

**EASTBOURNE**

Borough Council



# Eastbourne Local Plan **Sustainability Appraisal**



Regulation 18 | February 2026



Eastbourne Local Plan 2022 - 2042

# Interim Sustainability Appraisal Report

February 2026

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# I. Introduction

## I.1 Introduction to this document

- 1.1.1 Eastbourne Borough Council (EBC) is preparing a new Local Plan for Eastbourne Borough outside the South Downs National Park covering the period between 2022 and 2042. The Local Plan will set out the vision, objectives, planning policies and site allocations that will guide development over the next years.
- 1.1.2 The Local Plan has been formulated in line with the principles of sustainable development, as defined by the NPPF and aligned with the United Nations Sustainable Development Goals (SDGs). It seeks to balance social, economic, and environmental objectives, which are interdependent and need to be pursued in mutually supportive ways. This is done to ensure that Eastbourne grows in an inclusive, resilient, and environmentally responsible way.
- 1.1.3 The purpose of the Sustainability Appraisal is to help assess the potential impacts of the plan, including its strategy, policies and site allocations, and evaluate their relative sustainability and identify reasonable alternative options that the plan could implement.
- 1.1.4 To ensure that the Local Plan meets these objectives of sustainable development, a Sustainability Appraisal (SA) has been prepared. The SA assesses the environmental, social, and economic performance of the emerging Local Plan by weighing its likely effects against reasonable alternatives for the proposed objectives, planning policies, and site allocations.
- 1.1.5 This evaluation and comparison will help inform the selection of Plan options and identify measures to avoid, minimise, or mitigate potential negative effects arising from the Plan's implementation. At the same time, the SA advises on the opportunities to make the Local Plan more sustainable.
- 1.1.6 Preparing a Local Plan is an iterative process, and during its preparation, the SA must be carried out simultaneously. The SA process is then integrated into the Plan's preparation to ensure it promotes the sustainable development of the plan area.

- 1.1.7 At this stage, the SA on the Regulation 18 Consultation Document presents a final adjustment of the SA Framework and the appraisal of the spatial strategy, neighbourhood policies, strategic and non-strategic policies and site allocations.

## 1.2 Consultation on this document

- 1.2.1 This document is published for public consultation alongside the Eastbourne Local Plan Regulation 18 Consultation. The consultation is open for an 8-week period between Friday 13<sup>th</sup> February and Friday 10<sup>th</sup> April 2026. Consultees are welcome to comment or provide input on any aspect of the content outlined in this report.
- 1.2.2 For this purpose, Eastbourne Borough Council has established a consultation portal available at <https://www.lewes-eastbourne.gov.uk/Eastbourne-Local-Plan>. Alternatively, you may submit your comments by email to [localplan@lewes-eastbourne.gov.uk](mailto:localplan@lewes-eastbourne.gov.uk) or by post to: Planning Policy, Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

## 1.3 Plan Area

- 1.3.1 The Local Plan only applies to the area of Eastbourne covered by the Eastbourne Borough Council Planning Authority, *excluding* the area within the South Downs National Park.
- 1.3.2 However, it is recognised that there are functional geographic, social and economic ties between Eastbourne and Wealden based on housing, employment, retail, education, green infrastructure, surface water run-off, traffic and public transport networks and leisure links.
- 1.3.3 Eastbourne is in East Sussex, surrounded by Wealden District to the north and west, and bordering with the English Channel to the east and south. The town has a clear residential and coastal identity, with strong ties to its natural surroundings. A large section to the west of the Borough encompasses the most eastern section of the South Downs National Park, and the middle of the built-up area is occupied by Eastbourne Park, a natural and flood management alleviation area.

Figure 1 - Location of Eastbourne



## 1.4 Purpose of the Sustainability Appraisal and the Strategic Environmental Assessment

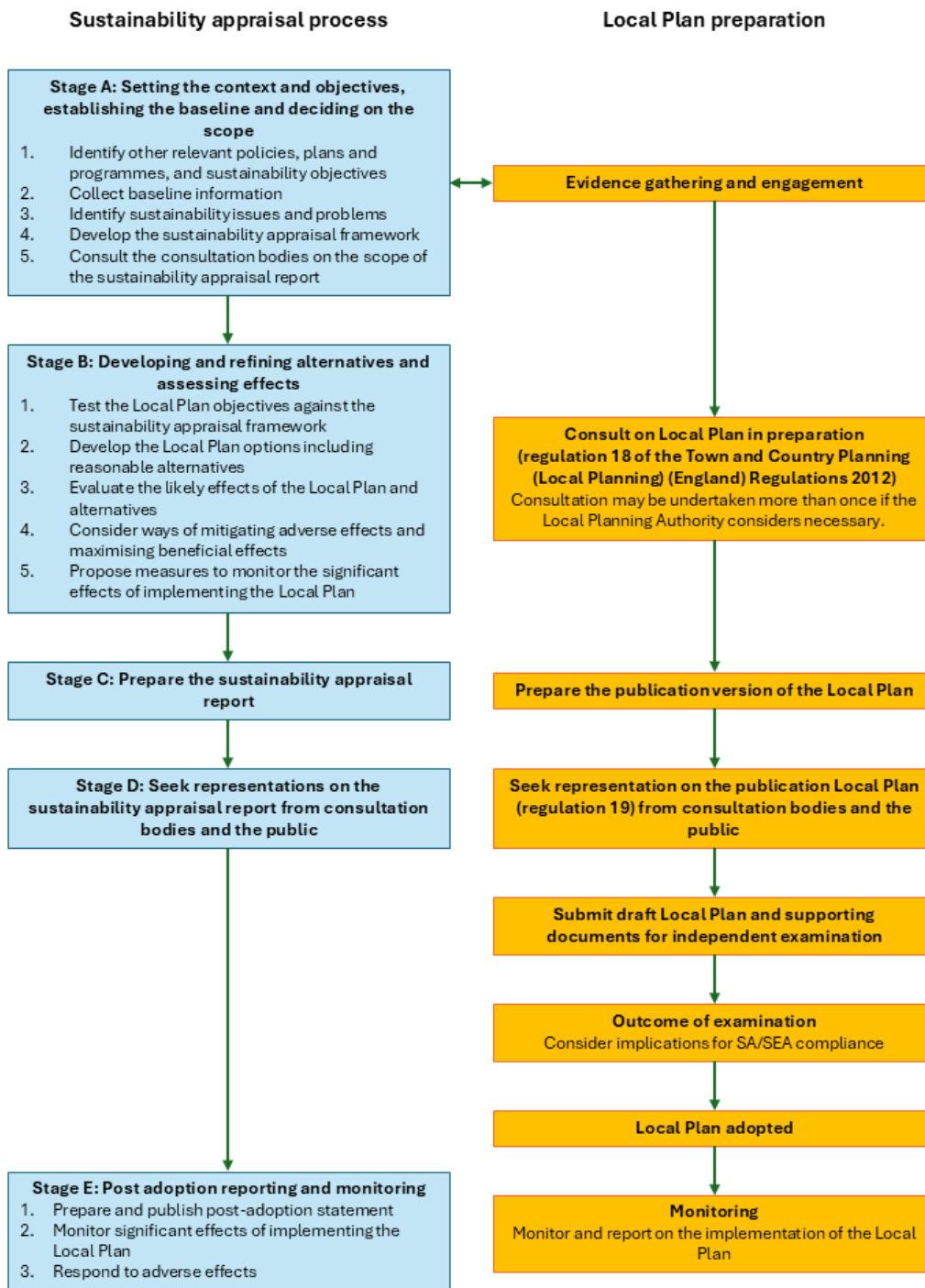
- 1.4.1 The Environmental Assessment of Plans and Programmes Regulations 2004 require a strategic environmental assessment (SEA) of plans that set the framework for future development.
- 1.4.2 Section 19 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal of a proposed plan during its preparation.
- 1.4.3 The Sustainability Appraisal should also incorporate the requirements of the SEA Regulations to identify likely significant environmental effects and reasonable alternatives.
- 1.4.4 Unlike the SEA, the Sustainability Appraisal must look not only at the environmental impacts of the plan but must take into account a holistic approach that includes the social and economic impacts on the long-term sustainability of the area.
- 1.4.5 The Sustainability Appraisal is an integral part of the plan-making process; through it, local planning authorities can test the impacts that the local plan, its policies and strategies, will have on the social, environmental and economic aspects of the plan area.

- 1.4.6 By testing the Sustainability of the Local Plan, a planning authority can inform its decision-making process and evaluate that the selected policies are the most reasonable and will contribute more greatly to the Sustainability of the Local Plan.

## 2. Methodology

### 2.1 The Sustainability Assessment process

Figure 2 - Sustainability appraisal process



## 2.2 The Sustainability Assessment Framework (SA Framework)

- 2.2.1 The SA considers how the options identified perform against the Sustainability Objectives, whether there are likely to be positive or negative impacts, and the significance of the impact. The ‘Sustainability Objectives’ and ‘Questions to Consider’ together form the Sustainability Assessment Framework (SA Framework).
- 2.2.2 The SA Framework is the main tool to assist in making the assessment quantifiable, measurable and transparent.
- 2.2.3 The SA Framework for the Eastbourne Local Plan was prepared in the scoping report based on the review of the PPPSI and the baseline of the area. The Scoping Report was consulted on in November 2019, with the Regulation 18 ‘Issues and Options’ consultation of the Local Plan, and some amendments were proposed to the SA Framework. See
- 2.2.4 For the current consultation of the local plan, additional small amendments to the SA Framework were made to more accurately measure the impacts of the proposed policies in the local area. These are found in Figure 3. Below.

Figure 3 - Amendments to the SA Framework at the current stage

SA Objective	Amendment of the SA Framework
CLEAN ENVIRONMENT	<p>Inclusion of light as a significant source of pollution, when considering the intent of the Eastbourne Local Plan in furthering the purpose of the South Downs National Park.</p> <p>Additional question:</p> <ul style="list-style-type: none"> <li>Does the approach reduce light pollution?</li> </ul> <p>Additional subobjective:</p> <ul style="list-style-type: none"> <li>To reduce air, water, soil, noise and light pollution.</li> </ul>
HOUSING	<p>Inclusion of a question to consider whether the proposed policy contributes to meeting the Borough’s overall housing needs.</p> <p>Additional question:</p> <ul style="list-style-type: none"> <li>Does the approach help meet overall housing needs?</li> </ul>

- 2.2.5 The reviewed SA Framework was used to assess the Spatial Strategy, Neighbourhood policies, Site Allocation Policies, Strategic and Non-Strategic Policies of the upcoming regulation 18 Eastbourne Local Plan.
- 2.2.6 The full SA Framework used to assess the policies and alternatives is shown in Figure 4.

Figure 4 - SA Framework

Objective	Questions to consider
<b>Environment and climate change</b>	
<p>1. GREENHOUSE GAS EMISSIONS</p> <p>To promote and support the mitigation of climate change through a reduction in Eastbourne's greenhouse gas emissions from all sources.</p>	<p>Will the approach contribute to reduction of carbon dioxide emissions?</p> <p>Does the approach support reduction of energy consumption?</p> <p>Will the approach increase the proportion of energy from renewable sources?</p> <p>Will the approach increase the use of low-carbon heating sources?</p>
<p>2. FLOOD RISK AND WATER AVAILABILITY</p> <p>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.</p>	<p>Will the approach impact on flooding – coastal, fluvial and surface water?</p> <p>Does the approach reduce the risk of flooding?</p> <p>Does the approach impact on the quantity of available water?</p> <p>Will the approach support the reduction the consumption of water (domestic and commercial)?</p>
<p>3. CLEAN ENVIRONMENT</p> <p>To reduce air, water, soil, noise and light pollution.</p>	<p>Does the approach reduce air pollution?</p> <p>Does the approach reduce surface or ground water pollution?</p> <p>Does the approach affect a Source Protection Zone?</p> <p>Does the approach reduce soil pollution or improve the conditions of the soil?</p> <p>Does the approach reduce noise pollution in residential areas?</p> <p>Does the approach reduce light pollution?</p>
<p>4. BIODIVERSITY AND GREEN INFRASTRUCTURE</p>	<p>Does the approach protect the areas of SSSI and ancient woodland?</p>

Objective	Questions to consider
<p>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>	<p>Does the approach protect and enhance natural and semi-natural habitats and species?</p> <p>Does the approach optimise opportunities to create a Nature Recovery Network?</p> <p>Does the approach contribute to the achievement of net gains for biodiversity?</p> <p>Does the approach affect nationally important wildlife?</p> <p>Will the approach impact on green infrastructure?</p> <p>Does the approach contribute to the minimisation of impact on greenfield land?</p>
<p><b>5. LANDSCAPE, TOWNSCAPE AND HISTORIC ENVIRONMENT</b></p> <p>To protect, enhance and manage archaeological, historical and cultural heritage and their setting and strengthening local distinctiveness and sense of place.</p>	<p>Will the approach protect the character of the town and landscape and protect the key views?</p> <p>Will the approach contribute to the quality of the townscape?</p> <p>Does the approach have an impact on listed buildings and conservation areas?</p> <p>Does the approach have an impact on sites of archaeological interest?</p> <p>Does the approach have an impact on registered parks and gardens?</p>
<p><b>6. WASTE</b></p> <p>To minimise waste generation and maximise recycling of waste.</p>	<p>Will the approach reduce and minimise the generation of waste (household and construction &amp; demolition)?</p> <p>Will appropriate recycling and storage facilities be provided?</p> <p>Will the approach increase recycling rates and use opportunities to manage waste?</p>
<b>Social</b>	
<p><b>7. HOUSING</b></p> <p>To provide affordable, environmentally sound and good quality housing of types and sizes that meets the needs of the community.</p>	<p>Does the approach help meet affordable housing needs?</p> <p>Does the approach meet the needs of all members of the community (ageing population, new families)?</p>

Objective	Questions to consider
	<p>Does the approach encourage a mix of types and tenures to be achieved?</p> <p>Will the diversity of stock be improved?</p> <p>Does the approach lead to sustainably constructed homes?</p> <p>Will the approach contribute to quality design development?</p> <p>Does the approach help meet overall housing needs?</p>
<p><b>8. INFRASTRUCTURE</b></p> <p>To ensure the appropriate provision of infrastructure to meet needs arising from new and existing development.</p>	<p>Does the approach provide for sufficient infrastructure to sustain accessible services?</p> <p>Is the capacity of existing infrastructure sufficient?</p> <p>With special attention to services for the elderly population of the Borough, is the infrastructure easily accessible?</p> <p>Does the approach improve access to a range of facilities?</p> <p>Will there be sufficient capacity of utilities?</p>
<p><b>9. RESILIENT COMMUNITIES</b></p> <p>To improve community health, safety and wellbeing and promote inclusive and vibrant communities.</p>	<p>Will a sense of cultural identity, belonging and wellbeing be achieved?</p> <p>Does the approach support a healthy lifestyle and outdoor playing space?</p> <p>Does the approach optimise access to the town's green infrastructure and to the countryside?</p> <p>Does the approach encourage active transport modes?</p> <p>Does the approach lead to a reduction of crime rates?</p> <p>Does the approach consider the needs of people with protected characteristics, and/or the needs of the ageing population?</p> <p>Does this approach benefit the most deprived areas of the district?</p> <p>Does the approach support social inclusion?</p>

Objective	Questions to consider
	<p>Will the approach promote and support the empowerment and participation of local communities?</p> <p>Will the approach reduce the gap between the most deprived areas and the rest of the Borough?</p>
<b>Economic</b>	
<p><b>10. EMPLOYMENT AND BUSINESS GROWTH</b></p> <p>To promote economic growth in the Borough by supporting expanding businesses, encouraging creation of new jobs and businesses, and improve education and skills of the population.</p>	<p>Does the approach improve access to employment opportunities?</p> <p>Does the approach create and enhance support for existing businesses? Does the approach encourage the creation of new startups?</p> <p>Will the approach improve access to education and training for children, young people and adult learners?</p>
<p><b>11. LEISURE AND TOURISM</b></p> <p>To increase the number and spend of people visiting the town, and the town centre, for leisure and tourism purposes.</p>	<p>Does the approach create and enhance support for existing retail and tourism business?</p> <p>Does the approach encourage creation of new retail and tourism initiatives?</p> <p>Will the approach create jobs in the tourism sector?</p>
<p><b>12. TRAVEL AND TRANSPORT</b></p> <p>To provide a step-change in modal shift to sustainable forms of transport and reduce dependency on the private car.</p>	<p>Does the approach encourage sustainable modes of transport?</p> <p>Will the approach encourage a shift away from the private car and towards public transport and cycling?</p> <p>Will the approach ensure sufficient capacity of the highway and public transport network?</p> <p>Will the approach minimise the need to travel by car?</p>

## 2.3 Methodology to test the options

- 2.3.1 The SA Framework offers the “Questions to Consider” for each Sustainability Objective. These questions are used in assessing alternatives and options during the formulation of the Local Plan. As a result, the likely sustainability effects can be described, analysed, and compared.

- 2.3.2 The SA will identify and evaluate reasonable alternatives that consider the objectives and scope of the plan (as required by the SEA Directive).
- 2.3.3 These reasonable alternatives will include options discussed during consultations, along with other options suggested through the consultation process.
- 2.3.4 A reasonable alternative might include the ‘no plan’ or ‘business as usual’ option.
- 2.3.5 In cases where the proposed policy addresses a requirement of the National Planning Policy Framework, or other government directive, or where any other option is incompatible with the objectives of the plan, no alternative policies have been evaluated.
- 2.3.6 The table below presents the symbols and definitions which will be used to assess and highlight impacts when the options and objectives are tested.

Figure 5 - 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

- 2.3.7 The matrix for assessing the magnitude of effects will be accompanied by a commentary explaining the reasons for the assessment.
- 2.3.8 The results are evaluated based on short, medium, and long-term effects (5, 10, and 15 years), including both permanent (irreversible) and temporary effects. (Figure 6)
- 2.3.9 The SEA Regulations mandate an assessment of secondary, cumulative, and synergistic effects. Together, these effects are known as cumulative impacts.

- 2.3.10 Cumulative impacts may occur, for example, when multiple developments each have minimal effects but collectively produce a significant impact, or when several individual effects combine to create a greater overall effect. .
- 2.3.11 Synergistic effects work together to create a total impact that is greater than the sum of individual effects. Noticeable synergistic effects often happen when habitats, resources, or human communities approach their capacity.
- 2.3.12 For example, a wildlife habitat can become increasingly fragmented, with limited effects on a specific species until the final fragmentation renders the area too small to support it. In Figure 6, the relevant characteristics to consider are outlined; cumulative impacts are also included.

Figure 6 - 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"> <li>- Special natural characteristics or cultural heritage</li> <li>- Exceeded environmental quality standards or limit values</li> <li>- Intensive land-use</li> </ul>
G	The effects on areas or landscapes which have a recognised national, community or international protection status.

## 3. Appraising the Strategy

### 3.1 Background

- 3.1.1 In line with Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations (2004), there is a need to present an appraisal of reasonable alternatives considering the objectives and the geographical scope of the plan or programme whilst in line with Schedule 2(8), and there is a need to explain “the reasons for selecting the alternatives dealt with”. According to the guidance, options should be reasonable, realistic, deliverable and sufficiently distinct to enable meaningful comparisons to be drawn.
- 3.1.2 In the early stages of the preparation of the Local Plan, a range of high-level options for the spatial strategy were identified, which were used as a basis for initial engagement with Duty to Co-operate partners and infrastructure providers, prior to the public consultation on ‘Issues & Options’ in late 2019.
- 3.1.3 These high-level options were:
- **Option 1:** Density based on prevailing character
  - **Option 2:** Increased proportion of houses (focus on 3-bed houses)
  - **Option 3:** Increased proportion of flats (focus on 2-bed flats)
  - **Option 4:** Taller Buildings in Town Centre (6 storeys)
  - **Option 5:** Taller Buildings in Town Centre (10 storeys)
  - **Option 6:** 50% increase on baseline density on all sites in Sustainable Neighbourhoods only
  - **Option 7:** 50% increase on baseline density on all sites within the existing built-up area
  - **Option 8:** Housing only on sites of more than 0.5 hectares
  - **Option 9:** 50% increase on baseline density on all sites of more than 0.5 hectares
- 3.1.4 Following initial feedback on these options, these were narrowed down to six options that were presented for public consultation through the Issues & Options consultation.

- 3.1.5 The Issues & Options consultation highlighted that the strategy would inform the specific allocations for sites in the Local Plan in terms of how they should be developed. The options are not necessarily mutually exclusive and could be combined if this would form the most effective and sustainable strategy for the number and distribution of housing over the plan period. It also confirmed that a range of other options were also considered, but these other options were assessed as being less suitable and sustainable.
- 3.1.6 The strategy options identified in the ‘Issues & Options’ were:
- **Option A:** Densities based on the prevailing character of the area surrounding the site
  - **Option B:** Increasing the proportion of houses being delivered on sites
  - **Option C:** Increasing the proportion of flats being delivered on sites
  - **Option D:** Providing taller residential buildings in Town Centre
  - **Option E:** Increase on the prevailing density on all sites within the existing built-up area
  - **Option F:** Increase on the prevailing density on all sites of more than 0.5 hectares
- 3.1.7 Following the Issues & Options consultation in 2019/2020, and taking into account the representations made and the Sustainability Appraisal of options, it is clear that a single option on its own would be unlikely to be the most appropriate strategy for seeking to address issues of housing and employment growth across the borough.
- 3.1.8 Therefore, an additional option was considered that was based on a combination of the principles identified in *Option D: Providing taller residential buildings in Town Centre* and *Option E: 50% increase on the prevailing density on all sites within the existing built-up area*. However, the blanket 50% uplift on density was not considered appropriate to take forward, so a more nuance approach to density uplift was considered through maximising density on sites within the existing built-up area in the context of respecting the character of the local area, and increasing density further in locations that are highly accessible to services and public transport and seeking higher densities on sites in the town centre through the provision of taller buildings. This is known as **Option G: Increased density in areas with high levels of accessibility to services and facilities**. This option was subject to public consultation through the Regulation 18 ‘Growth Strategy’ consultation that was undertaken in 2022/23.

- 3.1.9 An option for meeting the local housing need in full was initially screened out, but it is considered appropriate that this is properly assessed as an option, and therefore the final option is **Option H: Meeting Local Housing Need in Full**.

## 3.2 Description of Spatial Strategy Options

### Option A: Densities based on the prevailing character of the area surrounding the site

- 3.2.1 Option A was based on sites being developed for housing at the prevailing density within the area that the site is located. The prevailing densities were assessed through the identification of character areas where areas show similar characteristics in terms of the type, size, style and age of residential development
- 3.2.2 The residential densities across the town have been assessed through the Assessment of Residential Density (2021). Whilst some parts of the town have relatively high prevailing densities, with parts of the Town Centre, Upperton and Sovereign Harbour seeing densities of over 120 dwellings per hectare, other areas of the town such as part of Meads, Ratton & Willingdon Village and Summerdown & Saffrons, have significantly low established densities of less than 15 dwellings per hectare.
- 3.2.3 Reflecting established densities in areas would help to ensure that development takes into account the desirability of maintaining an area's prevailing character and setting (NPPF, para 129) and ensure that development is sympathetic to local character and history, including the surrounding built environment and landscape setting (para 135).
- 3.2.4 However, reflecting some of the low densities in new development would be inconsistent with the NPPF requirements to make the most effective use of land in urban areas (paras 11 and 124), and avoiding homes being built at low densities to ensure that developments make optimal use of the potential of each site (para 130). It would also be inconsistent with the NPPF requirement to optimise the use of land to meet as much of the identified need for housing as possible (para 130). The NPPF also notes that seeking to ensure development is sympathetic to local character should not prevent or discourage appropriate innovation or change, such as increased densities (para 135).

**Option B: Increasing the proportion of houses being delivered on sites**

- 3.2.5 Option B would deliver homes (with a particular focus on 3-bed houses) on all sites with the exception of a small number of sites that could only be considered suitable for flatted developed. This is based on a density of 35 dwellings per hectare, which was the average density of sites that have delivered purely 3-bed homes since 2006.
- 3.2.6 The Local Housing Needs Assessment notes that the development that has taken place between 2011 and 2021 has been skewed towards smaller dwellings, particularly flats, and this may suggest that the borough may benefit from a greater proportion of future development being mid-sized, with some larger family dwellings, especially in market housing.
- 3.2.7 The LHNA identifies prioritisation of mid-sized homes (2-3 bedrooms) to meet changing demographic needs. It suggests the need for 3-bed or larger properties are more likely to be delivered as houses rather than flats, whilst 1-bed properties are overwhelmingly likely to be delivered as flats. This implies delivery of around 35% flats (if all 1-beds and half of 2-bed homes are delivered as flats) and 65% houses (assuming half of 2-beds and all 3-4+ beds are delivered as houses).
- 3.2.8 Option B therefore is most closely aligned with the types of housing that is needed in Eastbourne, particularly in terms of the delivery of 3-bed homes. This would be consistent with the NPPF requirement to include an appropriate mix of housing types for the local community that reflects the size, type and tenure of housing needed (para 61), and support development that makes efficient use of land, taking into account the identified need for different types of housing (para 129).
- 3.2.9 However, this option would be expected to deliver the lowest level of housing growth over the plan period. It would potentially mean development at lower densities than the established densities in certain parts of the town such as the Town Centre. This would therefore not be making the most effective use of land in urban areas (paras 11 and 124), and would also be inconsistent with the NPPF requirement to optimise the use of land to meet as much of the identified need for housing as possible (para 130). In addition, it would not cater for the housing needs of people who require smaller 1-bed and 2-bed properties, and there may be issues associated with market absorption and viability that prevent development coming through at a sufficient rate if the market for 3-bed homes is saturated, which would be inconsistent with the requirements of NPPF para 23.

**Option C: Increasing the proportion of flats being delivered on sites**

- 3.2.10 Option C would deliver more homes as part of flatted development with a particular focus on delivering 2-bed flats. This was based on densities of 130 dwellings per hectare in non-town centre locations and between 195 dwellings per hectare in the town centre, which reflected past trends for flatted-only residential development (new build and redevelopment) since 2006.
- 3.2.11 This option would result in high density development across the town, which would result in a relatively high level of housing growth compared to the majority of the other options. This would be consistent with the NPPF requirement to optimise the use of land to meet as much of the identified need for housing as possible (para 130). It would also be considered to be making the most effective use of land in urban areas (paras 11 and 124), and making optimal use of the potential of each site (para 130). Option B would also help facilitate opportunities to use the airspace above existing residential and commercial premises for new homes (para 125).
- 3.2.12 However, the Local Housing Needs Assessment notes that a significant number of flats have been delivered in Eastbourne in recent years, with the percentage of the housing stock that is flats notably higher than all of the benchmark areas. Further prioritisation of flats would not reflect the housing need requirements in terms of size and type of housing, which should be taken into account in planning policies (NPPF, para 61).
- 3.2.13 Similar to Option B, it would result in a significant oversupply of a particular type of home that doesn't meet the needs of the local community and could saturate the market, meaning that sufficient land would not come forward at a sufficient rate, and ultimately meaning that fewer homes will be delivered.
- 3.2.14 The Viability Assessment also identifies that there may be some viability challenges associated with flats due to their higher construction costs. There are recent examples of flatted developments in Eastbourne that have been permitted, with no Community Infrastructure Levy or affordable housing contributions, and have not come forward due to viability concerns.
- 3.2.15 In addition, flatted development is zero-rated in relation to Community Infrastructure Levy (CIL), meaning the flats make no contribution towards CIL. This was due to viability concerns expressed by the Examiner over the evidence of viability for flats through the CIL Charging Schedule examination. The Viability Assessment also notes that the potential for developer contributions is limited, which means that a high proportion of flatted

development would mean that there is no or limited contributions made towards infrastructure improvements by development.

- 3.2.16 In addition, this option would not take account of the desirability of maintaining an area's prevailing character and setting (NPPF, para 129) and ensure that development is sympathetic to local character and history, including the surrounding built environment and landscape setting (para 135).

#### **Option D: Providing taller residential buildings in Town Centre**

- 3.2.17 Option D would deliver taller buildings in the Town Centre in flatted development of ten storeys. This option assumes that the prevailing density would be used on sites outside of the town centre. The tallest purpose-built block of flats in the Town Centre is the nine-storeys but the majority of the purpose-built blocks of flats in the Town Centre are between five and seven storeys. The tallest purpose-built block of flats in Eastbourne is the 19-storey South Cliff Tower.
- 3.2.18 This option would result in very high density development in the Town Centre, with varying levels of density based on established character across the rest of the town, which would result in a relatively high level of housing growth compared to the majority of the other options. It would also be considered to be making the most effective use of land in urban areas (paras 11 and 124).
- 3.2.19 In addition, this option would be consistent with the NPPF requirement to recognise that residential development often plays an important role in ensuring the vitality of centres (para 90). The Town Centre is considered to be the most sustainable location, which means that more people would be within walking distance of a wide range of services and facilities, as well as having the greatest access to public transport, which would be consistent with the NPPF requirement to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities (para 111). It would also help to support and revitalise the Town Centre by providing more customers to local businesses. It would also meet the requirement to seek a significant uplift in the average density of residential development within town centres and other locations that are well served by public transport (NPPF, para 130).
- 3.2.20 However, taller buildings would provide homes in the form of flats, which already dominate the housing stock in the Town Centre. Eastbourne also has a significant proportion of flats compared to other similar areas, with flats

being the predominant form of housing development over recent years. Significant levels of future flatted development may not reflect housing needs (NPPF, para 61), although reflecting established densities in other parts of the town may mitigate this impact.

- 3.2.21 The Viability Assessment also identifies that there may be greater viability challenges associated with taller buildings due to their higher construction costs. Furthermore, not all sites in the Town Centre may be suitable for taller buildings in terms of the size, shape and location of the site and the impact on townscape and landscape, so this option may not be deliverable in its purest interpretation.
- 3.2.22 The Tall Buildings and Townscape Study identifies that, given the large avenue size, the presence of mature trees, the recreational land use, the open and coastal character and presence of taller buildings, the Town Centre has scope to accommodate tall buildings within certain areas, although suitability is highest along the seafront and in a nucleated pattern around the train station, and lowest in areas to the west and north given the small scale, low density and residential nature present. It also notes that tall buildings should not be located within view corridors relating to landmarks in order to preserve the prominence of such buildings in the local townscape, careful consideration should be to the effects on views towards the South Downs National Park and seaward views. Where tall buildings are located adjacent to existing buildings, they must be of a relatable scale to avoid adverse townscape and visual effects. Tall buildings should be located on the end of plots, acting as a ‘book-end’ rather than breaking the middle of consistent building lines.
- 3.2.23 Significantly increasing density in a specific part of town may result in issues with infrastructure capacity, particularly relating to sewerage and road congestion, through having such a significant number of additional people living in an already densely populated area.

**Option E: Increase on the prevailing density on all sites within the existing built-up area**

- 3.2.24 Option E increases the density of sites by 50% on the prevailing density on all sites within the built-up area boundary.
- 3.2.25 The residential densities across the town have been assessed through the Assessment of Residential Density (2021). These range from an average density of 87 dwelling per hectare across the Town Centre neighbourhood to

an average density of 13 dwellings per hectare in the Ratton & Willingdon Village neighbourhood.

- 3.2.26 This option would seek to make more effective use of land in urban areas, which would be consistent with paras 11 and 124 of the NPPF. By giving reference to the established density in identifying the amount of development that should take place, this option could help to maintaining an area's prevailing character and setting and ensure that development is sympathetic to local character (para 135).
- 3.2.27 It would also enable a range of different housing types and sizes to come forward, which would address the NPPF requirement to include an appropriate mix of housing types for the local community that reflects the size, type and tenure of housing needed (para 61), and support development that makes efficient use of land, taking into account the identified need for different types of housing (para 129).
- 3.2.28 However, a 50% increase on established densities is a simple uplift that would not take into account the local circumstances and context of development sites. Therefore, there is the potential that such an uplift may either not make the most efficient use of sites, or potentially may not maintain an area's prevailing character or be sympathetic to local character. The NPPF also recognises that minimum density standards should reflect the accessibility and potential of different areas, rather than one broad density range (para 130).

**Option F: Increase on the prevailing density on all sites of more than 0.5 hectares**

- 3.2.29 Option F increases the density of all large sites in Eastbourne (more than 0.5 hectares) by 50% on the prevailing density. The prevailing density would be used for all other sites less than 0.5 hectares. A threshold of 0.5 hectares is relevant because the majority of sites in Eastbourne are small, and 0.5 hectares is a relatively large site in the context of development in Eastbourne.
- 3.2.30 By not seeking an uplift on prevailing density on small sites, this would enable smaller infill or redevelopments to be integrated into the built environment as they are more likely to reflect the character of the area. It would also enable better and more efficient use of sites to be made on larger sites, where there would be greater options for design and layout to mitigate the impacts of higher density on existing and future residents.
- 3.2.31 Similar to Option E, a 50% increase on established densities is a simple uplift that would not take into account the local circumstances and context of

development sites, and therefore either may not make the most efficient use of sites, or potentially may not maintain an area's prevailing character or be sympathetic to local character. This would also not meet the NPPF requirement for density standards to reflect the accessibility and potential of different areas (para 130).

- 3.2.32 In addition, the Local Housing Needs Assessment notes a need for a greater proportion of future development to be mid-sized, in particular 3-bed homes, which are more likely to be provided in the form of houses rather than flats. Smaller sites, particularly in locations such as the Town Centre, may be more appropriate for flatted development as opposed to houses, and the options for the development of houses is likely to be greater on larger sites to ensure that the overall need for housing types is met across the Borough. Increasing the density on large sites is likely to require the number of houses to be minimised and the number of flats to be maximised in order to meet the density uplift, particularly where on-site infrastructure or forms of mitigation might be required to make a site acceptable. This could have the effect of reducing the overall number of houses that are delivered against the housing need.

**Option G: Increased density in areas with high levels of accessibility to services and facilities**

- 3.2.33 Option G seeks to combine some of the principles identified in Option D and Option E, whilst also considering identifying more development in areas that have high levels of accessibility via walking and cycling to a range of services and facilities.
- 3.2.34 In taking into account Option E, this option takes a more nuanced approach to increasing density on sites within the built-up area by giving consideration to how density can be maximised without having negative impacts on the character of areas.
- 3.2.35 The Assessment of Residential Density (2021) seeks to establish the densities would be appropriate for future residential development with the aim of maximising the number of new homes that can be sustainably delivered. It is done through an analysis of the density of the established areas and comparing these against the density of recent developments to consider the higher range of densities that may be appropriate in each area that still reflect the character of the area.
- 3.2.36 The Assessment of Residential Density then seeks to identify local circumstances that may influence the densities that would be appropriate in

different parts of the town. One of these local considerations is the levels of accessibility to services and public transport that indicate where densities should be increased.

- 3.2.37 The Sustainable Neighbourhood Assessment identifies a range of services and facilities that are considered to be important for a sustainable neighbourhood, and assesses neighbourhoods in relation to accessibility to these services and facilities. This identifies areas that have the widest range of services and facilities within walking distance, where there should be lower requirements for car ownership and where density should be increased beyond prevailing densities.
- 3.2.38 This approach is consistent with the NPPF requirements to make the most effective use of land in urban areas (paras 11 and 124), and avoiding homes being built at low densities to ensure that developments make optimal use of the potential of each site (para 130).
- 3.2.39 The NPPF also notes that seeking to ensure development is sympathetic to local character should not prevent or discourage appropriate innovation or change, such as increased densities (para 135), which this option seeks to achieve. On the whole, the option seeks to ensure that development takes into account the desirability of maintaining an area's prevailing character and setting (NPPF, para 129) and that development is sympathetic to local character and history, including the surrounding built environment and landscape setting (para 135), although this may not be achieved through higher densities in areas with high accessibility. However, the NPPF is clear that minimum density standards should reflect the accessibility and potential of different areas (para 130).
- 3.2.40 Furthermore, increasing densities in areas with high accessibility to services and facilities is consistent with the NPPF requirements to addressing the potential impacts of development on transport networks and identifying and pursuing opportunities to promote walking, cycling and public transport use (para 109), and focusing development in locations that are sustainable (para 110). It would also minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities (para 111).
- 3.2.41 Whilst the higher densities are likely to mean the provision of a significant number of flats, especially in locations with high accessibility, seeking to maximise density within the context of established character in other parts of the town would enable a greater range of different housing types and sizes to come forward, which would address the NPPF requirement to include an appropriate mix of housing types for the local community that reflects the

size, type and tenure of housing needed (para 61), and support development that makes efficient use of land, taking into account the identified need for different types of housing (para 129).

### **Option H: Meeting Local Housing Need in Full**

- 3.2.42 The Local Housing Need for Eastbourne as calculated via the ‘standard method’ is 714 homes per year. Over Core Strategy period since 2006, Eastbourne has delivered an average of 205 homes per year. However, since 2018, this average has dropped to 171 new homes per year despite the application of the NPPF’s presumption in favour of sustainable development. In the context of the various constraints limit the amount of land available to develop, it was considered that this option was undeliverable, and was therefore not a reasonable alternative, and as a result ‘screened’ out through the Sustainability Appraisal process.
- 3.2.43 However, it is now considered appropriate that this option is assessed as part of the options for the spatial strategy. It is considered that, in order to meet housing need in full, either development would need to take place within areas of significant flood risk, including areas designated as functional floodplain, or densities on sites within the built-up area would need to be significantly increased across the whole town.
- 3.2.44 The NPPF identifies that inappropriate development in areas at risk of flooding should be avoided, and where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere (para 170).
- 3.2.45 Planning Practice Guidance Development identifies that ‘highly vulnerable’, ‘more vulnerable’ and ‘less vulnerable’ uses should not be permitted within areas designated as functional floodplain. In addition, development in these areas is unlikely to provide wider sustainability benefits to the community that outweigh flood risk; the development would not be safe for its lifetime taking account of the vulnerability of its users; and would increase flood risk elsewhere.
- 3.2.46 The NPPF also identifies that local plans should also safeguard land from development that is required, or likely to be required, for current or future flood management (para 172).
- 3.2.47 In order to accommodate the local housing need in full within the built-up area, it is estimated that sites would need to be developed at four times the established density in each area. This would require residential development

in the form of flats, which would not reflect the housing need requirements in terms of size and type of housing (NPPF, para 61), and would result in a significant oversupply of a particular type of home that doesn't meet the needs of the local community. This would also saturate the market, meaning that sufficient land would not come forward at a sufficient rate, and ultimately meaning that fewer homes will be delivered.

- 3.2.48 In addition, densities as high as required to meet local housing need would mean heights of buildings would need to increase significantly across the whole town, including in areas that would not be suitable for tall buildings for townscape and landscape reasons, which would have adverse impacts on the character of the town, with possible impact on well-being of the residents, and the reputation of the town as a tourist resort, which would impact on the local economy. This would also have significant adverse impacts on the setting of the South Downs National Park.
- 3.2.49 Furthermore, the Eastbourne Local Plan Shared Transport Evidence Base (STEB): Interim Assessment and Mitigation Strategy (2022) identifies that growth at much lower levels than local housing need would have significant adverse impacts on the highway network, that would require high levels of mitigation including a 15% modal shift. The NPPF (para 109) requires that transport issues to be considered by understanding and addressing the potential impacts of development on transport networks. Although the full local housing need was not tested as part of this STEB transport modelling, based on the findings of lower levels of growth, it is considered that the levels of mitigation required on the highway network for local housing need to be delivered would not be deliverable.

### 3.3 Appraisal of Options

#### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Option A	-/i	-/0	-/0	-/i	0	i	0/i	0	0	0	0	-
Option B	-/i	-/0	-/0	-/i	0	i	+/-	0	0	0	0	-
Option C	--/i	-/0	-	0	--/i	-/i	++/-	-	-	0	0	+/-
Option D	+/-	+/-	+/-	0	-/i	-/i	++/-	+/-	-	+/i	0	++
Option E	-/i	-/0	-/0	0	-/i	-/i	++/i	-	-	0	0	+/i
Option F	-/i	-/0	-/0	0	-/i	-/i	++/i	-	-	0	0	+/-
Option G	+/-	+/-	+/-	-	-/i	-/i	++/i	+/i	-	+/i	0	++
Option H	--/i	--	--/0	--	--	-/i	++/-	--	--	--	--	+/i

Option A: Densities based on the prevailing character of the area surrounding the site

#### Positive impacts

- No positive impacts have been identified for Option A.

#### Negative impacts

- The policy will have a negative to uncertain impact by generating carbon emissions during construction. The impact for the occupation of the development will depend on the implementation of each development. Lower-density housing

generally allows for better on-site renewable energy generation (Solar PV) compared to flats, though it may result in less efficient energy use.

- The policy will have a largely negative impact on achieving a clean environment. It will have a strong negative impact on air pollution by perpetuating low-density development that is reliant on private cars for transport. It will also have a negative impact on water quality by increasing the volume of surface water runoff from new roads and driveways, and a negative to uncertain impact on noise and light pollution by introducing general urban noise and street lighting to edge-of-settlement areas.
- The policy will have a negative impact by placing additional recreational strain on SSSIs and Green Infrastructure due to population growth. However, this is mitigated as lower densities offer a higher chance to provide on-site biodiversity net gains (via gardens and verges) compared to high-density options.
- The policy will have a negative impact by maintaining current density and not providing changes to aid modal shift.

### **Mixed impacts**

- No mixed positive and negative impacts have been identified for Option A.

### **Implementation-dependent impacts**

- The impact of the policy will depend on the operational implementation of waste management strategies rather than the spatial strategy itself, though houses generally accommodate bin storage more easily than flats.

### **Neutral impacts**

- The policy will have a neutral impact by ensuring that new development mimics the prevailing character of the area, thereby respecting the existing townscape and avoiding harm to key views and the setting of the South Downs National Park.
- The policy will have a neutral impact, with some impacts that will depend on its implementation. By not changing the density, the policy will be neutral, but by replicating the existing densities, it will deliver a mix of dwellings.
- The policy will have a neutral impact by mitigating the strain on existing infrastructure, because house-led developments (unlike flats) are liable for Community Infrastructure Levy (CIL) payments, thus generating the funding capacity to mitigate these impacts.
- The policy will have a neutral impact by maintaining current community structures without significant positive or negative changes identified.

- The policy will have a neutral impact by not significantly altering the provision of employment land or business opportunities.
- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

### Option B: Increasing the proportion of houses being delivered on sites

#### **Positive impacts**

- No positive impacts have been identified for Option B.

#### **Negative impacts**

- The policy will have a negative to uncertain impact by generating carbon emissions during construction. The impact of the occupation on the development will depend on the implementation of each development. Lower-density housing generally allows for better on-site renewable energy generation (Solar PV) compared to flats, though it may result in less efficient energy use.
- The policy will have a mixed positive and negative impact on flood risk and water availability. It will have a positive impact on reducing flood risk and improving water availability by utilising lower-density layouts that provide necessary space for Sustainable Drainage Systems (SuDS) and offer higher possibilities for on-site rainwater harvesting. However, the policy will have a negative impact on reducing water consumption by increasing the absolute population and total aggregate demand for water resources. Finally, it will have a neutral impact on general flooding events by not actively increasing risk in sensitive zones.
- The policy will have a largely negative impact on achieving a clean environment. It will have a strong negative impact on air pollution by perpetuating low-density development that is reliant on private cars for transport. It will also have a negative impact on water quality by increasing the volume of surface water runoff from new roads and driveways, and a negative to uncertain impact on noise and light pollution by introducing general urban noise and street lighting to edge-of-settlement areas.
- The policy will have a negative impact by increasing the population, which puts additional recreational strain on SSSIs and Green Infrastructure. However, this is mitigated by the fact that lower-density development offers a higher chance to provide on-site biodiversity net gains and integrate green infrastructure (gardens, verges) compared to high-density options.
- The policy will have a negative impact by maintaining current density and not providing changes to aid modal shift.

### **Mixed impacts**

- The policy will have a mixed impact by increasing the overall number of housing units, but potentially failing to diversify the stock adequately to meet the needs of all groups, such as those requiring smaller, affordable entry-level dwellings or downsizing options.

### **Implementation-dependent impacts**

- The impact of the policy will depend on the specific waste management strategies implemented rather than the spatial strategy itself.

### **Neutral impacts**

- The policy will have a neutral impact by avoiding the visual intrusion of tall buildings, maintaining a scale of development that is generally consistent with the prevailing townscape.
- The policy will have a neutral impact by mitigating the strain on existing infrastructure, because house-led developments (unlike flats) are liable for Community Infrastructure Levy (CIL) payments, thus generating the funding capacity to mitigate these impacts.
- The policy will have a neutral impact by maintaining current community structures without significant positive or negative changes identified.
- The policy will have a neutral impact by not significantly altering the provision of employment land or business opportunities.
- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

### Option C: Increasing the proportion of flats being delivered on sites

#### **Positive impacts**

- No positive impacts have been identified for Option C.

#### **Negative impacts**

- The policy will have a strong negative to uncertain impact by requiring high-intensity construction, resulting in significant carbon emissions during construction. The impact on the occupation of the development will be negative, as flats typically possess insufficient roof space to meet their energy needs via Solar PV, necessitating a higher reliance on energy from the grid, while the heating solutions remain unknown.

- The policy will have a mostly negative impact on flood risk and water availability. It will have a negative impact on reducing flood risk because high-density flat developments leave limited space for permeable surfaces and Sustainable Drainage Systems (SuDS). It will also have a negative impact on water availability due to the lower possibility of implementing on-site rainwater harvesting compared to houses, and a negative impact on reducing water consumption due to the aggregate demand from the increased population. Finally, it will have a neutral impact on the immediate occurrence of flooding events by generally adhering to currently developed zones and not using areas at higher risk of flooding.
- The policy will have a negative impact on a clean environment. It will have a strong negative to uncertain impact on noise and light pollution by introducing high-density living environments that concentrate noise and light spill. It will have a negative impact on air pollution due to increased activity, and a negative impact on water pollution due to surface runoff. Finally, it will have a neutral impact on Source Protection Zones and soil pollution.
- The policy will have a negative to uncertain impact by potentially harming the town's character and key views. The density required would likely fail to respect the prevailing character, with specific negative risks identified for Conservation Areas where high-density housing would be out of character.
- The policy will have an uncertain impact depending on implementation, as high-density buildings can complicate waste separation and recycling logistics, however, developments can produce solutions to better manage waste in facilities that individual dwellings might be too onerous.
- The policy will have a negative impact by placing a higher strain on utilities and infrastructure due to density. As flats currently do not pay the Community Infrastructure Levy (CIL), this option reduces the capacity to deliver the new infrastructure required to support the population growth.
- The policy will have a negative impact by reducing the land inside developments dedicated for green infrastructure and communal outdoor space. Additionally, flats can have a negative impact on the ageing population, for whom tall buildings and high-density living can present accessibility and social isolation challenges.

### **Mixed impacts**

- The policy will have a mixed, strong positive and negative impact. It will have a strong positive impact on the total number of units delivered, maximising the use of land. However, it will have a negative impact on meeting specific community needs, as flats have greater difficulty in delivering affordable and social housing,

and the resulting mix of tenures and types will be less diverse than required for families.

- The policy will have a positive to uncertain impact by creating the critical mass of density that makes the introduction of new public transport routes commercially viable, potentially fostering a shift away from private car dependency, which is dependent on the delivered infrastructure.

### **Implementation-dependent impacts**

- No impacts that will depend on their implementation have been identified for Option C.

### **Neutral impacts**

- The policy will have a neutral impact on biodiversity, as the concentration of development in flats may spare land elsewhere, though it offers limited opportunities for on-site biodiversity net gain compared to lower-density options.
- The policy will have a neutral impact by not significantly altering the provision of employment land or business opportunities.
- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

### Option D: Providing taller residential buildings in the Town Centre

#### **Positive impacts**

- The policy will have a positive to uncertain impact by improving access to employment opportunities for residents living in the centre. However, the impact depends on implementation and whether sufficient land for business is safeguarded against residential conversion.
- The policy will have a strong positive impact by creating the critical mass of density that makes the introduction of new public transport routes viable. By focusing development in the Town Centre, which has access to services and infrastructure, it significantly reduces the need to travel by private car.

#### **Negative impacts**

- The policy will have a negative to uncertain impact by potentially harming the town's character and key views. The density required would likely fail to respect the prevailing character, with specific negative risks identified for Conservation Areas where high-density housing would be out of character.

- The policy will have an uncertain impact depending on implementation, as high-density buildings can complicate waste separation and recycling logistics; however, developments can produce solutions to better manage waste in facilities that individual dwellings might find too onerous.
- The policy will have a negative impact by reducing the land inside developments dedicated to green infrastructure and communal outdoor space. Additionally, flats can have a negative impact on the ageing population, for whom tall buildings and high-density living can present accessibility and social isolation challenges.

### **Mixed impacts**

- The policy will have a mixed negative and positive impact on emissions. It will have a negative impact due to the high levels of carbon from constructing tall buildings and the reliance on energy from the grid (as flats lack sufficient roof space for solar PV). However, it will have a positive impact by locating more people close to destinations, thereby encouraging public transport use and reducing transport-related emissions.
- The policy will have a mixed positive and negative impact on flood risk and water availability. It will have a positive impact on reducing flood risk overall by concentrating development in the town centre, leaving space outside of it for natural flood management. It will also have a positive impact on water availability by offering a higher possibility to use rainwater harvesting systems off-site. However, the policy will have a negative impact on flooding vulnerability by placing a larger population directly into the Town Centre, which is an area at risk of flooding. Finally, it will have a negative impact on reducing water consumption due to the aggregate demand from the increased population.
- The policy will have a mixed impact on a clean environment. It will have a positive impact on air pollution by fostering a modal shift to sustainable transport, decreasing pollution related to private car use. It will have a mixed positive and negative impact on noise and light pollution, as it increases nuisance on the sites but potentially reduces impacts in other areas. Finally, it will have a neutral impact on Source Protection Zones and soil pollution.
- The policy will have a mixed, strong positive and negative impact. It will have a strong positive impact on the total number of units delivered, maximising the use of land. However, it will have a negative impact on meeting specific community needs, as flats have greater difficulty in delivering affordable and social housing, and the resulting mix of tenures and types will be less diverse than required for families.
- The policy will have a mixed positive and negative impact. It will have a positive impact by placing residents in close proximity to existing services, improving

accessibility. However, it will have a negative impact because flats currently do not pay the Community Infrastructure Levy (CIL), meaning this option reduces the capacity to fund the necessary upgrades to utilities and infrastructure that are under strain from higher density.

### **Implementation-dependent impacts**

- No impacts that will depend on their implementation have been identified for Option D.

### **Neutral impacts**

- The policy will have a neutral impact on biodiversity, as it focuses density on the existing built-up footprint of the Town Centre, avoiding direct encroachment on greenfield sites.
- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

### **Option E: Increase in the prevailing density on all sites within the existing built-up area**

#### **Positive impacts**

- The policy will have a strong positive impact, with some impacts depending on implementation. It will have a strong positive impact on the number of units delivered and will provide a more diverse mix of types and tenures than the flats-only option. However, it will have a negative impact on affordability, as the component of the delivery that relies on flats will struggle to deliver affordable and social housing contributions.
- The policy will have a positive to uncertain impact by increasing density sufficiently to make the introduction of new public transport routes more viable, potentially supporting a shift away from private car dependency.

#### **Negative impacts**

- The policy will have a negative to uncertain impact by generating greenhouse emission gases during construction due to the increased volume of building required. The impact on the occupation of the development will be mixed: while the strategy delivers a mix of typologies, the flats involved cannot easily meet their energy needs with on-site Solar PV, requiring more grid energy, whereas the houses delivered under this option could potentially meet part of their own needs.

- The policy will have a largely negative impact on flood risk and water availability. It will have a negative impact on reducing flood risk because increasing density on all sites leaves less space for Sustainable Drainage Systems (SuDS). It will also have a negative impact on the quantity of available water due to the lower possibility of implementing rainwater harvesting compared to lower-density options, and a negative impact on reducing water consumption due to the aggregate demand from the increased population. Finally, it will have a neutral impact on the immediate occurrence of flooding events by adhering to existing flood zones.
- The policy will have a mixed impact on a clean environment. It will have a mixed positive and negative impact on noise and light pollution; while it increases these disturbances on the developed sites themselves, it potentially reduces impacts in other, less developed areas by containing sprawl. However, it will have a negative impact on air pollution by increasing the number of cars on the road. Finally, it will have a neutral impact on water pollution, soil pollution, and Source Protection Zones.
- The policy will have a negative to uncertain impact by potentially harming the town character and key views. The density required would likely fail to respect the prevailing character, with specific negative risks identified for Conservation Areas where high-density housing would be out of character.
- The policy will have an uncertain to negative impact depending on implementation, as higher densities across the board generally correlate with higher waste generation and more complex collection logistics.
- The policy will have a negative impact by placing a higher strain on utilities and infrastructure across the existing built-up area and not focusing on infrastructure densification in specific areas.
- The policy will have a negative impact. The increased density across all sites reduces the land available for green infrastructure and community spaces within neighbourhoods, potentially impacting the quality of life for residents.

### **Mixed impacts**

- No mixed impacts have been identified for Option E.

### **Implementation-dependent impacts**

- No impacts that will depend on their implementation have been identified for Option E.

### **Neutral impacts**

- The policy will have a neutral impact on biodiversity, as the intensification occurs within the existing built-up area boundary, avoiding direct use of greenfield land, though it limits opportunities for significant new green infrastructure on-site.
- The policy will have a neutral impact by not directly reallocating employment land or altering the economic spatial strategy.
- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

#### Option F: Increase on the prevailing density on all sites of more than 0.5 hectares

##### **Positive impacts**

- The policy will have a strong positive impact, with some characteristics that will depend on the implementation. It will have a strong positive impact on the number of units delivered and will provide a more diverse mix of types and tenures than the flats-only option. However, it will have an uncertain impact regarding affordability, as each development's delivery of affordable and social housing will depend on the development.
- The policy will have a positive to uncertain impact by increasing density sufficiently to make the introduction of new public transport routes more viable, potentially supporting a shift away from private car dependency.

##### **Negative impacts**

- The policy will have a mixed negative to uncertain impact by generating greenhouse gas emissions during construction due to the increased volume of building required. The impact of the occupation on the development will be mixed. While the strategy delivers a mix of typologies, the flats cannot readily meet their energy needs with on-site Solar PV, requiring more energy from the grid, whereas the houses delivered under this option could meet part of their own needs.
- The policy will have a mixed negative, uncertain and neutral impact on flood risk and water availability. It will have a negative impact on the quantity of available water due to the lower possibility of using rainwater harvesting compared to lower-density options, and a negative impact on reducing water consumption due to the aggregate demand from the increased population. It will have an uncertain impact on reducing flood risk, as the provision of space for Sustainable Drainage Systems (SuDS) will depend heavily on the specific layout of these larger sites. Finally, it will have a neutral impact on the immediate occurrence of flooding events.

- The policy will have a mixed negative, uncertain and neutral impact on a clean environment. It will have a negative impact on air pollution by potentially increasing the number of private cars on the road. It will have an uncertain impact on noise and light pollution, as the effects depend on the specific design and layout of these larger developments. Finally, it will have a neutral impact on water pollution, soil pollution, and Source Protection Zones.
- The policy will have a negative to uncertain impact depending on implementation. The significant increase in density might have a negative impact by not considering the local character, particularly if larger sites are located within or near Conservation Areas, where such intensification would conflict with the prevailing character.
- The policy will have an uncertain to negative impact depending on implementation. Higher densities on these larger sites generally correlate with higher waste generation and more complex collection logistics compared to standard prevailing densities.
- The policy will have a negative impact by placing a higher strain on utilities and infrastructure across the existing built-up area and not focusing on infrastructure densification in specific areas.
- The policy will have a negative impact. The increased density across all sites reduces the land available for green infrastructure and community spaces within neighbourhoods, potentially impacting the quality of life for residents.

### **Mixed impacts**

- No mixed impacts have been identified for Option F.

### **Implementation-dependent impacts**

- No impacts that will depend on their implementation have been identified for Option F.

### **Neutral impacts**

- The policy will have a neutral impact on biodiversity. By focusing intensification on larger sites within the built-up area, it may allow for easier delivery of green infrastructure, though it does not actively create new habitats.
- The policy will have a neutral impact by not directly reallocating employment land or altering the economic spatial strategy.
- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

### Option G: Increased density in areas with high levels of accessibility to services and facilities

#### **Positive impacts**

- The policy will have a strong positive impact, with some characteristics that will depend on the implementation. It will have a strong positive impact on the number of units delivered and will provide a more diverse mix of types and tenures than the flats-only option. However, it will have an uncertain impact regarding affordability, as each development's delivery of affordable and social housing will depend on the development.
- The policy will have a mixed positive and negative impact. It will have a positive impact by increasing access to existing services due to the proximity of new homes to facilities. However, development will place a higher strain on those same utilities and infrastructure, so the impact will depend on developer contributions to fund capacity upgrades.
- The policy will have a positive impact that will depend on the implementation of each development. It will have a positive impact by improving residents' access to employment opportunities. However, the outcome depends on implementation and whether sufficient land for business is safeguarded against residential conversion.
- The policy will have a strong positive impact. Increasing density in accessible locations makes the introduction of new public transport routes viable and helps reduce dependency on the private car.

#### **Negative impacts**

- The policy will have a negative impact. The higher density required in these accessible areas results in fewer connections between sites, fragmenting the nature recovery network, and a lower possibility to deliver Biodiversity Net Gain (BNG) on-site.
- The policy will have a negative to uncertain impact depending on implementation. The significant increase in density might have a negative impact by not considering the local character, particularly if larger sites are located within or near Conservation Areas, where such intensification would conflict with the prevailing character.
- The policy will have an uncertain to negative impact depending on implementation. Higher densities on these larger sites generally correlate with higher waste generation and more complex collection logistics compared to standard prevailing densities.

- The policy will have a negative impact. The increased density might reduce the land available for communal green infrastructure and recreational spaces within the neighbourhoods.

### **Mixed impacts**

- The policy will have a mixed negative to uncertain impact by generating greenhouse gas emissions during construction due to the increased volume of building required. The impact of the occupation on the development will be mixed. While the strategy delivers a mix of typologies, the flats involved cannot easily meet their energy needs with on-site Solar PV, requiring more energy from the grid, whereas the houses delivered under this option could potentially meet part of their own needs. However, the policy will have a positive impact by focusing development in served areas, which decreases emissions related to private car use by facilitating sustainable transport.
- The policy will have a mixed positive and negative impact on flood risk and water availability. It will have a positive impact on reducing flood risk overall by concentrating development in the town centre, leaving space outside of it for natural flood management. It will also have a positive impact on water availability by offering a higher possibility to use rainwater harvesting systems off-site. However, the policy will have a negative impact on flooding vulnerability by placing a larger population directly into the Town Centre, which is an area at risk of flooding. Finally, it will have a negative impact on reducing water consumption due to the aggregate demand from the increased population.
- The policy will have a mixed impact on a clean environment. It will have a positive impact on air pollution by fostering a modal shift to sustainable transport, decreasing pollution related to private car use. It will have a mixed positive and negative impact on noise and light pollution, as it increases nuisance on the sites but potentially reduces impacts in other areas. Finally, it will have a neutral impact on Source Protection Zones and soil pollution.

### **Implementation-dependent impacts**

- No impacts that will depend on their implementation have been identified for Option G.

### **Neutral impacts**

- The policy will have a neutral impact by neither enhancing nor detracting from the town's tourism offer or visitor accommodation.

## Option H: Meeting Local Housing Need in Full

### **Positive impacts**

- The policy will have a positive impact by creating densities that make it more viable to introduce new public transport routes, although growth would not necessarily be focused on specific strategic sites.

### **Negative impacts**

- The policy will have a strong negative to uncertain impact by requiring the highest levels of construction, resulting in significant greenhouse gas emissions during construction. The impact of the occupation on the development will depend on the characteristics of each development. While the new flats will be more sustainable, the policy will have a negative impact because flats cannot easily meet their energy needs with on-site Solar PV, necessitating a higher reliance on energy from the grid.
- The policy will have a strong negative impact on flood risk and water availability. It will have a strong negative impact on flooding by placing more people in areas at risk of flooding to respond to the need to fully deliver housing targets. It will have a strong negative impact on reducing flood risk due to limited space for sustainable drainage. It will have a negative impact on water availability due to the lowest chance of utilising rainwater harvesting, and a negative impact on reducing water consumption due to the aggregate demand from the increased population.
- The policy will have a largely negative impact on a clean environment. It will have a strong negative impact on air pollution, as this option results in the highest potential number of cars. It will have a strong negative impact on water pollution and noise pollution. It will have an uncertain impact on light pollution. Finally, it will have a neutral impact on Source Protection Zones and soil pollution.
- The policy will have a strong negative impact by necessitating development in sensitive areas like Eastbourne Park. The high density required reduces the possibility of providing network connections between sites, meaning Biodiversity Net Gain (BNG) will likely have to be delivered off-site, with large impacts on green infrastructure.
- The policy will have a strong negative impact. The densities required would be so high that they would fail to respect the prevailing character, with negative impacts on key views and the necessity to develop high-density housing within Conservation Areas.
- The policy will have an uncertain to negative impact depending on implementation. Higher densities on these larger sites generally correlate with

higher waste generation and more complex collection logistics compared to standard prevailing densities.

- The policy will have a strong negative impact by placing a higher strain on utilities and infrastructure across the existing built-up area and potentially currently undeveloped areas, and not focusing on infrastructure densification in specific areas.
- The policy will have a strong negative impact by utilising most available land for housing, thereby reducing the provision of playing fields and recreational spaces.
- The policy will have a strong negative impact by involving the delivery of housing on existing employment land, reducing economic sustainability.
- The policy will have a strong negative impact by involving the delivery of housing on land currently used for tourism, leading to the loss of tourist accommodation.

### **Mixed impacts**

- The policy will have a mixed, strong positive and negative impact. It will have a strong positive impact on the number of units delivered. However, it will have a negative impact on the mix of types and tenures, with flats being predominant, which have more difficulty in delivering affordable and social housing.

### **Implementation-dependent impacts**

- No impacts that will depend on their implementation have been identified for Option H.

### **Neutral impacts**

- No neutral impacts have been identified for Option H.

## **3.4 Evaluation of spatial strategy options**

### **Option A: Densities based on the prevailing character of the area surrounding the site.**

- **Main benefits:** Option A protects Eastbourne's existing character, ensuring no harm to the townscape, key views, or the setting of the South Downs National Park. It delivers the type of housing that is most common and supports on-site biodiversity and renewable energy (solar PV) better than high-density options.
- **Main limitations:** It fails to meet the government's housing target and depends on private cars for transport, resulting in negative impacts on the environmental and economic aspects of the SA.

- Assessment: Option A is not effective in supporting the Objectives established in the SA Framework.

### **Option B: Increasing the proportion of houses being delivered on sites**

- Main benefits: Option B delivers high-quality family homes and offers the benefits for the environmental aspects of the SA.
- Main limitations: It exacerbates land consumption and fails to deliver the density required to make new public transport routes viable, depending on car use and associated pollution.
- Assessment: Option B is not effective in supporting the Objectives established in the SA Framework.

### **Option C: Increasing the proportion of flats being delivered on sites**

- Main benefits: Option C maximises land efficiency and delivers high housing numbers.
- Main limitations: It lacks a diversity of housing types and a mix that does not meet the community's needs. It might place severe strain on infrastructure without generating CIL funding.
- Assessment: Option C provides a high number of dwellings but fails to support other Objectives established in the SA Framework.

### **Option D: Providing taller residential buildings in the Town Centre**

- Main benefits: Option D provides a strong impact in delivering modal shift by promoting development near services, which significantly reduces car dependency and supports the vitality of the Town Centre. It preserves greenfield land elsewhere by intensifying the centre.
- Main limitations: It concentrates the population in a zone with flood risk and potentially harms the Conservation Areas' character due to the taller buildings.
- Assessment: Option D provides a high number of dwellings, and benefits in sustainable transport and economy, but can potentially harm the townscape if not well designed.

**Option E: 50% increase on the prevailing density on all sites within the existing built-up area, and Option F: 50% increase on the prevailing density on all sites of more than 0.5 hectares**

- Main benefits: Options E&F increase the delivery of dwellings to support the council targets.
- Main limitations: The lack of specific areas to increase density risks posing a burden on infrastructure, services and transport without a cohesive policy or resources to deliver the necessary services.
- Assessment: Options E&F provide a high number of dwellings but can strain infrastructure if not well designed and if new infrastructure or transport links are not delivered.

### **Option G: Increased density in areas with high levels of accessibility to services and facilities**

- Main benefits: Option G aligns growth with infrastructure capacity and promotes modal shift by placing density where public transport and services already exist or can be viably improved. It also protects sensitive landscapes by directing growth away from them.
- Main limitations: It requires high-density development, which may conflict with the character of some conservation areas.
- Assessment: Option G provides a high number of dwellings with a balanced strategy that supports several objectives of the SA Framework.

### **Option H: Meeting Local Housing Need in Full**

- Main benefits: Option H delivers the highest number of homes by meeting the government's housing target.
- Main limitations: The high level of construction and use of all available land creates significant challenges in delivering sustainable development. It has a significant negative impact on almost every objective, given the limitations imposed by Eastbourne's character and physical constraints.
- Assessment: Option H does not deliver a sustainable option for development, as too many objectives report a negative impact.

## **3.5 Preferred Option**

The preferred option is Option G: Increased density in areas with high levels of accessibility to services and facilities. This approach maximises the number of dwellings to be delivered while taking into account Eastbourne's character and

constraints. It facilitates infrastructure delivery by focusing on well-connected built-up areas.

## 4. Appraising the Policies

### 4.1 Introduction

4.1.1 The following sections show the Appraisal that EBC has conducted to identify the likely impact that the proposed policies and the reasonable alternatives would have on the short, medium and long term in the district and how they would contribute to making the Borough a more sustainable place.

4.1.2 The sections of the appraisal consider the following policies:

- Spatial Strategy Policies;
- Site Allocation Policies;
- Neighbourhood Policies; and
- Strategic and Non-Strategic Policies

### 4.2 Appraisal of the Spatial Strategy Policies

#### Policy proposal SS1: Spatial Development Strategy

##### **Preferred Policy summary**

Establishes the framework for growth through 2042, directing development within the built-up area boundary to protect green spaces and the town's character. It prioritises high-quality development that supports carbon neutrality, sustainable travel, and neighbourhood regeneration. The strategy ensures that growth is balanced with the protection of essential services, employment land, and community facilities, while focusing investment on regenerating the Town Centre and enhancing the Seafront.

##### **Reasonable alternative**

No reasonable alternative has been identified. The policy reflects the physical constraints of the built-up area boundary, the requirement to meet national housing targets, and the protection of green spaces.

**Summary evaluation**

Objective	13. Greenhouse Gas Emissions	14. Flood Risk and Water Availability	15. Clean Environment	16. Biodiversity and Green Infrastructure	17. Landscape, Townscape and Historic Environment	18. Waste	19. Housing	20. Infrastructure	21. Resilient Communities	22. Employment and Business Growth	23. Leisure and Tourism	24. Travel and Transport
Preferred policy performance	++	0	+	+	-	0	++	+	+	+	+	++

**Positive impacts**

- Focuses the majority of growth in the most sustainable locations (Town Centre and brownfield sites), significantly reducing the need for private car travel, thus supporting modal shift and associated carbon emissions.
- Supports modal shift and using more sustainable transport, which in turn will reduce air pollution from cars.
- Prioritises the redevelopment of previously developed land, and safeguards priority habitats.
- Provides the strategic framework necessary to deliver the borough’s housing target through an intensification-led approach.
- Focuses growth in areas where infrastructure already exists, making the delivery and upgrading of services more viable and efficient.
- Channels investment into existing neighbourhoods, helping to regenerate areas and maintain the viability of local services.
- Supports the regeneration of the town centre and seafront, as well as established employment areas, which will support business retention and development.
- Supports the regeneration of the seafront, which is critical for the visitor economy and the maintenance of leisure facilities.
- Locates high-density development in areas with the highest public transport accessibility, maximising the use of sustainable travel modes.

**Negative impacts**

- The policy will have a negative impact in some areas because the requirement for high-density intensification is likely to alter the existing character of some areas.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with a potential negative impact identified in the Landscape, Townscape and Historic Environment policy, and no suitable alternative policy identified.

**Policy proposal SS2: Promoting Sustainable Transport**

<b>Preferred Policy summary</b>
To reduce reliance on private cars and cut carbon emissions, this policy mandates that new developments prioritise active travel (walking and cycling) and public transport. Development must be located in areas with good access to services to minimise the need to travel. The design of streets and spaces must place pedestrians and cyclists first, ensuring safe and convenient connectivity between neighbourhoods, while parking provision is minimised to encourage a shift toward sustainable transport modes.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a requirement of the NPPF to promote sustainable transport and prioritise active travel.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	++	0	+	0	0	0	0	+	++	+/-	+/-	++

**Positive impacts**

*Preferred policy*

- Ensures that new development is located within walking distance of essential services, reducing greenhouse gas emissions related to travel.
- Reduces car dependency, leading to a reduction in traffic congestion in local neighbourhoods, and decreases in air and noise pollution.

- Supports the development of infrastructure that supports active travel and public transport options.
- Fosters inclusive, walkable neighbourhoods where residents can access daily needs without a car, supporting movement and a healthy lifestyle.
- Structures development around active travel and public transport nodes, minimising car dependency.

### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

### **Mixed impacts**

#### *Preferred policy*

- The policy will have a mixed positive and negative impact; while it supports public and active transport modes, it will encourage support to local high street and small businesses; however, travel to businesses in out-of-centre locations might be negatively impacted.
- The policy will have a mixed positive and negative impact; while it will support tourist that arrive or move around the District using sustainable transport, it might have a slight negative impact on those who rely on their car.

### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with two mixed impacts on the economic objectives, no negative impacts measured, and no suitable alternative policy identified.

**Policy proposal SS3: Eastbourne Park**

<b>Preferred Policy summary</b>
Protects Eastbourne Park as a vital multi-functional green space at the heart of the town. It safeguards the park's essential role in flood storage and mitigation, ensuring it continues to protect surrounding built-up areas from flooding. Development is strictly controlled and only permitted if it enhances the park's value for ecology, recreation, or flood management, and preserves its archaeological heritage, ensuring it remains a key asset for climate resilience and leisure.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy reflects the site's specific hydrological constraints, its ecological value and its essential function for flood storage.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	++	+	++	+	0	0	0	+	0	0	0

**Positive impacts**

*Preferred policy*

- Contains growth within the urban area, preventing low-density sprawl that generates high carbon emissions from transport and enabling the development of renewable energy infrastructure.
- Directs development away from the functional floodplains and areas used for water storage, decreasing the likelihood of flooding both in existing and new development.

- Protects the natural habitats of the borough, particularly vegetation, which is necessary to reduce air pollution.
- Acts as a strict barrier against encroachment onto the South Downs and the Pevensey Levels, supporting and enhancing these critical areas.
- Preserves the distinct setting of the town and prevents the coalescence of Eastbourne with neighbouring settlements.
- Maintains easy access to the natural spaces for recreation.

**Negative impacts***Preferred policy*

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides mostly positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts measured, and no suitable alternative policy identified.

**Policy proposal SS4: Local Green Spaces**

<b>Preferred Policy summary</b>
Provides strong protection for designated Local Green Spaces. Development on these sites is prohibited unless there are "very special circumstances" where the public benefits clearly outweigh the harm. This ensures that parks, playing fields, and other green areas important to local people are preserved for future generations to enjoy.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a mechanism set out in the NPPF to protect community-valued green spaces.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	++	+	0	0	0	+	0	0	0

**Positive impacts**

*Preferred policy*

- Protects local green spaces, ensuring that development does not harm these assets. Unless very special circumstances are met.
- Conserves local green spaces that are a significant part of the setting and landscape of the town.
- Preserves a key environmental asset that contributes to the community's identity and sense of belonging, as well as supporting their access to green infrastructure and a healthy lifestyle.

**Negative impacts***Preferred policy*

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts measured, and no suitable alternative policy identified.

**Policy proposal SS5: Provision of Homes**

<b>Preferred Policy summary</b>
Sets the housing target for the plan period, aiming to deliver 6,010 net additional homes between 2022 and 2042 (approx. 301 per year). It prioritises the use of previously developed ("brownfield") land, targeting 82% of new homes on such sites to regenerate urban areas and protect greenfield land. The policy ensures that housing growth is managed to meet local needs while making efficient use of available land within the town.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is derived from the Government's New Standard Method, and the constraints specific to the plan area.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	+	i	0	+/-	+	i	0	0	i

**Positive impacts***Preferred policy*

- Focuses on brownfield sites, thus protecting green areas.
- Focuses development in areas with existing utility and transport infrastructure, reducing the cost and environmental impact of new service provision.

**Negative impacts***Preferred policy*

- No negative impacts for the preferred policy have been identified.

### **Mixed impacts**

#### *Preferred policy*

- The policy will have a mostly positive impact, as it will support the borough to explore every option to meet its housing need, however the requirement to deliver appropriate densities for the neighbourhoods might decrease the overall number of units delivered.

### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with one mixed impact on the housing objective, no negative impacts measured, and no suitable alternative policy identified.

**Policy proposal SS6: Provision of Employment and Commercial Floorspace**

<b>Preferred Policy summary</b>
Plans for the delivery of approximately 39,924 sqm of new employment floorspace. This provision ensures there is sufficient space for businesses to grow and for new jobs to be created, thereby diversifying the local economy. The policy guides the allocation of land for offices, industrial use, and other commercial activities to ensure the town remains a competitive and attractive place for investment.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The provision figures reflect the findings of the Employment and Economic Study.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	i	0	0	0	++	0	0

**Positive impacts***Preferred policy*

- Allocates sufficient land to meet the borough's employment needs, ensuring businesses have the space to expand and invest.

*Reasonable alternative*

- No positive impacts for the reasonable alternative have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the economic aspects of the sustainability appraisal, no negative impacts measured, and no suitable alternative policy identified.

## 4.3 Appraisal of the Site Allocation Policies

- 4.3.1 All key development sites are assessed according to the methodology set out in section 2.2.
- 4.3.2 The sites are grouped by area. There are sustainability impacts that may apply to sites in comparable circumstances and grouping sites helps to increase consistency in assessments. Additionally, it enables a transparent assessment of cumulative effects. The final column of the matrix is designated for this cumulative assessment.

### Sites in the Town Centre:

#### *Strategic Allocations*

- SA1: Land adjacent to Enterprise Centre and Railway Station
- SA2: Former Debenhams, 152-170 Terminus Road
- SA3: Land at the corner of Langney Road and Cavendish Place (56 Langney Road)
- SA4: Land at 38-40 Ashford Road
- SA5: Former Curzon Cinema, Langney Road
- SA6: Land at 2-8 Saffrons Road
- SA7: Former Police Station, Grove Road
- SA8: Former Law Courts, Old Orchard Road
- SA9: Former Claremont Hotel, Grande Parade

#### *Neighbourhood Allocations (Policy N1-B)*

- Land to the rear of Burlington Hotel, Burlington Road
- 111a Ashford Road
- 21-23 Langney Road
- Fairlands Hotel 15-17 Lascelles Terrace
- Savoy Court Hotel, Cavendish Place
- Eastbourne House, 22-24 Gildredge Road
- Parking area to rear of Queens Hotel Lion Lane
- 22a/b/c Commercial Road

### Sites in Upperton:

#### *Neighbourhood Allocations (Policy N2-B)*

- 2-26 Willingdon Road
- Leaf Hospital, St Annes Road

## Sites in Seaside

### *Strategic Allocations*

- SA10: Whitley Bridge Yard
- SA11: Land adjacent to Royal Parade and Prince William Parade (Sovereign Centre to Fort Fun)

### *Neighbourhood Allocations (Policy N3-B)*

- 55-67 Willowfield Road
- Coachmakers Business Centre, 116a Seaside
- Garages to the rear of 1-11 Wannock Road
- 104 Firle Road
- Fort Windows, Fort Lane
- National Tyres Autocare, 49 Seaside
- 2 Firle Road

## Sites in Ocklynge and Rodmill

### *Strategic Allocation*

- SEA12: East Sussex College, Kings Drive/Cross Levels Way

### *Neighbourhood Allocation (Policy N5-B)*

- St Elisabeth's Church, Victoria Drive

## Sites in Roselands & Bridgemere

### *Strategic Allocations*

- SA13: Former Gas Works, Land East of Finmere Road and North of Britland Estate
- SA14: 2-4 Moy Avenue

## Sites in Hampden Park

### *Neighbourhood Allocations (Policy N7-B)*

- Land at end of Lottbridge Drive
- Station House, Station Approach, Hampden Park
- Telephone Exchange, 7 Waldron Close

## Sites in Langney

### *Strategic Allocations*

- SA15: Land at East Langney levels
- SA16: Land North of Pevensey Bay Road

### *Neighbourhood Allocations (Policy N8-B)*

- Martello pub and Car Mechanics 106 Langney Rise
- Land at end of Slindon Crescent

### Sites in Shinewater & North Langney

### *Neighbourhood Allocation (Policy N9-B)*

- Hide Hollow Farm, Hide Hollow

### Sites in Summerdown & Saffrons

### *Strategic Allocations*

- SA17: Land at Summerdown Field, Compton Drive

### *Neighbourhood Allocation (Policy N9-B)*

- Compton Cottage, Compton Place Road
- Beresford Car Park and Teaching Block
- Memorial Field

### Sites in Meads:

### *Strategic Allocations*

- SE18: Aldro, Darley Road
- SE19: Queenwood, Darley Road
- SE20: Land at the Welkin, Carlisle Road
- SE21: New Field, Carlisle Road
- SE22: Land East of Carlisle Road

### *Neighbourhood Allocations*

- Wargrave House, Blackwater Road
- Gonville House, Carlisle Road
- Ollier Court, Lennox Lodge & Craig House, Carlisle Road
- Hillbrow, Denton Road
- Spring Mead 25 Meads Brow

### Sites in St Anthony's & Langney Point

#### *Strategic Allocations*

- SA23: Land North-East of St Anthony's Hill.

### Sites in Sovereign Harbour

#### *Strategic Allocations*

- SA24: Land off Harbour Quay
- SA25: Land adjacent to the Waterfront, Sovereign Harbour

#### *Neighbourhood Allocations*

- Berth Holders Car Park, Atlantic Drive

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

## Appraisal of sites in the Town Centre

### Strategic Allocations

#### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA1: Land adjacent to Enterprise Centre and Railway Station.	0	0	-	0	-	0	++	+	0	++	+	++
SA2: Former Debenhams, 152-170 Terminus Road	0	0	-	0	-	-	++	+	0	+	+	++
SA3: Land at the corner of Langney Road and Cavendish Place (56 Langney Road)	0	0	-	0	-	-	+	+	0	-	0	++
SA4: Land at 38-40 Ashford Road	0	0	-	0	-	-	+	+	0	-	0	++
SA5: Former Curzon Cinema, Langney Road	0	0	-	0	-	-	+	+	0	0	+	++
SA6: Land at 2-8 Saffrons Road	0	0	-	0	-	-	+	+	0	0	0	++
SA7: Former Police Station, Grove Road	0	0	-	0	-	0	+	+	0	0	+	++
SA8: Former Law Courts, Old Orchard Road	0	0	-	0	-	0	+	+	0	0	+	++
SA9: Former Claremont Hotel, Grande Parade	0	0	-	0	-	0	+	+	0	0	+	++

### Neighbourhood Allocations

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
Burlington Road car park to the rear of Burlington Hotel	0	0	-	0	-	0	+	+	0	0	-	++
111a Ashford Road	0	0	-	0	0	0	+	+	0	-	0	++
21-23 Langney Road	0	0	-	0	0	0	+	+	0	0	0	++
Fairlands Hotel 15-17 Lascelles Terrace	0	0	-	0	-	0	+	+	0	-	-	++
Savoy Court Hotel, Cavendish Place	0	0	-	0	-	0	+	+	0	-	-	++
Eastbourne House, 22-24 Gildredge Road	0	0	-	0	-	0	+	+	0	-	0	++
Parking area to rear of Queens Hotel Lion Lane	0	0	-	0	-	0	+	+	0	0	-	++
22a/b/c Commercial Road	0	0	-	0	0	0	+	+	0	-	0	++

**Positive impacts**

- All the sites provide housing, and therefore score positively on Objective 7: Housing. Some sites score a strong positive given the significance of the level of housing provision proposed.

- The sites are within the most sustainable neighbourhood and therefore have excellent access to a range of services and therefore score positively on Objective 8: Infrastructure.
- The sites that include provision of employment or commercial uses score positively on Objective 10: Employment and Business.
- The re-use of derelict sites in the Town Centre will have a positive impact on Objective 11: Leisure and Tourism.
- All the sites score positively on Objective 12. Travel and Transport given the Town Centre is the most sustainable neighbourhood with good access to services/facilities and public transport so good potential for modal shift.

### **Negative impacts**

- All the sites are within a Source Protection Zone and therefore score negatively on Objective 3: Clean Environment.
- All the sites are within or within the setting of a Conservation Area and many are within the setting of listed buildings. There is also risk of tall buildings impacting negatively on Townscape, high quality design will be required to ensure that development contributes to the townscape and protects key views.
- A number of the sites involve the demolition of buildings, which increases the production of waste and therefore these sites score negatively for Objective 6: Waste. SA8 and SA9 score neutrally as the demolition has already taken place.
- The sites that include the loss of employment or commercial uses score negatively on Objective 10: Employment and Business.
- The sites that result in the loss of tourist Accommodation or parking for tourist accommodation uses score negatively on Objective 11: Leisure and Tourism, the loss of car parking could reduce the attractiveness of the use if visitors are unable to park on site.

### **Neutral impacts**

- All the sites are within Flood Zone 1.
- All the sites in the Town Centre are previously developed land with limited existing biodiversity/nature, therefore the sites score neutrally on Objective 4: Biodiversity and Green Infrastructure. Existing biodiversity value is likely to be low so Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.
- The sites in the town centre allocated for high density flats, are more likely to be able to facilitate the use of heat networks. However, the sites score

neutrally on Objective 1: Green House Gas Emissions as there is unlikely to be a reduction of carbon emissions and the benefit of solar PV to occupiers is reduced in flats.

- Whilst there could be some positive impacts on areas of Objective 9 – Resilient Communities, such as the encouragement of active travel modes by being the most sustainable neighbourhood with access to a range of services within walking distance and increased population within the town centre which could reduce crime and antisocial behaviour, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.

### **Evaluation of options**

- The Town Centre sites have mostly positive impacts given the neighbourhood is the most sustainable neighbourhood with access to a range of services and public transport. The sites are all previously developed sites and can provide high density housing development, and some will also provide additional employment/commercial uses increasing the vitality of the Town Centre.

Appraisal of sites in Upperton**Strategic Allocations**

There are no strategic allocations proposed in Upperton.

**Neighbourhood Allocations***Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
2-26 Willingdon Road	0	0	-	0	0	-	+	0	0	-	0	+
Leaf Hospital, St Annes Road	0	0	-	0	0	0	+	0	0	0	0	+

**Positive impacts**

- Both sites are allocated for the provision of housing, and therefore score positively on Objective 7: Housing.
- Both sites score positively on Objective 12: Travel and Transport given Upperton is a sustainable neighbourhood with good access to services/facilities and public transport so good potential for modal shift.

**Negative impacts**

- Both sites are within a Source Protection Zone and therefore score negatively on Objective 3: Clean Environment.
- The development of 2-26 Willingdon Road is likely to involve the demolition of buildings, which increases the production of waste and therefore score negatively for Objective 6: Waste.

- 2-26 Willingdon Road includes the loss of employment or commercial uses and therefore scores negatively on Objective 10: Employment and Business.

### **Neutral impacts**

- Both sites are within Flood Zone 1.
- The sites in Upperton are likely to be developed for high density flats which are more likely to be able to facilitate the use of heat networks. However, the sites score neutrally on Objective 1: Green House Gas Emissions as, there is likely to be no impact on the reduction of carbon emissions and the benefit of solar PV to occupiers is reduced in flats.
- Both sites in Upperton are previously developed land with limited existing biodiversity/nature designations, therefore they have a neutral impact on Objective 4: Biodiversity and Green Infrastructure. Existing biodiversity value is likely to be low so Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.
- The sites are within a sustainable neighbourhood within walking distance of a district shopping centre and a range of services but score neutrally considering all points of Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by being in a sustainable neighbourhood with access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.
- Neither site allocation would impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The sites within Upperton have mostly neutral or positive impacts given the sites are all previously developed sites and the neighbourhood is a sustainable neighbourhood with good access to public transport and a range of services and facilities, providing high density housing development. Both sites are within a Source Protection Zone, development will need to protect the quality and yield of the water resource. 2-26 Willingdon Road, scores negatively on Objective 10 as development could result in the loss of a parade of existing commercial units, the loss is relatively minor and a number of the units within the parade have been vacant for several years.

Appraisal of sites in Seaside

**Strategic Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA10: Whitley Bridge Yard	0	-	-	0	0	-	+	0	0	-	0	+
SA11: Land adjacent to Royal Parade and Prince William Parade (Sovereign Centre to Fort Fun)	0	-	0	0	0	-	+	+	++	0	-	+

**Neighbourhood Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
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55a/67a Willowfield Road	0	-	-	0	0	-	+	0	0	-	0	+
Coachmakers Business Centre, 116a Seaside	0	-	-	0	0	-	+	0	0	-	0	+
Garages to the rear of 1-11 Wannock Road	0	-	0	0	0	-	+	0	0	0	0	+
104 Firle Road	0	-	-	0	0	0	+	0	0	-	0	+
Fort Windows, Fort Lane	0	-	-	0	0	-	+	0	0	-	0	+
National Tyres Autocare, 49 Seaside	0	-	-	0	-	0	+	0	0	-	0	+
2 Firle Road	0	-	-	0	0	-	+	0	0	-	0	+

### Positive impacts

- All the sites provide housing, and therefore score positively on Objective 7: Housing.
- The sites that include provision of employment or commercial uses score positively on Objective 10: Employment and Business.
- All the sites score positively on Objective 12: Travel and Transport given the neighbourhood is sustainable with good access to services/facilities and public transport so good potential for modal shift.
- SA11 scores positively on Objective 8: Infrastructure and a strong positive on Objective 9: Resilient Communities as the development will help to cross subsidise retention and improvements to the Leisure Centre.

### Negative impacts

- All the sites score negatively on Objective 2: Flood Risk and Water Availability as they are sited within Flood Zone 3. Development needs to consider the site-specific flood risk. SA10 scores a strong negative for this objective as the Bourne Stream is also culverted under the site. SA11 scores a strong negative as the site is located adjacent the coastline and provision of coastal defences will be required.
- The majority of the sites score negatively on Objective 3: Clean Environment as they are within a Source Protection Zone and/or are likely to require remediation of contamination.
- National Tyre Autocare, 49 Seaside is within the Town Centre and Seafront Conservation Area and also within the setting of a number of Listed Buildings

and therefore scores negatively on Objective 5: Landscape, Townscape and Historic Environment. High quality design will be required to ensure that development contributes to the townscape and does not harm the heritage assets.

- A number of the sites are likely to involve the demolition of buildings, which increases the production of waste and therefore these sites score negatively for Objective 6: Waste.
- The sites that include the loss of employment or commercial uses score negatively on Objective 10: Employment and Business.
- The sites that result in the loss of tourist Accommodation or parking for tourist accommodation uses score negatively on Objective 11: Leisure and Tourism, the loss of car parking could reduce the attractiveness of the use if visitors are unable to park on site.

### Neutral impacts

- The sites in Seaside score neutrally on Objective 1 Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- All the sites in Seaside are previously developed land with limited existing biodiversity/nature; therefore they score neutrally on Objective 4: Biodiversity and Green Infrastructure. Existing biodiversity value is likely to be low so Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.
- The sites other than National Tyre Autocare, 49 Seaside are outside of a conservation area and therefore score neutrally on Objective 5: Landscape, Townscape and Historic Environment. High quality design will still be required to ensure that development contributes to the townscape
- The sites are within a sustainable neighbourhood and walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by being a sustainable neighbourhood with access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion other than at site SA11.
- Other than SA11, the sites would not impact on Objective 11: Leisure and Tourism. Site SA11 scores negatively on this objective as there is potential that

development may result in the loss of land that could potentially be used for tourism/leisure attractions.

### **Evaluation of options**

- The sites within the Seaside Neighbourhood have mostly positive or neutral impacts given the sites are all previously developed sites within a sustainable neighbourhood with good access to public transport and a range of services and facilities. Some sites score negatively where they result in the loss of employment or commercial uses and/or the demolition of buildings. All the sites score negatively in relation to Flood Risk and site-specific flood risk assessments to consider flood risk will be required. Sites within a Source Protection Zone will also be required to protect the quality and yield of the water resource; and sites with potential contamination will require further investigation and remediation.

Appraisal of sites in Ocklynge and Rodmill

**Strategic Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SEA12: East Sussex College, Kings Drive/Cross Levels Way	+	0	0	0	0	-	++	+	-	0	0	++

**Neighbourhood Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
St. Elisabeth’s Church, Old Town	0	0	0	0	-	0	+	0	0	0	0	+

**Positive impacts**

- East Sussex College site scores positively on Objective 1: Green House Gas Emissions as the scale of development and location adjacent to the hospital could increase the potential for the generation of energy from renewable sources and linked energy and heat generation.
- Both sites provide housing, and therefore score positively on Objective 7: Housing, East Sussex College site scores a strong positive due to the scale of the allocation.
- The East Sussex College site will facilitate better quality of education buildings/facilities and therefore scored positively for Objective 8: Infrastructure.
- Both sites score positively on Objective 12: Travel and Transport given the sites are sustainable with good access to services/facilities and public transport so good potential for modal shift. East Sussex College site has potential to link with the existing cycle path to the south increasing the potential for modal shift.

### **Negative impacts**

- St Elisabeths Church site is adjacent to a listed and therefore scores negatively on Objective 5: Landscape, Townscape and Historic Environment. High quality design will be required to ensure that development contributes to the townscape and does not harm the heritage assets. Redevelopment of the site which has been vacant and hoarded for several years would improve the setting of the listed building.
- Development at the East Sussex College site is likely to involve the demolition of buildings, which increases the production of waste and therefore these the site scores negatively for Objective 6: Waste. At St Elisabeth’s Church the demolition has already taken place several years ago and therefore the site scores neutrally on this objective.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities in relation to East Sussex College site there is also potential for development of the site to impact on the adjacent sports facilities and therefore the site scores negatively on the Objective. Mitigation and careful design will be required.

### **Neutral impacts**

- Both sites are within Flood Zone 1 so score neutrally on Objective 2: Flood Risk and Water Availability.

- Neither of the sites are within a Source Protection Zone nor are likely to require remediation of contamination and therefore they score neutrally on Objective 3: Clean Environment
- Both sites are previously developed land with limited existing biodiversity/nature therefore they score neutrally on Objective 4: Biodiversity and Green Infrastructure. Existing biodiversity value is likely to be relatively low so Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on the sites.
- East Sussex College scores neutrally on Objective 5: Landscape, Townscape and Historic Environment, as it is not situated within the setting of a conservation area or near listed buildings. However high-quality design will still be required to ensure that development contributes to the wider townscape.
- St Elisabeths Church site is within walking distance of a district centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by being a sustainable neighbourhood with access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion so St Elisabeths Church site scores neutrally on this Objective.
- Neither site is allocated for the provision of employment or commercial uses and therefore the sites score neutrally on Objective 10: Employment and Business.
- Neither of the site allocations would impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The sites within the Ocklynge and Rodmill Neighbourhood have mostly neutral or positive impacts given they are previously developed sites within a sustainable location with good access to public transport and a range of services and facilities. Careful design and mitigation may be required for potential impacts at East Sussex College on adjacent sports facilities. St Elisabeths site has been vacant for some time and redevelopment subject to sensitive design could positively impact the setting of the listed building adjacent.

## Appraisal of sites in Roselands and Bridgemere

### Strategic Allocations

#### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA13: Former Gas Works, Land East of Finmere Road	0	-	-	0	0	0	0	0	0	++	0	++
SA14: 2-4 Moy Avenue	0	-	-	0	+	-	+	0	0	0	0	+

### Neighbourhood Allocations

There are no neighbourhood allocations in Hampden Park Neighbourhood.

#### Positive impacts

- 2-4 Moy Avenue scores positively on Objective 5: Landscape, Townscape and Historic Environment as the site contains a derelict building which currently causes significant detriment to the local area. High quality design will ensure that development improves the townscape.
- 2-4 Moy Avenue is allocated for housing, and therefore scores positively on Objective 7: Housing.
- The Former Gas Works site is allocated for employment uses and therefore scores a strong positive on Objective 10: Employment and Business.
- Both sites score positively on Objective 12: Travel and Transport given the sites are within sustainable locations with good access to services/facilities and public transport so good potential for modal shift. The Former Gas works

site scores a strong positive as it has potential to connect with the Horsey Sewer Cycle Path to the north with good potential for modal shift.

### **Negative impacts**

- Both sites score negatively on Objective 2: Flood Risk and Water Availability as they are sited within Flood Zone 3. Development needs to consider the site-specific flood risk and flooding mitigation is likely to be required.
- Both sites score negatively on Objective 3: Clean Environment, 2-4 Moy Avenue is within a Source Protection Zone and has potential land contamination, and the Former Gas Works will require remediation of contamination given its previous use.
- 2-4 Moy Avenue is likely to require some demolition of existing buildings at the site which increases the production of waste and therefore these sites score negatively for Objective 6: Waste.

### **Neutral impacts**

- Both sites score neutrally on Objective 1: Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- Both the sites are previously developed land with limited existing biodiversity/nature therefore they score neutrally on Objective 4: Biodiversity and Green Infrastructure. Existing biodiversity value is likely to be low so Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.
- Both sites are within walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services withing walking distance, there is largely a neutral or no impact on cultural identify, healthy lifestyle, the empowerment of local communities or social inclusion.
- Neither of the site allocations would impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The sites within the Roselands and Bridgemere Neighbourhood have mostly neutral or positive impacts given the sites are previously developed sites with good access to a district centre and a range of services and facilities. Both

sites score negatively in relation to Flood Risk and site specific flood risk assessments to consider flood risk will be required. Both sites also score negatively on Objective 3: Clean Environment, both will require remediation of contamination. The redevelopment of 2-4 Moy Avenue will improve the townscape given the existing detrimental impact of the derelict building. The Former Gas Works can provide significant Employment floorspace and therefore scores positively for Objective 10.

## Appraisal of sites in Hampden Park

### Strategic Allocations

There are no strategic allocation in Hampden Park Neighbourhood.

### Neighbourhood Allocations

#### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
Land at end of Lottbridge Drive	0	0	0	-	0	0	+	0	0	0	0	++
Station House, Station Approach, Hampden Park	0	0	0	0	0	0	+	0	0	0	0	++
Telephone Exchange, 7 Waldron Close	0	0	0	0	0	-	+	0	0	-	0	+

#### Positive impacts

- All the sites are allocated for housing and therefore score positively on Objective 7: Housing.
- The sites score positively on Objective 12: Travel and Transport given the sites have good access to services/facilities and public transport so good potential for modal shift.

#### Negative impacts

- The Land at the End of Lottbridge Drove is a greenfield site, without any current designation therefore the site scores negatively on Objective 4: Biodiversity and Green Infrastructure.

- The Telephone Exchange is likely to require some demolition of existing buildings at the site which increases the production of waste and therefore these sites score negatively for Objective 6: Waste.
- Development of the Telephone Exchange would result in the loss of employment uses and therefore the site scores negatively on Objective 10: Employment and Business.

### **Neutral impacts**

- The sites score neutrally on Objective 1 Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- All the sites are within Flood Zone 1 and therefore score neutrally on Objective 2: Flood Risk and Water Availability.
- None of the sites are within a Source Protection Zone nor are likely to require remediation of contamination and therefore they score neutrally on Objective 3: Clean Environment
- Other than Land at the End of Lottbridge Drove the sites are previously developed land with limited existing biodiversity/nature therefore they score neutrally on Objective 4: Biodiversity and Green Infrastructure. Existing biodiversity value is likely to be low so Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.
- The sites score neutrally on Objective 5: Landscape, Townscape and Historic Environment, as they are not situated within the setting of a conservation area or near listed buildings. However high-quality design will still be required to ensure that development contributes to the townscape.
- The sites are within walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.
- None of the site allocations would impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The sites within the Hampden Park Neighbourhood have mostly neutral or positive impacts. Other than Land at the End of Lottbridge Drive, the sites are

previously developed sites with good access to a district centre, a range of services and facilities, and public transport.

- Land at the End of Lottbridge Drive is a greenfield site, development would result in the loss of open space, the site has no current biodiversity designations. The site would score negatively on objective 4 and have some impacts on Objective 9, but on the whole, the site scores positively on the provision of housing and objective 12 as the site is well located for public transport provision and provides footpath access across the site which could be retained.

Appraisal of sites in Langney

**Strategic Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA15: Land at East Langney Levels	0	·	·	·	·	0	++	0	0	0	0	+
SA16: Land North of Pevensey Bay Road	0	·	·	·	·	0	++	0	0	0	0	+

**Neighbourhood Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport

Martello pub and Car Mechanics 106 Langney Rise	0	0	0	0	0	-	+	0	0	-	0	+
Land at end of Slindon Crescent	0	-	0	-	0	0	+	0	-	0	0	+

### Positive impacts

- All the sites are allocated for housing, and therefore score positively on Objective 7: Housing. SA15 and SA16 score a strong positive given the scale of development proposed.
- The sites score positively on Objective 12: Travel and Transport given the sites have good access to services/facilities and public transport so good potential for modal shift.

### Negative impacts

- Sites SA15, SA16 and Land at Slindon Crescent score negatively on Objective 2: Flood Risk and Water Availability as they are sited within Flood Zone 3. Development needs to consider the site-specific flood risk and flooding mitigation is likely to be required.
- Sites SA15 and SA16 score negatively on Objective 3: Clean Environment as water quality mitigation may be required in relation to surface water and groundwater.
- Sites SA15 and SA16 score strong negative effect on Objective 4: Biodiversity and Green Infrastructure. They are greenfield sites, containing LWS and habitats of principle importance.
- Sites SA15 and SA16 score negatively on Objective 5: Landscape, Townscape and Historic Environment. The sites are within an area of archaeological interest which requires further investigation. The open flat levels are also very sensitive to change in landscape terms and development could impact on the landscape setting of the town, encroaching on the countryside gap between Langney and Westham.
- Development of the Martello Pub site is likely to require some demolition of existing buildings which increases the production of waste and therefore the site scores negatively for Objective 6: Waste.
- Development of the Martello Pub site would result in the loss of employment use and therefore the site scores negatively on Objective 10: Employment and Business.

### Neutral impacts

- The sites score neutrally on Objective 1 Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- The Martello Pub site is within Flood Zone 1 and therefore scores neutrally on Objective 2: Flood Risk and Water Availability.
- The Martello Pub is a previously developed site and existing biodiversity value is likely to be low, therefore the site scores neutrally on Objective 4: Biodiversity and Green Infrastructure.
- The Martello Pub and Land at the end of Slindon Close sites score neutrally on Objective 5: Landscape, Townscape and Historic Environment, as they are not situated within the setting of a conservation area or in close proximity to listed buildings. However high-quality design will still be required to ensure that development contributes to the townscape.
- The sites are within walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.
- None of the site allocations would impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The strategic allocations sites SA15 and SA16 score negatively on a number of objectives. The sites are greenfield, contain coastal floodplain grazing marsh a habitat of principle importance, include or are adjacent to Local Wildlife Sites and there are records of protected species. Development of the sites would result in harm to existing biodiversity; further site-specific biodiversity investigations are required. The sites also require site specific flood risk assessments to consider flood risk and will potentially require mitigation in relation to water quality as development would potentially impact surface water and ground water. The sites also score negatively on Objective 5 as the sites have archaeological interest and are sensitive to change given the low-lying position and edge of settlement location. Further evidence on landscape visual impact and archaeology are required to assess the impact of development. However, the sites are relatively sustainable being in walking distance of Pevensey and Westham train station and a neighbourhood centre and could provide a significant contribution of housing.

- The Martello Pub has mostly neutral or positive impacts, although would result in the loss of employment/commercial uses the site would score positively on Objective 7 for the development of housing.
- Land at the End of Slindon Crescent is a greenfield site, development would result in the loss of open space, the site has no current biodiversity designations. The site would score negatively on objectives 2 and 4 but positively on the provision of housing and objective 12 as the site is well located for public transport provision and access to services.

Appraisal of sites in Shinewater & North Langney

**Strategic Allocations**

There are no strategic allocations in the neighbourhood.

**Neighbourhood Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
Hide Hollow Farm, Hide Hollow	0	0	0	-	0	0	+	0	0	0	0	+

**Positive impacts**

- The site is allocated for housing, and therefore scores positively on Objective 7: Housing.
- The site scores positively on Objective 12: Travel and Transport given the site has good access to services/facilities and public transport so good potential for modal shift.

**Negative impacts**

- The site is a greenfield site, without any current designation, the site scores negatively on Objective 4: Biodiversity and Green Infrastructure due to potential biodiversity harm. The site contains a number of mature trees which are protected by Tree Preservation Orders and should be retained.

**Neutral impacts**

- The sites score neutrally on Objective 1: Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- The site is within flood zone 1 and therefore scores neutrally on Objective 2: Flood Risk and Water Availability.
- The site is not within a Source Protection Zone nor is it likely to require remediation of contamination and therefore scores neutrally on Objective 3: Clean Environment
- The site scores neutrally on Objective 5: Landscape, Townscape and Historic Environment, as it is not situated within the setting of a conservation area or in close proximity to listed buildings. However high-quality design will still be required to ensure that development contributes to the townscape.
- No demolition of existing buildings will be required at the site therefore the sites score neutrally for Objective 6: Waste.
- The site is within walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services withing walking distance, there is largely a neutral or no impact on cultural identify, healthy lifestyle, the empowerment of local communities or social inclusion.
- The site would not impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The site has mostly neutral or positive impacts. the only negative score comes from Objective 4 as the site is greenfield and contains existing biodiversity habitats. The existing trees protected by the Tree Preservation Order must be retained at the site. The site would score positively on the provision of housing and objective 12 as the site is well located for public transport provision.

Appraisal of sites in Summerdown & Saffrons

**Strategic Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
Summerdown Field	0	0	0	-	-	0	+	0	-	0	0	-

**Neighbourhood Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
Compton Cottage, Compton Place Road	0	0	0	0	0	-	+	0	0	0	0	+

Beresford Car Park and Teaching Block	0	0	0	0	0	-	+	0	0	0	0	-
Memorial Field	0	0	0	0	0	-	+	0	0	0	0	-

### Positive impacts

- All the sites are allocated for housing and therefore score positively on Objective 7: Housing.
- Compton Cottage scores positively for Objective 12: Travel and Transport as the site is at the edge of Town Centre with good access to services/facilities and public transport so has good potential for modal shift.

### Negative impacts

- Summerdown Field scores negatively on Objective 4: Biodiversity and Green Infrastructure as the site is a greenfield site, however the site is not currently designated for its biodiversity value.
- Summerdown Field scores negatively on Objective 5: Landscape, Townscape and Historic Environment as the site is situated adjacent to the South Downs National Park and there is potential for negative impacts on its setting. However, this could be mitigated through high-quality design and landscaping.
- The sites score negatively for Objective 6: Waste where demolition of existing buildings could be required as this could increase the production of waste.
- Summerdown Field scores negatively on Objective 9: Resilient Communities as development would result in the loss of a playing field, however the playing field is not publicly accessible.

### Neutral impacts

- The sites score neutrally on Objective 1: Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- The sites are within Flood Zone 1 and therefore scores neutrally on Objective 2: Flood Risk and Water Availability.
- The sites are expected to have limited impacts on the clean environment and therefore score neutrally on Objective 3: Clean Environment.
- Other than the Summerdown Field Site the other sites are previously developed sites value is likely to be low, therefore the site scores neutrally on Objective 4: Biodiversity and Green Infrastructure. Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.

- Other than the Summerdown Field Site the sites score neutrally on Objective 5: Landscape, Townscape and Historic Environment, as they are not situated within a conservation area or in close proximity to listed buildings. However high-quality design will still be required to ensure that development contributes to the townscape.
- The sites are within walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.
- Development of the sites would not result in the loss of employment use and therefore the sites score neutrally on Objective 10: Employment and Business.
- None of the site allocations would impact on Objective 11: Leisure and Tourism.
- Sites Summerdown Field, Beresford Car Park and Memorial Field score negatively on Objective 12: Travel and Transport as they do not currently have good access by walking or cycling to key destinations, and relatively poor public transport accessibility. This would require mitigation.

### **Evaluation of options**

- The sites have mostly neutral or positive impacts, the previously developed sites have limited impacts however could result in increased demolition waste, and two sites are considered to lack good access to key destinations and public transport and therefore score negatively on Objective 12.
- Summerdown Field is a greenfield site on the edge of the South Downs National Park, it scores negatively for objective 4 and objective 5, though impacts on the setting of the National Park are likely to be able to be mitigated through high-quality design and landscaping.

Appraisal of sites in Meads**Strategic Allocations***Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA18: Aldro, Darley Road	0	0	0	0	-	0	++	0	0	0	0	-
SA19: Queenwood, Darley Road	0	0	0	0	-	-	+	0	0	0	0	-
SA20: Land at the Welkin, Carlisle Road	0	0	0	-	-	0	+	0	0	0	0	-
SA21: New Field, Carlisle Road	0	0	0	-	-	0	+	0	-	0	0	-
SA22: Land East of Carlisle Road	0	0	0	-	-	0	+	0	-	0	0	-

**Neighbourhood Allocations***Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
Wargrave House, Blackwater Road	0	0	0	0	-	0	+	0	0	0	0	+
Gonville House, Carlisle Road	0	0	0	0	-	0	+	0	0	0	0	+
Ollier Court, Lennox Lodge & Craig House, Carlisle Road	0	0	0	0	-	0	+	0	0	0	0	+
Hillbrow, Denton Road	0	0	0	0	-	0	+	0	0	0	0	-
Spring Mead 25 Meads Brow	0	0	-	-	-	-	+	0	0	0	0	-

### Positive impacts

- All the sites are allocated for housing, and therefore score positively on Objective 7: Housing. Aldro scores a strong positive given the scale of development proposed.
- Wargrave House, Gonville House and Ollier Court site, score positively for Objective 12: Travel and Transport as the sites are at the edge of Town Centre with good access to services/facilities and public transport so good potential for modal shift.

### Negative impacts

- The greenfield sites score negatively on Objective 4: Biodiversity and Green Infrastructure, however the sites are not currently designated for their biodiversity value.
- All the sites score negatively on Objective 5: Landscape, Townscape and Historic Environment as the sites are situated within a Conservation Area and/or adjacent to the South Downs National Park and there is potential for negative impacts on its setting. However, impacts on the Conservation Area

and South Downs National Park could be mitigated through high-quality design and landscaping.

- The sites score negatively for Objective 6: Waste where demolition of existing buildings could be required as this could increase the production of waste.
- New Field and Land East of Carlisle Road score negatively on Objective 9: Resilient Communities as development would result in the loss of a playing field, however the playing fields are not publicly accessible.

### **Neutral impacts**

- The sites score neutrally on Objective 1: Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- The sites are within Flood Zone 1 and therefore score neutrally on Objective 2: Flood Risk and Water Availability.
- The sites are expected to have limited impacts on the clean environment and therefore score neutrally on Objective 3: Clean Environment.
- The previously developed sites have limited existing biodiversity value and therefore score neutrally on Objective 4: Biodiversity and Green Infrastructure. Biodiversity Net Gain will add limited value, Urban Greening may improve biodiversity on sites.
- The sites are within walking distance of a district shopping centre and a range of services though on the whole score neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.
- Development of the sites would not result in the loss of employment use and therefore the sites score neutrally on Objective 10: Employment and Business.
- None of the site allocations would impact on Objective 11: Leisure and Tourism.
- The sites scoring negatively on Objective 12: Travel and Transport do not currently have good access by walking or cycling to key destinations, and relatively poor public transport accessibility. This would require mitigation.

### **Evaluation of options**

- The sites have mostly neutral impacts. Some of the sites score negatively in respect of Objective 12 due to the lack of good walking and cycling access to services and public transport accessibility, this will require mitigation. The sites closer to the town centre have good access to services.
- All the sites also score negatively on Objective 5 due to the location within a conservation area and also in the setting of the South Downs National Park. However impacts on the conservation area or the SDNP can likely be overcome through high-quality design and landscape mitigation.
- Most of the sites are brownfield sites which reduces the biodiversity impacts and makes good use of previously developed land.
- New Field and Land East of Carlisle Road score negatively on Objective 9 as development would result in the loss of a playing field, the loss of the playing fields needs to be considered further however the playing fields are not publicly accessible.

Appraisal of sites in St Anthony’s & Langney Point Neighbourhood

**Strategic Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA23: Land North-East of St Anthony’s Hill	+	-	-	-	-	0	+	+	0	0	0	++

**Neighbourhood Allocations**

There are no neighbourhood allocations in the neighbourhood.

**Positive impacts**

- The site scores positively on Objective 1: Green House Gas Emissions as the site is located adjacent to a cycle path which provides an attractive alternative to the private car increasing potential modal shift and potentially resulting in the reduction of carbon emissions.
- The site is allocated for housing and therefore scores positively on Objective 7: Housing.
- The site scores a strong positive on Objective 12: Travel and Transport given the site has good access to services/facilities and public transport, and is adjacent to a cycle path which provides good potential for modal shift.

**Negative impacts**

- The site is a greenfield site and is part of a Local Wildlife Sites and therefore scores a strong negative on Objective 4: Biodiversity and Green Infrastructure due to potential biodiversity harm. Site specific biodiversity assessment should

be undertaken to assess the impact of development and mitigation/compensation will be required.

- The site scores negatively on Objective 2: Flood Risk and Water Availability as it is sited within Flood Zone 3. Development needs to consider the site-specific flood risk and flooding mitigation is likely to be required.
- The site scores negatively on Objective 3: Clean Environment as water quality mitigation may be required in relation to surface water.
- The site scores negatively on Objective 5: Landscape, Townscape and Historic Environment as the sites is within an area of archaeological interest which requires further investigation.

### **Neutral impacts**

- No demolition of existing buildings will be required at the site therefore the sites score neutrally for Objective 6: Waste.
- The site is within walking distance of a district shopping centre and a range of services though on the whole scores neutrally on Objective 8: Infrastructure.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services withing walking distance, there is largely a neutral or no impact on cultural identify, healthy lifestyle, the empowerment of local communities or social inclusion.
- Development of the sites would not result in the loss of employment use and therefore the sites score neutrally on Objective 10: Employment and Business.
- The site would not impact on Objective 11: Leisure and Tourism.

### **Evaluation of options**

- The site has some negative impacts. Further assessment of the biodiversity present on site, a site specific flood risk assessment and the archaeological interest of the site are required to inform the assessment. However, the site scores positively in its sustainable location with good public transport links and connection with an attractive cycle path which provides an active travel alternative which could increase the potential of modal shift.

Appraisal of sites in Sovereign Harbour

**Strategic Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
SA24: Land off Harbour Quay	0	-	-	-	0	0	+	+	0	+	0	+
SA25: Land adjacent to the Waterfront, Sovereign Harbour	0	-	0	0	0	0	+	+	0	+	++	+

**Neighbourhood Allocations**

*Summary evaluation*

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and transport
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Berth Holders Car Park, Atlantic Drive	0	-	0	0	0	0	+	0	0	0	-	+
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### Positive impacts

- The sites are allocated for housing and therefore score positively on Objective 7: Housing.
- The sites score positively on Objective 12: Travel and Transport given they have good access to services/facilities and public transport accessibility.
- Land at Harbour Quay scores positively on Objective 8: Infrastructure as development could improve access to the existing community centre on the site, which should be retained. Land Adjacent to the Waterfront scores positively as the site could provide additional commercial space to compliment the adjacent Waterfront development.
- The strategic site allocations include employment/commercial floorspace and therefore the sites score positively on Objective 10: Employment and Business.
- The allocation at SA25 includes provision of new retail and food/beverage uses within existing centre and adjacent to similar uses will have positive impact on leisure and tourism so scores positively on Objective 11: Leisure and Tourism.

### Negative impacts

- The sites score negatively on Objective 2: Flood Risk and Water Availability as they are sited within Flood Zone 3. Development needs to consider the site-specific flood risk and flooding mitigation is likely to be required.
- Land at Harbour Quay scores negatively on Objective 3: Clean Environment as the site is a former landfill, contamination and remediation measures would need to be investigated prior to development.
- Land off Harbour Quay scores negatively on Objective 4: Biodiversity and Green Infrastructure due to potential biodiversity harm. The Biodiversity Study identifies that the site contains a mosaic of shingle and scrub habitats, including NERC S41 habitat: Open Mosaic Habitat on Previously Developed Land, and the presence of protected and notable species. Site specific biodiversity assessment should be undertaken to assess the impact of development and mitigation/compensation will be required.
- The Berth Holders Car Park site scores negatively on Objective 11: Leisure and Tourism as development of the site would result in the loss of the car

parking for the marina. However, it is considered that other car parking is available.

### **Neutral impacts**

- The sites score neutrally on Objective 1: Green House Gas Emissions as the development of the sites is unlikely to result in the reduction of carbon emissions.
- Other than SA24, the sites are not within a Source Protection Zone nor likely to require remediation of contamination and therefore they score neutrally on Objective 3: Clean Environment
- The sites score neutrally on Objective 5: Landscape, Townscape and Historic Environment, as it is not situated within the setting of a conservation area or in close proximity to listed buildings. However high-quality design will still be required to ensure that development contributes to the townscape.
- No demolition of existing buildings will be required at the site therefore the sites score neutrally for Objective 6: Waste.
- Whilst there could be some positive impacts on areas of Objective 9: Resilient Communities, such as the encouragement of active travel modes by having access to a range of services within walking distance, there is largely a neutral or no impact on cultural identity, healthy lifestyle, the empowerment of local communities or social inclusion.

### **Evaluation of options**

- The sites in Sovereign Harbour Neighbourhood score positively in relation to Objective 12, given the sustainable location in walking distance of a range of services and public transport.
- Land at Harbour Quay scores negatively on Flood Risk, Clean Environment and Biodiversity Objectives, further investigation is required into the existing biodiversity habitats and potential mitigation and site specific flood risk. However the site has potential to deliver significant housing, employment and potentially commercial floorspace.

## 4.4 Appraisal of the Neighbourhood Policies

### Policy proposal N1-A Town Centre Neighbourhood

<b>Preferred Policy summary</b>
Proposes delivery of a minimum 1,930 car-free homes, limiting HMOs, while remaining a key hub for retail, leisure and tourism. Regeneration to support taller buildings, conserve historic character, enhance seafront and improve sustainable transport. Public realm upgrades prioritising high-quality design, while SuDS retrofitting and daylighting the Bourne Stream encouraged. Strengthening of food and evening economy.
<b>Reasonable alternative</b>
The policy aims to restrict the growth of HMOs while promoting town centre regeneration focused on new car-free residential development. It also seeks to maintain a strong mix of retail, leisure and tourism uses to support a vibrant and sustainable centre. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	0	+	0	+	+	+	+	++	++

### Positive impacts

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options, and by requiring new residential development to be car-free.
- Reduces the risk of flooding by retrofitting SuDS and deculverting the Bourne Stream to accept surface water runoff.

- Protects the amenity of occupiers of new residential development from noise disturbance, smell and vibration associated with local businesses and community facilities.
- Protects the setting of the South Downs National Park from inappropriate development.
- Conserves the historic environment and protects the character of the seafront through delivery of high-quality design of new development.
- Delivers new homes which could help to meet affordable housing needs.
- Restricts high concentrations of HMOs, safeguarding properties for residential use, supporting community cohesion and a sense of belonging.
- Supports active travel through provision of new homes within an area that is already well served by local services, facilities, and employment opportunities.
- Supports provision of taller buildings where there is no adverse impact on the setting of the South Downs National Park.
- Improves the quality and safety of the public realm, including pedestrianisation and enhanced public spaces, enhancing the quality of the townscape and supporting opportunities for social interaction.
- Retains and encourages investment in hotels to the west of the Pier, supporting existing and future employment opportunities.
- Supports both new and existing businesses and jobs by encouraging a balanced mix of uses to strengthen the vitality and economic resilience of the Town Centre, helping to foster an inclusive and vibrant neighbourhood.
- Enhancements to food and beverage provision and the evening and night-time economy are supported, alongside maintaining an attractive, high-quality and sustainable seafront offer, supporting the leisure and tourism industries.
- Creates safe walking and cycling routes, and enhances public transport provision, supporting the Council's goal of a modal shift.

### **Negative impacts**

- The policy could have a minor negative impact on housing delivery, as provision of taller buildings is unlikely to meet the needs of all members of the community.
- The policy could have a minor negative impact on the setting of the South Downs National Park.
- The policy could have a minor negative impact on the skyline and character of the neighbourhood if taller buildings are constructed.

## Evaluation of options

- The preferred policy has strong positive effects on the social and economic aspects of the sustainability appraisal, and mostly positive effects on the environmental aspects. One minor negative potential impact could arise in the delivery of housing if local needs are not met, and two minor negative potential impacts on the setting of the South Downs National Park and the skyline and character of the neighbourhood if the heights and siting of taller buildings is not given full consideration. However, on balance, the positive impacts of policy N1-A outweigh any potential negative impacts.

### Policy proposal N1-B: Town Centre Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of eight sites for a total of 128 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

## Positive impacts

- Helps to address the housing needs of the community.

- Reintroduces town centre living.

**Negative impacts**

- Neighbouring land use could have an adverse impact on residential amenity.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N1-C: Car Free Developments in the Town Centre

<b>Preferred Policy summary</b>
Proposals for Town Centre residential (including from change of use) should be car free. Proposals with car parking supported only where the need is justified. Priority given to designated spaces for disabled people and car clubs, where parking provision is low.
<b>Reasonable alternative</b>
The policy sets out the approach to reducing car parking within the Town Centre, as part of a modal shift to sustainable travel. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	0	0	0	0	+	0	0	+

**Positive impacts**

- Reduces carbon dioxide emissions and noise pollution.
- Enables development to be provided at higher densities.
- Frees up existing road space for public realm improvements for other modes of travel.
- Contributes to reducing traffic congestion.
- Promotes active travel in an area with strong access to services, active travel routes and public transport, while ensuring appropriate parking for disabled users.

### Negative impacts

- The policy could have a minor negative impact on surrounding neighbourhoods, as some car-free development residents might still own cars and park elsewhere.

### Evaluation of options

- The preferred policy has some positive effects on the environmental, social and economic aspects of the sustainability appraisal. A potential minor negative impact could arise by worsening parking problems elsewhere. However, in sum, the positive impacts of policy N1-C outweigh any potential negative impacts.

### Policy proposal N1-D: The Beacon Shopping Centre

<b>Preferred Policy summary</b>
Support for Beacon Shopping Centre refurbishment or redevelopment if contributes positively to Town Centre regeneration, improves the quality and diversity of uses, and enhances user experience. Residential should be included, unless it comprises deliverability.
<b>Reasonable alternative</b>
The policy sets out the requirements and expectations for proposals involving the regeneration of the shopping centre. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	i	+	+	+

### Positive impacts

- Helps to address the housing needs of the community.
- Supports both new and existing businesses and jobs by encouraging a balanced mix of uses to strengthen vitality and economic resilience.
- Supports new and existing retail provision through refurbishment or redevelopment of the shopping centre, improving the overall user experience and enhancing the area's tourism offer, thus potentially increasing jobs in the tourism sector.
- Supports active travel through provision of new homes within an area that is already well served by local services, facilities, and employment opportunities.
- Encourages greater footfall within the shopping centre from residential provision.
- Residential development may enhance natural surveillance and help deter crime, though this would be reliant on effective design and implementation.

### Negative impacts

- The policy could have a minor negative impact on the mix of business uses, as housing delivery could potentially restrict opening hours.

### Evaluation of options

- The preferred policy has mostly positive effects on the economic and social aspects of the sustainability appraisal. On balance, the positive impacts of policy N1-D outweigh any negative impacts.

Policy proposal N1-E: Devonshire Quarter

<b>Preferred Policy summary</b>
Support given to proposals within Devonshire Quarter that maximise opportunities for the tourism, cultural and conference offer, provided they safeguard the strategic role of the International Lawn Tennis Centre and protect the park's predominantly open nature.
<b>Reasonable alternative</b>
The policy sets out clear requirements for enhancing the visitor and conference offer within the Devonshire Quarter, while protecting existing uses and maintaining openness. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	0	0	+	+	+	0

**Positive impacts**

- Retains the predominantly open nature of the park, protecting the quality of the townscape.
- Safeguards the International Lawn Tennis Centre as a key visitor and community asset, protecting and enhancing outdoor sports and leisure opportunities, and supporting healthier lifestyles.
- Maximises opportunities to widen the tourism, cultural, and conference offer, supporting the retention of – and potentially creating - employment opportunities.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly positive effects on the economic aspects of the sustainability appraisal, and some positive effects on the environmental and social aspects, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N2-A: Upperton Neighbourhood

<b>Preferred Policy summary</b>
Proposes delivery of a minimum 447 new homes while protecting local character, particularly historic areas. Promotes conversion of large properties into small flats, affordable housing, and limiting HMOs. Supports sustainable transport, retrofitting of SuDS, and safeguarding access to Eastbourne Park and its setting.
<b>Reasonable alternative</b>
The policy promotes housing delivery through the conversion of large dwellings into flats, while restricting HMOs to protect local character. It supports sustainable transport and SuDS and safeguards access to Eastbourne Park. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	+	0	+	0	+	0	0	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Reduces the risk of flooding by retrofitting SuDS.
- Creates access to Eastbourne Park, enabling connection to nature and green infrastructure, while supporting healthier lifestyles.
- Protects the boundary of Eastbourne Park and the distinctive character of the neighbourhood from inappropriate development.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Restricts high concentrations of HMOs, safeguarding properties for residential use, supporting community cohesion and a sense of belonging.
- Creates safe walking and cycling routes, enhances public transport provision along the along the A2270 'sustainable movement corridor', supporting the Council’s goal of a modal shift.

**Negative impacts**

- The policy could have a minor negative impact on meeting local housing needs, as it focuses on the delivery of 1- and 2-bed flats.

**Evaluation of options**

- The preferred policy has strong positive effects on the environmental aspects of the sustainability appraisal, and some positive effects on the social and economic aspects. A minor negative potential impact could arise in the delivery of housing if local housing needs are not met. However, on balance, the positive impacts of policy N2-A outweigh any potential negative impacts.

Policy proposal N2-B: Upperton Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of two sites for a total of 35 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N3-A: Seaside Neighbourhood

<b>Preferred Policy summary</b>
Provides at least 912 new homes through redevelopment and infill. Enhances Seafront leisure and tourism, regenerates commercial areas, improves active travel and public transport, and upgrades public realm. Protects heritage and green spaces, manages HMOs, boosts flood resilience, supports renewable energy, and strengthens community facilities.
<b>Reasonable alternative</b>

The policy aims to restrict the growth of HMOs while promoting regeneration of commercial areas. It also seeks to maintain a strong seafront leisure and tourism offer. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	++	+	+	+	0	++	+	++	+	++	++

### Positive impacts

- Helps reduce carbon emissions and noise pollution.
- Encourages renewable energy generation, supporting the Council's climate change adaptation objectives.
- Reduces the risk of flooding by improvements to the Crumbles outfall and related flood alleviation scheme, along with retrofitting SuDS.
- Resists the loss of greenspaces, preventing a reduction of green infrastructure.
- Protects the historic environment from inappropriate development.
- Enhances the townscape by improving the quality of the public realm.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Supports a mixture of housing types to meet local needs.
- Restricts high concentrations of HMOs, safeguarding properties for residential use, supporting community cohesion and a sense of belonging.
- Encourages changing tourist accommodation to alternative uses, helping to maintain a vibrant community.

- Restricts the use of properties as short-term holiday lets or second homes, and houseboats from mooring in the marina.
- Enhances play spaces, leisure, and community facilities to support wellbeing, healthy lifestyles, strengthen social inclusion and empower local communities.
- Promotes regeneration of commercial areas, establishes the Redoubt as a destination venue, retains key tourism and leisure uses, and introduces new seafront food and beverage provision, supporting business growth in the leisure and tourism industries and enhancing local employment opportunities.
- Creates safe walking and cycling routes, enhances public transport provision along the A259 'sustainable movement corridor', supporting the Council's goal of a modal shift.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has strong positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

### Policy proposal N3-B: Seaside Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of six sites for a total of 94 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- Neighbouring land use could have an adverse impact on residential amenity.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N3-C: Seaside Estate Regeneration

<b>Preferred Policy summary</b>
Support regeneration between Norway Road and Alexandra Road, through redevelopment of existing properties to provide a net increase of homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered, and how existing ones could be improved. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	i	0	+	0	+	0	0	0

### Positive impacts

- Design could improve the quality of the townscape, but it depends upon implementation.
- Delivers new homes through more efficient use of land to meet local housing needs.
- Improves the quality of housing, raising living standards.

### Negative impacts

- The policy could have a minor negative impact on local housing provision, as it does not specify the quantum of residential development.
- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

### Evaluation of options

- The preferred policy has positive effects on the social aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing if local housing needs are not met. However, on balance, the positive impacts of policy N3-C outweigh any potential negative impacts.

### Policy proposal N3-D: Sovereign Centre

#### Preferred Policy summary

Supports refurbishment, extension or replacement of the Sovereign Centre to provide year-round public leisure, retain/enhance swimming facilities, and include complementary uses. Encourages low-carbon heating and energy, active travel and public transport.

Requires sustainable long-term financial management and interim arrangements that maintain public access.

### Reasonable alternative

The policy seeks to upgrade the Sovereign Centre and its leisure offer. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	i	0	0	+	+	+	+	+

## Positive impacts

- Promotes the use of low-carbon heating and energy technologies, helping to reduce carbon emissions, supporting the Council's climate change adaption objectives.
- Design could enhance the quality of the townscape, but this will depend upon implementation.
- Retains core swimming provision, unless an alternative health and activity mix would maintain or improve population health outcomes.
- Supports provision of complementary leisure facilities to meet the needs of the Borough, supporting healthy lifestyles and social inclusion.
- Refurbishes and extends, or replaces, the Sovereign Centre, potentially increasing footfall, strengthening existing businesses and employment, and encouraging new economic activity.

- Seeks to ensure that the centre is financial sustainability for the long term, securing leisure industry employment.
- Prioritises active travel and public transport, helping lower carbon emissions, reduce noise pollution, and support the Council’s goal of a modal shift.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

### Policy proposal N4-A: Old Town Neighbourhood

<b>Preferred Policy summary</b>
Proposes delivery of a minimum of 192 new homes via infill and redevelopment, protects the historic environment, parks and greenspaces, promotes sustainable transport, retrofitting SuDS, and improves access to the South Downs National Park without harming its setting.
<b>Reasonable alternative</b>
The policy aims to provide new homes while protecting the neighbourhood’s heritage, parks and greenspaces. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport

Preferred policy performance	+	+	+	+	+	0	+	+	+	0	+	+
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### Positive impacts

- Helps reduce carbon emissions and noise pollution through promoting to sustainable travel options.
- Reduces the risk of flooding by retrofitting SuDS.
- Protects and enhances important parks and greenspaces, safeguarding green infrastructure and supporting healthy lifestyles.
- Enhances access to the South Down National Park, promoting leisure and tourism opportunities and benefitting residents by enabling greater access to the countryside.
- Protects the historic environment and the setting of the South Downs National Park from inappropriate development.
- Delivers new homes which would help to meet local housing needs.
- Creates safe, accessible walking and cycling routes, supporting the Council's goal of a modal shift.

### Negative impacts

- The policy could have a minor negative impact on the South Downs National Park by increasing pressure from visitors.
- The policy could have a minor negative impact on local housing provision, as it does not specify the quantum of residential development.
- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

### Evaluation of options

- The preferred policy has positive effects on the environmental, social and economic aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing if local housing needs are not met and one by increasing visitor pressure on the National Park. However, on balance, the positive impacts of policy N4-A outweigh any potential negative impacts.

**Policy proposal N4-B: Old Town Estate Regeneration**

<b>Preferred Policy summary</b>
Support given to regeneration of Old Town neighbourhood north of Central Avenue, including redevelopment of existing properties to deliver a net increase in homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered, and how existing ones could be improved. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	i	0	+	0	+	0	0	0

**Positive impacts**

- Design could improve the quality of the townscape, but it depends upon implementation.
- Delivers new homes through more efficient use of land to meet local housing needs.
- Improves the quality of housing, raising living standards.

**Negative impacts**

- The policy could have a minor negative impact on local housing provision, as it does not specify the quantum of residential development.
- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

### Evaluation of options

- The preferred policy has positive effects on the social aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing if local housing needs are not met. However, on balance, the positive impacts of policy N4-B outweigh any potential negative impacts.

### Policy proposal N5-A: Ocklynge & Rodmill Neighbourhood

<b>Preferred Policy summary</b>
Proposes delivery of at least 272 new homes via infill and redevelopment, support hospital infrastructure at Eastbourne District General Hospital, and protect key greenspaces. Promote active travel, protect existing networks, and enhances public transport along the A2021. Improves access to Eastbourne Park while maintaining its boundary. Encourage SuDS retrofitting, and renewable energy generation.
<b>Reasonable alternative</b>
The policy aims to provide new homes and supports improvements to hospital infrastructure. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	0	0	+	++	+	i	0	+

### Positive impacts

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.

- Promotes renewable energy opportunities, to reduce dependence on fossil fuels.
- Reduces the risk of flooding by retrofitting SuDS.
- Resists the loss of greenspaces, preventing a reduction of green infrastructure.
- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Delivers new homes through more efficient use of land which would help to meet affordable housing needs.
- Enhances access to Eastbourne Park, enabling connection to nature and green infrastructure, while supporting healthier lifestyles.
- Supports provision of new or enhanced hospital infrastructure and related facilities, supporting community health and wellbeing.
- Could increase employment opportunities at Eastbourne District General Hospital but this would be subject to NHS investment.
- Delivers safe, accessible walking and cycling routes, and enhances public transport provision along the A2770 'sustainable movement corridor', supporting the Council's goal of a modal shift.

#### Negative impacts

- No negative impacts for the preferred policy have been identified.

#### Evaluation of options

- The preferred policy has strong positive effects on the social aspects of the sustainability appraisal, and mostly positive effects on the environmental and economic aspects, with no negative potential impacts identified, and no suitable alternative policy identified.

#### Policy proposal N5-B: Ocklynge & Rodmill Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of one site for a total of 10 homes.
<b>Reasonable alternative</b>

The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- Neighbouring land use could have an adverse impact on residential amenity.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N5-C: Eastbourne Sports Park

**Preferred Policy summary**

Supports development at Eastbourne Sports Park to improve, expand or diversify sports and leisure facilities where existing infrastructure is retained and improved, and usability and safety are not compromised. Proposals must improve accessibility, promote active travel and sustainable transport, address traffic and parking impacts, and ensure design respects the site’s sensitive location.

**Reasonable alternative**

The policy seeks to upgrade the sports and leisure offer at Eastbourne Sports Park. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	i	0	0	+	+	+	+	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution through prioritising to sustainable travel options.
- Design could contribute to the quality of the townscape, but this depends upon implementation.
- Improves, expands, or diversifies sports and leisure provision to meet the needs of the Borough, supporting healthy lifestyles.
- Improves accessibility for all users, including those with disabilities, social inclusion.
- Expands or diversifies sports and leisure offer which could stimulate visitor footfall and create employment opportunities.
- Prioritises access via active travel and public transport, supporting the Council's goal of a modal shift.

**Negative impacts**

- The policy could have a minor negative impact on neighbouring residential amenity through increased footfall, noise and light pollution.

**Evaluation of options**

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. A minor negative potential impact on neighbouring residential amenity could arise from increasing visitor footfall, noise and light pollution. However, on balance, the positive impacts of policy N5-C outweigh any potential negative impacts.

### Policy proposal N6-A: Roselands & Bridgemere Neighbourhood

<b>Preferred Policy summary</b>
Proposes delivery of at least 174 homes and 15,000 sqm of industrial and warehouse space within existing estates, support employment-led refurbishment/redevelopment, promote sustainable transport, restrict floodplain development, enhance flood defences, and safeguard Eastbourne Park with public access and screening.
<b>Reasonable alternative</b>
The policy aims to provide new homes and to increase industrial and warehouse space. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	0	0	+	+	+	+	0	+

### Positive impacts

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Resists development within areas of functional floodplain, reducing risk to people and property.

- Supports additional flood defence infrastructure to reduce the risk of flooding.
- Creates access to Eastbourne Park, enabling connection to nature and green infrastructure, while supporting healthier lifestyles.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Encourages refurbishment or redevelopment and seeks to deliver an additional 15,000 sqm of industrial and warehousing floorspace, within existing industrial estates to maintain and attract new businesses and employment opportunities.
- Creates and enhances safe walking and cycling routes, improves public transport provision, supporting the Council’s goal of a modal shift.

**Negative impacts**

- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

**Evaluation of options**

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. A minor negative potential impact could arise in the delivery of housing if local housing needs are not met. However, on balance, the positive impacts of policy N6-A outweigh any potential negative impacts.

Policy proposal N6-B: Flood Risk in Roselands and Bridgemere

<b>Preferred Policy summary</b>
Development within Flood Zone 3b in Roselands & Bridgemere will not be permitted for uses classified as ‘highly vulnerable’, ‘more vulnerable’ or ‘less vulnerable’. Redevelopment of existing buildings should not increase their footprint or vulnerability. Sites within Flood Zone 3b that are vacant for a prolonged period will be considered to be functional floodplain.
<b>Reasonable alternative</b>
The policy seeks prevent development classified as ‘vulnerable’ within areas subject to high risk of flooding. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	+	0	0	0	0	0	0	0	0	0	0

**Positive impacts**

- Restricts development within Flood Zone 3b to minimise flood risk, thus reducing risk to people and property.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has a positive effect on the environmental aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N7-A: Hampden Park Neighbourhood

<b>Preferred Policy summary</b>
Proposes delivery at least 200 homes, alongside small-scale infill and redevelopment, allow well-designed taller buildings near Hampden Park station and employment-led refurbishment/redevelopment of industrial estates. Improve sustainable transport links. Enhance public realm, protect Hampden Park’s character, integrate natural flood management and nature-based solutions, and improve access to Eastbourne Park while softening the urban edge.

**Reasonable alternative**

The policy aims to provide new homes and upgrade industrial estates. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	+	0	+	+	+	+	0	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Supporting natural flood management and nature-based solutions to reduce flood risk.
- Enhances access to Eastbourne Park, enabling connection to nature and green infrastructure, while supporting healthier lifestyles.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Protects Hampden Park from inappropriate development.
- Enhances the quality of the public realm, improving user experience and encouraging visitor footfall in shopping areas.
- Encourages refurbishment or redevelopment of industrial estates to maintain and attract new businesses and employment opportunities.
- Creates safe walking and cycling routes, enhances public transport provision, and improves accessibility and interchange facilities at the railway station, supporting the Council's goal of a modal shift.

### Negative impacts

- The policy could have a minor negative impact on local housing provision, as it does not specify the quantum of residential development.
- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.
- The policy could have a minor negative impact on housing delivery, as provision of taller buildings is unlikely to meet the needs of all members of the community.
- The policy could have a minor negative impact on the skyline and character of the neighbourhood if taller buildings are constructed.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. Three minor negative potential impacts could arise in the delivery of housing if local housing needs are not met and one minor negative impact could arise from development of taller buildings on the quality of the skyline and character of the neighbourhood. However, on balance, the positive impacts of policy N7-A outweigh any potential negative impacts.

### Policy proposal N7-B: Hampden Park Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of three sites for a total of 3 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N7-C: Hampden Park Estate Regeneration

<b>Preferred Policy summary</b>
Support given to regeneration of the Hampden Park neighbourhood, at the northern end of Lottbridge Drive, including redevelopment of existing properties to deliver a net increase in homes provided will be supported.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered, and how existing ones could be improved. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	i	0	+	0	+	0	0	0

### Positive impacts

- Design could improve the quality of the townscape, but it depends upon implementation.
- Delivers new homes through more efficient use of land to meet local housing needs.
- Improves the quality of housing, raising living standards.

### Negative impacts

- The policy could have a minor negative impact on local housing provision, as it does not specify the quantum of residential development.
- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

### Evaluation of options

- The preferred policy has mostly positive effects on the social aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing if local housing needs are not met. However, on balance, the positive impacts of policy N7-C outweigh any potential negative impacts.

### Policy proposal N8-A: Langney Neighbourhood

#### Preferred Policy summary

Proposes delivery of at least 574 homes, alongside additional housing via infill and redevelopment. Improvements to active travel, public realm, and Eastbourne Borough Football Club. Retrofit SuDS and enhance access to Eastbourne Park while safeguarding its boundaries.
<b>Reasonable alternative</b>
The policy aims to provide new homes and upgrade facilities at Eastbourne Borough Football Club. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	+	0	+	+	+	0	+	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Reduces the risk of flooding by retrofitting SuDS.
- Enhances access to Eastbourne Park, enabling connection to nature and green infrastructure, while supporting healthier lifestyles.
- Improves the quality and safety of the public realm, including pedestrianisation and enhanced public spaces, enhancing the quality of the townscape and supporting opportunities for social interaction.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Enhances Eastbourne Borough Football Club, benefitting the local community, while recognising its role as a visitor draw and its potential to bolster local retail and tourism.

## Negative impacts

- No negative impacts for the preferred policy have been identified.

## Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

### Policy proposal N8-B: Langney Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of two sites for a total of 32 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

## Positive impacts

- Helps to address the housing needs of the community.

## Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

### Policy proposal N8-C: Langney Shopping Centre

<b>Preferred Policy summary</b>
Supports proposals for the extension or redevelopment of Langney Shopping Centre where they broaden local services and facilities and improve user experience. Developments should include residential use, unless this would compromise deliverability.
<b>Reasonable alternative</b>
The policy aims to upgrade the Langney Shopping Centre and provide new homes. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	i	0	+	+	+	+	0	+

### Positive impacts

- Design could enhance the quality of the townscape, but this will depend upon implementation.
- Delivers new homes which could help to meet affordable housing needs.
- Integrates housing with local services and facilities, strengthening community cohesion and resilience.

- Extends or redevelops the shopping centre where this increases the existing range of services and facilities, helping to meet the local community's needs, potentially increasing footfall, strengthening existing businesses and employment, and encouraging new economic activity.
- Reduces reliance on private car usage, supporting the Council's goal of a modal shift.

**Negative impacts**

- The policy could have a minor negative impact on local housing provision, as it does not specify the quantum of residential development.
- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

**Evaluation of options**

- The preferred policy has mostly positive effects on the social and economic aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing as it does not specify a quantum or a mixture of housing types. However, on balance, the positive impacts of policy N8-C outweigh any potential negative impacts.

Policy proposal N8-D: Eastbourne Borough Football Club site

<b>Preferred Policy summary</b>
Supports proposals to upgrade or expand facilities at Eastbourne Borough Football Club, where they improve pitch quality, deliver environmental benefits, include sustainable drainage, secure community access, and protect residential amenity.
<b>Reasonable alternative</b>
The policy seeks to upgrade or expand facilities at Eastbourne Borough Football Club. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	0	i	0	0	+	+	0	+	+

### Positive impacts

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Requires microplastic mitigation in order to deliver net environmental benefits.
- Limits noise, lighting and hours of use to protect neighbouring residential amenity.
- Supports SuDS and water sensitive design, to prevent flood risk and reduce water consumption.
- Design should protect the townscape from adverse impacts but this will depend upon implementation.
- Upgrades or expands facilities to meet the needs of the Borough.
- Safeguarding the quality and capacity of existing playing pitches provision, supporting healthy lifestyles and community facilities.
- Specifies access for local teams, schools and community groups, promoting social cohesion and community empowerment.
- Recognises the club's role as a visitor draw and its potential to bolster local retail and tourism.
- Promotes active travel, supporting healthy lifestyles and the Council's goal of a modal shift.

### Negative impacts

- The policy could have a minor negative impact on neighbouring residential amenity through increased footfall, noise and light pollution.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and environmental aspects of the sustainability appraisal. A minor negative potential impact on neighbouring residential amenity could arise from increasing visitor footfall. However, on balance, the positive impacts of policy N8-D outweigh any potential negative impacts.

**Policy proposal N9-A: Shinewater & North Langney Neighbourhood**

<b>Preferred Policy summary</b>
Delivery of at least 54 homes, alongside additional housing via infill and redevelopment, improve sustainable transport, enhance open spaces with multi-functional greenspaces, upgrade Shinewater Lane playing field facilities, retrofit SuDS, and enhance access to Eastbourne Park while protecting its boundaries.
<b>Reasonable alternative</b>
The policy aims to provide new homes, upgrade playing field facilities, and enhance open spaces. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	0	0	+	+	+	0	0	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Reduces the risk of flooding by retrofitting SuDS.

- Encourages multi-functional greenspaces, enhanced access to Eastbourne Park, and improvements to the quality of open space, thus supporting healthy lifestyles and access to green infrastructure.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Supports a mixture of housing types and tenures to meet local needs.
- Creates and improves safe walking and cycling routes, and enhances the quality of public transport provision, supporting the Council’s goal of a modal shift.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

### Policy proposal N9-B: Shinewater & North Langney Neighbourhood Site Allocations

<b>Preferred Policy summary</b>
Proposes allocation of one site for a total of 13 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N10-A: Summerdown & Saffrons Neighbourhood

<b>Preferred Policy summary</b>
Delivery of at least 98 homes, increasing affordable housing provision. Improve sustainable transport, enhance Saffrons Sports Ground facilities, conserve the historic environment, prevent inappropriate development, and improve access to the South Downs National Park while safeguarding its boundary.
<b>Reasonable alternative</b>
The policy aims to provide new homes and enhance facilities at Saffrons Sports Ground. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	+	+	0	+	+	+	0	+	+

## Positive impacts

- Helps reduce carbon emissions and noise pollution through improvements to sustainable travel options.
- Enhances access to the South Down National Park, promoting leisure and tourism opportunities and benefitting residents by enabling greater access to the countryside.
- Protects the historic environment and the setting of the South Downs National Park from inappropriate development.
- Delivers new homes helping to meet affordable housing needs.
- Enhances sports and community facilities for the benefit of the local community, supporting healthier lifestyles.
- Creates and improves safe walking and cycling routes, enhances public transport provision, supporting the Council's goal of a modal shift.

## Negative impacts

- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.
- The policy could have a minor negative impact on the South Downs National Park by increasing pressure from visitors.

## Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing if local housing needs

are not met and by increasing visitor pressure on the National Park. However, on balance, the positive impacts of policy N10-A outweigh any potential negative impacts.

**Policy proposal N10-B: Summerdown & Saffrons Neighbourhood Site Allocations**

<b>Preferred Policy summary</b>
Proposes allocation of three sites for a total of 40 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

**Policy proposal N10-C: The Saffrons Sports Ground**

<b>Preferred Policy summary</b>
Supports proposals for The Saffrons Sports Ground that respect its historic character, safeguard residential amenity, retain or replace playing fields, promote health and wellbeing, and incorporate sustainable design with safe access. Encourages multi-functional spaces complementing sport and community use.
<b>Reasonable alternative</b>
The policy aims to upgrade facilities, and sports and recreation offer at The Saffrons Sports Ground. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	0	0	0	+	+	i	0	+

**Positive impacts**

- Promotes active travel, helping lower carbon emissions and reducing noise pollution, limiting adverse impacts on climate, wildlife, and the amenity of neighbouring residents.
- Safeguards existing playing field and open space provision, supporting wellbeing, healthy lifestyles.

- Improves, expands or diversifies the range of sports, recreation, and community facilities to meet the needs of the neighbourhood.
- Supports multi-functional facilities that enhance its role as a community hub, thereby promoting social cohesion.
- Could lead to further employment opportunities, depending upon implementation.
- Promotes active travel, supporting the Council’s goal of a modal shift.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has some positive effects on the environmental, social and environmental aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

### Policy proposal N11-A: Meads Neighbourhood

<b>Preferred Policy summary</b>
Delivery of at least 611 homes, including affordable housing, through redevelopment and conversions. Improve active travel and public transport infrastructure while safeguarding the area's distinctive and historic character. Limit HMO concentrations, retain and invest in seafront hotels, and promote SuDS via multi-functional green spaces. Enhance access to the South Downs National Park and protect its boundary.
<b>Reasonable alternative</b>
The policy aims to restrict the growth of HMOs while promoting delivery of new homes. It also seeks to retain and invest in seafront hotels. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	+	+	0	+	+	+	+	+	+

### Positive impacts

- Helps reduce carbon emissions and noise pollution.
- Reduces the risk of flooding by retrofitting SuDS.
- Encourages multi-functional greenspaces and enhanced access to the South Downs National Park, enabling greater access to green infrastructure and the countryside, supporting healthy lifestyles.
- Protects the distinctive character of the neighbourhood, the seafront, and the setting of the South Downs National Park from inappropriate development.
- Delivers new homes with a mixture of housing types and styles.
- Restricts high concentrations of HMOs, safeguarding properties for residential use, supporting community cohesion and a sense of belonging.
- Retains and encourages investment in hotels along the seafront, supporting existing and new jobs in the tourism sector.
- Creates and improves safe walking and cycling routes and enhances the quality of public transport provision.

### Negative impacts

- The policy could have a minor negative impact on the South Downs National Park by increasing pressure from visitors.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. A minor negative potential impact could arise from increasing access to the National Park.

However, on balance, the positive impacts of policy N11-A outweigh any potential negative impacts.

**Policy proposal N11-B: Meads Neighbourhood Site Allocations**

<b>Preferred Policy summary</b>
Proposes allocation of five sites for a total of 84 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

Policy proposal N12-A: Ratton & Willingdon Neighbourhood

<b>Preferred Policy summary</b>
Delivery of at least 63 homes via infill and redevelopment, with affordable housing. Improve public transport along the A2270 and A2021 and provide safe active travel routes. Support additional open space uses at Westlords playing field, protect natural and historic environment from inappropriate development, and enhance access to the South Downs National Park while safeguarding its boundary.
<b>Reasonable alternative</b>
The policy aims to provide new homes and supports additional open space uses at Westlords playing field. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	+	+	0	+	+	+	0	0	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution.
- Enhances access to the South Down National Park, enabling connection access to the countryside.
- Protects the natural and historic environment, including the setting of the South Downs National Park from inappropriate development.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.

- Encourages a mixture of housing types and tenures through small-scale infill and redevelopment.
- Supports provision of additional open space at Westlords playing field, supporting healthy lifestyles.
- Creates safe walking and cycling routes, enhanced public transport provision along the A2021 and A2270 'sustainable movement corridors', supporting the Council's goal of a modal shift.

### Negative impacts

- The policy could have a minor negative impact on the South Downs National Park by increasing pressure from visitors.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. A minor negative potential impact could arise from increasing access to the National Park. However, on balance, the positive impacts of policy N12-A outweigh any potential negative impacts.

### Policy proposal N13-A: St Anthony's & Langney Point Neighbourhood

<b>Preferred Policy summary</b>
Delivery of at least 49 new homes via infill and redevelopment, support taller buildings near the Sovereign Centre roundabout, key avenues, and the seafront. Redevelop and intensify industrial estates with improved public realm; enhance leisure and facilities along the seafront; upgrade active travel routes and A259 public transport infrastructure; and improve access to Eastbourne Park while screening the urban fringe.
<b>Reasonable alternative</b>
The policy establishes requirements for new housing, enhancements to park access and the seafront offer, and industrial estate improvements, supported by sustainable transport links. No reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	+	0	0	+	+	+	+	+	+

### Positive impacts

- Helps reduce carbon emissions and noise pollution.
- Enhances access to Eastbourne Park, enabling connection to nature and green infrastructure, while supporting healthier lifestyles.
- Delivers new homes through more efficient use of land which could help to meet affordable housing needs.
- Supports provision of taller buildings in designated areas.
- Promotes the redevelopment and intensification of industrial estates to retain existing businesses and encourage investment by new ones.
- Enhances the seafront visitor offer by supporting leisure uses and facilities
- Promotes environment, sustainability and swimming proposals within the local neighbourhood.
- Supports new and existing jobs and businesses in the tourism sector.
- Creates safe walking and cycling routes, enhanced public transport provision along the A259 'sustainable movement corridor', supporting the Council's goal of a modal shift.

### Negative impacts

- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.
- The policy could have a minor negative impact on housing delivery, as provision of taller buildings is unlikely to meet the needs of all members of the community.
- The policy could have a minor negative impact on the skyline and character of the neighbourhood if taller buildings are constructed.

## Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing if local needs are not met, and one minor negative potential impact on the skyline and character of the neighbourhood if the heights and siting of taller buildings is not given full consideration. However, on balance, the positive impacts of policy N13-A outweigh any potential negative impacts.

### Policy proposal N14-A: Sovereign Harbour Neighbourhood

<b>Preferred Policy summary</b>
Deliver at least 469 new homes with affordable housing; strengthen The Waterfront as a leisure and tourism destination enhance marina operations with extra berths and boat storage while preventing houseboat use. Expand landscaped public open space; improve active travel and public transport links, including a bus gate to link North and South Harbour. Limit short-term holiday lets and second homes where possible; promote retrofitting of SuDS.
<b>Reasonable alternative</b>
The policy establishes requirements for new housing, enhancements to the public realm, and the promotion of the area as a leisure and tourism destination supported by sustainable transport links. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	i	+	0	+	+	+	+	+	+

**Positive impacts**

- Helps reduce carbon emissions and noise pollution.
- Reduces the risk of flooding by retrofitting SuDS.
- Could improve access to green infrastructure in public open space, but this depends upon implementation.
- Supports delivery of new homes and affordable housing to meet local need.
- Restricts the use of properties as short-term holiday lets or second homes, and houseboats from mooring in the marina.
- Reinforces The Waterfront's role as a leisure-focused tourist destination, supporting economic growth and employment opportunities.
- Creates safe walking and cycling routes, enhances the quality of public transport provision, including a bus gate to connect the harbours.

**Negative impacts**

- The policy could have a minor negative impact on local housing provision, as it does not specify a mixture of housing types.

**Evaluation of options**

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal. A minor negative potential impact could arise in the delivery of housing, if local housing needs are not met. However, in sum, the positive impacts of policy N14-A outweigh any potential negative impacts.

**Policy proposal N14-B: Sovereign Harbour Neighbourhood Site Allocations**

<b>Preferred Policy summary</b>
Proposes allocation of one site for a total of 16 homes.
<b>Reasonable alternative</b>
The policy sets out where new homes could be delivered within the neighbourhood to support local need. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	0	0	0	0

**Positive impacts**

- Helps to address the housing needs of the community.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

## 4.5 Appraisal of the Strategic and Non-Strategic Policies

### Climate Resilience Policies

#### *Policy proposal CR1: Mitigating and Adapting to Climate Change*

<b>Preferred Policy summary</b>
<p>Development proposals must demonstrate a comprehensive approach to climate change mitigation and adaptation. All new development is required to reduce carbon emissions to contribute to the Council’s carbon neutrality target.</p> <p>Proposals must be designed to withstand climate risks, including flooding, overheating, and water stress. Development must prioritise active travel, be energy efficient, deliver biodiversity net gain, and promote natural flood management to ensure long-term resilience.</p>
<b>Reasonable alternative</b>
<p>The policy seeks to create a strategy to mitigate and adapt to the effects of climate change; as this is an no reasonable alternative has been identified.</p>

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy	++	++	+	+	i	0	+/?	+	+	+	0	+

### Positive impacts

- Ensures that new development is as energy efficient as possible, designed to minimise carbon emissions, and supports low carbon energy generation and storage.

- Promotes natural flood management, Sustainable Urban Drainage Schemes, and ensures improvements in water efficiency in both new and existing developments.
- Ensures that new development does not risk water quality and mitigates harm to the natural environment.
- Ensures biodiversity net gain and supports nature restoration.
- Supports the improvement of facilities to sustain low carbon energy storage and sustainable development.
- Supports residents in reducing emissions and ensures that all future growth is underpinned by climate adaptation principles.
- Supports sustainable construction methods and the use of locally sourced building materials.
- Prioritises active travel measures and enables the transition to low carbon transport.

#### **Negative impacts**

- No negative impacts for the preferred policy have been identified.

#### **Mixed impacts**

- Ensures properties are designed to address climate risks and are constructed to be as energy efficient and low carbon as possible.

#### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts identified, and no suitable alternative policy identified.

#### *Policy proposal CR2: Development Standards*

##### **Preferred Policy summary**

All new buildings and conversions must adopt a "fabric first" approach to minimise energy demand for heating, cooling, and lighting. Proposals must be supported by an Energy Statement demonstrating adherence to the energy hierarchy.

Fossil fuel heating systems must be avoided, and low-carbon heating technologies must be integrated into the design to ensure long-term energy efficiency and carbon reduction.

### Reasonable alternative

Rely solely on building regulations standards to decarbonise future development and not any standards beyond this.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy	++	0	+	0	0	0	+/?	+	+	+	0	0
Alternative policy 1	+	0	0	0	0	0	+/i	0	+	0	0	0

## Positive impacts

### Preferred policy

- Ensures that new developments minimise energy demand and transition to low-carbon heating systems, such as heat pumps, to reduce operational carbon emissions.
- Supports a transition away from fossil fuels.
- Supports the development of and connection to low-carbon heat networks, and reduces overall demand for grid energy and pressure on power networks.
- Improves energy security for occupants and reduces energy-related operational costs for residents.
- Encourages the use of energy-efficient systems, which might increase the viability of energy-intensive development and potentially create jobs.

*Reasonable alternative 1*

- Follows the standards established in the building regulations.
- Improves energy security for occupants and reduces energy-related operational costs for residents.

**Negative impacts***Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- No negative impacts for the reasonable alternative 1 policy have been identified.

**Mixed impacts***Preferred policy*

- Makes new homes more energy-efficient and sustainable, helping reduce long-term operational costs for residents. However, impacts will depend on the proposed solutions for each development.

*Reasonable alternative 1*

- Ensures that the standards to decarbonise homes in the building regulations are met. However, impacts will depend on the proposed solutions for each development.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts identified: the reasonable alternative 1 policy provides less significant positive effects on the environmental and social aspects of the sustainability appraisal, thus it is not chosen.

*Policy proposal CR3: Solar PV, Storage and Demand Management***Preferred Policy summary**

New build developments and residential conversions must incorporate renewable energy generation, specifically Solar Photovoltaic (PV) systems. Generation capacity must be maximised relative to the roof area to match the building's annual energy consumption.

Proposals will be required to include energy storage and demand management systems to reduce reliance on the national grid and enhance energy security.

### Reasonable alternative

Have no policy and rely solely on building regulations and national policy to support renewable energy generation

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	++	0	+	0	i	0	+/?	+	+	+/?	0	0
Reasonable alternative	i	0	i	0	i	0	i	0	0	0	0	0

## Positive impacts

### Preferred policy

- Requires all new developments to provide renewable energy generation at building scale to meet their energy needs, up to the total annual consumption.
- Supports clean energy generation that does not result in unacceptable harm to its surroundings.
- Reduces the overall demand for grid energy and provides wider benefits to local power networks through the use of energy storage and demand management systems.

- Improves energy efficiency and security, and utilises smart meters to help residents identify waste and manage their energy data.

*Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 policy have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- No negative impacts for the reasonable alternative 1 policy have been identified.

**Mixed impacts**

*Preferred policy*

- Improves energy security and reduces future running costs for occupiers.
- Reduces grid energy demand and provides long-term energy cost savings for commercial occupiers, however the viability on all development can be uncertain.

*Reasonable alternative 1*

- No mixed impacts for the reasonable alternative 1 policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts identified. The reasonable alternative 1 policy's impact will depend on the implementation of each case, and does not provide positive effects, thus it is not chosen.

*Policy proposal CR4: Sustainable Construction*

**Preferred Policy summary**

Development proposals must minimise waste and raw material use by adopting circular economy principles. The use of reused and recycled materials must be prioritised, and construction methods must reduce embodied carbon.

Applications must detail how waste will be managed through the waste hierarchy, ensuring that the environmental impact of the construction process is minimized and materials are kept in use for as long as possible.

**Reasonable alternative 1**

Have no policy on waste and rely solely on the EU Waste Framework Directive, which is a material consideration in planning applications.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	i	+	0	i	++	0	0	0	+	0	0
Reasonable alternative 1	0	0	i	0	0	+	0	0	0	0	0	0

**Positive impacts**

*Preferred policy*

- Prioritises sustainable construction methods with lower carbon footprints and gives priority to locally sourced building materials to reduce transportation-related emissions.
- Minimises the use of materials and the creation of waste, and promotes the reuse or recycling of materials arising from demolition or refurbishment.

- Promotes circular economy principles that prioritise the reuse and recycling of materials from demolition or refurbishment and encourages the design of developments for longevity and repairability.
- Prioritises the use of locally sourced building materials.

#### *Reasonable alternative 1*

- The WFD regulations will have a positive impact on waste management.

#### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative 1*

- No negative impacts for the reasonable alternative 1 policy have been identified.

#### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts identified. The reasonable alternative 1 policy provides less significant positive effects on the environmental aspects of the sustainability appraisal; therefore, it is not chosen.

#### *Policy proposal CR5: Renewable Energy Generation*

#### **Preferred Policy summary**

Proposals for renewable and low-carbon energy generation, including community-led schemes, will be supported provided they do not result in significant adverse landscape or visual impacts.

Development must preserve the special qualities of the South Downs National Park and allow for continued agricultural use where generation is located on agricultural land.

#### **Reasonable alternative 1**

Allocate specific sites or broad areas for renewable energy generation , solar and wind.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy	++	i	+/i	i	i	0	0	+/i	0	0	0	0
Reasonable alternative 1	++	-	+/i	i/-	i	0	0	+/i	0	0	0	0

### Positive impacts

#### *Preferred policy*

- Supports the development of renewable and low-carbon energy generation and distribution networks, including community-led and small-scale localised generation, to help Eastbourne achieve its target of becoming carbon net zero.

#### *Reasonable alternative 1*

- Supports the development of renewable and low-carbon energy generation and distribution networks, including community-led and small-scale localised generation, to help Eastbourne achieve its target of becoming carbon net zero.

### Negative impacts

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative 1*

- Potentially identifies open areas as locations for renewable energy, which in Eastbourne could also be areas used for flood alleviation schemes.

## Mixed impacts

### *Preferred policy*

- Encourages a transition to clean energy sources and supports distribution networks, though the final impact depends on implementation, as there could be an increase on noise or soil pollution depending on the characteristics of the scheme.
- Supports the creation of low-carbon energy distribution networks, although the outcome depends on whether the scheme's energy generation will directly benefit the Borough and its residents.

### *Reasonable alternative 1*

- Encourages a transition to clean energy sources and supports distribution networks, though the final impact depends on implementation, as there could be an increase on noise or soil pollution depending on the characteristics of the scheme.
- Supports the creation of low-carbon energy distribution networks, although the outcome depends on whether the scheme's energy generation will directly benefit the Borough and its residents.

## Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides strong positive effects on reducing greenhouse gases, with no negative impacts identified. The reasonable alternative 1 policy also provides strong, positive effects on the effects in GHG reduction, however a negative impact in flood risk was identified; therefore, it is not chosen.

### *Policy proposal CR6: Water Efficiency*

#### **Preferred Policy summary**

To address water stress, all new residential development must be designed to achieve a strict water consumption limit of 105 litres per person per day. Non-residential development will be required to achieve a BREEAM rating of 'Very Good' or 'Excellent' for water efficiency.

Proposals must demonstrate that water efficiency measures, such as rainwater harvesting and greywater recycling, have been integrated to reduce demand on potable water supplies.

<b>Reasonable alternative 1</b>
Set no local policy but rely on current building regulations.
<b>Reasonable alternative 2</b>
Set a lower requirement of 90l/p/d in residential developments

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	++	0	0	+	0	+/i	+	+	0	0	0
Reasonable alternative 1	0	+	0	0	0	0	+/i	0	+	0	0	0
Reasonable alternative 2	0	++	0	0	+	0	-	+	+	0	0	0

### Positive impacts

#### *Preferred policy*

- Sets stringent water consumption targets for new residential buildings and requires non-residential developments to meet high BREEAM standards. It also supports increasing water availability by requiring applicants to consider rainwater and greywater harvesting and reuse.
- Explicitly states that water efficiency improvements in heritage buildings must be consistent with preserving the building's importance and heritage significance.

- Requires new developments to use materials and techniques that are resilient to future leaks, thereby contributing to the overall reduction of leakage within the wider water network.
- Reduces the cost of living by increasing the efficiency of fittings and fixtures, thereby lowering water costs.

#### *Reasonable alternative 1*

- Could have a positive effect, as building regulations also support the smart and rational use of water, however to a lesser degree than the proposed policy.
- Reduces the cost of living by increasing the efficiency of fittings and fixtures, although to a lower level than the preferred policy, thereby lowering water costs.

#### *Reasonable alternative 2*

- Sets even stricter water consumption targets for new residential buildings. It also supports increasing water availability by requiring applicants to consider rainwater and greywater harvesting and reuse.
- Explicitly states that water efficiency improvements in heritage buildings must be consistent with preserving the building's importance and heritage significance.
- Requires new developments to use materials and techniques that are resilient to future leaks, thereby contributing to the overall reduction of leakage within the wider water network.
- Reduces the cost of living by further increasing the efficiency of fittings and fixtures, thereby lowering water costs.

### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative 1*

- No negative impacts for the reasonable alternative 1 policy have been identified.

#### *Reasonable alternative 2*

- Increases housing construction costs due to the higher water efficiency standard, and the associated costs of meeting it.

### **Mixed impacts**

#### *Preferred policy*

- Improves the efficiency and quality of the water fittings and fixtures in new homes, extensions, and conversions. However, the impact will depend on how it is implemented by developers to ensure these measures are effectively integrated without compromising the functionality or affordability of the dwellings.

#### *Reasonable alternative 1*

- Improves the efficiency and quality of the water fittings and fixtures in new homes, extensions, and conversions. However, the impact will depend on how it is implemented by developers to ensure these measures are effectively integrated without compromising the functionality or affordability of the dwellings.

#### *Reasonable alternative 2*

- No mixed impacts for the reasonable alternative 2 policy have been identified.

### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts identified. The reasonable alternative 1 policy provides less significant positive effects on the environmental and social aspects of the sustainability appraisal, while the reasonable alternative 2 policy provides higher positive effects on the environmental and social aspects of the sustainability appraisal; however, a negative effect on the delivery of housing was identified. Therefore, these two alternatives are not chosen.

#### *Policy proposal CR7: Electric Vehicle Charging Points*

#### **Preferred Policy summary**

Non-residential developments with parking must provide Electric Vehicle (EV) charging points to support the transition to electric mobility. Proposals must meet minimum

thresholds for active (ready-to-use) and passive (infrastructure in place) charging points, based on the number of parking spaces provided.

### Reasonable alternative 1

Set no local policy on EVCP, rely on building control to deliver EVCP

### Reasonable alternative 2

Set higher requirements for EVCP

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	0	0	0	+	i	0	+	-
Reasonable alternative 1	i	0	i	0	0	0	0	i	0	0	-	0
Reasonable alternative 2	++	0	++	0	0	0	0	+	i	0	+	-

## Positive impacts

### Preferred policy

- Increases the availability of public electric vehicle charging infrastructure, thereby encouraging the take-up of electric cars.
- Facilitates the adoption of electric vehicles, thereby reducing tailpipe emissions and improving air quality.

- Addresses the current deficit in public charging devices.
- Allows tourists to visit the Borough in electric vehicles, supporting sustainable tourism as a robust public charging network is provided.

#### *Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 policy have been identified.

#### *Reasonable alternative 2*

- Further increases the availability of public electric vehicle charging infrastructure, which will encourage the take-up of electric cars.
- Further facilitates the use of electric vehicles, thereby reducing tailpipe emissions and improving air quality.
- Addresses the current deficit in public charging devices.
- Allows tourists to visit the Borough in electric vehicles, supporting sustainable tourism as a robust public charging network is provided.

### **Negative impacts**

#### *Preferred policy*

- Impacts travel and transport objectives negatively as the provision of charging points is linked to the continued provision of car parking spaces, which may conflict with broader goals to reduce car dependency and prioritise active travel or public transport.

#### *Reasonable alternative 1*

- Reduces the options for tourists with EVs to come to the town due to the lack of a policy that specifically supports the increase of EVP.

#### *Reasonable alternative 2*

- Impacts travel and transport objectives negatively as the provision of charging points is linked to the continued provision of car parking spaces, which may conflict with broader goals to reduce car dependency and prioritise active travel or public transport.

### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental, social, and economic aspects of the sustainability appraisal, with one negative impact on transport being identified.

The reasonable alternative 1 policy does not provide positive effects on the aspects of the sustainability appraisal and has one negative impact on tourism; while the reasonable alternative 2 policy offers higher positive effects on the environmental, social, and economic aspects of the sustainability appraisal; however, it also has a significant negative effect on transport, potentially increasing interest in owning an electric vehicle and discouraging the necessary modal change. Therefore, these two alternatives are not chosen.

*Policy proposal CR8: Cycle Parking Provision*

<b>Preferred Policy summary</b>
<p>High-quality, secure, and accessible cycle parking must be provided at all new residential and commercial developments. Provision must be convenient, well-lit, and integrated into the design to encourage cycling as a primary mode of transport.</p> <p>Standards for both long-stay and short-stay parking must be met to cater to the needs of residents, employees, and visitors.</p>
<b>Reasonable alternative 1</b>
<p>Rely on NPPF and ESCC Guidance on Parking at new developments to deliver cycle parking and not have any local policy beyond this.</p>
<b>Reasonable alternative 2</b>
<p>Require an increased level of cycle parking above that set out in Local Transport Note 1/20</p>

**Summary evaluation**

<b>Objective</b>	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
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Preferred policy	+	0	+	0	i	0	0	+	++	+	+	++
Alternative policy 1	0	0	0	0	0	0	0	0	0	0	0	0
Alternative policy 2	+	0	+	0	i	0	0	+	+	0	+	+

## Positive impacts

### *Preferred policy*

- Reduces carbon dioxide emissions through the promotion of cycling and decreasing the reliance on private vehicles.
- Reduces the volume of motorised traffic in residential and commercial areas, leading to a cleaner and quieter urban environment.
- Ensures that new developments provide sufficient infrastructure, such as secure cycle parking and storage, to support accessible and sustainable services.
- Supports healthy lifestyles and physical wellbeing, optimising access to the town's green infrastructure, and encouraging social inclusion through accessible travel options for all members of the community.
- Requires workplaces to provide essential facilities such as showers, changing rooms, and secure storage to support employees who choose to cycle to work.
- Enhances the network of footpaths and cycleways, making the Borough more attractive for visitors who wish to explore the area using sustainable modes of transport.
- Supports modal shift, prioritising the needs of pedestrians and cyclists, and ensuring that high-quality, secure cycle parking is integrated into all new developments.

### *Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 policy have been identified.

### *Reasonable alternative 2*

- Reduces carbon dioxide emissions through the promotion of cycling and decreasing the reliance on private vehicles.
- Reduces the volume of motorised traffic in residential and commercial areas, leading to a cleaner and quieter urban environment.
- Increases infrastructure, such as secure cycle parking and storage, to support accessible and sustainable services.
- Supports healthy lifestyles and physical wellbeing, optimising access to the town's green infrastructure, and encouraging social inclusion through accessible travel options for all members of the community.
- Enhances the network of footpaths and cycleways, making the Borough more attractive for visitors who wish to explore the area using sustainable modes of transport.
- Provides infrastructure that supports cyclists.

### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative 1*

- No negative impacts for the reasonable alternative 1 policy have been identified.

#### *Reasonable alternative 2*

- No negative impacts for the reasonable alternative 2 policy have been identified.

### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts identified. The reasonable alternative 1 policy has no positive or negative effect on the sustainability appraisal, while the reasonable alternative 2 policy has a less significant positive impact on the environmental, social, and economic aspects of the appraisal. Therefore, these two alternatives are not chosen.

*Policy proposal CR9: Managing Flood Risk*

<b>Preferred Policy summary</b>
<p>Development must be directed to areas at the lowest flood risk. Where development is proposed in at-risk areas, the Exception Test must be passed, demonstrating wider sustainability benefits and safety for the development's lifetime.</p> <p>Vulnerable uses must be located in the safest parts of the site, and development in the functional floodplain (Flood Zone 3b) will be safeguarded for water-compatible uses and essential infrastructure only.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy reflects the strict sequential approach to flood risk required by the NPPF.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy	0	++	0	0	0	0	+	0	+	0	0	0

**Positive impacts**

- Strictly directs new development away from areas at the highest risk of flooding and requires site-specific flood risk assessments, thereby minimising the exposure of people and property to flood hazards.
- Ensures that new housing remains safe for its lifetime, preventing the construction of homes that would become uninhabitable due to climate change.
- Ensures that communities are protected from climate-related risks.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts identified, and no suitable alternative policy identified.

*Policy proposal CR10: Sustainable Drainage*

<b>Preferred Policy summary</b>
<p>All development proposals must incorporate Sustainable Drainage Systems (SuDS) to manage surface water runoff. Proposals must follow the drainage hierarchy, prioritising rainwater reuse and infiltration over discharge to sewers.</p> <p>SuDS must be designed to manage runoff for all rainfall events up to the 1-in-100-year probability, including climate change allowances, and should provide multifunctional benefits for amenity and biodiversity.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is required for major developments in the NPPF and represents an essential measure to decrease surface water runoff.</p>

**Summary evaluation**

<b>Objective</b>	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
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Preferred policy performance	0	++	+	+	i	0	0	+	+	0	0	0
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**Positive impacts**

- Requires the use of SuDS to allow natural drainage, significantly reducing surface water runoff rates and alleviating pressure on the sewer network during heavy rainfall.
- Uses natural filtration methods to remove pollutants from surface water runoff before it enters watercourses or the ground.
- Encourages SuDS features such as ponds, wetlands, and rain gardens, which provide new habitats for wildlife and enhance urban biodiversity.
- Delivers additional drainage infrastructure that is integrated into the landscape, reducing the need for hard-engineered solutions.
- Creates multi-functional green spaces that manage water while providing amenity space for residents, contributing to a healthier living environment.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts identified, and no suitable alternative policy identified.

*Policy proposal CR11: Coastal Change and Vulnerability*

<b>Preferred Policy summary</b>
Development in areas identified as vulnerable to coastal change and sea level rise must not compromise coastal defences or natural processes. Proposals in these areas must be time-limited or designed to be adaptable to ensure safety over the development's lifetime without increasing the need for new coastal engineering works.
<b>Reasonable alternative</b>

No reasonable alternative has been identified. The policy reflects the management policies of the adopted Shoreline Management Plan and ensures the safety of development and its users.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	++	0	+	0	0	0	+	0	0	0	0

**Positive impacts**

- Manages development within zones identified as vulnerable to coastal erosion and tidal flooding, ensuring no new risks are created within these areas.
- Provides opportunities to enhance coastal biodiversity through the creation of buffer zones that allow habitats to thrive without human interference.
- Ensures that critical infrastructure is not located in areas at risk of loss to the sea, or is designed to be safe and resilient to coastal change over its operational life.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts identified, and no suitable alternative policy identified.

*Policy proposal CR12: Coastal Resilience and Adaptation Areas*

<b>Preferred Policy summary</b>
<p>Development in designated Coastal Resilience and Adaptation Areas is strictly controlled to manage risk to life and property. Proposals must be accompanied by a Flood Risk Assessment demonstrating that safety can be achieved without reliance on emergency evacuation.</p> <p>Development must contribute to the area's resilience through defensive measures and adaptive design, and must not intensify use in ways that increase the population at risk.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is necessary to ensure public safety in areas of identified coastal risk.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	++	0	0	0	0	+	0	++	0	0	0

**Positive impacts**

- Designates specific areas where adaptation measures are necessary, ensuring that flood risk is proactively managed in response to climate and coastal change.
- Provides a clear framework for housing in coastal change areas, ensuring that residents and dwellings are not exposed to risks.

- Works with communities to maintain their safety through long-term adaptation strategies, ensuring development does not occur in unsafe areas.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides significant positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts identified, and no suitable alternative policy identified.

Prosperous Economy Policies

*Policy proposal PE1: Supporting Sustainable Economic Growth*

<b>Preferred Policy summary</b>
<p>Proposals must contribute to sustainable economic growth and job diversification in line with the Eastbourne Economic Strategy. Development must provide new commercial premises in locations accessible by sustainable travel.</p> <p>Main town centre uses must be directed to designated centres to support their vitality. The policy supports the redevelopment and intensification of existing employment sites and encourages the growth of the digital and green energy sectors.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is a requirement of the NPPF to help create the conditions in which businesses can invest, expand and adapt.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0/i	0	i	+	i	0	0	0	+	++	++	+

**Positive impacts**

- Focuses development on occupied and sustainable locations, thereby minimising the impact on greenfield land and supporting nature restoration.
- Ensures employment growth is supported by sustainable transport connections, facilitating better access to jobs for local communities.

- Identifies and allocates sufficient employment land to meet the borough's future needs, encouraging the creation of new jobs and supporting expanding businesses.
- Provides a strategic framework that supports the retail and tourism sectors.
- Ensures employment allocations are located in areas that minimise the need to travel by car and support sustainable transport modes.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

*Policy proposal PE2: Local Employment and Training*

<b>Preferred Policy summary</b>
Major development proposals must contribute to local skills and employment. Local Labour Agreements will be required to secure training and job opportunities for local residents in the construction sector and associated industries, ensuring that regeneration delivers tangible benefits to the local workforce.
<b>Reasonable alternative</b>
A policy that encourages, but does not require, developers to enter into local labour agreements.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	0	0	+	++	0	0
Reasonable alternative	0	0	0	0	0	0	0	0	i	i	0	0

### Positive impacts

#### *Preferred policy*

- Secures local employment and training agreements for local people, thereby supporting skill development and social inclusion.
- Requires development to contribute to improving the local skill base, ensuring the local workforce can meet the needs of development in the area.

#### *Reasonable alternative*

- No positive impacts for the reasonable alternative have been identified.

### Negative impacts

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative*

- No negative impacts for the reasonable alternative have been identified.

### Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the social and economic aspects of the sustainability appraisal, while no negative impacts have been identified. The reasonable alternative is neutral overall, with two impacts depending on the delivery.

*Policy proposal PE3: Retention of Sites and Premises in Employment Use*

<b>Preferred Policy summary</b>
Existing employment sites and premises (Use Classes E(g), B2, and B8) must be protected. Proposals resulting in the loss of employment space will only be supported where it is robustly demonstrated that the site is no longer viable for employment use following a comprehensive marketing campaign, or if the loss is justified by significant wider regeneration benefits.
<b>Reasonable alternative</b>
Allow the loss of employment sites to residential use without a rigorous marketing period, prioritising housing delivery over employment land protection.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	0	0	0	+	0	0
Reasonable alternative	0	0	0	0	0	0	+	0	0	-	0	0

**Positive impacts**

*Preferred policy*

- Keeps opportunities open for the development of modern business spaces, such as co-working hubs, which support startups and small businesses.

*Reasonable alternative*

- Allows commercial land and buildings to be converted more easily into residential uses.

### Negative impacts

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative*

- Reduces the number of spaces for businesses and compromises Eastbourne's economic sustainability, thereby decreasing employment opportunities for current and future residents.

### Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the economic aspects of the sustainability appraisal, while no negative impacts have been identified. The reasonable alternative has a positive impact on the housing objective but a significant negative impact on employment.

#### *Policy proposal PE4: Industrial Estates*

<b>Preferred Policy summary</b>
<p>Industrial and warehouse uses (Use Classes B2 and B8) must be the priority within designated Industrial Estates. Redevelopment and intensification for employment purposes will be supported.</p> <p>Non-employment uses, particularly residential, will be refused within these estates to protect their primary function as business locations and to prevent conflicts with industrial operations.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy protects the primary function of established employment areas in line with economic needs, and mixed uses are not acceptable alongside industrial estates.</p>

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	+	0	+	0	0	0	0	++	i	0

### Positive impacts

- Concentrates industrial activities in designated estates, thereby protecting other areas from impactful business operations such as noise or air pollution.
- Contains industrial development within specific areas, which protects the character and townscape of other parts of the borough.
- Identifies specific industrial estates where clusters of businesses can benefit from shared infrastructure and dedicated operational space.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy.

### *Policy proposal PE5: Retail Hierarchy*

#### Preferred Policy summary

Development must support the established retail hierarchy, with the Town Centre designated as the primary location for retail, leisure, and cultural activities, supported by District and Local Centres.

Retail and main town centre uses must be directed to these designated centres, appropriate to their scale and function, to maintain a sustainable network of shopping facilities.

### Reasonable alternative

Do not establish a retail hierarchy in Eastbourne; allow retail uses wherever the market requires them.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	0	+	+	+	++	+
Reasonable alternative	0	0	0	0	0	0	0	i	i	i	-	-

## Positive impacts

### Preferred policy

- Ensures that retail development is appropriately distributed, supporting the provision of accessible facilities across the borough.
- Ensures that shops and services are provided close to where people live, promoting walking and social interaction.
- Supports existing businesses within the established retail hierarchy and encourages new initiatives in appropriate locations.
- Prioritises the town centre as the primary location for retail and leisure, which is critical for attracting visitors and increasing tourist spend.

- Reduces the need for residents to travel long distances by car for day-to-day shopping and services.

*Reasonable alternative*

- No positive impacts for the reasonable alternative have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- The policy will have a negative impact by risking consolidated areas like the Town Centre, creating conditions for ground-level spaces to be unused and creating a less appealing destination.
- The policy will have a negative impact by failing to promote development in the most sustainable and well-served areas, leading to a dependency on private cars to access retail options.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the social and economic aspects of the sustainability appraisal, while no negative impacts have been identified. The reasonable alternative has two negative impacts on the economic objectives.

*Policy proposal PE6: Primary Shopping Areas*

<b>Preferred Policy summary</b>
Proposals within Primary Shopping Areas must contribute to vitality and pedestrian activity. Active ground floor frontages are required, and the loss of retail units to non-town centre uses will be restricted unless it is demonstrated that the function and character of the centre will not be harmed. Residential use will be supported on upper floors to add vibrancy.
<b>Reasonable alternative</b>

Do not have a policy for a Primary Shopping Area and allow retail/leisure uses anywhere within Eastbourne.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	0	0	+	0	+	0	+	+	+	+
Reasonable alternative	0	0	0	0	0	0	0	i	-	i	-	-

### Positive impacts

#### *Preferred policy*

- Concentrates "town centre uses" within the most accessible locations, encouraging trips by sustainable modes of transport rather than by car, which reduces carbon emissions.
- Requires that development does not harm the character and function of the town centre
- Supports residential use on upper floors within Primary Shopping Areas, thereby increasing housing supply in sustainable locations.
- Enhances vitality, activity, and pedestrian footfall, creating safer, well-surveilled streets and maintaining the town centre as a social hub for the community.
- Protects the primary function of the town's key retail areas, ensuring they remain vibrant and economically viable destinations for businesses.
- Consolidates a strong retail and leisure offer in the town centre.
- Directs high footfall uses to locations that are accessible and well-served by public transport, reinforcing sustainable travel patterns.

*Reasonable alternative*

- No positive impacts for the reasonable alternative have been identified.

**Negative impacts***Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- The policy will have a negative impact by jeopardising the long-term sustainability of the town centre, a space that contributes to the town's sense of identity and fosters community activities.
- The policy will have a negative impact by risking that stores will leave the Town Centre area and decrease the economic sustainability of the high streets and visitor centres.
- The policy will have a negative impact by failing to promote development in the most sustainable and well-served areas, leading to a dependency on private cars to access retail options.

**Evaluation of options**

- The preferred policy is considered the desirable option, as it has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, while the reasonable alternative has impacts that will depend on the implementation of the policy, as well as negative impacts on the social and economic aspects.

*Policy proposal PE7: Sequential and Impact Tests***Preferred Policy summary**

Proposals for main town centre uses outside of designated centres must satisfy the sequential test, demonstrating that no suitable sites exist within or on the edge of centres.

Applications exceeding the local floorspace threshold of 500 sqm (gross) will be required to provide an Impact Assessment to demonstrate that the vitality and viability of existing centres will not be significantly adversely affected.

**Reasonable alternative**

Do not have a policy for a sequential, impact-assessed approach to allow retail uses outside the identified locations.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	0	0	+	+	0	0
Reasonable alternative	0	0	0	0	0	0	0	0	-	i	0	0

**Positive impacts**

*Preferred policy*

- Protects the vitality and viability of town centres, ensuring they remain the focus of community services and social interaction.
- Prioritises investment in established centres where businesses can benefit from agglomeration effects and shared footfall, preventing the hollowing out of high streets by out-of-town retail.

*Reasonable alternative*

- No positive impacts for the reasonable alternative have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- The policy will have a negative impact by allowing retail uses to be established outside consolidated locations, thereby diminishing the vitality of well-established community gathering places.

**Evaluation of options**

- The preferred policy is considered the desirable option, as it has mostly positive effects on the social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, while the reasonable alternative has impacts that will depend on the implementation of the policy, as well as a negative impact on the social aspect.

*Policy proposal PE8: Evening and Night-time Economy*

<b>Preferred Policy summary</b>
<p>Proposals for the evening and night-time economy will be supported in the Town Centre and Seafront to promote Eastbourne as a diverse destination. Development must demonstrate effective management of noise, safety, and operating hours.</p> <p>Permission will only be granted where it is demonstrated that the proposal would not result in an over-concentration of such uses or cause unacceptable harm to residential amenity.</p>
<b>Reasonable alternative</b>
<p>Do not have a policy that supports the evening and night-time economy.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	i	0	0	0	0	0	+/-	+	++	+

Reasonable alternative	0	0	0	0	0	0	0	0	0	0	-	-	0
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**Positive impacts**

*Preferred policy*

- Supports a range of businesses that operate outside of standard hours, contributing to a more resilient local economy.
- Supports the growth of bars, restaurants, and cultural venues that are essential to the town’s appeal as a leisure destination.
- Supports activities in areas that are already well connected, ensuring safe and sustainable travel for patrons and staff.

*Reasonable alternative*

- No positive impacts for the reasonable alternative have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- The absence of a policy will have a negative impact by decreasing the opportunities for local employers to develop new sources of employment beyond the current offerings.
- The absence of a policy will have a negative impact by not supporting a diversified and broader offer for evening and night-time uses that caters to visitors.

**Mixed impacts**

*Preferred policy*

- The policy will have a positive impact by providing social activities for younger generations and preventing crime through increased activity; however, it will also have a negative impact due to the potential for increased noise and antisocial behaviour in the late hours.

**Evaluation of options**

- The preferred policy is considered the desirable option, as it has mostly positive effects on the social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, while the reasonable alternative has impacts that will depend on the implementation of the policy, as well as two negative impacts on the economic aspect.

### Policy proposal PE9: Seafront

Preferred Policy summary
<p>Development within the Seafront area must contribute to a vibrant, inclusive, and climate-resilient environment in accordance with the Seafront Strategy. Proposals will be expected to preserve heritage assets, promote cultural uses, and enhance the visitor experience.</p> <p>High-quality design that withstands coastal conditions and improves accessibility and active travel connections along the coast is required.</p>
Reasonable alternative
<p>No special policy requirements are considered for the Seafront, and development in this area is treated with the same regard as development in other parts of Eastbourne.</p>

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	0	0	+	+	+	0
Reasonable alternative	0	0	0	0	i	0	0	0	i	i	-	0

## Positive impacts

### *Preferred policy*

- Protects the iconic character and aesthetic value of the seafront, which is a key part of the town's heritage.
- Reinforces the cultural identity of the town and provides high-quality public spaces for resident wellbeing.
- Supports businesses that rely on the seafront location, ensuring that new development does not worsen the existing commercial environment.
- Protects and enhances the seafront's role as Eastbourne's primary tourist attraction.

### *Reasonable alternative*

- No positive impacts for the Reasonable alternative have been identified.

## Negative impacts

### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

### *Reasonable alternative*

- The policy will have a harmful effect by failing to implement the necessary measures to protect the Seafront from inappropriate development.

## Evaluation of options

- The preferred policy is considered the desirable option, as it has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, while the reasonable alternative has impacts that will depend on the implementation of the policy, as well as a negative impact on the economic aspect.

### *Policy proposal PE10: Visitor Accommodation*

#### **Preferred Policy summary**

The loss of existing visitor accommodation will only be supported where it is demonstrated that the business is not viable despite active and sustained marketing.

New visitor accommodation must be directed to the Seafront and Town Centre. Proposals outside these areas must adhere to a sequential approach, prioritising the most sustainable locations first.

**Reasonable alternative**

Allow the change of use of buildings in the Seafront, allowing their conversion into residential or other uses by a less stringent process

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	0	0	0	++	++	+
Reasonable alternative	0	0	0	0	-	0	+	0	0	-	-	i

**Positive impacts**

*Preferred policy*

- Ensures that any new or converted tourist accommodation maintains a high standard of design within sensitive areas.
- Enables new accommodation and retaining existing stock, which supports the economy of the borough through visitor spend.
- Protects the core stock of hotels and guest houses; without this protection, the borough risks losing its capacity to host large numbers of visitors.
- Keeps the majority of tourist accommodation in the most accessible locations near the town centre and seafront.

*Reasonable alternative*

- Allows the conversion of buildings in the area into residential uses, increasing the number of net dwellings in Eastbourne.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- The policy will negatively impact the area by permitting a reduction in tourist accommodation along the seafront, which is an inalienable characteristic of the town and its surroundings.
- The policy will have a significant negative impact by allowing the conversion of hotels into other uses, losing a source of employment.
- The policy will have a strong negative impact by allowing the reduction of the provision of hotels in the town and diminishing the attractiveness of Eastbourne as a tourist destination.

**Evaluation of options**

- The preferred policy is considered the desirable option, as it has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, while the reasonable alternative has impacts that will depend on the implementation of the policy, one positive impact on housing, and negative impacts on the environmental and economic aspects.

*Policy proposal PE11: Short-term Holiday Lets*

<b>Preferred Policy summary</b>
<p>Change of use from permanent residential to short-term holiday lets will be strictly controlled in areas of high housing stress or high concentration.</p> <p>Planning permission will be refused where such use would erode the local housing stock or result in adverse impacts on residential amenity or community cohesion.</p>
<b>Reasonable alternative</b>

Do not require planning permission for converting long-term housing into short-term lets.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+/-	0	+	0	-	0
Reasonable alternative	0	0	0	0	0	0	-	0	-	0	+	0

### Positive impacts

#### *Preferred policy*

- Ensures that area residents are not subject to unfair competition from short-term lets, which could increase their rent or force them to relocate.

#### *Reasonable alternative*

- Allows short-term lets in any area, permitting the market to determine the best locations for visitor accommodation.

### Negative impacts

#### *Preferred policy*

- The policy will have a negative impact by reducing the number and diversity of tourist accommodations available in certain areas of Eastbourne.

#### *Reasonable alternative*

- The policy will have a negative impact by reducing long-term and permanent housing options for residents of the town, in favour of creating short-term accommodation for tourists.

- The policy will have a negative impact by forcing communities to compete with short-term lets and potentially lose members due to rising costs.

### **Mixed impacts**

- The policy will have a mixed positive and negative impact; it may lead to the loss of individual dwellings within designated visitor areas, but it provides overall protection for residential dwellings outside of these zones by containing tourism growth.

### **Evaluation of options**

- The preferred policy is considered the desirable option, as it has one positive effects on the social aspects of the sustainability appraisal, with one potential negative impact identified, and a mixed impact, while the reasonable alternative has one positive impact on leisure and tourism, and two negative impacts on the economic aspects.

### *Policy proposal PE12: Tourist Facilities and Attractions*

<b>Preferred Policy summary</b>
New tourist attractions within the Seafront Area will be supported to enhance the town's visitor offer. The loss of existing tourist facilities will only be permitted if it is demonstrated that the facility is no longer required or if a replacement of equivalent quality and accessibility is provided.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The police aim to safeguard the tourist facilities and attractions of the town; it would not be reasonable to permit their loss.

### **Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	+	0	0	0	+	+	++	+

### Positive impacts

#### *Preferred policy*

- Ensures that proposals within the Seafront Area are accessible by sustainable and active modes of transport, thereby reducing the carbon footprint associated with visitor travel.
- Concentrates active leisure and evening economy uses within a designated area, thus protecting the tranquillity of residential zones.
- Enhances the specific vibrant character of the Seafront Area while simultaneously protecting the character and setting of the areas outside this zone.
- Ensures that new visitor attractions do not have an unacceptable impact on the amenities of existing residential properties.
- Supports the development of additional visitor attractions and facilities that create jobs and economic value.
- Facilitates the growth and diversification of the borough's tourism offer.
- Directs new visitor facilities to the most accessible locations, reducing the need for car-based tourism.

### Negative impacts

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy.

Quality Environment Policies

*Policy proposal QE1: Nature Recovery*

<b>Preferred Policy summary</b>
<p>This policy drives the restoration of Eastbourne’s natural environment by ensuring that development contributes to a connected network of nature-rich spaces. It requires new projects to protect existing habitats and create new ones, helping to reverse biodiversity loss. The focus is on linking fragmented green spaces—such as parks, gardens, and the Downs—to enable wildlife to move freely and thrive, ultimately integrating nature into the urban fabric.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is a requirement of the Environment Act 2021.</p>

**Summary evaluation Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	++	++	++	+	0	-	0	++	-	0	+

**Positive impacts**

- Creates necessary spaces to capture, store, and manage flooding from various sources.
- Increases the suitable spaces to allow water to replenish the local aquifers.
- Reduces soil, air, surface water, and groundwater pollution by protecting and enhancing the natural environment.

- Delivers a substantial positive effect by enhancing and safeguarding the Borough's natural habitats while promoting an increase in biodiversity net gain.
- Supports the existing character of the town, which is known for its tree-lined streets, contributing to the quality of its landscape.
- Generates a strong positive outcome by enhancing community access to green and blue infrastructure and delivering spaces that promote outdoor recreation and health-focused activities.
- Fosters an attractive environment that encourages walking and reduces reliance on private car travel.

### Negative impacts

- The policy could have a minor negative impact on housing delivery, as the objective to protect and extend the Borough's network of green and blue infrastructure could require the use of land that would otherwise be destined for residential use.
- The policy could have a minor negative impact on business growth, as the objective to protect and extend the Borough's network of green and blue infrastructure could require the use of land that would otherwise be destined for employment use.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental and social aspects of the sustainability appraisal. Two minor negative impacts could arise from the delivery of housing and employment spaces, as protecting land could preclude allocation for other uses. However, in sum, the positive impacts of policy QE1 outweigh any potential negative impacts.

### *Policy proposal QE2: Development within the Setting of the South Downs National Park*

#### **Preferred Policy summary**

Development proposals on land that contributes to the setting of the South Downs National Park will only be permitted where they further the National Park's purposes by conserving and appropriately enhancing its special qualities, including key views, its natural and scenic beauty, wildlife and cultural heritage, tranquillity and the dark night skies.

#### **Reasonable alternative**

The policy seeks to further the purposes of the South Downs National Park; no reasonable alternative has been identified.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	+	+	++	0	-	0	0	-	+	0

### Positive impacts

- Recognises and supports the SDNP dark skies goals and reducing light pollution.
- Protects and enhances the habitats and biodiversity near the South Downs National Park.
- Strongly supports the goals of protecting the town's character, its protected views, and its setting.
- Supports tourism and leisure, as the National Park is one of the Borough's draws for visitors.

### Negative impacts

- The policy could have a minor negative impact on housing delivery, as potential restrictions on height and density in the area around the SDNP could decrease the number of dwellings delivered.
- The policy could have a minor negative impact on business growth, as the objective of protecting the Park's setting could impede the development of businesses deemed unsuitable.

### Evaluation of options

- The preferred policy has mostly positive effects on the environmental and social aspects of the sustainability appraisal. Two minor negative potential impacts could arise in the delivery of housing and employment spaces, by protecting land that could be allocated for other uses. However, in sum, the positive impacts of policy QE2 outweigh any potential negative impacts.

*Policy proposal QE3: Green and Blue Infrastructure*

<b>Preferred Policy summary</b>
Protects and enhances the network of "green" (parks, trees, woodlands) and "blue" (rivers, ponds, coast) spaces across the town. It prevents development that would break up this network and requires new schemes to incorporate green and blue features on-site. The goal is to create a resilient infrastructure that supports wildlife, manages water, and provides recreational space for people.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a requirement of the NPPF to protect and enhance green infrastructure.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	i	+	++	+	0	0	0	+	0	+	0

**Positive impacts**

- Supports carbon sequestration through the protection and enhancement of the green infrastructure network.
- Improves air quality through increased planting and urban greening.

- Protects, enhances, and connects the borough’s network of green and blue spaces, preventing habitat fragmentation and promoting nature recovery.
- Protects the borough's landscape character, particularly the interface between the urban and green areas.
- Ensures residents have access to high-quality natural spaces for recreation.
- Maintains the town's green appeal, which is a relevant asset for the visitor experience.

**Negative impacts**

- No negative impacts were identified for this policy option.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE4: Biodiversity Net Gain*

<b>Preferred Policy summary</b>
<p>All developments must adopt a ‘nature first’ approach. Development must avoid harming the existing biodiversity on the site. If harm to existing biodiversity cannot be avoided, impacts must be minimised through measures to reduce the duration, intensity and extent of impacts on biodiversity, and all ecological damage must be compensated or mitigated.</p> <p>New development, except development exempt from BNG requirements, must contribute to net gains in biodiversity, and will be required to achieve a minimum biodiversity net gain of 10%.</p> <p>Development resulting in the loss or deterioration of irreplaceable habitats will be refused, unless there are wholly exceptional circumstances, and a suitable compensation strategy exists.</p>
<b>Reasonable alternative</b>
<p>10% Biodiversity Net Gain is mandatory; local plan policy cannot require a lower percentage. A reasonable alternative to this policy would be to require a higher percentage (20%) of BNG on-site.</p>

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	i	+	++	+	0	0	0	+	0	0	0
Reasonable alternative	0	i	+	++	+	0	-	0	+	0	0	0

### Positive impacts

#### *Preferred policy*

- Provides a clean environment, as actions to increase BNG can also support the remediation and conservation of previously polluted sites.
- Increases the quality of the landscape in the Borough, as measures to green and enhance biodiversity are likely to enhance the setting of Eastbourne and generate a sense of place.
- Has a strong positive impact on enhancing the Borough's biodiversity and green infrastructure. The requirements to avoid unsuitable development will help deliver a biodiversity net gain of at least 10%.
- Protects and enhances the Borough's green infrastructure, both on-site and through compensation schemes. Depending on the solutions used, interventions can foster a sense of belonging and encourage healthy lifestyles.

#### *Reasonable alternative*

- Provides a clean environment, as actions to increase BNG can also support the remediation and conservation of previously polluted sites.
- Increases the quality of the landscape in the Borough, as measures to green and enhance biodiversity are likely to enhance the setting of Eastbourne and generate a sense of place.

- Has a stronger positive impact on enhancing the Borough's biodiversity and green infrastructure. The requirements to avoid unsuitable development will help deliver a biodiversity net gain of at least 20%.
- Protects and enhances the Borough's green infrastructure, both on-site and through compensation schemes. Depending on the solutions used, interventions can foster a sense of belonging and encourage healthy lifestyles.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- The reasonable alternative is expected to have a minor negative impact on the delivery of new housing, as a condition to deliver BNG above national requirements could increase the costs of building new homes and impact the number of affordable homes delivered.

**Evaluation of options**

- The preferred policy is considered the most sustainable option. Although increasing the BNG to 20% can have a positive impact on environmental aspects, the associated higher costs could reduce the number of dwellings delivered, which would negatively affect the social aspects of the sustainability appraisal.

*Policy proposal QE5: Urban Greening*

<b>Preferred Policy summary</b>
<p>Development proposals for residential dwellings of five new build dwellings or more, and new build commercial development proposals must assess the potential of the site for improvements in green infrastructure, and through the Urban Greening Factor tool must demonstrate how the development will meet the target Urban Greening Factor score of 0.3 as a minimum.</p> <p>Development proposals must set out how the UGF scores have been met, and how their design proposals make a positive contribution to urban greening.</p>
<b>Reasonable alternative 1</b>

No urban greening requirement.
<b>Reasonable alternative 2</b>
Higher UGF requirements on any new residential dwellings (i.e., setting no threshold).

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	l	+	++	+/i	+/i	0	?	0	+	0	0	+/i
Reasonable alternative 1	0	0	0	0	0	0	0	0	0	0	0	0
Reasonable alternative 2	i	+	++	+/i	+/i	0	-	0	+	0	0	+/i

**Positive impacts**

*Preferred policy*

- Implementing Urban Greening and permeable surfaces will have a positive effect in reducing runoff and the risk of surface flooding by enabling on-site rainwater absorption.
- The introduction of vegetation will have a strong positive effect on air pollution reduction by absorbing gaseous pollutants and capturing particulate matter. The introduction of trees, hedgerows and green walls with dense foliage will also reduce noise pollution by absorbing and scattering sound waves.

- Increases the greening factor; however, its impact on biodiversity protection and enhancement will depend on the implementation of each scheme and the species considered.
- Has a positive effect on Eastbourne's setting; however, its impact on enhancing and protecting the town's environment will depend on the quality of the solutions implemented by each scheme.
- Provides a cleaner environment (reducing air and noise pollution) and creates more vibrant, inviting places that encourage walking.
- Increases the number of residents who walk and cycle by providing more vibrant, inviting places. However, the impact will depend on the extent of new development and greening in each area.

#### *Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 have been identified.

#### *Reasonable alternative 2*

- Implementing Urban Greening and permeable surfaces will have a positive effect in reducing runoff and the risk of surface flooding by enabling on-site rainwater absorption.
- The introduction of vegetation will have a strong positive effect on air pollution reduction by absorbing gaseous pollutants and capturing particulate matter. The introduction of trees, hedgerows and green walls with dense foliage will also reduce noise pollution by absorbing and scattering sound waves.
- Increases the greening factor; however, its impact on biodiversity protection and enhancement will depend on the implementation of each scheme and the species considered.
- Has a positive effect on Eastbourne's setting; however, its impact on enhancing and protecting the town's environment will depend on the quality of the solutions implemented by each scheme.
- Provides a cleaner environment (reducing air and noise pollution) and creates more vibrant, inviting places that encourage walking.
- Increases the number of residents who walk and cycle by providing more vibrant, inviting places. However, the impact will depend on the extent of new development and greening in each area.

### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- No negative impacts for the reasonable alternative 1 have been identified.

*Reasonable alternative 2*

- Mandating the implementation of urban greening solutions on developments of four dwellings or fewer could present a slight negative financial impact in some cases, which could impact the delivery of housing, particularly affordable housing.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides a wide array of positive impacts, while no negative impacts have been identified. Reasonable alternative 1 is neutral in both its positive and negative effects, as it maintains the current status quo. And reasonable alternative 2 provides a stronger positive impact in some areas by ensuring that all new developments, including those with 4 or fewer dwellings, improve their UGF. However, this can also reduce the number of smaller developments, particularly of those that will include affordable homes.

*Policy proposal QE6: Tree Protection and Planting*

<b>Preferred Policy summary</b>
Protects existing healthy trees from removal and promotes the planting of new ones. It recognises the vital role trees play in cooling the town, improving air quality, and enhancing character. Where tree removal is unavoidable, robust replacement planting is required to ensure no net loss of canopy cover.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a requirement of the NPPF to ensure that trees are protected and incorporated into developments.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	+	+	0	0	0	+	0	0	0

### Positive impacts

#### *Preferred policy*

- Protects existing trees and requires new planting, which contributes directly to carbon capture and climate change mitigation.
- Utilises trees to improve local air quality and provide cooling/shading in the town.
- Strictly protects ancient woodland and veteran trees, which are irreplaceable habitats, and requires net increases in canopy cover.
- Preserves the leafy character of Eastbourne's streets and neighbourhoods.
- Enhances the visual amenity and environmental quality of residential areas, contributing to a sense of place and wellbeing.

### Negative impacts

#### *Preferred policy*

- No negative impacts were identified for this policy option.

### Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE7: Quality of the built environment*

<b>Preferred Policy summary</b>
<p>All new developments should contribute to local distinctiveness and sense of place through consideration of the scheme's design, layout, and built characteristics.</p> <p>Developments should use high-quality design, materials and finishes to ensure buildings are efficient and fit for the life of the development, integrating positively with the surrounding area. As well as incorporating and protecting existing distinct features of the site, or typical of the surrounding area.</p> <p>Developments should also respect the site's existing natural features and consider all potential users of the site, creating safe conditions for access, egress, active travel, and good links to public transport and the wider area.</p>
<b>Reasonable alternative</b>
<p>The policy considers design requirements to improve the quality of the built environment. No reasonable alternative has been identified.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	0	+	++	+	+	0	++	0	0	++

**Positive impacts**

- Increases the use of natural light and potentially reduces energy consumption. Additionally, by encouraging active travel and providing links to public transport, residents can reduce their emissions compared with travelling by private car.

- Respects and protects natural features and integrates them into development.
- Ensures that new development considers and enhances the existing environment and uses high-quality design and materials.
- Ensures that new developments incorporate well-designed disposal facilities.
- Ensures that developments consider the best layouts, materials, and finishes to make them more efficient.
- Fosters the development of well-designed, secure environments that contribute to the area and improve accessibility and walkability for residents and neighbours.
- Creates safe conditions for active travel and good links to public transport that reduce the need to travel by car, and by creating well-designed places that can become local destinations, reducing the need to travel long distances.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

*Policy proposal QE8: Landscaping and Layout*

<b>Preferred Policy summary</b>
Ensures that the spaces between buildings are as well-designed as the buildings themselves. It requires layouts to be easy to navigate, safe, and inclusive for all users. Landscaping must be integral to the design, using high-quality materials and planting to create pleasant, usable public and private spaces that connect well with the wider neighbourhood.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is essential to ensure developments are visually appealing and accessible, and that they support the aim of modal shift.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	++	0	0	+	+	0	0	+

**Positive impacts**

- Requires high-quality hard and soft landscaping that respects the local character and enhances the setting of new developments.
- Ensures that landscaping schemes include appropriate provisions for integrating utilities and services without compromising visual quality.
- Creates pleasant, well-designed external environments that encourage social interaction in the community.
- Requires landscaping to integrate legible and attractive routes for pedestrians and cyclists, supporting active travel within developments.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE9: Tall buildings*

Preferred Policy summary
Proposals for tall buildings, buildings over 18m in height, may be suitable in specified areas as shown on the policies map, and on identified sites.

<p>Design of tall buildings must consider the following design principles:</p> <ul style="list-style-type: none"> <li>• An appropriate transition between tall buildings and their immediate neighbours,</li> <li>• Buildings must limit light pollution,</li> <li>• The internal and external design must ensure the safety of all occupants.</li> <li>• The buildings' servicing and maintenance must ensure that it does not cause a disturbance to the surrounding public realm.</li> <li>• All proposals should strive to better current best practice standards in all aspects of sustainability.</li> </ul> <p>Applications for tall buildings must be accompanied by;</p> <ul style="list-style-type: none"> <li>• A Townscape and Visual Impact Assessment</li> <li>• A Building Design Statement</li> </ul>
<p><b>Reasonable alternative</b></p>
<p>The policy sets out the approach to the consideration of applications for tall buildings. No reasonable alternative has been identified.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+	0	+	+	i	?	0	i	i	+

**Positive impacts**

- Ensures that existing natural features and some permeable surfaces remain and are protected, enabling on-site rainwater absorption.
- Requires development proposals to avoid light pollution when considering external lighting.

- Requires proposals to ensure wildlife can connect to the wider landscape and to optimise green and blue infrastructure opportunities.
- Protects and enhances the quality of the townscape and landscape by ensuring that development respects and improves the public realm of Eastbourne and by providing arrangements for future maintenance and funding.
- Improves the quality of housing delivered, by ensuring the design of private public spaces is accessible, safe and of high quality.
- Supports resilient communities by delivering a high-quality public realm that fosters healthier residents and enhances safety through proper illumination, active frontages, and opportunities for natural surveillance by increasing the number of street users.
- Creates a more pleasant public realm that improves visitor experience.
- Improves accessibility and enhances the pedestrian experience, supporting the council's goal of a modal shift.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has mostly positive effects on the environmental, social and economic aspects of the sustainability appraisal, with no negative potential impacts identified, and no suitable alternative policy identified.

*Policy proposal QE10: Advertisements*

<b>Preferred Policy summary</b>
Express consent for advertisements will only be granted where the design, including proposed lighting, and proposed location respect the character and appearance of the surrounding area and does not create a danger or hazard to public safety.
<b>Reasonable alternative</b>
The policy sets out the approach to assessing express advertisement consent. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	0	0	0	0	0	0

### Positive impacts

- The policy will have a positive impact on Eastbourne's townscape and landscape by granting consent only if the design and location respect the character of the surrounding area.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has mostly neutral effects on the environmental, social and economic aspects of the sustainability appraisal, with a positive impact on the protection of Eastbourne's townscape and landscape, with no negative potential impacts identified, and no suitable alternative policy identified.

### *Policy proposal QE11: Environmental Amenity*

#### Preferred Policy summary

Protects residents and the environment from harmful pollution. It requires all development to avoid significant adverse impacts from noise, light, odour, air pollution, or soil pollution. It places the onus on developers to prove that their schemes will not degrade the quality of life for neighbours or the wider area.

#### Reasonable alternative

No reasonable alternative has been identified. The policy is a requirement to prevent new development from contributing to unacceptable levels of pollution.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	+	0	0	0	0	0	+	0	0	0

**Positive impacts**

- Strictly regulates environmental nuisance, ensuring activities won't contribute to air and water pollution.
- Protects the health, wellbeing and quality of life of residents from environmental impacts associated with commercial activities.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE12: Noise*

**Preferred Policy summary**

This policy manages noise to protect health and wellbeing. It prevents "noise-sensitive" developments (like homes and schools) from being built in noisy locations unless effective

mitigation is in place. Conversely, it stops new "noise-generating" uses (like factories or clubs) from opening near homes if they would cause unacceptable disturbance.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a requirement of the NPPF to mitigate and reduce to a minimum potential adverse impacts resulting from noise.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	++	0	0	0	0	0	+	0	+	0

**Positive impacts**

- Strictly controls noise-generating developments and requires mitigation measures to prevent "significant adverse impacts" on health and quality of life.
- Protects residential amenity and ensures that communities are not disturbed by unacceptable levels of noise from neighbouring uses.
- Manages noise pollution in the town centre and seafront, ensuring a balance between a vibrant evening economy and the need for a quiet environment for visitors and residents.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental, social and economic aspects of

the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE13: Lighting*

<b>Preferred Policy summary</b>
To reduce light pollution and protect dark skies—especially near the South Downs—this policy controls external lighting. It requires lighting to be the minimum necessary for safety and security, ensuring it is directed downwards and does not spill into sensitive habitats or neighbouring windows.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is necessary to limit the impact of light pollution on the South Downs National Park, in line with the Town's obligation to further the objectives of the National Park.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	++	+	0	0	0	0	+	0	0	0

**Positive impacts**

- Minimises light pollution and requires that external lighting is strictly necessary and well-designed to prevent sky glow and glare.
- Protects nocturnal wildlife from the harmful effects of excessive artificial lighting in sensitive areas, including the boundary with the SDNP.

- Preserves dark skies, particularly on the edge of the South Downs National Park and prevents light clutter that detracts from the townscape.
- Prevents light trespass into residential windows, protecting the sleep and health of residents.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

### *Policy proposal QE14: Contaminated Land*

<b>Preferred Policy summary</b>
Ensures public safety by requiring the thorough investigation and cleanup of contaminated sites before development begins. Developers must assess risks from past industrial uses and implement effective remediation strategies to make the land safe for its new use, preventing harm to future residents and the water environment.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a requirement in the NPPF to ensure land is safe and suitable for its intended use.

### Summary evaluation

<b>Objective</b>	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
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Preferred policy performance	0	0	++	0	0	0	0	0	0	+	0	0	0
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**Positive impacts**

- Ensures that contaminated land is fully remediated and made safe before any new use commences, preventing pollution of soil and groundwater.
- Protects the health of future residents and site users from the risks associated with past contamination.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE15: Air Quality*

<b>Preferred Policy summary</b>
Recognising the health risks of poor air quality, the policy requires new developments to be "air quality neutral" or better. Major developments must assess their impact on pollution levels and include mitigation measures—such as EV charging or better cycling facilities—to minimise harmful emissions.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is necessary to comply with national air quality objectives, as per the NPPF.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	++	0	0	0	0	0	+	0	0	0

### Positive impacts

- Requires Air Quality Assessments for major developments and promotes measures that reduce transport emissions, which reduce carbon emissions.
- Seeks improvements in overall air quality.
- Protects the health of vulnerable groups from the adverse effects of poor air quality.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

### *Policy proposal QE16: Cafes, Restaurants, Hot Food Takeaways and Drinking Establishments*

#### Preferred Policy summary

Manages the potential nuisance caused by food and drink venues. It requires applications for such uses to demonstrate how they will control odours, noise, and waste. It ensures that the operation of these businesses, including their opening hours, does not unreasonably disturb nearby residents.

<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is necessary to manage potential conflicts with residential amenity.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	+	0	0	+	0	0	+	0	+/-	0

**Positive impacts**

- Requires effective extraction and ventilation systems to prevent odour and noise nuisance for neighbours.
- Requires adequate facilities for waste storage and disposal, helping to prevent littering and pest issues associated with takeaways.
- Manages the concentration of hot food takeaways (particularly near schools) to support healthier food environments.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Mixed impacts**

- Supports a diverse food and drink offer, which is vital for tourism; however, it might also have a negative impact by possibly limiting the growth of new businesses that visitors might demand.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE17: Environmental Amenity*

<b>Preferred Policy summary</b>
Protecting neighbours' living conditions, the policy ensures that new development does not cause unacceptable harm. It assesses impacts such as loss of daylight, privacy, and overshadowing, ensuring that new buildings sit comfortably alongside existing homes without reducing their quality of life.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is required to protect residents' living conditions.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	+/-	0	++	0	0	0

**Positive impacts**

- Ensures that development layouts respect the character of the surrounding area, preventing overdevelopment and preserving the character of the place.
- Prioritises the physical and mental well-being of residents, protecting them from harmful impacts such as loss of privacy, overshadowing, and disturbance.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Mixed impacts**

- Ensures that all new housing delivers a high standard of living conditions for future occupants; however, it might also have a negative impact if the strict application of the policy limits the density of sites and reduces the overall number of homes that can be delivered.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive effects on the environmental and social aspects of the sustainability appraisal, with no negative impacts, and no suitable alternative policy identified.

*Policy proposal QE18: Conservation and enhancement of heritage assets***Preferred Policy summary****Designated Heritage Assets**

Proposals must preserve or, where appropriate, enhance the district's designated heritage assets in a manner appropriate to their significance.

Proposals impacting a designated heritage asset must clearly explain the asset's significance, supply enough information to show how it will be preserved, justify any damage to its significance, assess the public benefits, demonstrate that the proposed work is the minimum needed for its long-term use, and show efforts to retain, repair, or restore historic features when appropriate.

Proposals for development within a conservation area or its setting must preserve or enhance those elements that contribute positively or neutrally to the special character or appearance of the conservation area; make a positive contribution to its local character and distinctiveness; and explore opportunities for new development to improve or better reveal its significance.

**Non-Designated Heritage Assets**

Proposals should conserve or, where appropriate, enhance the district's non-designated heritage assets.

**Energy Efficiency of Heritage Assets**

Retrofitting of heritage assets to achieve greater energy efficiency and reductions in carbon emissions will be supported where proposed in a manner that conserves or enhances the significance of the heritage asset.

### Changes of use of heritage assets

In the case of a change of use from a use for which a heritage asset was originally designed, it must be demonstrated that all reasonable efforts have been made to sustain the existing use, find alternative uses that would avoid harm, or minimise and mitigate the extent of the harm to the asset.

### Archaeology

Where a site includes, or potentially includes, heritage assets of archaeological interest, an appropriate desk-based assessment will be required and a field evaluation where necessary. Development proposals that would result in substantial harm to Scheduled Monuments and other important archaeological sites, including their setting, will not be permitted unless there are exceptional circumstances.

### Reasonable alternative

The policy sets out the approach to the protection of designated and non-designated heritage assets. No reasonable alternative has been identified.

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	0	0	++	0	0	0	+	0	+	0

### Positive impacts

- Supports the retrofitting of heritage assets to achieve greater energy efficiency and reduce carbon emissions.

- Protects and manages Eastbourne's heritage assets by ensuring that any proposals related to them preserve and enhance their significance and context, and by requiring stringent standards for changes to their use.
- Promotes the cultural identity of communities where heritage assets are located by ensuring they are protected.
- Protects the heritage assets that characterise the town and are part of the draw that brings visitors.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has a mostly positive impact, with positive assessments on the environmental, social and economic aspects of the sustainability appraisal, no negative potential impacts identified, and no suitable alternative policy identified.

### *Policy proposal QE19: Water quality*

#### **Preferred Policy summary**

Development must seek to protect and enhance groundwater, surface water and control pollution of the water environment. Development will be permitted provided that it does not have an unacceptable impact on the quality and potential yield of local water resources, the water environment and its ecology.

A preliminary risk assessment will be required for any development where there is a potential risk of contamination of controlled waters. New development within the Groundwater Source Protection Zones will only be permitted where it is shown that it will not have an unacceptable impact on the quality and potential yield of local water resources, the water environment and its ecology.

Development proposals adjacent to watercourses must seek to restore rivers to their natural state, including de-culverting where possible.

All new developments must incorporate infrastructure to decrease surface water runoff, including methods to catch, store, use, or sustainably dispose of rainwater. Support will be given to proposals to replace existing traditional drainage systems with suitable Sustainable Urban Drainage systems.

**Reasonable alternative**

The policy sets out the approach to protecting water quality. No reasonable alternative has been identified.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	+	++	++	+/i	0	0	+	0	0	0	0

**Positive impacts**

- The policy will have a positive impact by reducing the risk of flooding from surface water by requiring all new developments to incorporate infrastructure to reduce runoff, including Sustainable Drainage Systems.
- The policy will have a strong positive impact on reducing pollution of Eastbourne's water resources by requiring all development to protect and enhance groundwater and surface water, and to control pollution. Development will need to provide risk assessments for sensitive areas and implement any required safeguards to prevent pollution.
- The policy will have a strong positive impact on the Borough's blue infrastructure and biodiversity, by preventing pollution and supporting the restoration of watercourses to their natural state, including de-culverting where possible.
- The impact of the policy will be positive on the town's landscape by providing greenery through SuDS and restoring its watercourses, but in the long term, its success will depend on proper maintenance of that infrastructure.

- The policy will have a positive impact by promoting the use of Sustainable Drainage Systems, which will reduce water runoff and improve water quality, which in turn will ease the pressure on the existing water infrastructure.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has a mostly positive impact, with positive assessments on the environmental and social aspects of the sustainability appraisal, no negative potential impacts identified, and no suitable alternative policy identified.

## Thriving Communities Policies

### Policy proposal TC1: Healthy Places

<b>Preferred Policy summary</b>
Development must be designed to support healthy, inclusive, and safe places that enable healthy lifestyles and address health inequalities. Major developments (10+ homes or 1,000 sqm non-residential) will be required to submit a Health Impact Assessment to identify and mitigate adverse impacts on community wellbeing.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is a requirement of the NPPF to enable and support healthy lifestyles.

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	++	0	0	0	+	+	++	0	0	+

### Positive impacts

- Promotes development that supports healthy lifestyles, which intrinsically encourages active travel (walking and cycling) over private car use, thereby reducing associated emissions.
- Requires Health Impact Assessments (HIA), which ensure that potential negative environmental impacts on health, such as poor air quality or noise pollution, are identified and mitigated early in the planning process.

- Encourages the diversification of housing stock and mixes to ensure that homes meet the specific health and wellbeing needs of different groups within the community.
- Establishes a direct link between physical infrastructure provision and healthy lifestyles.
- Places health and wellbeing as a main concern, reducing health inequalities and fostering inclusive communities.
- Mandates that the design integrates high-quality cycling and walking infrastructure.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has strong positive effects on the environmental, social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy TC1 is considered the preferred option.

*Policy proposal TC2: Public Open Space*

<b>Preferred Policy summary</b>
<p>Walking, wheeling, and cycling connections must be integral to the design of all development, maximising access to community facilities and open spaces.</p> <p>Existing public open space must be protected from loss. Any ancillary uses on such land must support physical activity and community use, ensuring the network of accessible open spaces is maintained.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is a requirement of the NPPF to provide access to a network of high quality open spaces.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	0	i	+	0	0	+	++	0	i	++

**Positive impacts**

- Supports active, low-carbon travel through green corridors and contributes to carbon capture through the preservation and creation of vegetated open spaces.
- Provides necessary breaks in the urban fabric, increasing the provision of open spaces that enhance the visual quality and character of the townscape.
- Ensures the provision of open space infrastructure to meet the needs of the population.
- Provides accessible outdoor space which supports for mental health, physical activity, and social interaction.
- Provides a network of spaces that support active travel routes, making walking and cycling more attractive and viable.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has strong positive effects on the environmental, social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy TC2 is considered the preferred option.

*Policy proposal TC3: Design of Public Open Space*

**Preferred Policy summary**

Public realm proposals must be inclusive, accessible, and high-quality. Development will be expected to enhance navigation and wayfinding through the use of landmarks, lighting, and public art, and must reference local character and heritage.

Designs must prioritise pedestrian safety and comfort, creating legible spaces that encourage social interaction.

**Reasonable alternative**

The alternative is to not have a specific policy regarding design standards for development in Eastbourne and rely on the design proposed by the developers.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	0	+	++	0	0	++	++	0	+	+
Reasonable alternative	0	0	0	i	i	0	0	i	i	0	i	l

**Positive impacts**

*Preferred policy*

- Promotes the creation of a public realm that prioritizes active, low-carbon transport and incorporates urban greening to mitigate heat island effects.
- Integrates greening measures, such as street trees and planting, into public spaces.
- Ensures high-quality design in the public realm that contributes significantly to the character, distinctiveness, and quality of the town.

- Promotes the delivery of high-quality public realm infrastructure that connects different parts of the town.
- Requires legible wayfinding and inclusive design that supports the ageing population and those using wheeled mobility aids, ensuring access to a quality environment for all.
- Improves visitor experience through better wayfinding, distinct public art, and a more attractive street scene.
- Creates a pedestrian-friendly environment that encourages modal shift away from cars.

*Reasonable alternative*

- Impacts will depend on the design delivered by developers.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative*

- Impacts will depend on the design delivered by developers.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides strong positive impacts in the environmental, social and economic areas of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 impacts are uncertain as they will depend on the design delivered by developers.

*Policy proposal TC4: Sports and Recreation Facilities*

<b>Preferred Policy summary</b>
Existing sports and recreation facilities must be protected. Redevelopment for alternative uses will only be supported where better or equivalent provision is made in an accessible location, or where it is robustly demonstrated that the facility is surplus to requirements.
<b>Reasonable alternative 1</b>

No reasonable alternative has been identified. The policy aligns with Sport England requirements to protect playing fields and facilities.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	i	+	++	0	0	+

**Positive impacts**

- Ensures the delivery of social infrastructure (play areas) required to support residents in new developments.
- Promotes physical activity among children and young people, intergenerational interaction and healthy lifestyles, which is vital for long-term community health.
- Locates play spaces where they can be easily accessed via walking and cycling networks.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has positive effects on the social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy TC4 is considered the preferred option.

*Policy proposal TC5: Children’s Play Space*

**Preferred Policy summary**

New residential developments of 10 or more dwellings must provide an equipped on-site children’s play space. Existing play spaces must be protected.

Where on-site provision is not feasible, financial contributions to enhance nearby play facilities will be required to ensure the needs of new residents are met.

**Reasonable alternative**

The alternative is to not have a specific policy requesting development to provide a play space on-site and rely on the publicly available sites.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	+/-	0	0	0	0	+	++	0	+	+
Reasonable alternative 1	i	0	0	0	0	0	0	0	i	0	0	i

**Positive impacts***Preferred policy*

- Increases the use of natural light and potentially reduces energy consumption. Additionally, by encouraging active travel and providing links to public transport, residents can reduce their emissions compared with travelling by private car.
- Respects and protects natural features and integrates them into development.

- Ensures that new development considers and enhances the existing environment and uses high-quality design and materials.
- Ensures that new developments incorporate well-designed disposal facilities.
- Ensures that developments consider the best layouts, materials, and finishes to make them more efficient.
- Fosters the development of well-designed, secure environments that contribute to the area and improve accessibility and walkability for residents and neighbours.
- Creates safe conditions for active travel and good links to public transport that reduce the need to travel by car, and by creating well-designed places that can become local destinations, reducing the need to travel long distances.

*Reasonable alternative 1*

- Impacts will depend on the design delivered by developers.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- Impacts will depend on the design delivered by developers.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the environmental, social and economic areas of the sustainability appraisal, and no negative impacts have been identified. The reasonable alternative 1 impacts are uncertain, as they will depend on the design delivered by the developers.

*Policy proposal TC6: Design of Children’s Play Space*

**Preferred Policy summary**

New play spaces must be inclusive and designed for all-weather use, accommodating children with limited mobility. Proposals will be required to provide shelter, shading, and natural surveillance to ensure safety and protect the amenity of neighbouring residents.

**Reasonable alternative**

The alternative is not to have a specific policy on the design of children's play space and rely on guidance available from Play England.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	+	0	0	0	++	++	0	0	0
Reasonable alternative 1	0	0	0	0	0	0	0	+	+	0	0	0

**Positive impacts***Preferred policy*

- Requires the design to make use of new and existing trees wherever possible to provide shelter and shading, contributing to urban greening.
- Requires that equipment is accessible to wheelchair users and those with visual impairments, and by encouraging multi-generational interaction.
- Creates high quality spaces that promotes community engagement on the location and by prioritising inclusive design that supports interactive play between children and carers, fosters social inclusion.

*Reasonable alternative 1*

- Ensuring that play spaces comply with the standards established by Play England.
- Creates play spaces that support safe design and accessibility that comply with the standards established by Play England.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides strong positive impacts in the environmental and social areas of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 provides positive impacts as well in the social areas of the sustainability appraisal; however, it lacks the focus of the preferred policy on community interaction.

*Policy proposal TC7: Non-Commercial Community Facilities*

<b>Preferred Policy summary</b>
Buildings and land used for non-commercial community purposes (e.g., places of worship, halls) must be protected from loss. Redevelopment will only be supported if the facility is re-provided to an equivalent standard or if it is demonstrated that it is no longer needed by the community.
<b>Reasonable alternative</b>
No reasonable alternative has been identified. The policy is required to plan for the provision, retention and use of community facilities.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	++	++	0	0	+

### Positive impacts

- Supports an element of residential development in proposals for the redevelopment of community facilities, provided the design meets the needs of both the community and future residents.
- Protects existing non-commercial community facilities from loss unless they are proven surplus, and by ensuring new facilities are located where they best serve the community.
- Ensures communities remain well-served by essential facilities that support social interaction and by requiring replacement provision if a facility is redeveloped.
- Ensures that communities are served by facilities in locations that are explicitly accessible by active travel modes.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has positive effects on the social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy TC7 is considered the preferred option.

### *Policy proposal TC8: Commercial Community Facilities*

#### Preferred Policy summary

<p>Commercial premises that serve as community hubs (e.g., pubs) must be retained. Loss of such facilities will only be supported if a replacement is provided within walking distance or if evidence demonstrates there is no longer a demand for the service and the site is not needed for other community uses.</p>
<p><b>Reasonable alternative</b></p>
<p>The alternative is not to have a specific policy on protecting commercial community facilities.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	0	+	++	+	+	+
Alternative policy 1	0	0	0	0	0	0	0	-	i	-	-	i

**Positive impacts**

*Preferred policy*

- Seeks to retain land and buildings used for commercial enterprises that serve a local community (such as pubs or local shops), recognising them as vital community assets.
- Protects venues that engender community cohesion and requiring that any replacement provision is made within a 15-minute walk (1,200m) to maintain local access.
- Retains commercial premises that provide local employment, only allowing their loss if there is evidenced lack of demand.

- Preserves the town’s food and drink offer, which is important for the tourism sector.
- Requires replacement facilities to be located within walking distance, ensuring they remain accessible to the local community without needing to use a car.

#### *Alternative policy 1*

- No positive impacts for alternative policy 1 have been identified.

#### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Alternative policy 1*

- The policy will have a negative impact by allowing land and buildings used for commercial enterprises that serve a local community (such as pubs or local shops), to be removed and developed into new uses.
- The policy will have a negative impact by allowing commercial enterprises that generate employment to be removed and replaced with new uses, particularly if it is residential uses.
- The policy will have a negative impact by allowing commercial community facilities, such as pubs, cafes, and restaurants, to be removed and converted to other uses, thus reducing the draw for visitors.

#### **Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides strong positive impacts in the social and economic areas of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1, on the other hand, does not provide positive impacts and carries significant negative impacts in relation to the social and economic aspects of the sustainability appraisal.

#### *Policy proposal TC9: Healthy Food Environment*

#### **Preferred Policy summary**

Allotments and community food growing spaces must be protected from development. All new residential developments resulting in a net gain of dwellings will be required to include

provision for food growing, such as communal plots or private gardens, to support access to healthy food.

**Reasonable alternative**

No reasonable alternative has been identified. The policy supports the objective of enabling access to healthier food and controlling the development of hot food takeaways.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	0	0	+	+/-	i	0	+	++	+	0	0

**Positive impacts**

- Supports local food growing spaces which can reduce the carbon footprint associated with transporting food.
- Promotes the provision of orchards, perennial edible landscaping, and gardens in new developments, which increases urban vegetation and supports biodiversity.
- Supports the development of ancillary community food infrastructure, such as storage for equipment and produce, which supports the viability of growing spaces.
- Protects and supports community food growing spaces and manages the concentration of hot food takeaways to support healthier lifestyles.
- Creates opportunities for training in gardening and horticulture.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

## Mixed impacts

- The policy will have a mixed positive and negative impact; while greening enhances the environment, unmanaged fruit bearing trees or allotments can result in waste issues that detract from the visual quality.

## Evaluation of options

- The preferred policy has positive effects on the environmental, social and economic aspects of the sustainability appraisal, a mixed impact on the environmental section, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy TC9 is considered the preferred option.

### *Policy proposal TC10: Safe and Resilient Places*

<b>Preferred Policy summary</b>
<p>Development proposals must demonstrate that safety and security have been considered in the design. Measures such as natural surveillance, appropriate lighting, and the minimization of blind spots must be incorporated ("Secured by Design" principles) to mitigate crime and anti-social behaviour.</p> <p>Water safety must be addressed in developments near coastal or riparian areas to prevent accidental drowning.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is a requirement of the NPPF to create places that are safe, inclusive and accessible.</p>

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport

Preferred policy performance	0	0	0	0	+	0	0	0	++	+	+	0
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**Positive impacts**

- Mandates the appropriate inclusion of lighting and the minimisation of blind corners, which enhances the safety and usability of the public realm.
- Requires development to include measures that mitigate identified threats such as suicide, accidental falls, and intentional vehicle impact, and by promoting natural surveillance to reduce crime.
- Creates better conditions for businesses to operate and invest.
- Creates safer environments (through lighting and surveillance) which encourages the use of public spaces and supports the visitor economy.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has positive effects on the environmental, social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy TC10 is considered the preferred option.

## Homes for All Policies

### Policy proposal HO1: Affordable Housing

Preferred Policy summary
<p>All new residential developments of 10 or more dwellings or sites over 0.5 hectares must contribute to affordable housing provision. A minimum percentage of affordable homes (30% on brownfield sites, 40% on greenfield sites) must be provided on-site and integrated seamlessly with market housing.</p> <p>The tenure mix must reflect local needs, prioritising social rent for larger homes.</p>
Reasonable alternative
<p>No reasonable alternative has been identified. The policy is based on evidence of local viability and the identified need of affordable housing.</p>

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	++	0	++	0	0	0

### Positive impacts

- Sets clear targets for affordable housing contributions and mandates a tenure split that prioritises Affordable Rent, addressing the Borough's need for affordable tenures.
- Ensures affordable homes are indistinguishable from market housing and distributed in clusters to create mixed and balanced communities, whilst also

requiring 5% of affordable homes to meet wheelchair accessible standards to support residents with accessibility needs.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has strong positive effects on the social aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy HO1 is considered the preferred option.

### *Policy proposal HO2: Housing Type and Mix*

<b>Preferred Policy summary</b>
<p>Development proposals must provide a mix of dwelling sizes and types, prioritising 2 and 3-bedroom homes to meet the identified needs of the population.</p> <p>The proposed mix must be justified by up-to-date evidence, ensuring a balanced supply of housing that caters to families, smaller households, and diverse demographic groups.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy reflects the findings of the Local Housing Needs Assessment.</p>

### Summary evaluation

<b>Objective</b>	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
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Preferred policy performance	0	0	0	0	0	0	++	0	++	0	0	0
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**Positive impacts**

- Prioritises the delivery of 2- and 3-bedroom homes to address the specific shortage of family-sized units and rebalance the housing stock.
- Ensures a diversity of housing types and sizes is delivered, which supports the creation of sustainable, mixed communities where households can remain as their needs change over time.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has strong positive effects on the social aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy HO2 is considered the preferred option.

*Policy proposal HO3: Specialist Housing for Older and Vulnerable People*

<b>Preferred Policy summary</b>
<p>Specialist accommodation must be located in accessible areas close to services and public transport. Existing specialist housing must be protected unless it is demonstrated to be no longer fit for purpose or needed.</p> <p>New proposals must provide appropriate amenity space and be designed to support the independence and well-being of residents.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is required to address the needs of groups with specific housing requirements.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	++	+	+	+	0	+

### Positive impacts

- Supports the delivery of supported housing to meet the identified needs of the older population and vulnerable groups, while resisting the loss of existing specialist accommodation.
- Requires specialist accommodation to be located in areas that are well-connected to essential services and community facilities, ensuring adequate social infrastructure support for residents.
- Supports mixed and inclusive neighbourhoods and prevents the overconcentration of supported accommodation, ensuring community safety and cohesion.
- Supports the Health and Social Care sector through the provision of new care facilities.
- Ensures that high-density specialist housing is sited in locations well-served by public transport, facilitating sustainable travel for staff and visitors.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has strong positive effects on the social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy HO3 is considered the preferred option.

*Policy proposal HO4: Provision of Self-Build and Custom Housebuilding*

<b>Preferred Policy summary</b>
<p>Developments of 10 or more dwellings will be required to provide 5% of plots as serviced plots for self-build and custom housebuilding.</p> <p>Proposals must be accompanied by a design code to ensure high-quality development that integrates well with the wider site, diversifying the housing market.</p>
<b>Reasonable alternative 1</b>
<p>Policy that allows development to provide self-build plots in lieu of a proportion of the affordable housing requirement.</p>
<b>Reasonable alternative 2</b>
<p>To not include a specific policy on self-build and custom housebuilding.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	+	0	0	+	0	0
Reasonable alternative 1	0	0	0	0	0	0	-	0	0	+	0	0
Reasonable alternative 2	0	0	0	0	0	0	?	0	0	0	0	0

## Positive impacts

### *Preferred policy*

- Requires that self-build projects are accompanied by a site-wide design code to ensure high-quality, context-sensitive design that respects local character.
- Diversifies the housing market and meets the specific needs of different groups, helping to increase a mix of types and tenures of housing.
- By supporting self-build projects, it promotes using smaller local construction companies and suppliers, retaining economic benefits within the local area.

### *Reasonable alternative 1*

- The policy will have a positive impact as self-build projects often utilise smaller local construction companies and suppliers, retaining economic benefits within the local area.

## Negative impacts

### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

### *Reasonable alternative 1*

- The policy could negatively affect the delivery of affordable housing, as there are no restrictions to ensure that self-build plots benefit the same people who would have benefited from the affordable options.

## Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the environmental, social and economic areas of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 has one positive aspect and one negative aspect, demonstrating the least desirable option. Finally, the impact of reasonable alternative 2 is largely neutral or unclear.

### *Policy proposal HO5: Houses in Multiple Occupation (HMOs)*

## Preferred Policy summary

Proposals for new HMOs will only be supported where they do not result in a concentration of more than 10% of properties within a 100m radius.

Permission will be refused where the proposal would result in a residential property being sandwiched between two HMOs, safeguarding residential amenity and community balance.

**Reasonable alternative 1**

A blanket policy restricting new HMO’s within the plan area.

**Reasonable alternative 2**

A policy supporting new HMO’s with no criteria restricting their location.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	+	+	+	0	+	+	+	+	+	0	+	+
Reasonable alternative 1	0	0	0	0	0	0	-	0	0	0	0	0
Reasonable alternative 2	-	i	i	0	i	i	i	-	i	0	-	-

**Positive impacts**

*Preferred policy*

- Requires new HMOs and extensions incorporate measures to reduce carbon emissions and improve energy efficiency.
- Prohibits ground floor sleeping accommodation in areas of flood risk and requiring the provision of flood warning and evacuation plans.
- Requires demonstration that any increase in activity will not cause unacceptable noise and disturbance to neighbouring properties.
- Ensures that any external alterations or extensions are of a high-quality design that responds positively to the character of the surrounding neighbourhood.
- Mandates that sufficient space for waste and recycling storage, appropriate to the number of occupants, is provided within the curtilage of the property. The policy will have a positive impact by mandating that sufficient space for waste and recycling storage, appropriate to the number of occupants, is provided within the curtilage of the property.
- Diversifies the mix of housing options and maintaining mixed and balanced communities.
- Ensures HMOs are directed to locations that are already well-served by local services and facilities.
- Provides necessary accommodation while preventing overconcentration to maintain mixed and balanced communities.
- Restricts new HMOs within the designated Seafront Area to protect the tourist accommodation offer and visitor experience.
- Requires HMOs to be located in areas well-served by public transport and mandating secure cycle parking to support sustainable travel.

#### *Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 have been identified.

#### *Reasonable alternative 2*

- No positive impacts for the reasonable alternative 2 have been identified.

#### **Negative impacts**

#### *Preferred policy*

- No negative impacts for the preferred policy have been identified.

#### *Reasonable alternative 1*

- The policy will have a negative impact by totally banning the offer of a type of affordable housing option.

*Reasonable alternative 2*

- The policy will have a negative impact, as HMO residents might need to rely on private cars that produce more emissions if HMOs are not well located, and the policy does not specify any criteria related to energy efficiency.
- The policy will have a negative impact by not focusing on developing HMOs in areas that already have the necessary services and infrastructure.
- The policy could have a potential negative impact by permitting the development of HMOs in areas usually designated for tourism, thus competing with the supply of units intended to attract and accommodate visitors.
- The policy may have a negative impact by not situating HMOs in areas well served by public transport, forcing residents to rely on cars or limiting their mobility options.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the environmental, social and economic areas of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 has one negative aspect, demonstrating a less desirable option. Finally, the impact of reasonable alternative 2 is largely negative, with many of the impacts to be determined by decisions from developers.

*Policy proposal HO6: Residential Standards*

<b>Preferred Policy summary</b>
<p>All new homes must comply with the Technical Housing Standards – Nationally Described Space Standards to ensure adequate internal living space.</p> <p>Development will be required to provide private outdoor amenity space, such as a garden, balcony, or terrace, for every dwelling to ensure a high quality of life for occupants.</p>
<b>Reasonable alternative</b>

A reasonable alternative to this policy is to have no policy on space standards but leave the dwelling size to the market.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	+	0	0	0
Reasonable alternative 1	0	0	0	0	0	0	i	0	-	0	0	0

**Positive impacts**

*Preferred policy*

- Ensures better quality accommodation through the requirement that all new dwellings meet the Nationally Described Space Standards.
- Prevents overcrowding and ensuring homes provide adequate living space for the number of occupants, supporting long-term health and wellbeing.

*Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- The policy might have a negative impact by not directly promoting the delivery of housing that provides adequate space and design, thereby not directly supporting residents' wellbeing.

### Evaluation of options

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the social area of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 has one negative aspect, demonstrating a less desirable option.

### Policy proposal HO7: Residential Accessibility

Preferred Policy summary
<p>All new dwellings must meet the Building Regulations Standard M4(2) for accessible and adaptable dwellings.</p> <p>A proportion of affordable housing units will be required to meet the M4(3) standard for wheelchair users, ensuring the housing stock can meet the needs of an ageing population and residents with disabilities.</p>
Reasonable alternative
<p>A reasonable alternative to this policy is to have no policy on accessible housing, but to leave the proposed dwelling's size and design to the market.</p>

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	+	0	+	0	0	0

Reasonable alternative 1	0	0	0	0	0	0	i	0	-	0	0	0
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**Positive impacts**

*Preferred policy*

- Requires new dwellings to meet M4(2) accessible and adaptable standards, ensuring the housing stock is flexible and fit for purpose for the long term.
- Supports the needs of an ageing population and people with decreased mobility through the requirement for wheelchair accessible homes (M4(3)) on larger sites.

*Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- The policy might have a negative impact by not directly promoting the delivery of housing that caters to the needs of people with reduced mobility, thus not directly supporting the wellbeing of residents.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides positive impacts in the social area of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 has one negative aspect and some impacts that will depend on the delivery of the housing, demonstrating a less desirable option.

*Policy proposal HO8: Retaining Residential Use*

<b>Preferred Policy summary</b>
Development involving the net loss of existing dwellings or committed housing sites will not be permitted.

Exceptions will only be considered where specific criteria regarding unviability, replacement provision, or wider regeneration benefits are met, ensuring the borough’s housing stock is preserved.
<b>Reasonable alternative</b>
A reasonable alternative would be no policy to resist the net loss of dwellings.

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	0	++	+	+	0	0	0
Reasonable alternative 1	0	0	0	0	0	0	-	i	-	0	0	0

**Positive impacts**

*Preferred policy*

- Strictly resists the net loss of existing dwellings, which is critical to maintaining housing supply.
- Allows exceptions where the loss of a dwelling would enable the provision of a local community service that meets an identified need.
- Prevents the conversion of small family homes (3 bedrooms or fewer) into flats, thereby retaining essential family housing stock within communities.

*Reasonable alternative 1*

- No positive impacts for the reasonable alternative 1 have been identified.

**Negative impacts**

*Preferred policy*

- No negative impacts for the preferred policy have been identified.

*Reasonable alternative 1*

- This policy would have a significant negative impact by allowing the loss of residential spaces in a context where housing needs are high. The loss of housing would further exacerbate the shortage of dwellings.
- The policy would have a negative impact by allowing the loss of dwellings in consolidated neighbourhoods and changing existing community dynamics.

**Evaluation of options**

- The preferred policy is considered the most sustainable option, as it provides strong positive impacts in the social area of the sustainability appraisal, and no negative impacts have been identified. Reasonable alternative 1 has one strong negative aspect, one negative aspect, and an impact that will depend on the potential development, which would represent a loss of housing. Policy proposal HO9: Gypsy & Traveller Accommodation

*Policy proposal HO9: Gypsy & Traveller Accommodation*

<b>Preferred Policy summary</b>
<p>Applications for Gypsy and Traveller pitches will be supported where the site is not subject to absolute constraints such as high flood risk.</p> <p>Sites must be of sufficient size to accommodate residential and touring needs and must be located with reasonable access to services and utilities, contributing to meeting identified accommodation needs.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is required to meet the needs identified in the Gypsy and Traveller Accommodation Assessment.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	0	+	++	0	+	0	0	0

**Positive impacts**

- Requires that sites are capable of being provided with safe waste disposal facilities.
- Supports social inclusion and the needs of groups with protected characteristics, ensuring they have access to suitable accommodation.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has strong positive effects on the social aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy HO9 is considered the preferred option.

Effective Infrastructure Policies

*Policy proposal E11: Delivery of Infrastructure*

<b>Preferred Policy summary</b>
<p>Development will be required to provide or contribute to the infrastructure necessary to support the scheme, such as schools, health facilities, and transport upgrades.</p> <p>Essential infrastructure must be operational prior to the occupation of the development to prevent strain on existing services.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is necessary to ensure development is sustainable and supported by adequate services.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	i	i	0	0	0	0	-	++	+	+	+	i

**Positive impacts**

- Strongly ensures that all necessary infrastructure is delivered in a timely manner to support growth, and by securing maintenance contributions to sustain these facilities.
- Ensures that social and environmental infrastructure is provided to support communities, which can in turn create inclusive and vibrant communities.

- Ensures that the infrastructure required to make Eastbourne an attractive destination for business is delivered effectively, addressing the demands of both existing and future businesses.
- Supports the provision of facilities and infrastructure that support the tourism industry of Eastbourne, which can include leisure amenities that benefit both residents and visitors.

**Negative impacts**

- The policy will have a negative impact on housing delivery because the requirement for significant infrastructure contributions and financial obligations (such as CIL and S106) may compromise development viability, potentially reducing the ability to deliver affordable housing and meet overall housing targets.

**Evaluation of options**

- The preferred policy generally has positive effects on the social and economic aspects of the sustainability appraisal. One potential negative impact is on housing delivery, as higher infrastructure costs could reduce viability. Overall, the positive impacts of policy E11 outweigh any potential negatives, and delivering housing without the necessary infrastructure is not a suitable option, as it would not ensure a quality of life for new and existing residents. With no reasonable alternative policy identified, Policy E11 is considered the preferred option.

*Policy proposal E12: Influencing Travel Behaviour*

<b>Preferred Policy summary</b>
<p>Development proposals must prioritise the needs of pedestrians, cyclists, and public transport users. Major developments will be required to submit a Travel Plan setting out measures to reduce car use.</p> <p>Incentives for sustainable transport, such as car club membership or public transport vouchers, must be provided to encourage a modal shift.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is a requirement of the NPPF to promote sustainable transport modes.</p>

## Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	++	0	+	0	+	0	+	+	+	+	0	++

## Positive impacts

- Strongly seeks to rebalance transport in the borough and prioritise active travel to reduce the proportion of journeys made by private car.
- Encourages measures that create safer roads by reducing speeds and reducing the environmental impact of traffic movements, thereby improving local air and noise quality.
- Enhances the townscape and ensures that the design and layout of new developments improve the streetscape quality.
- Improves the diversity of stock by decreasing the amount of land destined for cars in new development, thus increasing the amount of land available for housing or to potentially improve or increase the size of dwellings.
- Ensures that new development contributes to connecting neighbourhoods and supports the provision of safe and reliable sustainable transport infrastructure.
- Seeks to connect neighbourhoods through improved active travel routes and ensuring good accessibility to schools, shops, and services for all residents.
- Ensures that new development is located in sustainable locations with good access to jobs and key services via walking, cycling, and public transport.
- Actively discourages car dependency and supporting the expansion of public transport services and the development of a high-quality walking and cycling network throughout the Borough.

## Negative impacts

- No negative impacts have been identified for the preferred policy option.

### Evaluation of options

- The preferred policy has several positive effects on the environmental, social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy EI2 is considered the preferred option.

#### *Policy proposal EI3: Digital Infrastructure*

<b>Preferred Policy summary</b>
<p>Proposals for new development must be supported by high-quality digital infrastructure (e.g., full fibre broadband) from the outset.</p> <p>The expansion of digital networks is encouraged, but developers will be required to demonstrate that opportunities to utilise existing infrastructure or mast sharing have been explored to minimise visual clutter.</p>
<b>Reasonable alternative</b>
<p>No reasonable alternative has been identified. The policy is a requirement of the NPPF to support the expansion of high quality communications networks.</p>

### Summary evaluation

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	0	0	0	+	0	0	+	0	+	0	0

### Positive impacts

- Requires that proposals minimise visual clutter through mast sharing and ensuring that the location and design do not have significant adverse impacts on the historic environment or the character of the area.
- Supports the expansion and improvement of digital infrastructure within Eastbourne.
- Supports the delivery of high-quality digital infrastructure to establish Eastbourne as a successful business location and facilitate economic growth.

**Negative impacts**

- No negative impacts for the preferred policy have been identified.

**Evaluation of options**

- The preferred policy has positive effects on the environmental, social and economic aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy EI3 is considered the preferred option.

*Policy proposal EI4: Water supply and Wastewater Management*

<b>Preferred Policy summary</b>
<p>Development must demonstrate that adequate water supply and wastewater capacity exist to serve the new homes or businesses.</p> <p>Where existing provision is insufficient, a strategy for necessary infrastructure upgrades must be agreed with the service provider and delivered prior to occupation to ensure service reliability and environmental protection.</p>
<b>Reasonable alternative 1</b>
<p>No reasonable alternative has been identified. The policy is necessary to ensure development does not overload water and wastewater networks.</p>

**Summary evaluation**

Objective	1. Greenhouse Gas Emissions	2. Flood Risk and Water Availability	3. Clean Environment	4. Biodiversity and Green Infrastructure	5. Landscape, Townscape and Historic Environment	6. Waste	7. Housing	8. Infrastructure	9. Resilient Communities	10. Employment and Business Growth	11. Leisure and Tourism	12. Travel and Transport
Preferred policy performance	0	++	+	0	0	0	+	++	0	0	0	0

### Positive impacts

- Ensures that adequate water and wastewater infrastructure is in place to support new development, thereby reducing the risk of sewer flooding and ensuring that the water supply network can cope with increased demand.
- Ensures that wastewater is managed effectively, which reduces the risk of pollution incidents and protects the quality of local bodies of water.
- Ensures that new homes are served by the necessary utility infrastructure, making them habitable and sustainable for the long term.
- Mandates the provision of essential water and wastewater infrastructure to meet the needs of new development and requires coordination with statutory undertakers to deliver necessary upgrades.

### Negative impacts

- No negative impacts for the preferred policy have been identified.

### Evaluation of options

- The preferred policy has strong positive effects on the environmental and social aspects of the sustainability appraisal, and no negative potential impacts have been identified. With no reasonable alternative policy identified, Policy EI4 is considered the preferred option.

## 5. Next steps

- 5.1.1 In accordance with guidance, this Interim SA Report has been issued for consultation alongside the Regulation 18 consultation on Draft Local Plan. Consultation will take place for 8-weeks between 13<sup>th</sup> February and 10<sup>th</sup> April 2026.
- 5.1.2 The Draft Local Plan and its Sustainability Appraisal Report are available via the Council's website at [www.lewes-eastbourne.gov.uk-eastbourne-local-plan](http://www.lewes-eastbourne.gov.uk-eastbourne-local-plan). Representations can be made via the online consultation portal available through the above weblink. Representations can also be submitted via email to [LocalPlan@lewes-eastbourne.gov.uk](mailto:LocalPlan@lewes-eastbourne.gov.uk), or via post to Planning Policy team, Eastbourne Borough Council, Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG
- 5.1.3 Following consultation, any comments or feedback will be used to inform the next stage in the production of the Local Plan.