

Non-Technical Summary

Sustainability Assessment on Local Plan Growth Strategy

I. Purpose of this document

This document is the Non-Technical Summary of the Sustainability Assessment on the Eastbourne Local Plan Growth Strategy (SA Growth). The SA Growth is published at the same time as the Sustainability Assessment on the Issues and Options (SA on I&O).

For both main documents, the SA Growth and the SA on I&O, a Non-Technical Summary is prepared. The Non-Technical Summary of the SA Growth doesn't include steps in the assessment process that are already described in the Non-Technical Summary on the SA on I&O. However, the SA Framework itself and the methodology of assessing are included. This is all visualised in Figure 1.

This Non-Technical Summary focuses entirely on the background of the LP Growth Strategy and on the assessment of the Key Development Sites as they are presented in the Local Plan Growth Strategy consultation document.

The SA on I&O is linked to the consultation document which was published in 2019.

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 Local Plan Growth Strategy

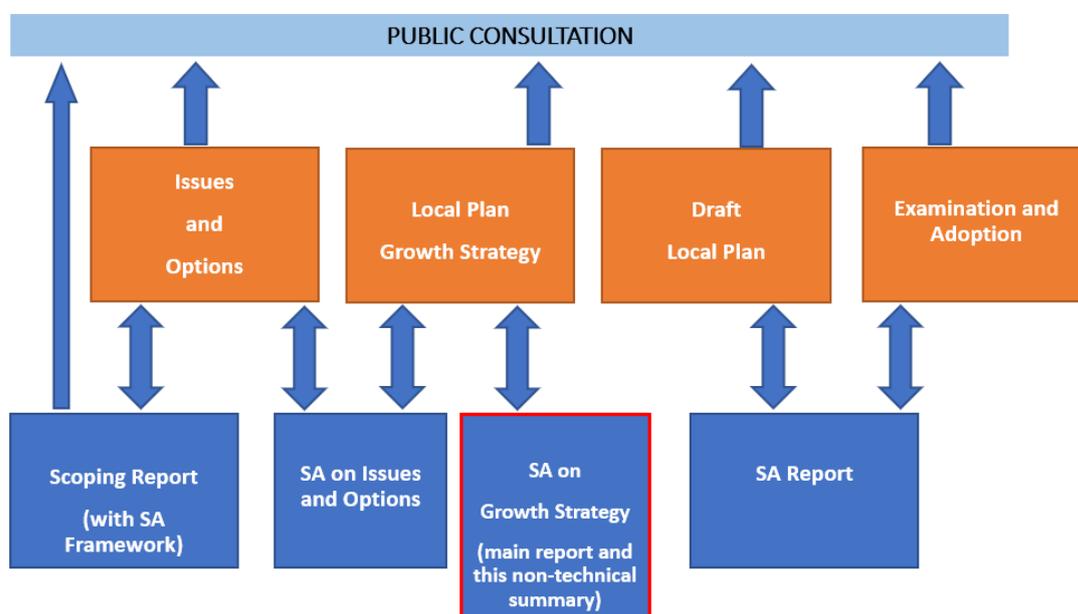
Eastbourne Borough Council is preparing a new Local Plan which will set the levels of housing and economic development that should be provided over the period to 2039. It will set policies to ensure that development is of high quality and will meet the challenges the borough faces with a changing climate. Apart from the level of growth a Local Plan addresses many more issues such as climate change, encouraging regeneration, and the protection of the natural, the built, and the historic environment.

The Local Plan Growth Strategy is not a draft Local Plan; the consultation on the Local Plan Growth Strategy is an interim step in the plan making process, and the results will feed into the next draft Local Plan document which then will be subject to a future public consultation.

The Local Plan Growth Strategy focuses specifically on housing and employment growth, including key development sites.

Sustainability Assessment

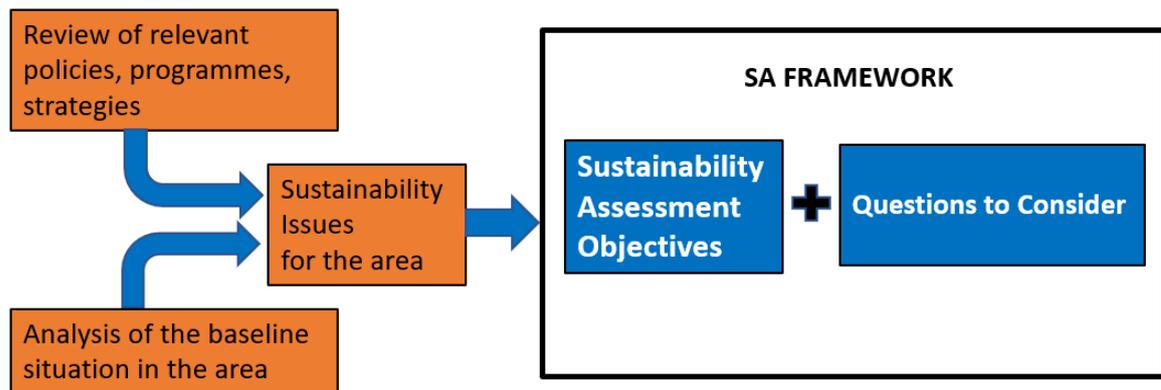
Preparing a Local Plan is an iterative process, and during the preparation of the Plan the SA should be interwoven to ensure that sustainability is promoted. Therefore, at each step in the plan making process an SA is prepared. The figure below shows how the plan-making process is linked to the steps taken in the SA.



The purpose of the Sustainability Appraisal is to help identify reasonable alternative options that the plan could implement and test them to identify the potential impacts and their relative sustainability.

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 impacts cannot be avoided. At this stage of the SA preferred policy options are not yet recommended because much evidence base and information gathering is still underway.

In the SA Scoping Report, it is described how the review of policies, programmes and strategies and the analysis of baseline information led to the construction of an SA Framework specific for the borough. The figure below is a schematic representation of the steps taken in the SA Scoping Report.



The SA Framework ensures the assessment is realised in a consistent way. There are 12 'Sustainability Objectives' and the 'Questions to Consider' help to flag up the different aspects of each SA Objective. The SA Framework is the main tool to assist in making the assessment quantifiable, measurable, and transparent.

Legal compliance and duty to cooperate

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. In the National Planning Policy Framework (NPPF, July 2021) this is specified further in paragraph 32. In the Planning Practice Guidance sets out the requirements for the SA process, the SA documents, and public consultation.

Under Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended by Localism Act 2011) and in accordance with the NPPF, it is a requirement for local planning authorities to engage actively and on an on-going basis with neighbouring planning authorities in the preparation of development plan documents. This is the Duty to Cooperate.

In July 2022 Wealden District Council (WDC) and EBC signed a Statement of Common Ground 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)¹. 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.

3. The SA Framework

The SA Framework to be applied in the assessment of the Growth options is presented in table 1.

Table 1: 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	<ul style="list-style-type: none"> • Does the approach reduce air pollution?

¹ www.lewes-eastbourne.gov.uk/eastbournelocalplan

Objective	Questions to Consider
<p>To reduce air, water, soil and noise pollution.</p>	<ul style="list-style-type: none"> • 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?
<p>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. To make efficient use of land by developing brownfield area.</p>	<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? • 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>	<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? • Will the approach contribute to quality design development?

Objective	Questions to Consider
<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 utilities?
<p>9. RESILIENT COMMUNITIES To improve community health, safety and wellbeing and promote inclusive and vibrant communities.</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 access to the town's green infrastructure and to the countryside? • 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 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	
<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</p>	<ul style="list-style-type: none"> • Does the approach encourage sustainable modes of transport?

Objective	Questions to Consider
To provide a step-change in modal shift to sustainable forms of transport and reduce dependency on the private car.	<ul style="list-style-type: none"> 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?

4. 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 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 assessment are explained. The SA Growth relies on the information available at that moment; in following stages of the plan making process assessments may vary.

The SEA Regulations require an assessment of secondary, cumulative and synergistic effects. 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. The results are assessed in terms of short, medium and long-term effects including irreversible and temporary effects. The characteristics of likely significant effects are set out in table 3.

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: <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.

5. Growth Strategy

Background

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.

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.

At the same time, it is obvious that any growth strategy of the Council should aim to maximise the delivery of dwellings while this should not lead to unsustainable growth.

The consultation document on the Local Plan Growth Strategy together with the SA Growth should demonstrate that the Growth Strategy strikes the most optimal balance between the constraints, the housing needs and sustainable development.

According to the guidance, options should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn. The following options do not meet these criteria:

- 'Doing nothing' because it's not realistic. It is a statutory requirement to have a Local Plan in place.
- 'Meeting the Local Housing Need in full'. This is not reasonable nor realistic. There is insufficient land available to meet needs in full, compared with the rate of delivery over the last 10 years this is also considered an unrealistic option.
- 'Prolongation of the growth rate' or Building out respecting prevailing densities'. Both are not considered a positive approach; the Council should demonstrate no stone is left unturned to maximise housing numbers.

The growth strategy as set out in the 'Local Plan Growth Strategy' is based on the housing delivery estimated by the Land Availability Assessment (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
- 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
- Ensuring that infrastructure can meet future demands from growth

Sustainability Assessment – Exploring alternative option

This Growth Strategy applies maximising available land (there are no alternative locations for development) and densities (densities are maximised according to the Assessment of Residential Densities Study² carried out by EBC). Therefore, the only alternative option would consist of developing residential dwellings over employment development. This would increase housing numbers albeit at the cost of employment

² <https://planningpolicyconsult.lewes-eastbourne.gov.uk/gf2.ti/-/1456610/150046181.1/PDF/-/EBC%20Assessment%20of%20Residential%20Density%20-%20October%202021.pdf>

space. This option is assessed against the Local Plan Growth Strategy and presented in Table 3.

Table 3: Assessment explorative option and Growth Strategy

		Balance residential and employment land	Less employment land	
SA OBJECTIVES		1	2	Comments
1	GREENHOUSE GAS	?	?	The out-of-town centre locations are not in such sustainable locations
2	FLOOD RISK / WATER AVAIL	?	?	For businesses the risk of flooding may be easier to mitigate.
3	POLLUTION	?	?	At this stage the impact of those effects is difficult to estimate.
4	BIODIVERSITY / GREEN INFRA	?	?	There is no information to assess the effect of residential development instead of business development in this aspect.
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, carefully 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 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 loss of employment

				space will potentially 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 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 must 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). Developing residential dwellings on employment land is therefore not the preferred option.

6. Key Development Sites

Background

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 Sustainability Appraisal has a key role to play in identifying sites for new housing and employment growth, but they are not the only factors considered when deciding what will be taken forward in the Local Plan. Factors such as consultation responses, and deliverability will also be taken into account by plan-makers.

At this stage of plan-making the level of detail of the assessment is limited because much of the evidence base is still underway. 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.

Assessment of Key Development Sites

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. Where it is considered that the combination of development doesn't have an extra effect there are no scores registered.

Sites in the Centre of the Town

The assessment of the sites in the Town Centre are presented in Table 4.

Table 4: Assessment of sites in the centre of the town

SA OBJECTIVES		Land adj Enterprise Centre and Railway	Junction Road Car Park	Former Debenhams	Former TJ 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:

From the point of view of transport and travel the sites in the Centre of Town are in a sustainable location, close to public transport and services. Scores on SA Objectives 1, 8 and 12 are positive.

The townscape might be affected negatively because of high density development near the many listed buildings, therefore there is a negative score on SA Objective 5. This should be mitigated.

All sites in the town centre are brownfield sites, this leads to a positive score for SA Objective 4, but a negative score for SA Objective 6. When derelict buildings are reused, this could be mitigated.

Cumulative assessment:

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): 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.

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): 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) and SA Objective 11 (Leisure and Tourism): The cumulative effect of development will contribute to the vitalisation and attractiveness of the town centre. It will also improve viability of the provision of retail and 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 Table 5.

Table 5: Assessment of the sites in Roselands and Upperton

SA OBJECTIVES		Bedfordwell Road Depot	Land at Tutts Barn Lane	2-4 Moy Avenue	ESK, Courtlands Road	Dairy Crest, Waterworks Road	Cumulative
		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:

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. (SA Objectives 1 and 12)

There is a significant flood risk to these sites and all sites score negatively. On all the sites there is also potential risk of surface water flooding. (SA Objective 2)

The sites that involve brownfield development are assessed positively; the site on greenfield, involving Eastbourne Park LWS and Eastbourne Marshes Biodiversity Opportunity Area is assessed negatively. (SA Objective 4 and 5). The site on Moy Avenue involves the development of an unattractive site with derelict buildings; new development potentially will have a positive impact on the townscape in the area.

Apart from the site on Tutts Barn Lane 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 8)

The negative scores of Sites 13 and 14 are due to the loss of employment land. (SA Objective 10)

Cumulative assessment:

SA Objective 2 (Flood risk): Developing on land in flood zone 3a may push the flood risk elsewhere.

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 12 (Transport): The cumulative effect of the increased traffic flow which will affect negatively on the highway network specifically in areas at or near capacity.

Sites in Meads

The assessment of the sites in Meads are presented in Table 6.

Table 6: Assessment of key development 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	+	-	-	

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	
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:

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 (SA Objective 1 and 12).

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. An Open Space Assessment should be undertaken to assess the provision of playing space as some development may affect this negatively (SA Objective 4 and 9).

All sites are within the Meads Conservation Area, some sites are adjacent to listed buildings or contain listed buildings. 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 (SA Objective 5).

Cumulative assessment:

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. 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 7.

Table 7: 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

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. (SA Objective 1 and 12)

All sites are located within flood zone 3a and will require further Flood Risk assessment which will inform the Sequential and Exception Test. The sites are also at risk of surface water flooding. (SA Objective 2).

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). The Langney Sewer on Site 17 is an important habitat corridor for biodiversity. The impact on biodiversity on the sites in Sovereign Harbour requires more investigation (SA Objective 4).

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 5).

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 9 and 10).

Cumulative assessment:

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.

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 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.

Sites in Eastbourne Park

The assessment of the sites in Eastbourne Park are presented in Table 8.

Table 8: Assessment of the sites in Eastbourne Park

SA OBJECTIVES		Land at Tutts Barn Lane	Land at Southbourne INCL EMPLOYMENT	Land North East of St Anthony' s Hill	Cumulative
		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.

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 (SA Objective 1).

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. 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 (SA Objective 2).

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 3).

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 4 and 5).

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 (SA Objective 12).

Cumulative assessment:

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 9. The comments per site are set out after the table.

Table 9: Assessment of the other sites

		Fisherman' s 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
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:

Site 10 – Fisherman’s Green

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 (SA Objective 1 and 12).

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 2).

The negative impact on employment is due to the fact that some shops/businesses will have to be removed. 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 (SA Objective 10 and 11).

Site 11 – East Sussex College site, Cross Levels Way

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 1).

The site is close to two busy roads and air quality and noise pollution may affect the environment (SA Objective 3).

The site potentially could provide for more than 200 dwellings and mixed development. There is the potential for provision of care apartments (SA Objective 7).

There is infrastructure provision 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 8, 9 and 12)

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 (SA Objective 10).

Site 16 – Former Gas Works, Finmere Road

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 (SA Objective 1 and 12).

The remediation of the site would improve the environment of the site therefore this objective scores positively (SA Objective 3).

The impact on the community is considered positive because the redevelopment will result in employment opportunities (SA Objective 9 and 10).

Site 24 – Summerdown Field, Compton Drive

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 (SA Objective 1).

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. Its location adjacent to the SDNP results in a negative score on landscape and needs to be mitigated with careful consideration of the setting of the SDNP (SA Objective 4 and 5).

Site 19 – Wood’s Cottages, Swanley Close

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

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 scores 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.

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 4)

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 5).

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 (SA Objective 9).