

A New National Planning Policy Framework: But Will It Actually Get Eastbourne Building?

By Steve Knott, Planning Advisor, The Eastbourne Society

Just when we thought we were getting used to the last one, the Government published a completely revised National Planning Policy Framework (NPPF) on 17 August 2026, replacing the December 2024 version.

The intention is clear. Government wants a planning system which is quicker, clearer and more predictable and, above all, delivers substantially more housing.

There is much in that ambition that I support. We need more homes, we need to make better use of brownfield land and we need to find new uses for buildings and sites which have outlived their original purpose. But there is a danger of assuming that changing the planning system will, by itself, get Britain building again.

Eastbourne provides some fairly compelling evidence that the problem is considerably more complicated.

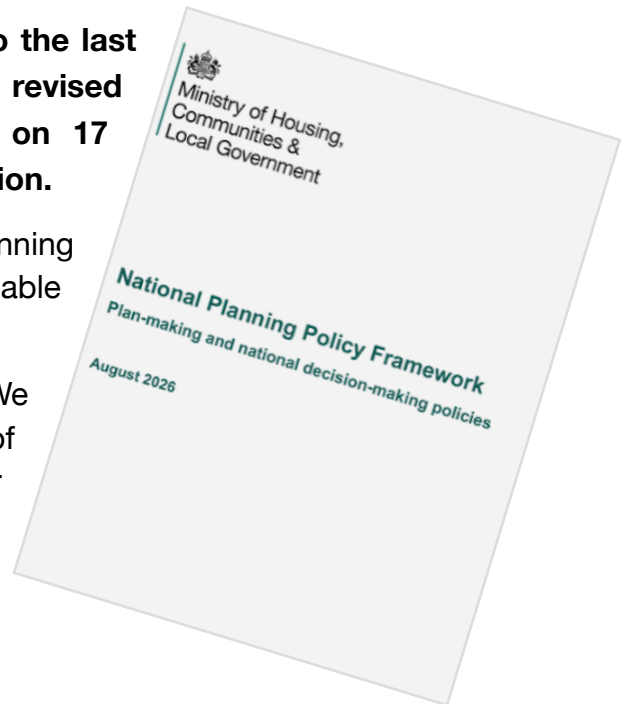
A more rules-based system

The new NPPF moves towards a more rules-based planning system, intended to reduce uncertainty and provide greater consistency in how applications are determined. There is stronger support for development within existing settlements, brownfield redevelopment, higher densities, infilling and making more efficient use of urban land. Development around well-connected railway stations is particularly encouraged.

For Eastbourne this matters

We are a relatively constrained town, sitting between the sea and the South Downs. If we are going to accommodate additional homes, inevitably some existing urban land will have to work harder. That does not have to be a bad thing. There are sites in Eastbourne where redevelopment should positively be welcomed. Equally, there are buildings which need to find a new purpose if they are to have a future.

Our approach at the Eastbourne Society should therefore not simply be to resist change. I think our position should increasingly be: We support appropriate development, but it has to be the right development in the right place.



The elephant in the room – viability

There is, however, a fundamental problem which no rewrite of the NPPF can solve on its own. The biggest obstacle to delivering development in Eastbourne is increasingly not obtaining planning permission. It is economic viability. We don't have to look very far to see the evidence.

The former BT site at Moy Avenue has permission for 72 homes.

The former Dairy Crest site at Waterworks Road has permission for 60 homes.

The former TJ Hughes building obtained permission for 65 homes, but development has not proceeded and the site has subsequently changed hands.

The former Grove Road Police Station has stood empty since 2014. Its previous permission for 50 homes has now expired. There are other stalled or long-running sites around the town, including Ocklynge Quarry, which reinforce the same basic point.

So perhaps we need to ask an uncomfortable question:

If the planning system is the principal reason we are not building enough homes, why aren't the homes which already have planning permission being built? That, for me, is the issue which national housing policy still does not adequately address. The new NPPF can encourage higher densities. It can favour brownfield development. It can make obtaining planning permission easier and seek to speed up decisions.

But it cannot make an economically unviable development viable

The numbers still have to work. Development is ultimately an economic activity. A developer has to contend with land and acquisition costs, demolition and remediation, construction costs, borrowing and finance, affordable housing requirements, infrastructure contributions, biodiversity requirements, energy standards, drainage, building regulations and an ever-growing range of environmental and technical obligations. Many of those requirements are individually entirely reasonable. The problem is their cumulative cost.

Government understandably wants more homes, more affordable homes, greener homes, better infrastructure, greater biodiversity and better design — delivered more quickly and at prices people can afford.

Those are admirable objectives

The difficult bit is making the numbers add up.

There comes a point where asking a development to deliver everything can result in it delivering nothing at all. A planning permission for 100 homes achieves very little if the economics mean those homes are never built. No market homes appear. No

affordable homes are provided. No infrastructure contribution is generated and no brownfield land is regenerated. The site simply sits there.

Housing and the green agenda.

There is therefore an uncomfortable discussion to be had about the relationship between Government's housing ambitions and its environmental ambitions.

That is not an argument against environmental standards.

We should be building energy-efficient homes. We need to respond to climate change, improve biodiversity, manage water properly and create developments which will remain sustainable for generations. But Government also has to recognise that every additional requirement ultimately has a cost. The individual requirements may be entirely sensible. The question is whether anybody is properly considering their cumulative effect on viability.

There is little environmental, social or economic benefit in designing the theoretically perfect development if the figures ensure nobody will ever build it. Housing and environmental responsibility should not be opposites. But they do have to be reconciled economically.

Debenhams – a very Eastbourne example

The former Debenhams building in Terminus Road illustrates the problem rather well.

Here we have a substantial, largely redundant building occupying a major town-centre site. Surely few people would argue that leaving such a prominent site substantially unused indefinitely represents a good outcome for Eastbourne. It is precisely the sort of brownfield town-centre site which national planning policy wants brought back into productive use.

But saying "redevelop it" is the easy part.

Can some or all of the existing building be successfully reused? Is conversion economically realistic? If redevelopment is required, what density is necessary to make it viable? What height and massing are appropriate? What happens at street level? How does it affect the surrounding townscape and heritage? And, ultimately: Can a scheme be created which is both good enough for Eastbourne and financially viable enough to actually get built? That is the real planning challenge.

Heritage – sometimes the best conservation is reuse

One aspect of the new NPPF which I particularly welcome is its more positive approach towards bringing historic buildings back into viable use.

Eastbourne has an extraordinary architectural and historic legacy. We have listed buildings, Conservation Areas, historic parks and gardens, important townscapes

and the South Downs National Park immediately alongside us. Those things deserve protection. Harm to designated heritage assets still requires clear and convincing justification. But conservation should not simply mean preventing things happening to old buildings. An empty historic building slowly deteriorating because nobody can find an economically viable purpose for it is hardly a victory for conservation. Sometimes the best way to preserve an historic building is quite simply to use it. That might mean accepting a sympathetic change of use, sensitive alterations or a commercial, residential, hospitality, cultural or community use completely different from that for which the building was originally constructed. Provided its significance is understood and respected, reuse can itself be conservation.

The question should not always be: "How do we stop this building changing?"

Sometimes it should be: "What sensible new use will secure this building's future?" Heritage protection and economic reality have to work together.

Density isn't necessarily greed. Viability also helps explain why developers sometimes seek greater density. It is very easy to assume that an additional floor or additional homes are simply about increasing developer profit.

Sometimes they may be. But sometimes additional development is what makes the difference between a scheme being viable and unviable. That doesn't mean we should automatically accept it. There will be occasions where additional height, massing or density causes unacceptable harm to neighbours, heritage or the wider townscape. But we should at least understand the economics driving a proposal before reaching a conclusion.

If a site can reasonably accommodate 20 homes, arguing that nothing should be built is unlikely to get very far. Equally, trying to squeeze 40 homes onto it at the expense of good design, trees, neighbours or heritage is not necessarily the answer either. And while the new NPPF may encourage greater density, I don't think anyone is suggesting that Eastbourne needs another South Cliff Tower on every available corner!

Good design matters even more

If Government is going to encourage more intensive use of land, then good design becomes more important, not less. Simply saying that a proposal is "out of character" or represents "overdevelopment" is no longer enough. We need to explain why.

Is it the height? Massing? Building line? Plot coverage? Materials? Roof form? Loss of trees? Parking dominating the frontage? Its relationship with neighbouring buildings? Likewise, where heritage is affected, we should identify what is significant and precisely how the development would harm it.

The Society should never be afraid to object strongly to poor development. But our objection needs to explain why it is poor planning. Equally, we should be prepared to support good development.

And then there is the Planning Committee... There is another issue which concerns me and which no rewrite of the NPPF will entirely solve. That is the role of politics in Planning Committees. Planning decisions are supposed to be made on planning merits. Councillors sitting on a Planning Committee are exercising an important regulatory function. There will always be political debate about the broader direction in which Eastbourne develops. That is entirely legitimate. But deciding an individual planning application should be different.

I remain uncomfortable when an application becomes party political, whichever political party is involved. A good development should not become a bad development because of who proposes it, and a bad development should not become acceptable because approving it happens to be politically convenient. Nor should councillors feel obliged to support or oppose an application because that happens to be the position adopted by their political group.

The test should surely remain much simpler: Is it good planning? Local democratic scrutiny remains important, particularly with major or controversial developments.

The challenge is maintaining that democratic involvement without allowing party politics to determine planning decisions.

What should the Eastbourne Society's role be? I believe all of this makes an independent organisation such as the Eastbourne Society more important. We are not a political party and we should not be anti-development. Our role should be to look objectively at what is proposed and ask whether it will protect and enhance Eastbourne while allowing the town to evolve. Sometimes that will mean objecting strongly. Sometimes it should mean supporting an application. Sometimes it might mean supporting the imaginative reuse of an historic building. And sometimes the most constructive response will simply be:

We support development here, but we believe this particular scheme needs to be better. Importantly, we should also ask whether what we are demanding is realistically deliverable. The best development is surely one which is good enough to deserve planning permission and viable enough to actually be built.

The real test

Eastbourne needs more homes. Our town centre needs investment. Some buildings will need completely new uses and previously developed land will need to work harder. The new NPPF recognises much of that. But I remain unconvinced that continually changing planning policy addresses the fundamental problem demonstrated by Eastbourne's stalled sites. We do not simply have a shortage of

planning permissions. We have a shortage of viable developments. Until that distinction is properly addressed, governments can announce whatever housing targets they like. For me, therefore, the real test of the new NPPF will not be how many additional planning permissions it produces. It will be how many viable developments actually come out of the ground and get delivered.

Because ultimately: Planning permission is not a new home. A completed building is.

There is, of course, one further rather inconvenient question

Even if we sort out planning and somehow make the numbers work, who is actually going to build all these homes? We already have a shortage of skilled people across construction, from bricklayers and carpenters to electricians, engineers and site managers. Government can set whatever housing target it chooses but houses still require people with the skills to build them.

That probably deserves an article in its own right!

So, if you can stand any more of my musings on why simply announcing that we are going to build lots more houses does not necessarily mean that we will, perhaps I'll tackle that one in the next edition ?

In the meantime, I remain convinced of one thing: Eastbourne does need to change and develop. Our role at the Eastbourne Society should not be to prevent that change, but to help ensure that what actually gets built is viable, well designed and makes Eastbourne a better place.