9). The impact of option A on the viability of housing development may be negative as well.

Option B will not support sustainable transport. The Eastbourne Interim Transport Assessment and Mitigation Strategy will assess the alternatives to improve mobility in the borough.

For option A it is difficult to assess the impact on employment and business growth. (10), and on leisure and tourism (11). Modal shift in transport might negatively affect the accessibility for HGVs or customers to the premises. At the same time improved public transport may improve accessibility and attractiveness of the town for customers and tourists.