

Committee	<b>Cabinet</b>
Date	<b>17 November 2004</b>
Report By	<b>Director of Transport and Environment</b>
Title of Report	<b>Sub-Regional Strategy for the Sussex Coast</b>
Purpose of Report	<b>To seek endorsement of the sub-regional strategy proposals submitted to the South East England Regional Authority (SEERA)</b>

---

## **RECOMMENDATION**

**The Cabinet is recommended to endorse the strategic planning advice recently presented to SEERA on a Sub-Regional Strategy for the Sussex Coast.**

---

### **1. Financial Appraisal**

1.1 The report has no direct financial implications for the Council. However, future levels of population and household growth will impact on the extent and nature of demands for council services and the resources available to meet these.

### **2. Supporting Information**

2.1 Under the Planning and Compulsory Purchase Act 2004, the Council has a duty to advise the Regional Planning Body – SEERA – on the implementation, monitoring and review of the Regional Spatial Strategy (RSS) (the South East Plan) particularly in relation to its sub-regional elements.

2.2 In this context, the principal planning authorities in the sub-region – East Sussex County Council, West Sussex County Council and Brighton & Hove City Council – submitted a report to SEERA at the end of April which made the case for the new RSS to include distinct policies for the Sussex coastal towns from Chichester through to Rye. This report was well received and led to SEERA further commissioning the principal authorities to prepare a sub-regional strategy to meet the economic and social needs of the Sussex Coast to 2026. A copy of SEERA's brief for this work has been placed in the Members' Room. (SEERA commissioned nine sub-regional strategies and the County Council has also contributed to the strategy for the Gatwick area which is being led by West Sussex County Council, see separate report also on the agenda)

2.3 East Sussex County Council has acted as the lead authority throughout the work and has done as much as possible to involve a very broad range of partners in a process that has been conducted in accordance with an extremely demanding timetable. This has involved regular meetings of a Members Steering Group and a supporting Officers Advisory Group. These groups include representatives of all the local planning authorities in the sub-region, together with other important partners from the private, voluntary and community sectors. Direct consultations have also been held with major infrastructure providers and key business interests, whilst a wider reference group of around eighty local stakeholders has also been kept informed of progress. In addition, details of the process and all the main documents have been made available on the Council's website.

2.4 The proposed Sub-Regional Strategy for the Sussex Coast (attached as Appendix 1) was submitted to SEERA on 29 October. At that time, it was approved for submission by the respective

Lead Members acting for each of the principal authorities. Although the proposals have been formulated with wider regional growth pressures in mind, it is the particular needs of the sub-region for an 'economic renaissance' that must take precedence. The strategy therefore accords with the conclusions of the earlier study which stated that, in the unique circumstances of this sub-region, promoting sustainable economic regeneration must take priority over meeting externally-generated demands for additional housing if the coastal towns are to reduce substantially existing disparities with the rest of the South East.

2.5 In also proposing that the sub-region should make provision for around 76,000 new homes over the 25-year period to 2026, the strategy is advocating that future housing provision should not be increased above current planned levels. Even so, this will still require new strategic land allocations for some 11,000 dwellings, about 6,000 of which would need to be found in the Bexhill and the Eastbourne/Hailsham areas of East Sussex. The strategy is also very clear that sustainable economic and housing growth can only be achieved if the infrastructure needed to service development and improve overall accessibility is actually delivered. In such a highly constrained sub-region, there simply are no alternative spatial options for future development and current delays in realising improvements to the strategic transport infrastructure are already holding up the implementation of key strategic developments for both housing and employment.

### **3. Environmental Issues**

3.1 In arriving at a preferred strategy, the social, economic and environmental implications of three main options were assessed against the objectives of the Integrated Regional Framework. Details of this assessment are included as Annex 3 to the strategy.

### **4. Community Safety Issues**

4.1 Community safety issues will be more relevant to the preparation of more detailed local development documents once the final South East Plan has been published.

### **5. Human Rights Act Implications**

5.1 The South East Plan will be subject to statutory consultation procedures and a full Examination in Public before an independent panel.

### **6. Conclusion and Reason for Recommendation**

6.1 The South East Plan must include distinct strategic policies to regenerate the Sussex coastal towns that reflect its unique demographic and environmental characteristics and the severe limitations of the area's existing transport network and services. Retaining 'priority area' status for the coastal towns from Shoreham eastwards; extending the 'masterplan' approach to other major towns; improving transport communications and accessibility; ensuring a decent supply and mix of good quality employment sites; protecting the environment as a key economic asset; extending skills training; improved business support and marketing; and ensuring that housing provision (and associated workforce growth) does not outstrip the demand for labour and the capacity of the local economy to grow all form key elements of the Sub-Regional Strategy for the Sussex Coast recently submitted to SEERA that the Cabinet is now asked to endorse.

BOB WILKINS

Director of Transport and Environment

4 November 2004 CABINET: C17November-Strategy-South Coast

Contact Officer: Paul Treadgold Tel. No. 01273 481804

Local Members: All

### **BACKGROUND DOCUMENTS**

Sussex Coastal Towns Sub-Regional Study Report, April 2004

**The South East Plan  
Proposed Sub-Regional Strategy for the Sussex Coast**

**Advice presented by East Sussex County Council on behalf of the principal planning authorities, 29 October 2004**

## 1 INTRODUCTION

This sub-regional strategy has been developed by the three principal authorities in the sub-region – East Sussex County Council, West Sussex County Council and Brighton & Hove City Council – in accordance with the brief set by the South East England Regional Assembly (SEERA). It follows on from, and further develops, the conclusions of the earlier sub-regional study report that the principal authorities submitted to SEERA on 30 April 2004.

In developing the strategy, the principal authorities have worked closely with all the local planning authorities in the sub-region, together with other of social, economic and environmental partners. Direct consultations have also been held with key infrastructure providers and business representatives, and a wider group of local stakeholders has been kept informed of the process.

### Definition of the area

The area covered by this strategy runs the whole length of the Sussex coast from Chichester through to Rye and includes all or part of the following districts: Adur, Arun, Chichester and Worthing in West Sussex; Brighton & Hove; and Eastbourne, Hastings, Lewes, Rother and Wealden in East Sussex. Further details of the main towns included in the sub-region are given in the following table:

<b>Towns</b>	<b>Districts</b>	<b>County</b>
East and West Wittering Chichester Selsey	Chichester (part)	West Sussex
Arundel Bognor Regis Littlehampton	Arun (all)	West Sussex
Worthing	Worthing (all)	West Sussex
Lancing Shoreham Sompting Southwick	Adur (all)	West Sussex
Brighton & Hove	Brighton & Hove (all)	n/a
Lewes Peacehaven/Telscombe Newhaven Seaford	Lewes	East Sussex
Eastbourne	Eastbourne (all)	East Sussex
Hailsham Polegate/Willingdon	Wealden (part)	East Sussex
Bexhill Rye	Rother (part)	East Sussex
Hastings	Hastings (all)	East Sussex

The sub-region also includes the immediate rural hinterland of the coastal towns, extending into both the High Weald and Sussex Downs Areas of Outstanding Natural Beauty (AONBs) but excluding the West Sussex districts of Horsham and Mid-Sussex. A map of the sub-region is included as Annex 1.

### **The need for a sub-regional strategy**

The Sussex Coast is home to more than 980,000 people which represents around one-in-eight of the South East's total population. It is the second largest of the nine sub-regions in this respect and, for that reason alone, warrants a dedicated strategy.

The April 2004 Study presented a clear outline of the main physical and socio-economic characteristics of the sub-region and the particular issues and challenges it faces. The key conclusions of that work suggested clear directions for sub-regional policy which have formed the starting point for developing this strategy. The Study's main conclusions are included as Annex 2.

The Sussex coastal towns share a number of distinct socio-demographic, economic and environmental attributes. However, it is the way that these characteristics combine to present a unique set of circumstances, issues and pressures that particularly distinguishes the Sussex Coast from all other parts of the South East and which demands a tailored, sub-regional response.

In line with the earlier Study findings, SEERA's brief clearly recognises that it is *the need to achieve a step change in the performance of the local economy* which must lie at the heart of the sub-regional strategy – all elements of which, therefore, must help to deliver sustainable economic regeneration and growth. Ever tightening constraints on further development, and the absence of any locally generated demand for additional housing, also underline the importance of the sub-region giving greater priority to achieving a real economic renaissance and reducing socio-economic disparities with the rest of the South East.

Developing a sub-regional strategy that is led by the need to secure sustainable economic development also means that future housing provision (and associated workforce growth) must now become much more closely tied to a level that the local economy can sustain. At the same time, it is impossible to see how economic regeneration (and associated physical development) can be stimulated sufficiently without much greater investment in transport infrastructure and services and, where clearly justified, the possible relaxation of certain environmental constraints in some locations.

## **2 THE OVERALL STRATEGY**

The current nature and extent of structural weaknesses in the sub-regional economy is immediately evident from a cursory review of just a few key indicators which show, for example, that:

- on a per capita basis, *Gross Value Added* in East Sussex is 31% below the UK average and lower than anywhere else in the mainland South East;
- *gross weekly earnings* in the Sussex coastal districts are also the lowest in the South East (excluding the Isle of Wight). Average earnings in Hastings are over 20% lower than the national average, whilst in all the other coastal districts they are around 15% below the Great Britain figure;
- *unemployment rates* in many of the wards along the Sussex Coast are significantly higher than the regional average, including 13 wards (in Brighton & Hove, Eastbourne and Hastings) where total unemployment exceeds 5%; and

- the extent of unsustainable, *long-distance out-commuting* from the Sussex Coast has increased very substantially over the past decade from all parts of the sub-region. By 2001, the numbers living in the sub-region but travelling elsewhere to work had increased to over 71,000 people – leading to a daily net commuting outflow from the sub-region of nearly 37,500<sup>1</sup> workers.

The overall strategy therefore focuses on the need for a much greater and more co-ordinated effort to deliver the substantial regeneration and growth of the whole sub-region. This aims to reduce such disparities as highlighted above by raising its economic performance up to the regional average. In this way, the sub-region aims to make an increased contribution to the wealth of the regional economy rather than continuing to depress its overall performance.

Achieving this will not be easy and will require concerted and co-ordinated action to be taken on a number of fronts. If successful, however, it would contribute significantly to reducing poverty, deprivation and social exclusion, giving local people a better opportunity to participate more fully in the economic and social life of the sub-region. It should also ease the acute difficulties many local households face in gaining access to decent, affordable, private housing by helping to close the house price:local earnings 'affordability gap'.

At the same time, there will always be those for whom such problems cannot be resolved by economic growth alone and who will still require direct intervention and assistance through the provision, for example, of increased social (i.e. subsidised) housing. It is important that the strategy is realistic enough to recognise this and does not inadvertently ignore sections of the community that may be less likely to benefit directly from increased economic growth. The drive for economic regeneration across the sub-region must also be sufficiently sensitive to the specific circumstances, opportunities and needs of individual towns within it and their residents.

Historically, substantial parts of the sub-region have struggled to provide sufficient jobs, let alone sufficient well-paid jobs, to keep pace with the rates of housing development required by Regional Planning Guidance. Therefore, to help achieve more sustainable communities, this sub-regional strategy needs to steer a strategic approach that will achieve an improved balance between promoting the needs of the sub-regional economy and contributing towards meeting wider regional demands for additional housing. However, the extensive environmental constraints bearing down on the coastal towns severely limit the opportunities for further development in sustainable locations such that the sub-region does not enjoy the luxury of being able to choose to try and build its way out of its economic troubles. Alongside striving for major economic regeneration, this strategy must therefore seek to moderate housing development to a level that the economy and environment can reasonably sustain.

Another key consideration is the fact that the strategic transport links connecting the sub-region to the rest of the South East are generally of poor quality and are widely regarded as a major impediment to its future prosperity and economic success. The standard of east-west transport links within the sub-region is particularly poor and is already holding up the delivery of strategic development opportunities for both employment and housing required by existing plans. Without substantial improvements to the strategic transport infrastructure and services, there is no confidence that the sub-region will be able to achieve the step change in economic performance required or meet its wider housing commitments.

To realise truly sustainable communities, this strategy must therefore ensure that all development will be matched, at the time it takes place, with the full range of necessary infrastructure, services and facilities that it and its community context requires. It also aims to protect and promote the

---

<sup>1</sup> The figures given for commuting levels are based on a special (ward-level) analysis by East Sussex County Council of Special Workplace Statistics from the 2001 Census that have only recently become available. This analysis replaces earlier figures that could only reflect commuting flows from, to and within whole districts that formed part of the sub-region. The new analysis reveals that whilst nearly 364,000 people live and work within the Sussex coastal towns, 71,100 people live in the sub-region but commute elsewhere to work and 33,700 people live outside the sub-region but commute in to it for work – resulting in a daily net commuting outflow of just over 37,400.

quality of both urban and rural environments and seek high design quality in new development, all of which are recognised by the business community as important ingredients of economic regeneration.

### **Policy SCT1**

Local authorities and other agencies should, as a priority, pro-actively pursue and promote the sustainable economic growth and regeneration of the Sussex coastal towns that will:

- a) reduce intra-regional disparities and help bring the performance of the sub-regional economy up to the South East average;
- b) respond to the different needs, opportunities and characteristics of each town, or group of towns, and all sections of their communities;
- c) build upon and help deliver major improvements to the strategic transport infrastructure and services both to reduce its peripherality and to improve accessibility within the sub-region;
- d) achieve a better balance between the provision of housing and the capability of both the local environment and economy to absorb this in a sustainable way whilst responding as far as possible to the needs of local people (including key workers) for decent homes at a price/cost that they can afford;
- e) ensure that development takes place only where and when all the necessary infrastructure to serve it is available or is firmly committed; and
- f) protect the sub-region's high environmental quality (in both town and country) and promote excellence in the design of new development in recognition of their importance to economic success.

## **3 PROMOTING ECONOMIC REGENERATION**

### **Priority Area status**

As highlighted above, there is a clear, justifiable need to retain the widespread recognition that the current Regional Spatial Strategy affords to much of the sub-region as a *Priority Area for Economic Regeneration* (PAER). There is also a high expectation that this PAER status should carry greater weight in the investment decisions of both government and other agencies and in influencing the provision of other direct assistance and advice. However, no significant change is sought to the geographical extent of the PAER which should continue to focus on the towns with the most extensive and severe social and economic needs. However, designated PAER status should not exclude other areas of the sub-region with pockets of quite severe deprivation from receiving the attention and investment that they need.

Realising substantial improvements in strategic transport communications and infrastructure is a top priority for the sub-region and one consistently raised by local businesses as a fundamental requirement. Improving east-west transport links and services will not only improve complementary connections with other key sub-regions (such as the Ashford Growth Area), it is also essential to improving access within the sub-region – particularly for those towns that do not have strong transport links with the rest of the South East. Since development opportunities and economic needs are not evenly distributed across the sub-region, improvements in east-west communications should help widen access to employment opportunities throughout the Sussex Coast and help facilitate an improved balance between labour supply and demand.

Improving north-south strategic transport links with the rest of the South East is equally important to reduce perceptions of the area as peripheral and relatively remote and to provide better access to wider markets and suppliers for business. Here, at least maintaining the quality of the London-

Brighton road and rail links and proposed improvements to the A21 London-Hastings are important whilst new opportunities may become available at Newhaven if the Lewes-Uckfield section of the central rail corridor is re-opened.

## **Policy SCT2**

To help realise a step change in the sub-region's economic performance, Government, SEEDA and other relevant agencies and authorities will give increased priority to infrastructure schemes, investment decisions and other direct support for the Sussex Coast, particularly in relation to the area from Shoreham to Rye as a recognised *Priority Area for Economic Regeneration*. Key measures shall include:

- a) directing national and regional assistance and expenditure to promote the social and economic regeneration of areas in greatest need by:
  - i. continuing the priority support being given to Hastings/Bexhill and Shoreham in general; whilst
  - ii. increasing the priority given to other parts of the PAER; and
  - iii. targeting other pockets of social and economic deprivation throughout the sub-region;
- b) delivering significant improvements to east-west transport links by road and rail to improve accessibility, facilitate strategic development opportunities and enable the better functioning of overlapping local labour and housing markets; and
- c) maintaining and/or improving key north-south communication links that will also help to knit the coastal towns better into the rest of the South East and increase its attractions as a business location.

## **Employment priority in land allocations**

One of the key challenges in this sub-region, where so little scope for sustainable development remains, is to reconcile the competing demands for the limited opportunities that do remain. Given the main objective to achieve an economic renaissance, priority in allocating land for development must now be given to economic development over housing in terms of location. Although there is a wide variety of uses that can provide employment, their locational requirements tend to be more specific than those of new housing. Unless enough land that can readily be developed for business uses is made available in the right locations with good access to strategic communications networks, the sub-regional economy is unlikely to improve dramatically. A more sophisticated approach is now required that goes beyond seeking to allocate just enough employment land to match calculated floorspace requirements (derived from the workforce growth associated with additional housing development). Location, quality, accessibility, choice and viability are all very important elements of the overall 'business offer'.

In determining employment land allocations, local planning authorities will therefore need to acknowledge and provide for a full range of economic development requirements to ensure that an appropriate mix of business sites and premises will be readily available. It is important that adequate space and facilities are provided to retain existing firms in the area, and to give them the flexibility they need to prosper and grow within the sub-region. It will also be vitally important to provide high quality opportunities capable of attracting vital new inward investment to the Sussex Coast.

The need for economic regeneration is so great and suitable site opportunities so limited that some limited encroachment into environmental constraints may be justified to help meet the specific economic needs of particular towns. The strategy is flexible enough to allow such a policy response in selected cases where it can be clearly demonstrated that no sustainable alternative exists that

would deliver the identified regeneration needs. Such an approach will require comprehensive justification in Local Development Documents.

Although it is accepted that additional housing must be provided to help meet wider regional demands, future provision also needs to be much more closely related to the growth capacity of the local economy to ensure a more sustainable balance between future labour supply and the availability of jobs locally. Such considerations have helped to inform the overall extent and distribution of future housing provision proposed under Policy SCT6 which recognises that the regeneration of the sub-regional economy will not be aided by further substantial increases in unsustainable out-commuting.

At the same time, by making reasonable provision for continuing net in-migration to the sub-region, this strategy will not exacerbate existing problems of access to housing by, for example, stoking inflationary pressures in the private housing market. However, such problems are clearly acute throughout the Sussex coastal towns<sup>2</sup> and local planning and housing authorities must do everything in their powers to help meet local requirements for affordable (i.e. subsidised) housing for both key workers and other households that cannot compete effectively in the private market.

### **Policy SCT3**

In allocating land for development, Local Development Documents should:

- a) give priority to delivering employment development in strategically accessible locations to ensure an appropriate mix of readily available sites and premises whilst also providing sufficient space to:
  - i. retain existing firms and enable their expansion or relocation (within the sub-region);
  - ii. create attractive opportunities for inward investment and new uses; and
  - iii. at least match anticipated increases in the resident workforce;
- b) as an exception to general policy, allow for some infringement of environmental constraints in specific instances where there is a clearly justifiable case for delivering economic regeneration to meet identified needs, and where no more sustainable alternatives exist and the harmful impacts of development can be satisfactorily mitigated;
- c) provide housing for the market at levels that can be sustained by local job growth (in accordance with Policy SCT6) and do everything possible to maximise the delivery and retention of affordable housing to meet identified local needs, including for key workers.

---

<sup>2</sup> A very recent study just published by the Joseph Rowntree Foundation clearly highlights the fact that housing affordability problems are both more acute and more widespread in the Sussex Coast sub-region than in any other part of the country. The research examined the ratio between average house prices for the 4<sup>th</sup> quarter in 2003 and household (earned) incomes for younger households with a 'head' aged between 20 and 39 years old. Of the 40 district areas in England with the worst (i.e. highest) affordability ratios, 10 are within the South East and 8 of those fall within the Sussex Coast.

## **Skills**

The skills, knowledge and aspirations of residents are central to the sub-region's economic success, yet adult qualifications in the sub-region are below the regional average at all levels. The sub-regional average is boosted by high attainment in the university towns and administrative centres, leaving a substantial proportion of the population in other towns (often more than half) with no, or very low, levels of qualification. The Area Investment Frameworks across the sub-region and other local research have identified the need for better education and training to improve workforce skills at all levels if the economy is to prosper and regional disparities in performance are to be closed.

The pattern of needs is complex and the breadth of learning opportunities diverse, if fragmented. Current identified priorities include providing basic literacy and numeracy for a significant minority of residents; raising the level of attainment among those with the lowest levels of qualification to a standard that will equip them to access the job market and progress; and raising higher-level skills that are required by innovative and dynamic sectors of the economy that can contribute to economic growth. Within this, improvements in core flexible business skills such as marketing, basic IT, customer care and management are also required.

There is a clear need to achieve a better match between the skills and training requirements of businesses with pathways to learning and appropriate modes of provision that can be effectively accessed by those who need it. This should deliver both specific and transferable skills. To accomplish this there needs to be even greater co-ordination between local authorities, education and training providers and business interests. Programmes also need to address issues such as attracting and retaining younger people and graduates in key skill areas and the need for more employer-based training of the workforce. At the peripheries of the sub-region, skills training and further/higher education provision should also take account of complementary provision and job market needs and opportunities in adjoining sub-regions, particularly in the Ashford Growth Area to the east.

### **Policy SCT4**

Local authorities should work jointly with the Learning and Skills Council, local education providers, universities, colleges and the business community to deliver co-ordinated programmes to ensure that the local workforce is trained appropriately and flexibly to enable residents to access and benefit from existing and new job opportunities.

### **Promotion of the Sussex coastal economy**

A crucial component of the sub-region's future economic success will be to overcome perceptions of the area amongst the business community as one of poor economic performance, low productivity and geographical peripherality (although there are notable exceptions in certain locations and in certain sectors). The sub-region needs to raise its profile as a location that wants to do business and can deliver what business needs. The crucial basic ingredients of this include a readily available array of sites and premises and good quality transport infrastructure that connects the sub-region together and to wider markets and suppliers, together with a well trained workforce. Other policies in the strategy aim to deliver these. However, it is also essential to promote the sub-region as 'open for business'.

Authorities engaged in promotional activities in the sub-region should combine together to act as a more powerful force stressing the common advantages of the sub-region and work in a more co-ordinated and co-operative way to maximise impact rather than, for example, each town acting in competition with each other.

The traditional strengths offered by Sussex and acknowledged by the business community – good quality of life, wide range of cultural and leisure activities and high quality environment – should continue to be promoted to prospective inward investors. The nature and mode of such promotional activity needs to be tailored to those that make business and investment decisions.

A better understanding of the requirements of existing local firms and the provision of good proactive advice and assistance should be directed towards helping them to remain and grow within the sub-region. One focus of such activity should be to identify and recognise any particular business clusters so that their specific needs can be met and their development potential fostered. There are specific sectors of the sub-regional economy that appear to offer particular prospects for growth, building upon local or national advantages. While these opportunities should be seized upon there is a strong argument in favour of also retaining a degree of flexibility that keeps open the ability to respond to new or unforeseen business or economic development opportunities. Where possible, promotional activities and the pursuit of economic growth and inward investment in specific sectors should complement the economies of adjoining sub-regions.

### **Policy SCT5**

The opportunities for economic development should be promoted in a co-ordinated way across the sub-region that emphasises the key advantages of the Sussex Coast as a place to do business. Key measures shall include:

- a) targeted marketing and promotion of the Sussex Coast to inward investors;
- b) advice to local businesses, including site opportunities and the availability of premises;
- c) encouraging development of key local business clusters; and
- d) identifying potential growth sectors to nurture and promote more actively, including high technology, media and arts, universities and spin out businesses from them, leisure activities and tourism.

## **4 SPATIAL STRATEGY**

### **Broad amount and distribution of future housing development**

Uniquely, the Sussex Coast has virtually no locally-generated requirement for additional housing. With 25% of people over pensionable age, the demographics of the sub-region region are such that natural change alone amongst existing residents (i.e. births and deaths) results in a substantial population decline which more than offsets any extra housing arising that would otherwise be required as a consequence of falling household sizes. Population growth, and the associated pressure to build more housing, therefore arises solely as a result of continuing net in-migration to the sub-region.

Whilst, numerically speaking, all new homes in the Sussex Coast are built to meet externally-generated demands (that mostly involve people wishing to move here from other parts of the South East), it is extremely difficult to predict with any acceptable degree of accuracy just how many people will have the desire and the ability to move either into or away from the area over the next 20-25 years. Even whilst the gross migrant inflows and outflows may remain relatively stable, very slight changes in either of these can lead to much more sizeable swings from year to year in the resulting levels of net migration. Furthermore, changes in the age and sex characteristics of the population can also have very profound implications for the associated number of households and, it follows, for the overall amount and type of housing that would be required to accommodate any given level of net in-migration.

Such 'technical' difficulties are true at any level but become more acute the smaller the area under consideration (because migration becomes an increasingly significant element of population change) and the further into the future we might seek to look. For these reasons alone, it would be

far too simplistic to base this sub-regional strategy on an attempt to provide sufficient housing to meet any such predicted demands. This is especially true in a sub-region where infrastructure and environmental factors are so highly constraining and where a clear emphasis must be given here to prioritising economic regeneration.

However, to assist with the development of this strategy, SEERA have made available some demographic projections that purport to show the additional levels of housing development that would be required if medium- and short-term migration trends were to continue unabated for another 25 years. These somehow imply a potential requirement to provide some 105,000 ~ 143,000 more dwellings in the sub-region by 2026; this would amount to an increase of between 40% and 90% on current requirements as set out in Regional Planning Guidance.

The principal authorities have previously raised with SEERA a range of serious technical concerns specific to the projections for this sub-region that have only served to reinforce our conviction that such figures do not provide a sensible basis for developing future plans. In any event, the very wide extent of environmental constraints of national and international importance bearing down on the sub-region<sup>3</sup> and the great difficulties encountered in trying to provide sufficient jobs to match only current levels of housing development mean that it would be grossly unsustainable to attempt to provide housing at such vastly increased rates. Such figures also appear wholly unjustified when it is appreciated that they would imply enormous hikes in future levels of housing development far in excess of anything being contemplated at the regional scale, and when bearing in mind one of the key findings to emerge from the earlier sub-regional study which concluded that it would be extremely difficult to maintain current levels of housing development along the Sussex Coast in the longer term.

Having determined that SEERA's projections do not, therefore, provide an appropriate basis for developing this strategy, the principal authorities have evaluated instead the only strategic development options realistically available. These are to continue to provide housing at something like the current rate, or to provide significantly less or more than that.

The environmental constraints are such, and the range of sustainable development opportunities so limited, that there are virtually no substantially different spatial patterns of development available at a strategic level that any given scale of growth could take. Furthermore, the social and economic needs of the sub-region are so great that the strategic approach to securing economic regeneration on a broad range of fronts would remain essentially the same whatever level of housing development needs to be accommodated (although the number of jobs required to match associated workforce growth would, of course, vary).

The appraisal of strategic development options has therefore considered the scope for, and the implications of, the Sussex Coast accommodating future housing provision at the current (RPG9) rate of around 3,000 dwellings per year and at levels 20% above (3,600 dwellings per year) and 20% below this (2,400 dwellings per year). Each option has been evaluated using the appraisal framework provided by SEERA and, in particular, has been assessed in terms of its compatibility with the fundamental objective of securing a step change in the economic performance of the sub-region. In addition to considering economic, social and environmental impacts, this assessment has also taken account of other essential criteria such as associated infrastructure requirements and deliverability. A summary of the assessment is given below and full details are provided in Annex 3.

**Option A** – Accommodating a rate of housing development approximately 20% below the current RPG requirement could be achieved without having to allocate significantly more (if any) land for housing than is implied in current and emerging structure and local plans. This would require all the

---

<sup>3</sup> The scales of housing development implied by SEERA's migration-led projections could not be accommodated within the sub-region without wholesale encroachment into environmentally protected areas (such as AONBs, SSSIs, Ancient Woodland), high quality agricultural land important to the local economy and/or land at flood risk.

allocations in such plans to be delivered (with their associated infrastructure) as well as continuing to deliver housing from windfall sites within the urban areas at the same rate as the recent past. To achieve this level of urban intensification will not be easy and would require creative policy responses and decisions on issues such as design, density and dwelling size and type at local level. This level of housing implies a considerable slowing down of development after 2011/2016. This would not provide continuity of housing or labour supply in the medium term, and it may exacerbate the availability of affordable housing for local people unless new mechanisms for this are made available nationally.

**Option B** – A strategy to accommodate housing development at a level that is around 20% higher than the current RPG requirement implies the same degree of urban intensification as Option A. However, it would additionally require very substantial new greenfield land allocations for housing that would certainly involve major incursion into significant environmental constraints, high quality agricultural land and/or land at flood risk. It may provide a better opportunity to lever in more affordable housing for local people and key workers, but it would also require high levels of job growth that, realistically, are unlikely to be achievable. This would lead to a number of other unsustainable consequences such as higher levels of out-commuting. Although development values would be higher, this option would also require higher levels of associated infrastructure that certainly could not be funded from the development alone. It is also unlikely that such infrastructure could be delivered quickly enough or be provided in an environmentally acceptable way.

**Option C** – The principal authorities have concluded that the best strategic balance overall would be achieved by continuing housing development at a level approaching the current RPG9 rate alongside the more vigorous drive for economic development and regeneration. However, even this would require the same level of urban intensification within the towns as well as new housing land allocations for about 11,000 dwellings over and above those being brought forward in existing plans. This could not be achieved without some incursion into environmental constraints. It cannot yet be said with confidence that this strategy is deliverable – there are still uncertainties regarding infrastructure and more detailed testing is required. However, in the unique circumstances of this sub-region, it appears to offer the most sustainable combination (or least worst option) of contributing to wider regional demand for housing while pursuing a step change in economic performance that will make a bigger contribution to the regional economy.

At this level of growth, the broad distribution across the sub-region is strongly influenced by the extent of constraints and the time horizons of existing plans<sup>4</sup>. Any new allocations required should be made as sustainable additions to existing settlements and include appropriate amounts of land for employment and other uses. The central part of the sub-region from Worthing to Seaford is highly constrained and virtually no further scope for greenfield development exists that would not encroach into the Sussex Downs AONB (or proposed National Park). In the eastern part of the sub-region from Eastbourne to Rye, the only strategic scope for additional greenfield development is at Bexhill and at Eastbourne/Hailsham, but here some compromise of constraints may be required to achieve an appropriate pattern of development. In the west of the sub-region, development is already proposed for the period up to 2016 in the West Sussex Structure Plan at Chichester and west of the River Arun. Subject to more detailed study, there may be further limited scope in the area from Chichester to Angmering, but even here there would be some conflict with important constraints. In all areas, significant improvements to infrastructure would be required to deliver additional housing at this scale.

### **Policy SCT6**

Subject to more detailed testing on deliverability and the provision of infrastructure identified in Policy SCT9, Local Development Documents should make provision for a total net increase in the dwelling stock of about 76,000 homes from 2001 to 2026 across the whole sub-region to achieve the following broad distribution:

<sup>4</sup> The West Sussex Structure Plan runs to 2016 and the East Sussex and Brighton & Hove Structure Plan to 2011.

Sub-regional sector	Dwellings (net)	
	Total housing provision	Annual average rate
Western (Chichester to Angmering)	22,000	880
Central (Worthing to Seaford)	28,000	1,120
Eastern (Eastbourne to Rye)	26,000	1,040
Sussex Coast total	76,000	3,040

Most of the new provision should be focused on the existing coastal towns. However, to achieve these rates of development it is expected that additional new land allocations for housing and associated economic development, service provision and infrastructure beyond those contained in current and emerging structure and local plans would be made as sustainable extensions to existing settlements in the following broad locations:

- a) 6,000 dwellings at Bexhill and in the Eastbourne/Hailsham area after 2011;
- b) 1,000 dwellings primarily at Brighton & Hove after 2011; and
- c) 4,000 dwellings in the Chichester to Angmering area after 2016.

### Employment sites and premises

The sub-region needs to ensure that more and a better mix of quality sites and premises are available for economic development, including high quality starter space for innovative and growth orientated businesses. However, the majority of the existing stock of industrial and office accommodation is over 30 years old and not very well suited to the needs of new industries and more dynamic, growth sectors of the economy. At the same time, there are several key strategic employment sites and business park allocations that have remained undeveloped over a number of years, particularly in East Sussex. Although nearly 290 hectares of land within the Sussex Coast is earmarked for industrial and commercial (B1-B8) development, only around 50 hectares of this total is readily available – the vast majority of which is located in the West Sussex coastal districts.

There are serious problems of viability in some areas where low rental yields (allied to high development costs in some cases) make the development of prospective employment sites unprofitable. Poor transport links, access problems and other constraints are also significant barriers in some areas to industrial and commercial development. Comprehensive measures are required to tackle viability problems and remove any other barriers inhibiting the development of strategic employment sites. It is vital that the sub-region does find creative ways to utilise the opportunity that these sites do present because there is such little scope for replacing them. In certain cases, realising the maximum potential benefit to the local economy may require the judicious introduction of other uses as part of a mixed use scheme to help fund the provision of otherwise unviable employment space. The focus of any such alternative uses should be on housing development wherever possible as this will also help to achieve other aims of the strategy and its extent can be finely tuned to minimise any necessary loss of employment potential.

Some existing sites may no longer be suitable for business purposes. If such redundant sites are 'lost' to other uses, planning authorities should also pursue the possibility of securing development contributions towards bringing forward employment provision on other sites. The successful regeneration of the Sussex Coast will largely depend on ensuring that an appropriate range of good

quality sites and premises in accessible locations is available to respond quickly to the needs of local businesses and help realise opportunities for securing much needed inward investment.

### **Policy SCT7**

To deliver sufficient appropriate sites and premises for business and other uses that will help to facilitate the regeneration of the local economy, local authorities should:

- a) protect existing and allocated employment sites from other uses unless they are demonstrated to be incapable of meeting the needs of businesses;
- b) develop and co-ordinate with other agencies delivery mechanisms to unlock and implement sites with economic development potential, including port and airport sites at Newhaven and Shoreham, existing allocated business parks and other important sites that have persistently remained undeveloped;
- c) be prepared to permit mixed use schemes on existing or allocated employment sites in circumstances where this would deliver necessary employment space at the right time on sites which would be unviable for an employment only scheme;
- d) seek to improve and upgrade existing industrial estates and business areas to bring them up to modern standards required by business; and
- e) allocate sufficient suitable additional land, in accordance with Policy SCT3, to provide a range of sites that can be readily delivered to meet the varied needs of businesses and particularly in association with new housing development proposals.

## **5 DELIVERY AND MONITORING**

### **Integrated multi-agency plans**

Integrated multi-agency plans and frameworks are seen as an essential component of, and pre-requisite to, achieving a step change in economic performance. It should be an aim for each major area of the sub-region to prepare a simple, overarching plan or vision for their area which will provide leadership and an agreed, common purpose and direction so that regeneration efforts are combined to maximum effect. This process of partnership working is as important as the framework itself, and such frameworks could emulate the process and approach to regeneration being taken in Hastings-Bexhill through the '5 Point Plan'. This has helped to foster genuine partnership working and has facilitated more concerted effort by all agencies that has had a great impact and begun to deliver real benefits in a comparatively short period of time. Further areas where such an approach should be employed are set out in Policy SCT8 below.

## **Policy SCT8**

Local authorities, regional agencies, government representatives and other key stakeholders should agree a long-term vision and together develop joint, multi-agency plans and frameworks as a focus for delivering economic and social regeneration for the following areas:

- a) Hastings – Bexhill area to develop and extend the work already undertaken in the “5 Point Plan” into the longer term;
- b) Eastbourne – Hailsham area to optimise the area’s potential to provide employment space and associated housing in sustainable and strategically accessible locations along the A22 corridor;
- c) Coastal West Sussex from Selsey to Worthing to develop, over a longer term, the co-ordinated approach fostered by the Area Investment Framework and other specific initiatives;
- d) Shoreham – Brighton & Hove – Newhaven to continue to strengthen the economy of Brighton & Hove as a major centre and transport hub and to capitalise on strategic port and airport site opportunities at Newhaven and Shoreham.

Such multi-agency plans should help to ensure the provision of an appropriate balance of additional employment space, affordable housing and the necessary infrastructure, facilities and services required to support development.

## **Infrastructure**

There is genuine public concern that in the past development has often taken place without the contemporary provision of the full range of infrastructure, services and facilities that is considered necessary both to serve it and the wider community. Consequently there is a growing perception of a backlog of infrastructure and service provision, and evidence of a lack of transport infrastructure already delaying the delivery of major proposals in current development plans. It is important that all the infrastructure required to support development proposals is identified sufficiently early in the planning process so that its provision can be phased in relation to the development it will serve, and it is especially crucial that it is delivered at the same time as that development. Greater joint working with the relevant agencies and providers will be required to ensure that development plans can set out the infrastructure and service requirements of development and include details of how and when this will be provided. Supplementary Planning Documents should also be prepared setting out how contributions from development will help to deliver infrastructure and services. However, it is recognised that increases in development value will not be able to fund all infrastructure requirements. Furthermore, there remains a general problem in the provision of necessary infrastructure in advance of development that can only be satisfactorily resolved by new mechanisms at a national level.

At planning application stage, no development should be approved unless the determining authority is convinced that the associated infrastructure requirements are available or, at least, firmly committed.

It is usual for the availability of spare capacity in infrastructure and services to influence the spatial pattern of development in plans. However, the range of development opportunities in this sub-region is so limited that there are no realistic sustainable alternatives to the strategic locations for development set out in policy SCT6 above that could be pursued to obviate the need for the infrastructure requirements set out below. Therefore, if the infrastructure is not able to be provided, then it jeopardises the ability to deliver the development at all.

The key items of strategic infrastructure that, at this stage in the process, are considered to be needed to deliver the strategy are set out in policy STC9 below. However, further detailed testing will be needed to determine precisely how dependent development is on them, their environmental acceptability and how far the timing of their delivery will affect the pace at which development itself can be delivered. In addition to the requirements listed, it should be remembered that a much wider range of facilities will be needed (such as schools, health facilities and social space). However, such needs can generally only be determined at more local levels of planning.

There are also other known strategic infrastructure constraints and issues related to the levels of development outlined in Policy SCT6 that have not yet been resolved. This may add to the list of required infrastructure, affect the timing of when the development can be delivered, or even call into question the overall scale of development that will be possible. For instance, the lead time required for developing new reservoir capacity to provide adequate water supply to the eastern part of the sub-region may challenge the sustainable pace of development in that sector, assuming that an acceptable solution can be found. Furthermore, there are issues related to the discharge of treated waste water and run off into watercourses feeding wetland SSSIs that require further exploration. In addition, the Highways Agency has indicated that there are constraints on the capacity of the trunk road network that would limit development potential but the scale of such limits has yet to be determined. For example, the A259 both east of Hastings and west of Bexhill is operating close to capacity and it may be unlikely that environmentally acceptable schemes can be found to increase this in future. Thus the delivery of the strategy and the pace of development that this implies cannot yet be regarded as assured.

### Policy SCT9

- a) In preparing Local Development Documents, local authorities should work jointly with other relevant agencies and providers to ensure that all the necessary infrastructure and services are available or will be provided in time to serve the development proposed. The requirements for new infrastructure and service provision should also be included in development plans together with details as to the means and timing of its provision, linked to the development proposals that are dependent upon it.
- b) In all planning decisions, local planning authorities must be satisfied that all the infrastructure, services and facilities that are needed to serve the development are available or firmly committed before allowing development to take place.
- c) The strategic infrastructure so far identified that is likely to be required to deliver this sub-regional strategy includes the following:

#### Passenger transport schemes

- |               |  |
|---------------|--|
| Quality       | • Eastbourne to Hailsham   |
| Bus Corridors | • A259 Bexhill-Hastings (following completion of Bexhill-Hastings link road) |
| Coastway      | • Station improvements   |
| Coastway west | • Train passing facilities at Worthing and Barnham                           |
|               | • Arundel rail chord at Ford junction  |
|               | • Grade separation of level crossings  |
| Coastway East | • Willingdon Chord   |
|               | • Bexhill/Hastings Metro   |
|               | • New stations at Polegate area, Glyne Gap and Wilting Farm                  |
|               | • Dualling and electrification of Hastings-Ashford route                     |

## Policy SCT9 (continued)

### Trunk road schemes

- A27
  - Chichester bypass – junction improvements (proposals being prepared)
  - Arundel – bypass (under investigation)
  - Tangmere, Crockerhill, Fontwell, Slindon – junction improvements
  - Worthing/Lancing – capacity improvements (under investigation)
  - Beddingham – grade separation of level crossing (committed scheme)
  - Selmeston and Wilmington – safety and capacity improvements (under investigation)
  - Polegate-Folkington link road (under investigation)
  
- A21
  - Sevenoaks to Hastings – improvements, including connection to B2092 Queensway

### Other transport schemes

- Schemes to improve accessibility to and within Brighton & Hove
- Bognor Regis bypass
- Shoreham Harbour link road
- A271 Relief Road north of Hailsham
- A267 Hailsham to Heathfield – safety and local improvements Eastbourne Park area – new road links to unlock business development and improve access to town centre (options being investigated)
- Bexhill-Hastings link road – to relieve A259 at Glyne Gap and facilitate development
- West Bexhill relief road

### Other infrastructure schemes

- New reservoir capacity to serve the east of the sub-region
- New wastewater treatment facilities to serve the Brighton & Hove area
- Sewerage and treatment works to cater for new development
- Fluvial and coastal flood defences

## Responsibilities for implementation

The success of this sub-regional strategy in delivering an economic renaissance for the Sussex Coast will ultimately depend upon the commitment of key national, regional and local agencies to its implementation. The strategic policies and proposals presented here need to be translated into more detailed policies and action plans through local development frameworks, local transport plans, community strategies, local economic strategies, area-based masterplans (where appropriate) and, crucially, investment programmes.

Local councils, as planning and transport authorities and in their community leadership role, must clearly play a leading role in galvanising concerted action in support of an agreed and consistent vision for their area. The table below provides some indication of the range of mechanisms that will need to be brought to bear in delivering this over-arching sub-regional strategy. It also identifies which agencies will need to take primary responsibility for delivering (or securing the delivery of) particular aspects of policy and those that will have important supporting roles.

Policy	Mechanisms	Lead roles	Support roles
SCT1 – Overall strategy	See specific policies below.		
SCT2 – Priority status	Selective assistance, funding and investment priority	Central Govt. Highways Agency Strategic Rail Authority SEEDA	Highway authorities Local authorities Econ. partnerships Local strategic partnerships
Policy	Mechanisms	Lead roles	Support roles
SCT3 – Principles for land allocations	Local development documents	City, borough and district councils	County councils Econ. partnerships
SCT4 – Skills	Education and training provision	Sussex Learning and Skills Council	Universities FE Colleges Education authorities Econ. partnerships
SCT5 – Promotion	Marketing Business advice	Local authorities Econ. Partnerships Sussex Enterprise	SEEDA Tourism South East
SCT6 – Housing provision	Local development documents	City, borough and district councils	County councils
SCT7 – Employment sites and premises	Local development documents	City, borough and district councils	County councils SEEDA Econ. partnerships Sussex Enterprise
SCT8 – Co-ordinated approach	Multi-agency plans	Local authorities	SEEDA Econ. partnerships Local strategic partnerships
SCT9a – Infrastructure	Local development documents	City, borough and district councils	Infrastructure providers
SCT9b – Infrastructure	Planning decisions	City, borough and district councils	Infrastructure providers Developers
SCT9c – Infrastructure	Direct provision Development contributions	Infrastructure providers Developers	City, borough and district councils
SCT10 – Monitoring performance	Annual review	County and city councils	Borough and district councils Sussex Enterprise

### Monitoring performance

The nature of this sub-regional strategy and the challenges it addresses cannot be easily translated into a set of SMART (specific – measurable – achievable – relevant – time bound) targets. However, it will be important to monitor the implementation of the strategy and changes in the real

world that it is trying to affect. An annual monitoring report will therefore be produced to both highlight key actions being taken to deliver the strategy and to evaluate any associated impacts this may be having on socio-economic circumstances in the sub-region. In particular, this report will focus on:

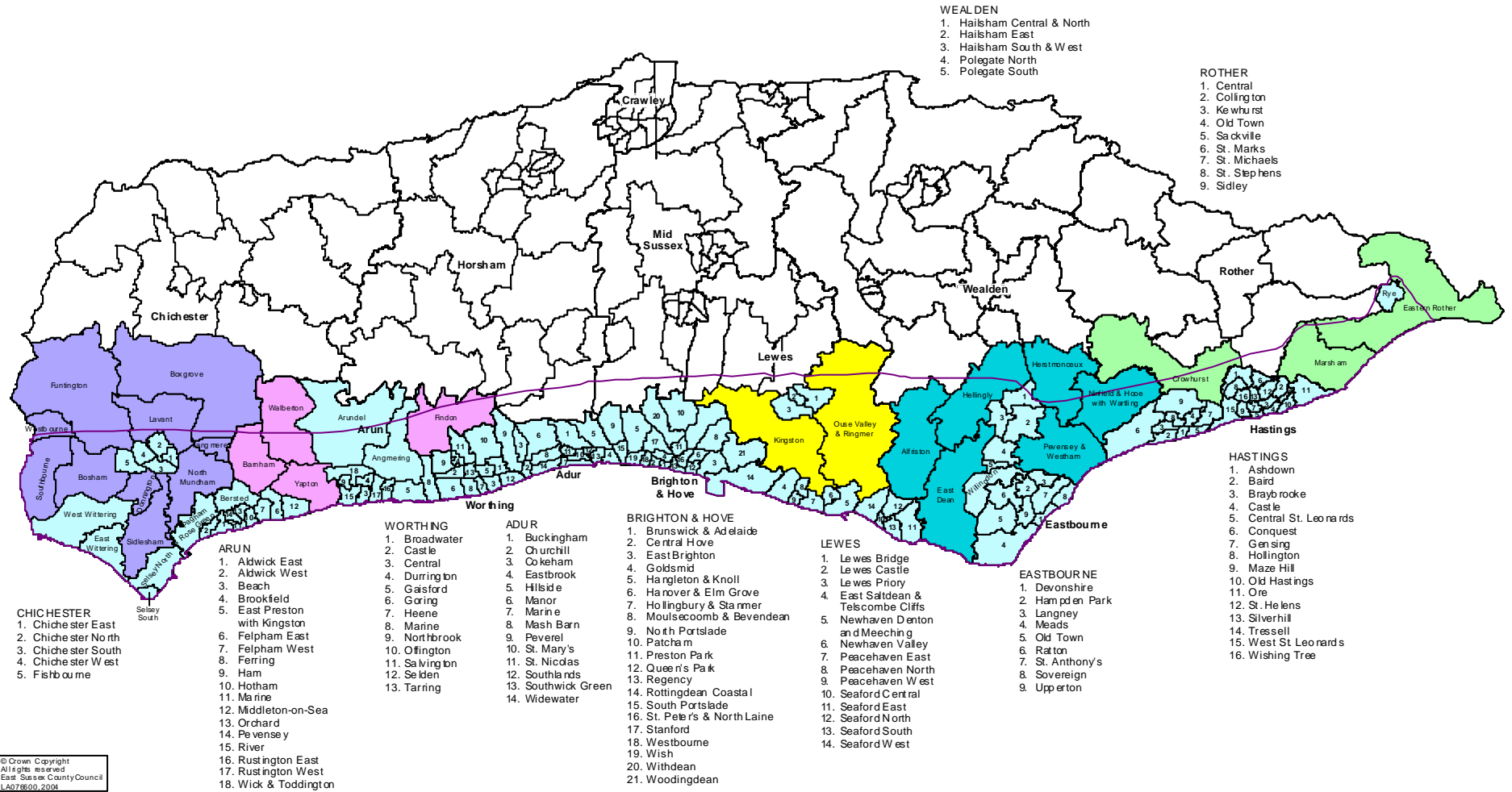
- the extent of job creation relative to population, household and workforce growth and the implications of this for levels and patterns of commuting (i.e. the changing people/homes/jobs 'balance');
- comparative economic indicators (such as gross valued added, average wages, unemployment levels etc.) that will help assess whether the strategy is having any success in reducing regional disparities and closing the substantial economic performance gap;
- the delivery of key infrastructure and the extent to which this may be facilitating or continuing to frustrate the implementation of key employment sites and other strategic allocations for economic and/or housing development;
- actual levels of development and outstanding commitments to the development of land for both employment and housing, together with a review of the extent to which employment sites are readily available; and
- the affordability of private housing relative to local earnings/income, the provision of social housing and other potential indicators of housing need/stress.

#### **Policy SCT10**

The principal planning authorities will produce an annual review to report on the implementation and impacts of this sub-regional strategy. In presenting and analysing key socio-economic data and other appropriate information, this review will also report on sub-regional indicators that are comparable with relevant regional targets.

**Annex 1 - Map of the Sussex Coast Sub-region**  
**Wards included in the sub-region as defined by the principal authorities.**

— indicative boundary as drawn by SEERA in the strategy brief.



## **Annex 2 – Main conclusions of the Sussex Coastal Towns Sub-Regional Study (April 2004)**

The key conclusions to emerge from the work undertaken are outlined below and suggest future directions for policy that will need to be developed in further work.

**There is a broad consensus that the sub-region needs to increase the priority given to economic regeneration by taking a more positive approach to economic growth. However there is less certainty about the associated scale of employment growth that will be needed, or indeed possible, to help achieve this.**

- To help the coastal towns regenerate new economic development sites and activity need to be located close to them but the scope to achieve this without affecting environmental constraints varies across the sub-region.

**Much better standards of transport infrastructure and services are vital to delivering improvements in sustainable economic development both now and in the future.**

- Existing deficiencies in the strategic transport network, particularly on the A27/A259, are already holding up the delivery of development in current structure and local plans.
- Further major infrastructure investment, particularly on east-west road and rail routes, will be needed to achieve the step change in economic performance that is sought. In conjunction with demand management measures and local transport schemes (including improved support for buses, walking and cycling whilst encouraging more sustainable travel behaviour), this should help the area achieve a better balance of labour supply and demand within the sub-region by reducing the impact of its peripherality and increasing its attractions as a prospective business location.

**There is now only very limited scope for further development in sustainable locations close to the coastal towns and the extensive environmental constraints surrounding them are tightening.**

- The sub-region is highly constrained by the sea to the south and extensive environmental constraints to the north and around edges of most towns. This has forced development to take place in an east-west direction whilst maintaining the separate identity of the coastal towns that are linked by the A27/A259 and railway.
- The proposed South Downs National Park would add more new highly protected land than it would remove from the existing Area of Outstanding Natural Beauty (AONB) and the longer-term impacts of climate change are likely to both extend the areas exposed to flood risk and increase the level of risk.

**Given these increasing constraints on further development, greater priority should be given to economic development over housing development to achieve a better future balance between the quality and quantity of jobs available in the sub-region and labour supply.**

- The sub-region as a whole is a substantial net exporter of labour and virtually all of the coastal towns now experience more out-commuting than in-commuting (although the detailed patterns of current movements are not yet known).

- The age structure of the area's population means that, overall, more households are dying than are being formed amongst existing residents. Consequently, the area has virtually no locally generated demand for additional housing development. In pure numerical terms, all the demand for extra housing arises as a consequence of the net inflow of people wanting to move into the sub-region to live.
- The sub-region needs to find or create some scope to provide better sites and premises for economic development close to the coastal towns in order to attract, retain and grow profitable businesses. This process will have to address the difficult issue of whether this may need to be at the expense of some environmental constraints in some locations.

**As far as further housing development is concerned, the priority must be addressing the issue of affordability.**

- Whilst in quantitative terms the demand for additional housing is generated by people who want to move to the sub-region, the fact that private housing costs are very high relative to local earnings gives rise to significant problems of access to decent, affordable housing for some existing and newly forming households.
- Additionally, a shortage of skilled workers has been identified as an important constraint facing some local businesses, whilst similar difficulties in attracting key workers to essential public services is also a major concern for the sub-region. In both cases, the (lack of) affordability of housing in the coastal towns is a major factor.

**It would be very difficult to accommodate even a continuation of RPG9 rates of housing development to 2026 in any sustainable way without encroaching into environmentally protected areas or pushing development further inland.**

- Development opportunities in the central part of the sub-region are extremely restricted, but some scope in the east and west is evident. However, more detailed assessments will be necessary to quantify this.
- We do not believe there is a case for relaxing environmental constraints to accommodate further housing provision but, as highlighted above, there is an issue as to whether they should be relaxed in some locations for economic development.
- Focussing development further inland would be more likely to damage than aid the sub-region's regeneration by siphoning off economic development and enterprises that might otherwise choose to locate, start up or remain in the coastal towns.
- Because of the additional constraint imposed by the High Weald AONB further north, the inland Low Weald north of the coastal towns will itself come under further pressure for development from areas such as Crawley/Gatwick in addition to its own local needs.

**We have serious doubts about the sub-region's long-term ability to continue to deliver housing development within the towns at the same rate as in the recent past.**

- As a result of the tightness of environmental constraints, the towns have been intensifying within their boundaries for many years and densities are already high.
- More aggressive policies and even higher densities would be necessary to maintain these rates to 2026, but there are concerns about the quality of life and congestion in towns that would result.
- There is a need to protect existing employment sites from development for other uses, especially housing.

- Urban capacity needs to be carefully assessed.

**The impact of climate change questions the wisdom of intensifying development within urban areas already at some risk to flooding and also begs the question about what remedial measures or actions we should now be taking to adapt to these changes.**

**Any strategy for the regeneration of the Sussex coastal towns must also meet communities' social and environmental needs for the provision of green/open space and community centres etc.**

- The importance being afforded economic regeneration objectives should not obscure the need to simultaneously promote social and environmental well-being to achieve lasting improvements in residents', employees' and visitors' overall quality of life.

**Finally, the more buoyant Crawley/Gatwick area offers no panacea for resolving the economic problems of the Sussex coastal towns. The degree of uncertainty regarding future growth rates at Crawley/Gatwick also means that it would be unwise to build a strategy for the coastal towns that relies upon it.**

- Crawley/Gatwick cannot provide the employment to solve the deficiencies in the coastal towns economy and neither is there scope in the coastal towns sub-region to provide more housing to supply labour for the Crawley/Gatwick economy.
- The north-south transport links remain important in facilitating the existing two-way flow of labour between Brighton & Hove and the Crawley/Gatwick area and for helping to develop business (including tourist) links.
- Each sub-region needs its own distinctive strategy to address its own issues, though opportunities for each to complement the other should be taken. However, it is probably in implementation where the most co-ordination between sub-regions is needed.

## Annex 3 – Options Appraisal

**Table 1 Assessment of Integrated Regional Framework Objectives' Relevance to the Sub-Regional Strategy for the Sussex Coast**

**AIM:** To assess the relevance of IRF Objectives to spatial planning at regional, sub-regional or local levels, to help inform the development of the appraisal framework for sub regions.

**HOW:** Decide and record if each IRF objective is of low (L), medium (M) or high (H) importance to the sub region and if the IRF objective is deliverable through regional, sub-regional or local spatial planning.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy LD	Frameworks	
<b>Social progress which recognises the needs of everyone</b>							
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	H	Extremely high housing costs relative to low local earnings means that problems of access to affordable housing are more acute in this sub-region than any other part of the South East		x	x	x	Sub-regional strategy should aim to tackle the issue by both raising local wage levels and not exacerbating house price inflation. Must also help to promote affordable housing, including for key workers.
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	H	This is a coastal area, many parts of which are at increasing risk of flooding.		x	x	x	Sub-regional strategy must avoid requiring further development in areas at risk of flooding, and in areas that would increase the risk of flooding elsewhere.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD Frameworks	
3. To improve the health and well-being of the population and reduce inequalities in health	H	Poor health and health inequalities are closely related to poverty and deprivation, levels of which are significantly higher in substantial parts of the sub-region than in the rest of the generally prosperous South East.		x	x	x	Sub-regional strategy must promote a step change in economic performance to improve employment opportunities and raise wages for existing residents whilst doing as much as possible to increase the provision of affordable (i.e. social) housing.
4. To reduce poverty and social exclusion and close the gap between the most disadvantaged communities [in the South East] and the rest [of the region]	H	Levels of poverty and deprivation are especially high in substantial parts of this sub-region.		x	x	x	Sub-regional strategy must promote a step change in economic performance to achieve an economic renaissance and reduce widening disparities with the rest of the region.
5. To raise educational achievement levels [across the region] and develop opportunities for everyone to acquire the skills needed to find, remain and progress at work	H	This will be critical to improving local economic performance although there are wide variations across the sub-region.	x				Although this objective cannot be directly delivered through the SE Plan etc., the need to raise skill levels must at least be highlighted in the sub-regional strategy.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD Frameworks	
6. To reduce crime and the fear of crime	H	This is an important ingredient in helping to create safe communities and an attractive image to investors as a potentially successful place to live, visit and do business.				x	Impossible to deliver directly through sub-regional strategy, but quality schemes and environmental improvements together with provision of appropriate infrastructure could all help in creating increasing pride in the area. May be a role in LDFs for detailed design codes to minimise crime.
7. To create and sustain vibrant communities	H	This is crucial to enhancing the quality of life of existing residents, promoting the leisure and tourist industry, which is still an important component of the local economy, as well as creating the right conditions for business investment.		x	x	x	In setting amounts of development SE Plan and sub-regional strategy must have regard to potential impact on environmental quality of urban areas and rural hinterland.
8. To improve accessibility to all services and facilities	H	Improving transport communications will be central to promoting improved and equitable access to employment, services and other facilities throughout such a narrow, elongated and essentially urban sub-region.		x	x	x	The sub-regional strategy must aim to achieve a better provision of key infrastructure and distribution of services etc. in line with existing needs and proposed levels of growth.
9. To encourage increased engagement in cultural activity across all sections of the community [in the South East]	L	Important general quality of life objective but not particularly salient to a spatial strategy at sub-regional level.	x				Would be more effectively addressed in cultural/community strategies etc.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD Frameworks	
<b>Effective protection of the environment</b>							
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance	H	This is one of the most highly constrained sub-regions and, consequently, one where development has increasingly intensified over past decades.		x	x	x	With so few sustainable opportunities left for greenfield development <u>within</u> the sub-region, every effort must be made to optimise development on PDL.
11. To reduce air pollution and ensure air quality continues to improve	H	Overall levels of development required will inevitably increase emissions of greenhouse gases (via new buildings and increased traffic).		x	x	x	Selective improvements can help reduce congestion and associated air quality problems at specific locations, at the same time as improving overall accessibility and contributing to increased transport choice.
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts	H	Climate change is a particularly important in this coastal area because of its impacts on flood risk etc.		x	x	x	Reducing the need to travel (e.g. out of the area to work) by increasing local employment opportunities, and better linking housing and labour markets along the coast will help to achieve this.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD Frameworks	
13. To conserve and enhance the region's biodiversity	H	The sub-region enjoys an extensive range of SSSIs (some of international importance), ancient woodland and a maritime environment.		x	x	x	All levels of plan need to recognise the vulnerability of these areas in determining the amounts and distributions of development, as well as containing robust policies for their protection and enhancement.
14. To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment	H	Although a largely urbanised sub-region, it is bounded by extensive areas of countryside that is consequently highly regarded and extensively used for recreation by locals and visitors alike. Much of this is designated AONB/proposed National Park etc.		x	x	x	The wider area's outstanding environmental qualities in both town and country must also be appreciated, protected and enhanced (and promoted) as a crucial economic asset.
15. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry	H	Whilst recognising the need to reduce travel by unsustainable modes by improving choice and reducing the need to travel, selective road improvements will be needed to also help improve travel choice and also reduce congestion and concentrations of air pollution in particular hotspots.		x	x	x	Lack of transport investment across all modes is already holding back economic performance and frustrating strategic development opportunities for both housing and employment. A strategy for growth must acknowledge the need for improvements in transport infrastructure and services.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD Frameworks	
<b>Prudent use of natural resources</b>							
16. To reduce the global social and environmental impact of consumption of resources by using sustainably produced and local products	L	No more of an issue here than anywhere else.	x				Simultaneously an important international and local issue that cannot be most effectively addressed at the sub-regional level.
17. To reduce waste generation and disposal, and achieve the sustainable management of waste	H	Is particularly important in this area given an acute shortage of landfill opportunities in a highly sensitive and protected environment. Minimising construction industry waste is also especially important in an area where very high levels of development will be on PDL.		x		x	Will be addressed primarily through Waste Development Frameworks.
18. To maintain and improve the water quality of the region's rivers and coasts, and to achieve sustainable water resources management	H	Extremely important in this sub-region with many rivers flowing through or into SSSIs, and where there is extensive coast, and where there are increasing difficulties in maintaining and ensuring future supply, particularly in more eastern parts.		x	x	x	Phasing of new development will be important in relation to any major infrastructure projects, especially to secure future water supply but also in developing and maintaining waste water treatment facilities of an appropriate standard

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?					Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD	Frameworks	
19. To increase energy efficiency, and the proportion of energy generated from renewable sources in the region	L	No more of an issue here than anywhere else.		x			x	Targets already established for the region. Main delivery will be through LDFs and planning decisions.
<b>Maintenance of high and stable levels of economic growth</b>								
20. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region	H	Crucially important in this sub-region that suffers from especially poor economic performance (low GDP, low wages, high out-commuting, high levels of deprivation etc.).		x	x		x	Sub-regional strategy must give real priority to promoting economic regeneration whilst doing all it reasonably can to help address wider regional housing development pressures.
21. To sustain economic growth and competitiveness across the region	H	It will actually be more important for this sub-region to close the economic performance gap with the rest of the South East and, in so doing, make a bigger contribution to the regional economy.		x	x		x	Sub-regional strategy must give real priority to promoting economic regeneration whilst doing all it reasonably can to help address wider regional housing development pressures.
22. To stimulate economic revival in priority regeneration areas	H	This sub-region is a priority regeneration area and the need to regenerate its economy is the central aim of the strategy (and is also one of the main parameters for the South East Plan).		x	x		x	Need to redouble our efforts in securing economic development and growth and achieve a better balance between the availability of employment locally and growth in the workforce.

Integrated Regional Framework Objective	What is the relative importance of the issue within your Sub-Region?		Is the issue deliverable through a spatial plan? If yes, which planning level is key to delivery of the issue?				
	H/ M /L	Commentary / explanation	Not deliverable	SE Plan	Sub-Reg Strategy	LD Frameworks	Commentary/explanation – why is the issue deliverable or not deliverable at the Sub-Regional Strategy level?
23. To develop a dynamic, diverse and knowledge - based economy that excels in innovation with higher value, lower impact activities	H	A key objective in such a constrained (and largely peripheral) area that must be pursued locally by building on existing strengths (e.g. two universities and cluster of multi-media activities etc.).		x	x	x	Requires a flexible planning regime that helps to promote and is responsive to such innovation and change, and a ready supply of high quality sites and premises to facilitate it.
24. To encourage the development of a buoyant, sustainable tourism sector	H	Very important in a major tourist area (but will be insufficient in itself to regenerate the economy).		x	x	x	Strategy must protect and build upon the area's key assets, including its high environmental quality in town and country.
25. To develop and maintain a skilled workforce to support long-term competitiveness of the region	H	Enhancing skills and matching these at all levels to varied economic requirements will be critical to the area's sustained regeneration.		x	x	x	Although the skills training element of this objective cannot be directly delivered through the SE Plan etc., spatial plans should not seek to inhibit sustainable economic growth and should aim ensure sufficient labour supply.

**Table 2: Sussex Coast Sub-Regional Strategy – Options Appraisal**

AIM: To assist the development and refinement of options by identifying potential sustainability impacts.

HOW: Each of the options should be tested against the IRF objectives, noting whether the effect is likely to be:

- positive (+)
- negative (-)
- neutral (0) or
- uncertain (?)

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary / explanation	Effect	Commentary / explanation	Effect	Commentary / explanation
Social progress which recognises the needs of everyone						

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary / explanation	Effect	Commentary / explanation	Effect	Commentary / explanation
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	-	<p>A reduced rate of development would lead to increased competition and, possibly, higher costs in a tighter housing market. The absence of any need to allocate additional strategic housing sites would also restrict opportunities to negotiate affordable housing provision as part of private development schemes.</p> <p>Policies relating to sustainable construction methods should be addressed regionally.</p>	+	<p>Maintaining the existing planned levels of development would continue to cater for externally generated demands for housing and should not exacerbate affordability problems.</p> <p>Policies relating to sustainable construction methods should be addressed regionally.</p>	+	<p>By further increasing supply, this option may tend to moderate upwards pressure on house prices and should provide more opportunities to secure affordable housing provision via S106 agreements.</p> <p>Policies relating to sustainable construction methods should be addressed regionally.</p>

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
2. To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment.	+	This option could be delivered by avoiding the functioning flood plain. However, development will continue to intensify in the developed floodplain which will remain at some risk.	+	This option could be delivered with very little or no encroachment on the undeveloped flood plain. However, development will continue to intensify in the developed floodplain which will remain at some risk.	-	Encroachment into undeveloped flood plains would be more likely under this option. This would have implications for the cost of housing (flood proofing + the costs of capital and revenue expenditure on necessary defences) whilst householders might well find it increasingly difficult to obtain home insurance.
3. To improve the health and well-being of the population and reduce inequalities in health	-	Reducing the future supply of housing could lead to increased costs and greater difficulties accessing social provision, both of which would be more likely to exacerbate rather than alleviate existing health problems and inequalities.	0	In terms of housing provision alone, this option would be unlikely to have any significant impact on health inequalities. However, in combination with employment policies, it should produce the best balance between workforce growth and the availability of local employment.	0	This option might go furthest in terms of improving access to affordable housing. However, it would also be difficult to increase local employment opportunities in line with the associated workforce growth. These two aspects would tend to balance each other out in terms of health problems/inequalities etc.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
4. To reduce poverty and social exclusion and close the gap between the most disadvantaged communities [in the South East] and the rest [of the region]	-	Lower levels of housing provision will not assist in securing necessary improvements to existing deficiencies in social and physical infrastructure, and neither would a more restricted labour market be very conducive to inward investment and/or the creation/expansion of local firms. This strategy would be unlikely, therefore, to deliver a step change in economic performance and the range and quality of jobs available locally. Consequently, it would do least to reduce social exclusion and levels of poverty.	+	This option strikes the most sustainable balance the needs of an expanding local workforce for gainful employment and the potential ability of the sub-region to match these requirements with a commensurate increase in the number, range and quality of local employment opportunities. It should, therefore, stand the best chance of reducing poverty and social exclusion.	-	Under this option, it would be extremely difficult to provide sufficient jobs to match the scale of the implied growth in the workforce. A higher level of housing provision could make it more difficult for existing residents (especially those with relatively low skills) to compete successfully against increased numbers of in-migrants and obtain decent employment in an increasingly competitive labour market.
5. To raise educational achievement levels [across the region] and develop opportunities for everyone to acquire the skills needed to find, remain and progress at work	0	Although an important issue regionally and sub-regionally, this objective cannot be directly delivered through the SE Plan or its sub-regional elements.	0	Although an important issue regionally and sub-regionally, this objective cannot be directly delivered through the SE Plan or its sub-regional elements.	0	Although an important issue regionally and sub-regionally, this objective cannot be directly delivered through the SE Plan or its sub-regional elements.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
6. To reduce crime and the fear of crime	0	Although an important issue regionally and sub-regionally, this objective cannot be directly delivered through the SE Plan or its sub-regional elements. Designing out crime is more appropriately dealt with at a very local level.	0	Although an important issue regionally and sub-regionally, this objective cannot be directly delivered through the SE Plan or its sub-regional elements. Designing out crime is more appropriately dealt with at a very local level.	0	Although an important issue regionally and sub-regionally, this objective cannot be directly delivered through the SE Plan or its sub-regional elements. Designing out crime is more appropriately dealt with at a very local level.
7. To create and sustain vibrant communities	+	Although the high levels of development required <u>within</u> existing urban areas will help to sustain vibrant towns along the Sussex Coast., this option requires marginally less than the other two.	+	The high levels of development required <u>within</u> existing urban areas under each option will help to sustain vibrant towns along the Sussex Coast.	+	The high levels of development required <u>within</u> existing urban areas under each option will help to sustain vibrant towns along the Sussex Coast. However, this option would also require substantial areas of more remote development.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
8. To improve accessibility to all services and facilities	?	Although a lower level of development would appear to generate fewer requirements for services and facilities, it would also provide less development value to help address any shortfalls or to fund transport schemes required to improve physical accessibility.	?	This option would give rise to greater requirements for additional facilities and services but might also stand a better chance of triggering key thresholds and generating more development value to help meet such costs and improve physical accessibility.	?	This would require the greatest investment in new services and facilities. At the same time as it would generate the greatest development value, transport infrastructure requirements would also be highest because the locations for additional development would be further away from main service centres.
9. To encourage increased engagement in cultural activity across all sections of the community [in the South East]	0	This objective would be more effectively addressed in cultural/community strategies.	0	This objective would be more effectively addressed in cultural/community strategies.	0	This objective would be more effectively addressed in cultural/community strategies.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
<b>Effective protection of the environment</b>						
10. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including re-use of materials from buildings, and encourage urban renaissance	+	As it would require no further strategic allocations of land for housing beyond that already being brought forward through existing structure plans to 2011/16, this option would achieve the highest proportion of development on PDL. It should also give some limited opportunity to reduce the planned development of greenfield sites or reduce the potential level of urban intensification.	+	Because development options for the sub-region are so highly constrained, every effort must be made to deliver optimal densities within urban areas and around key transport nodes. This option would require a very positive and creative approach to delivering maximum development on PDL in order to minimise the (still substantial) requirement for further strategic allocations of greenfield land for housing.	0	Although this option implies the same level of development on PDL as Option 2, it would deliver the lowest proportion of overall development on PDL as it would also require far more extensive strategic allocations of additional greenfield sites for housing, thereby encroaching into designated areas.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
11. To reduce air pollution and ensure air quality continues to improve	–	Given concerns over the ability to deliver transport improvements under this option, areas of marginal or poor air quality would be likely to deteriorate. Whilst, lower levels of development would mean fewer cars on the road (compared to other options), congestion would still worsen in the absence of necessary improvement schemes. This would result in worsening problems of poor air quality in specific locations. There would also be no reduction in the extent of long-distance out-commuting (mainly by car) as a result of the sub-region's continuing poor economic performance.	0	If successful in securing necessary road improvements, this option should diffuse any potential air quality problems that would otherwise arise due to worsening congestion. Selective transport improvements would also facilitate the development of key strategic employment sites. By increasing the range and quality of local jobs, and by better balancing workforce growth with the availability of local employment, this option would also go furthest in reducing overall needs to travel – even if the overall extent of carbon emissions were to increase because of the additional houses being built and the associated increase in the number of cars on the road.	–	In many respects, this option might appear to give rise to similar impacts as Option 2. However, the inability of the local economy to expand in line with the much higher levels of workforce growth associated with this option could only result in yet further substantial increases in long-distance out-commuting from the sub-region. This could give rise to significant new air quality problems at specific locations at the same time as causing an overall increase in general pollution levels.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
12. To address the causes of climate change through reducing emissions of greenhouse gases and ensure that the South East is prepared for its impacts	?	<p>Greenhouse gas emissions will almost inevitably increase as more houses are built and the number of cars etc. on the road continues to rise, but such impacts would be lowest under this option because it would give rise to the lowest overall level of development. However, this option would be less likely to deliver much needed improvements to the transport network and services which would lead to worsening problems of congestion and hinder the sub-region's potential regeneration. It would, therefore, also do little to reduce the extent of long-distance out-commuting (mostly by car).</p> <p>Whilst general adaptation measures will be addressed by regional policies included in the SE Plan, this option could be delivered by avoiding the functioning flood plain. However, development would continue to intensify</p>	?	<p>Greenhouse gas emissions will almost inevitably increase as more houses are built and the number of cars etc. on the road continues to rise. Whilst this option would give rise to higher levels of development than Option 1, it also stands the best chance of reducing overall needs to travel by increasing the availability of local employment opportunities relative to workforce growth and achieving a better balance between people, homes and jobs.</p> <p>Whilst general adaptation measures will be addressed by regional policies included in the SE Plan, this option could be delivered with very little or no encroachment on the undeveloped flood plain. However, development would continue to intensify in the developed floodplain which would remain at some risk.</p>	–	<p>Greenhouse gas emissions will almost inevitably increase as more houses are built and the number of cars etc. on the road continues to rise. However, not only would this option give rise to the highest levels of development, it would also cause a substantial increase in the need to travel as a result of workforce growth far outstripping any increase in the demand for labour locally.</p> <p>Whilst general adaptation measures will be addressed by regional policies included in the SE Plan, encroachment into undeveloped flood plains would be much more likely under this option. At the same time, development would continue to intensify in the developed floodplain which would also remain at some risk.</p>

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
13. To conserve and enhance the region's biodiversity	0	This option would require only a limited loss of greenfield sites. From that perspective, it is unlikely to have a substantial impact on the region's ecological resources but, in any event, the conservation and enhancement of the region's biodiversity will mainly be guided by region-wide policies.	?	This option would require more widespread development of greenfield sites than Option 1 and, from that perspective, could have a more significant impact on the region's ecological resources. However, other relevant impacts associated with this option (e.g. in respect of air pollution) may be relatively benign.	–	This option would require very extensive development of greenfield sites, with new housing encroaching into sensitive designated areas. This, together with other harmful impacts, makes it most likely that this option could have quite serious deleterious effects on the region's ecological resources.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
14. To protect, enhance and make accessible for enjoyment, the region's countryside and historic environment	+	This option would not require any further strategic allocations of land for housing beyond that coming forward under existing plans. It would also provide some scope for slightly alleviating intensification pressures within the coastal towns, whilst still delivering the greatest proportion of development on PDL.	0	This option would require a very positive approach to achieving maximum development on PDL in order deliver optimal densities within urban areas and around key transport nodes. High standards of design and general improvements in accessibility within and between the coastal towns would therefore be particularly important in protecting the quality of the built environment and urban life. Although this approach would minimise the residual requirement for further strategic allocations of land for housing, around 10,000 homes would still need to be accommodated on new greenfield sites.	-	Whilst this option implies the same level of development on PDL as under Option 2, it would also require far more extensive strategic allocations of additional greenfield sites for housing. This residual requirement to accommodate an extra 25,000 dwellings on greenfield sites could only be achieved by substantial encroachment into designated areas.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
15. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/lorry	-	<p>As discussed elsewhere, much needed improvements to transport infrastructure and services would be less likely to be realised under this option. The absence of such necessary schemes would inevitably lead to worsening problems of congestion (and associated pollution) across the sub-region.</p> <p>This option would also do least to promote the economic renaissance of the Sussex Coast and, consequently, would only reinforce the need for, and rising extent of, long-distance out-commuting from the sub-region to other more prosperous employment centres.</p>	+	<p>As highlighted elsewhere, necessary improvements to transport infrastructure and passenger transport services would be more likely to be realised under this option (than under Option 1) and would help ease congestion and any potential pollution problems.</p> <p>By facilitating the development of key strategic employment sites and increased economic investment, this option would also go furthest in reducing travel needs associated with work. By increasing the range and quality of jobs available locally, and by better balancing such growth with anticipated increases in labour supply, this option should help reduce the need for existing and future residents to commute (primarily by car) long-distances to work elsewhere.</p>	-	<p>At the same time as triggering key thresholds for potential infrastructure investment, this option would also generate the greatest development value to help fund transport improvements. However, travel demands would also be higher because of more rapid household growth and because the additional strategic locations for development that this would require would have to be quite distant from the existing main service centres.</p> <p>The impact of workforce growth also outstripping commensurate growth in local employment opportunities also means that this option could only result in yet further substantial increases in out-commuting from the sub-region. By increasing such needs to travel long-distances to work (mainly by car), this option would substantially increase overall traffic levels and</p>

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
<b>Prudent use of natural resources</b>						
16. To reduce the global social and environmental impact of consumption of resources by using sustainably produced and local products	0	These important issues will be more effectively addressed by other strategies and initiatives that lie beyond the scope of spatial planning.	0	These important issues will be more effectively addressed by other strategies and initiatives that lie beyond the scope of spatial planning.	0	These important issues will be more effectively addressed by other strategies and initiatives that lie beyond the scope of spatial planning.
17. To reduce waste generation and disposal, and achieve the sustainable management of waste	0	Although each option carries different implications for the overall amount of waste that would be generated across the sub-region, policies for sustainable waste management will be more effectively promoted through the regional waste strategy and waste development frameworks.	0	Although each option carries different implications for the overall amount of waste that would be generated across the sub-region, policies for sustainable waste management will be more effectively promoted through the regional waste strategy and waste development frameworks.	0	Although each option carries different implications for the overall amount of waste that would be generated across the sub-region, policies for sustainable waste management will be more effectively promoted through the regional waste strategy and waste development frameworks.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
18. To maintain and improve the water quality of the region's rivers and coasts, and to achieve sustainable water resources management	0	This option would enable a slight reduction in development rates. In the east of the sub-region, where future water supply is perceived to be a problem, this may be sufficient to avoid the need for major new reservoir resources which have a long lead time.	–	This option will tend to exacerbate perceived future water supply problems in the east of the sub-region as any necessary additional reservoir storage capacity would have a lead time longer than that by which housing from new land allocations would need to be built. Furthermore, this option would also threaten sustainable water management, particularly in the east of the sub-region, as the discharge of treated waste water (however "clean") into watercourses that drain into SSSI/Ramsar sites is already approaching acceptable limits of dilution.	–	This option will inevitably increase demand for water supply further, yet lead times for reservoir development remain equally long, thereby worsening the scale of delivery delay in housing and other development.  Furthermore, this option would also threaten sustainable water management, particularly in the east of the sub-region, as the discharge of treated waste water (however "clean") into watercourses that drain into SSSI/Ramsar sites is already approaching acceptable limits of dilution.
19. To increase energy efficiency, and the proportion of energy generated from renewable sources in the region	0	This objective will not be directly addressed by the sub-regional strategy but will be tackled through policies in the SE Plan and LDFs, together with associated planning decisions.	0	This objective will not be directly addressed by the sub-regional strategy but will be tackled through policies in the SE Plan and LDFs, together with associated planning decisions.	0	This objective will not be directly addressed by the sub-regional strategy but will be tackled through policies in the SE Plan and LDFs, together with associated planning decisions

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
<b>Maintenance of high and stable levels of economic growth</b>						
20. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the region	-	This option might appear to offer the best prospect for being able to numerically match the growth in jobs with the growth in the workforce. However, lower levels of housing provision will not assist in securing necessary improvements to existing deficiencies in strategic transport infrastructure, and neither would a more restricted labour market be very conducive to inward investment and/or the creation/expansion of local firms. This strategy would be unlikely, therefore, to deliver a step change in economic performance and the range and quality of jobs available locally.	+	This option strikes the most sustainable balance the needs of an expanding local workforce for gainful employment and the potential ability of the sub-region to match these requirements with a commensurate increase in the number, range and quality of local employment opportunities.	-	Under this option, it would be extremely difficult to provide sufficient jobs to match the scale of the implied growth in the workforce. It would, therefore, increase the local employment deficit (people/homes/jobs imbalance).

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary / explanation	Effect	Commentary / explanation	Effect	Commentary / explanation
21. To sustain economic growth and competitiveness across the region	-	This option would be unlikely to inspire confidence in the sub-region's longer-term economic prospects as it implies reducing levels of housing and workforce growth and might not deliver soon enough the strategic transport infrastructure needed.	+	This option would be most likely to deliver the sustainable regeneration of the sub-regional economy and, in so doing, make a bigger and lasting contribution to the wider region's economy, thereby reducing intra-regional disparities.	0	Whilst this option would not appear to undermine regional competitiveness, it could only be achieved at the expense of yet further substantial increases in unsustainable out-commuting.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary / explanation	Effect	Commentary / explanation	Effect	Commentary / explanation
22. To stimulate economic revival in priority regeneration areas	-	The cornerstones of our economic regeneration strategy will not vary significantly between the different housing options being considered. In addition to the considerations outlined under Objective 20 above, maintaining the area's highly regarded environmental qualities is also seen as essential to securing investment and future economic success. However, whilst substantially constraining the long-term supply of new housing may avoid the loss of some greenfield sites, this option would do little else positive to help promote an economic renaissance.	+	The cornerstones of our economic regeneration strategy will not vary significantly between the different housing options being considered. In addition to the considerations outlined under Objective 20 above, maintaining the area's highly regarded environmental qualities is also seen as essential to securing investment and future economic success. Although this option accepts the prospect of some very limited environmental encroachment for economic development, the associated level of housing provision could be delivered without the extensive encroachment implied by Option 3.	-	The cornerstones of our economic regeneration strategy will not vary significantly between the different housing options being considered. In addition to the considerations outlined under Objective 20 above, maintaining the area's highly regarded environmental qualities is also seen as essential to securing investment and future economic success. However, this scale of development would require substantial encroachment into environmentally designated areas.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
23. To develop a dynamic, diverse and knowledge - based economy that excels in innovation with higher value, lower impact activities	+	This is a highly relevant objective in such a physically constrained area where there are two universities and, in the centre of the sub-region, a thriving media sector. However, there is no perceived difference in the ways the different options could impact upon its achievement.	+	This is a highly relevant objective in such a physically constrained area where there are two universities and, in the centre of the sub-region, a thriving media sector. However, there is no perceived difference in the ways the different options could impact upon its achievement.	+	This is a highly relevant objective in such a physically constrained area where there are two universities and, in the centre of the sub-region, a thriving media sector. However, there is no perceived difference in the ways the different options could impact upon its achievement.
24. To encourage the development of a buoyant, sustainable tourism sector	+	Whilst promoting quality tourism is an important aspect of the sub-regional strategy, none of the options under consideration are likely to have significantly different impacts.	+	Whilst promoting quality tourism is an important aspect of the sub-regional strategy, none of the options under consideration are likely to have significantly different impacts.	+	Whilst promoting quality tourism is an important aspect of the sub-regional strategy, none of the options under consideration are likely to have significantly different impacts.

Integrated Regional Framework Objective	Option 1 – Reduction of 20% in the planned rate of development (compared to current provisions)		Option 2 – Continuation of the current planned rate of development		Option 3 – Increase of 20% in the planned rate of development (compared to current provisions)	
	Effect	Commentary explanation /	Effect	Commentary / explanation	Effect	Commentary / explanation
25. To develop and maintain a skilled workforce to support long-term competitiveness of the region	-	Although promoting increased skills training is an important feature of the strategy, there is more of a risk that this option could lead to skill shortages in some key areas and/or problems of recruitment and retention.	+	Promoting the growth of a skilled workforce is an important element of the strategy, particularly so given the low levels of productivity characteristic of the sub-regional economy. Maintaining existing levels of housing provision should reduce the risk of potential skill shortages in certain sectors.	0	Promoting the growth of a skilled workforce is an important element of the sub-regional strategy. Whilst increasing housing provision would obviate any potential labour shortages locally, the excess workforce (however highly skilled) would have to commute long distances to other centres of employment outside the sub-region.
<b>Additional Comments (including changes to the alternative) and Preferred Option</b>			On the basis of the above assessment, this option is being further developed in combination with associated policies for economic regeneration as the preferred strategy for the Sussex Coast.			