

**EMPLOYMENT LAND LOCAL PLAN**  
**Sustainability Appraisal /**  
**Strategic Environmental Assessment**  
**REVISED PROPOSED SUBMISSION**  
**SUSTAINABILITY APPRAISAL**

***November 2015***



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Eastbourne Borough Council  
Revised Proposed Submission  
**Employment Land Local Plan**



Revised Proposed Submission  
**Sustainability Appraisal**

November 2015

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## Non-Technical Summary

### N.1 Introduction

This document provides a [Revised Proposed Submission Sustainability Appraisal \(RSA\)](#) of Eastbourne Borough Council's [Revised Proposed Submission Economic Land Local Plan \(RELLP\)](#). Once adopted, the [RELLP](#) will replace Policy D2: Economy from the [Core Strategy \(Local Plan\)](#), adopted February 2013, and will provide the detailed planning guidance for development of employment land for the period up to 2027.

The Planning Inspector, Sue Turner, issued her final report to the Council's Core Strategy in November 2012, which recommended that the Council carry out an assessment of current and future levels of need and demand for employment floorspace to inform the production of an Employment Land Local Plan.

[Jam Consult Ltd](#) has been commissioned by Eastbourne Borough Council to undertake the [RSA](#) following a review of the Sustainability Appraisal process and reports that have been prepared in relation to the [Employment Land Local Plan \(ELLP\)](#) between 2012 and 2015. The RSA seeks to rectify any flaws in the SA process that have been identified and respond to comments made on the Draft Submission ELLP and SA report published in November 2014.

### N.2 Why is a Sustainability Appraisal needed?

Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.

When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.

Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the '[National Planning Policy Framework \(NPPF\) 2012](#)' and '[National Planning Practice Guidance \(NPPG\)](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

### N.3 The Sustainability Appraisal (SA) Process

The NPPG sets out the stages that should be followed when carrying out a Sustainability Appraisal in relation to the plan preparation as set out below.

Sustainability Appraisal Stages	ELLP Preparation
<b>STAGE A: SCOPING REPORT</b>	
A1: Identify other relevant plans, programmes and sustainability objectives	<b>Evidence gathering and engagement</b>
A2: Collect baseline information	
A3: Identify sustainability issues and problems	
A4: Develop SA framework, including objectives, indicators and targets	
A5: Consult the consultation bodies on the Scope of the SA report	
<b>STAGE B: DRAFT SUSTAINABILITY REPORT</b>	<b>Consult on draft ELLP</b>
B1: Test the plan objectives against the Sustainability Appraisal framework	
B2: Develop the plan options including reasonable alternatives	
B3: Evaluate the likely effects of the plan and alternatives	
B4: Consider ways of mitigating adverse effects and maximising beneficial effects	
B5: Propose measures to monitor the significant effects of implementing the plan	
<b>STAGE C: PREPARE THE SA REPORT</b>	Prepare the publication version of the ELLP
C1: Prepare the Sustainability Appraisal Report	
<b>STAGE D: CONSULT ON THE SA REPORT</b>	<b>CONSULT ON THE ELLP</b>
D1: Consult on the draft plan and SA Report	Submit draft ELLP and supporting documents for Examination
D2: Assess any significant changes as a result of the consultation	Outcome of Examination - consider implications for SA
D3: Finalise Sustainability Report	<b>Local Plan Adopted</b>
<b>STAGE E: POST ADOPTION REPORTING AND MONITORING</b>	<b>Monitor and Report on the implementation of the ELLP</b>
E1: Prepare and publish post-adoption statement	
E2: Monitor significant effects of implementing the plan	
E3: Respond to adverse effects	



## N.4 What is this document?

This document provides the [Revised Proposed Submission Sustainability Appraisal \(RSA\)](#) of the RELLP or [Stages B and C](#) of the SA process and assesses the options and policies considered in the development of the RELLP. The document provides an appraisal of the RELLP in order to address concerns raised through the consultation process regarding the selection of options and policies that were presented in the Proposed Submission ELLP and SA Report, November 2014.

## N.4 Previous Stages of the SA

### Scoping Report

The Scoping Report (**Stage A**) sets out the context and scope of the SA in accordance with the regulations and best practice guidance. An initial Scoping Report was prepared for the Core Strategy, which was published in 2005 for consultation and set out the proposed methodology for the SA. The Core Strategy SA framework was therefore used to inform the Scoping Report for the SA of the ELLP, issued in October 2013, as recommended by guidance. The full report can be accessed on the Council's website at <http://www.eastbourne.gov.uk>

A pre-production engagement exercise was undertaken with stakeholders to inform them that an Employment Land Local Plan was being produced and to ask them what it ought to contain. This engagement exercise took the form of a questionnaire, which was available on-line or via a paper copy between 21 June and 2 August 2013.

The Scoping Report, prepared in house by EBC, was forwarded to the statutory consultees to ensure that the proposed scope of work was appropriate, including:

- The Environment Agency
- Natural England
- English Heritage

The neighbouring local authorities and other key stakeholders were also consulted. Responses to the consultation were received from four of the consultees including: the statutory consultees shown above, Sovereign Harbour Ltd and Aldi stores Ltd. Key comments related to:

- The need for greater consideration of the impact on environmental factors and whether the sites provide opportunities for mitigation and enhancement
- Minor changes to the objectives and indicators
- Sustainable transport opportunities and accessibility of employment locations
- The need to reference the Sovereign Harbour SPD, February 2013
- The need to consider employment space densities, development viability and deliverability
- The need to consider longevity of economic growth
- Objection to the consultation being published before all of the evidence was available.

The full responses are provided in [Appendix 2](#) of the [Scoping Report, October 2013](#).

## Initial SA Report

An Initial SA Report dated November 2013 was issued for consultation alongside the Proposed Draft Employment Plan December 2013. Consultation was undertaken for twelve weeks between 20 December 2013 and 14 March 2014. A total of 33 representations were received during the consultation from 10 organisations.

The responses raised the following key issues:

- A failure to objectively assess the provision for 3,000 sqm of office space within the Town Centre
- A failure to consider all reasonable alternatives
- Viability constraints in relation to development at Sovereign Harbour
- Concern that the density assumptions used were too high
- Objection to the proposed protection of sites within industrial estates
- Support for the extension of industrial estates as a result of developer interest and immediacy of development
- Objection to the restriction of only allowing industrial development within industrial estates
- Support for the proposed ELLP and the need to protect Eastbourne Park and enable larger footplates to be provided.
- The need to protect South Water's infrastructure when undertaking development.

The full responses are provided in the [Statement of Consultation and Representations, November 2014](#), which can be found on the Council's website <http://www.eastbourne.gov.uk/ellp>

## Proposed Submission SA Report

The Proposed Submission SA Report dated November 2014 was published for representations alongside the Proposed Submission Employment Land Local Plan December 2014. The 8 week representation period commenced on Friday 12 December 2014 and finished on Friday 6 February 2015. A total of 12 representations were received with responses of support from the statutory consultees; the Environment Agency and Natural England.

Only one specific representation in relation to the SA was received from Teal Planning on behalf of Sovereign Harbour Ltd. Further details are set out in [Section 3](#) of the SA report and the full response can be found in [Appendix A9](#).

## N.5 Options considered in the development of the ELLP

A number of strategic options were identified through the preparation of the ELLP, with regard to the delivery of additional employment land in the future. The strategic options were developed in consultation with the Local Plan Steering Group using existing policies and strategies identified in the preparation of the Core Strategy. Evidence prepared to inform the Core Strategy was used to inform the options including the following:

- Strategic Housing Land Availability Assessment
- Employment Land Review
- Sites previously allocated for employment and housing development in the Borough Plan
- A review of employment and housing sites.

The strategic options were also subject to public consultation through the Draft Employment Land Local Plan, the Initial SA and the Proposed Submission SA. The six strategic options identified were as follows:

### 1: Intensification of Existing Industrial Estates

The provision of additional employment floorspace on the existing Industrial Estates by the redevelopment of low density plots at a higher density in order to intensify the employment use.

### 2: Extensions to Industrial Estates

The provision of additional employment floorspace through extensions to existing Industrial Estates, where it would be possible to develop land on the edge of industrial estates and within Eastbourne Park for employment use.

### 3: Redevelopment of sites outside Industrial Estates

The development of sites outside the existing Industrial Estates for employment use, the majority of which would be located outside of existing employment areas, and mostly within predominantly residential areas.

### 4: Town Centre

The delivery of employment land through the regeneration of the Town Centre, which is identified in the Core Strategy as a Sustainable Centre, in which housing growth will be balanced by significant improvements in the provision of services and facilities. Employment opportunities within the neighbourhood are an important element of creating a sustainable centre.

### 5: Sovereign Harbour

The development of land at Sovereign Harbour for employment use, to balance housing growth with the provision of services and facilities, and as an important element of creating a sustainable centre.

### 6: Greenfield Development

Allocation of greenfield sites outside of the built-up area boundary and not adjacent to existing Industrial Estates for employment use, some of which were previously identified for development but were de-allocated through the Core Strategy process.

As a result of the consultation on the options, Sovereign Harbour Ltd (SHL) made a representation, which stated that the provision of 3,000sqm of office space in the Town Centre was not objectively assessed and that the Town Centre had capacity for an increased amount of office space. As a consequence, an increased provision of office space in the Town Centre was an additional option tested through the Sustainability Appraisal process as part of the Proposed Submission SA.

In response to the consultation on the Proposed Submission SA, SHL made a further representation criticising the approach to the assessment of options and justification for the decisions made. In particular SHL considered that the most sustainable, deliverable option had not been selected. The full response can be found in [Appendix A9](#).

### The Revised Proposed Submission SA

As a result of the representation from SHL, the Council commissioned Jam Consult Ltd to review the SA work undertaken to date in relation to the ELLP, with specific attention to the selection of options. The review of the sustainability appraisals and supporting documents found there were some defects in the SA process, which needed to be corrected if the evidence base for the ELLP was to be considered suitably robust when subjected to Examination in Public (EiP).

In particular, the review found the assessment of options should be revisited in respect of the representations received, with specific reference to the quantum of office space that should be provided in the Town Centre and at Sovereign Harbour.

### Revision of Options

The review of the options revealed that some of the options could not be considered 'realistic alternatives' as defined by the regulations because they included the development of greenfield land and were contrary to Core Strategy policy regarding the development of areas of landscape and biodiversity value. Following discussion with the Council it was decided that given the previous results of the SAs and taking into consideration the conflict with Core Strategy policy the inclusion of Options 3 and 6 could not be supported. However, it was decided that Option 2 should be retained in order to address developer interest in land adjacent to industrial estates and to verify the sustainability impacts of such proposals.

In addition, it was considered that options should consider a different quantum of office space in both the town centre and at Sovereign Harbour in order to address the concerns raised in SHL's representations. SHL's representations proposed that an option should include a reduction in office floorspace at Sovereign Harbour to 11,000 sqm with 9,000 sqm of office space in the Town Centre and 3,000 sqm at other out of town locations. The inclusion of this option was considered but rejected as no other out of town sites were identified that could accommodate the additional 3,000 sqm. It was therefore decided to test the inclusion of 9,000 sqm of space within the town centre but with 14,000 sqm at Sovereign Harbour (**Option 3b**). It was also decided that a slight modification to this option should be considered as a comparison (**Option 3c**).

The revised options selected were therefore as follows:

- 1: As existing (No Plan)**  
90% office provision in Town Centre (TC): 10% Out of Town Centre (OTC); Industrial as existing.
- 2a: Intensification of industrial land (update of proposed submission SA)**
- 2b: Extensions to industrial land (update of proposed submission SA)**
- 3a: As proposed by EBC**  
76% office TC: 24% OTC (3,000 sqm TC: 20,000 sqm Sovereign Harbour (SH))
- 3b: As proposed by SHL**  
80% office TC: 20% OTC (9,000 sqm TC: 14,000 sqm SH)
- 3c: Alternative Option for comparison**  
77% office TC: 23% SH (5,000 sqm TC: 18,000 sqm SH)

## N.6 Selection and Rejection of RELLP Options

### Option 1

The assessment showed that maintaining the current situation within Eastbourne would result in the retention of an unbalanced, under performing employment market with an over provision of office space within the Town Centre, as well as providing increasing constraints upon the future economic growth.

**This option was therefore rejected.**

### Option 2a and 2b

Neither of the options would provide for all the employment provision for the borough on their own so will need to be combined with the best performing of **Option 3**.

**Option 2a** would enable current industrial space to be protected, whilst providing new opportunities for the identified need. The option also maximises the use of existing employment land and brownfield land having a minimal impact upon biodiversity and landscape.

**Option 2b** would enable further industrial land to be provided and thereby provide opportunities for the identified need. However this option would result in significant environmental effects upon biodiversity and landscape as it will require the development of greenfield land within Eastbourne Park, which is contrary to Core Strategy Policy D11, which protects Eastbourne Park as an area of high landscape and biodiversity importance.

**Option 2a was selected as the preferred option for industrial land.**

**Option 2b was rejected as a result of the significant environmental impacts.**

### Option 3a, 3b and 3c

Again none of the options can meet the employment land requirements on their own, so the best option will need to be combined with the best performing of **Option 2**.

**Option 3a** addresses the balance of employment provision within the town to result in provision closer to market norms, improving the future health of the town centre by providing opportunities for a more diverse business offer and opportunities for businesses to move to larger premises, which are in great demand. This option performs the best in terms of viability and deliverability as a greater quantum of development is provided at Sovereign Harbour, which was shown to be a more viable location for office development.

**Option 3b** will improve the balance of employment provision within the town but provide fewer opportunities for business growth and flexibility. The option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand, and is less viable and deliverable. Development at Sovereign Harbour also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining, the reduction in floorspace reduces the option's potential in this regard. The option potentially offers the scope for more sustainable travel, however the lack of choice in office provision could result in further out commuting.

**Option 3c**

The option provides a better balance of uses within the Borough offering greater choice and flexibility to the market. The increase in the provision of town centre floorspace reduces the viability of this option, retaining an over reliance on town centre stock and smaller floorplates, which conflicts with demand.

All of the options scored poorly with regard to the use of resources, climate change, biodiversity, air quality and waste as the increase in development is likely to have significant negative impacts upon these issues. Suitable mitigation measures will need to be identified.

**Option 3a was selected as the best performing option overall.**

**Option 3b and 3c were rejected because they failed to meet market demand and were less viable, deliverable and sustainable solutions.**

[The full results can be found in Section 8 and Appendix A5 of this report](#)

## N.7 Preferred Option

The Preferred Option is a result of the best performing options that were assessed, which includes:

**Option 2A** Intensification of Industrial Estates

**Option 3A** 76: 24 split of Town Centre: Out of town Centre development with 3,000 sqm of office space in the TC and 20,000 sqm at Sovereign Harbour.

The Preferred Option was then subject to SA to verify the results. The Preferred Option is as follows:

**76% office Town Centre (3,000 sqm): 24% office Sovereign Harbour (20,000 sqm) + Intensification of Industrial Estates (20,000 sqm)**

The revised SA has shown that the Preferred Option, as selected in the Proposed Submission SA, is still the most sustainable option for the RELLP.

- The preferred option tests a revised floorspace of 76:24 between the Town Centre and Out of Town provision with 3,000 sqm of space provided in the Town Centre, 20,000 sqm of office space provided at Sovereign Harbour and 20,000 sqm provided through the intensification of industrial estates.
- GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual.
- By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the Town Centre can be retained for residential purposes in order to meet the established housing need of 450 units across the five Development Opportunity Sites, identified in the Town Centre Local Plan.

- Industrial land is unlikely to be used for housing, enabling other sites to be used for residential development.
- The ELR also showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential.
- The preferred option provides a better balance of uses within the Borough offering greater choice and flexibility to the market. The office provision at Sovereign Harbour should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the Sovereign Harbour SPD 2013, although the impact is unlikely to be realised in the short term.
- Sovereign Harbour will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled which should result in a positive impact upon economic growth in the medium to long term.
- The viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole, particularly in the medium to long term. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining. The provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre.
- The retention and improvement of existing industrial sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. Such benefits should be achievable in the short term as well as medium to long term, which will have a greatly needed positive impact on the market
- Development within the town centre is well served by public transport. Development at Sovereign Harbour and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development could make the viability of improved public transport services more likely in the long term.
- The development is likely to result in an increase in the use of natural resources. However, the reduction in office space within the town centre provides the opportunity for new, more energy efficient accommodation to be provided, particularly in the medium to long term. A larger quantum of development at Sovereign Harbour could also increase the potential for renewable forms of energy to be incorporated.
- The increase in development is likely to cause an increase in the levels of pollutants, greenhouse gas emissions and the amount of waste produced in both construction and operation. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

The full results can be found in [Section 8](#) and [Appendix A5](#).



## N.8 Policies considered in the RELLP

The Revised Employment Land Local Plan will contain a number of policies that will implement the preferred option and help achieve the objectives. The appraisal of the options and selection of the preferred option revealed that the SA substantiated the Council's original approach to the policy development. These policies are:

Policy EL1: Economy and Employment Land

Policy EL2: Industrial Estates

Policy EL3: Town Centre

Policy EL4: Sovereign Harbour

A summary appraisal of the policies contained within the Revised Proposed Submission Employment Land Local Plan is provided below. [Section 9](#) and [Appendix A6](#) contain a full appraisal of each of the policies.

## N.9 Significant sustainability effects of the RELLP Policies

The results of the RSA have shown that the RELLP performs well, with the majority of the impacts regarded as positive. Some uncertain and minor negative impacts are identified with regard to environmental issues, particularly in the short term as a result of construction. Suitable mitigation measures will need to be identified through the development management process.

The Plan has sought to allocate employment land in the most sustainable and effective way, through intensifying development in existing employment locations and directing development toward the Sustainable Centres at the Town Centre and Sovereign Harbour that have been identified in the Eastbourne Core Strategy Local Plan 2006-2027. This approach will allow all sites within the Borough to 'work together' to meet future requirements, providing a functioning supply of sites that are deliverable and provide sufficient choice to support indigenous businesses and inward investment.

The policies support job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The retention and improvement of existing sites will enable future economic growth, which will support the development of housing and the generation of jobs. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development specifically the 450 units across the five Development Opportunity Sites, identified in the Town Centre Local Plan.

The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training are encouraged, which are all likely to encourage economic growth particularly in the long term.

Policy EL2 supports the redevelopment and intensification of vacant or under used sites in industrial estates to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas.

The policies encourage more diverse employment opportunities, which should result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. Sovereign Harbour will offer space for both new and relocating businesses within the area in the medium to long term.

The policies encourage the maximisation of land in existing employment locations as well as the use of previously developed land both at Sovereign Harbour and the Town Centre. No greenfield sites are identified for development. Whilst the town centre is not located next to any sensitive sites of biodiversity, Sovereign Harbour may result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.

Development within the town centre is well served by public transport. Development at Sovereign Harbour and the Industrial Estates is likely to be car reliant and may result in increased congestion in areas that are already congested. The quantum of development may make the viability of an improved public transport service more likely in the future.

The increase in development is likely to increase the amount of pollutants, greenhouse gas emissions and waste produced in both construction and operation. The development is also likely to result in an increase in non-renewable forms of energy and other natural resources. However, a larger quantum of development at Sovereign Harbour may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.

The full results and proposed mitigation measures can be found in [Section 9](#) of this report and [Appendix A6](#).

## N.10 Uncertainties and Risks

The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications for development. Specific attention should be given to the uncertain impacts identified when reviewing proposals.

Details of the specific mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed. Monitoring of the impacts will be addressed through the Local Monitoring Report, produced annually.

There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

## N.11 Next Steps

This [Revised Proposed Submission Sustainability Appraisal \(RSA\)](#) Report has been published alongside the Revised Proposed Submission Employment Land Local Plan. The documents are both available on the Council's website at: <http://www.eastbourne.gov.uk/ellp>

The 6 week consultation period will run from **11 December 2015 - 22 January 2016**.

If you would like to comment, representations can be made on-line via the consultation portal or alternatively can be sent by email to: [planning.policy@eastbourne.gov.uk](mailto:planning.policy@eastbourne.gov.uk) or post to:

**Specialist Advisory Team**  
Regeneration & Planning Policy  
1 Grove Road  
Eastbourne  
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Following the consultation period, all responses will be reviewed and taken into consideration. Where appropriate, the Revised Proposed Submission ELLP and Revised Proposed Submission SA will be amended. Should any amendments result in significant changes to the RELLP it may be necessary to undertake further sustainability assessment of the likely significant effects of the proposed changes. Should sustainability assessment be required it will be subjected to additional consultation.

# Revised Proposed Submission **Sustainability Appraisal Report**

## 1 Introduction

- 1.1 This document provides a [Revised Sustainability Appraisal \(RSA\)](#) of Eastbourne Borough Council's Revised Proposed Submission Economic Land Local Plan (RELLP). Once adopted, the [RELLP](#) will replace Policy D2: Economy from the [Core Strategy \(Local Plan\)](#), adopted February 2013, and will provide the detailed planning guidance for development of employment land for the period up to 2027.
- 1.2 The Planning Inspector, Sue Turner, issued her final report to the Council's Core Strategy in November 2012, which recommended that the Council carry out an assessment of current and future levels of need and demand for employment floorspace to inform the production of an Employment Land Local Plan.
- 1.3 [Jam Consult Ltd](#) has been commissioned by Eastbourne Borough Council to undertake the RSA following a review of the Sustainability Appraisal process and reports that have been prepared in relation to the Employment Land Local Plan (ELLP) between 2012 and 2015. The RSA seeks to rectify any flaws in the SA process that have been identified and respond to comments made on the Draft Submission ELLP and SA report published in November 2014.

### 1.2 Why is a Sustainability Appraisal Needed?

- 1.2.1 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.
- 1.2.2 When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.
- 1.2.3 Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the '[National Planning Policy Framework \(NPPF\) 2012](#)' and '[National Planning Practice Guidance \(NPPG\)](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

## 1.3 Background to the ELLP

- 1.3.1 In May 2012, the Eastbourne Core Strategy Local Plan was subject to Public Examination by a Planning Inspector. The Inspector expressed concerns over the evidence that supported Core Strategy Policy D2: Economy, particularly relating to the employment land supply. The Inspector concluded that the evidence lacked clarity and did not demonstrate that Policy D2 is the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne.
- 1.3.2 Furthermore, the Inspector considered that uncertainty about the viability of directing 30,000 sq m of employment floorspace to Sovereign Harbour cast doubt on whether the strategy was deliverable during the Plan period. This raised the question of whether the quantum of office development proposed in the Plan was based on accurate and up to date evidence.
- 1.3.3 The Inspector considered that if the adoption of the Plan were to be delayed to allow for the Plan to be revised, Eastbourne would be left without an up-to-date local plan and the Council would be unable to take a proactive, plan led approach to delivering development. The Planning Inspector issued her final report to the Council's Core Strategy in November 2012, which recommended that the Council carry out an assessment of current and future levels of need and demand for employment floorspace to inform the production of an Employment Land Local Plan.
- 1.3.4 The Inspector concluded:  
*"The evidence on employment land supply lacks clarity and does not demonstrate that Policy D2 is the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne. Furthermore uncertainty about the viability of directing 30,000 sqm of employment floorspace to Sovereign Harbour casts doubts on whether the strategy is deliverable during the plan period. In order to ensure that Policy D2 is soundly based the Council will need to undertake a review of employment land supply and viability testing of proposals for employment development at Sovereign Harbour."*
- 1.3.4 The Revised Proposed Submission Employment Land Local Plan will guide job growth and economic development in Eastbourne up to 2027 by identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a town where people want to live and work. It will specifically relate to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes.
- 1.3.5 The RELLP will form part of the Development Plan for Eastbourne, alongside other planning policy documents such as the Eastbourne Core Strategy Local Plan. The RELLP will replace Core Strategy Policy D2: Economy, but will otherwise have to conform to other policies set out in the Core Strategy Local Plan as well as national planning policy.

## 1.4 Previous Stages of the SA

### Scoping Report

- 1.4.1 The Scoping Report (**Stage A**) sets out the context and scope of the SA in accordance with the regulations and best practice guidance. An initial Scoping Report was prepared for the Core Strategy, which was published in 2005 for consultation and set out the proposed methodology for the SA. The Core Strategy SA framework was therefore used to inform the Scoping Report for the SA of the ELLP, issued in October 2013, as recommended by guidance. The full report can be accessed on the Council's website at <http://www.eastbourne.gov.uk/ellp>
- 1.4.2 The Scoping Report was forwarded to the statutory consultees to ensure that the proposed scope of work was appropriate, including:
- The Environment Agency
  - Natural England
  - English Heritage
- 1.4.3 The neighbouring local authorities and other key stakeholders were also consulted. Responses to the consultation were received from four of the consultees including: the statutory consultees shown above, Sovereign Harbour Ltd and Aldi stores Ltd. Key comments related to:
- The need for greater consideration of the impact on environmental factors and whether the sites provide opportunities for mitigation and enhancement
  - Minor changes to the objectives and indicators
  - Sustainable transport opportunities and accessibility of employment locations
  - The need to reference the Sovereign Harbour SPD, February 2013
  - The need to consider employment space densities, development viability and deliverability
  - The need to consider longevity of economic growth
  - Objection to the consultation being published before all of the evidence was available.

The full responses are provided in [Appendix 2](#) of the [Scoping Report, October 2013](#).

### Initial SA Report

- 1.4.4 An Initial SA Report dated November 2013 was issued for consultation alongside the Proposed Draft Employment Plan December 2013. Consultation was undertaken for twelve weeks between 20 December 2013 and 14 March 2014. A total of 33 representations were received during the consultation from 10 organisations.

The responses raised the following key issues:

- A failure to objectively assess the provision for 3,000 sqm of office space within the Town Centre
- A failure to consider all reasonable alternatives
- Viability constraints in relation to development at Sovereign Harbour
- Concern that the density assumptions used were too high
- Objection to the proposed protection of sites within Industrial estates
- Support for the extension of industrial Estates as a result of developer interest and immediacy of development
- Objection to the restriction of only allowing industrial development within industrial estates
- Support for the proposed ELLP and the need to protect Eastbourne Park and enable larger footplates to be provided.
- The need to protect South Water's infrastructure when undertaking development.

The full responses are provided in the [Statement of Consultation and Representations, November 2014](#), which can be found on the Council's website <http://www.eastbourne.gov.uk/ellp>

## Proposed Submission SA Report

- 1.4.5 The Proposed Submission SA Report dated November 2014 was published for representations alongside the Proposed Submission Employment Land Local Plan December 2014. The 8 week representation period commenced on Friday 12 December 2014 and finished on Friday 6 February 2015. Responses were received from 12 consultees in relation to the ELLP including statutory consultees; the Environment Agency and Natural England.

Only one response was received with specific reference to the SA from Teal Planning on behalf of Sovereign Harbour Ltd. Further details are set out in [Section 3](#) of this report and the full responses can be found in [Appendix A9](#).

## 1.5 What is this Document?

- 1.5.1 This document provides the [Revised Proposed Submission Sustainability Appraisal](#) of the [Revised Proposed Submission Employment Land Local Plan \(RELLP\)](#) or [Stages B and C](#) of the SA process and assesses the options and policies considered in the development of the RELLP. The document provides an appraisal of the RELLP in order to address concerns raised through the consultation process regarding the selection of options and policies that were presented in the Proposed Submission ELLP and SA Report, November 2014.

### 3.. The Employment Land Local Plan

#### 2.1 What is the purpose of the Plan?

2.1.1 Eastbourne Borough Council is preparing an Employment Land Local Plan to guide job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development. The Employment Land Local Plan will form part of the Development Plan for Eastbourne, alongside other planning policy documents such as the Eastbourne Core Strategy Local Plan. The Employment Land Local Plan will replace [Core Strategy Policy D2: Economy](#), but will otherwise have to conform to other policies set out in the Core Strategy Local Plan as well as national planning policy.

#### 2.2 What are the Objectives of the Plan?

The ELLP objectives are set out below.

ELLP1	<b>Stimulate Economic Growth</b> - To stimulate sustainable economic growth to meet the needs of the community within environmental constraints and encourage economic competitiveness through attracting increased investment and new and innovative businesses
ELLP2	<b>Encourage Small and Start-up Businesses</b> - To deliver a variety of new employment opportunities by providing a range of flexible employment spaces that can be used by existing businesses and new start-up businesses
ELLP3	<b>Diversify the Local Economy</b> - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish
ELLP4	<b>Support Existing Businesses</b> - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish’.
ELLP5	<b>Promote Sustainable Employment Locations</b> - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.



### 3.. Sustainability Appraisal Methodology

#### 3.1 Purpose of the Sustainability Appraisal

- 3.1.1 The purpose of Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of RELLP and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. [Appendix 1](#) provides details of how the SEA requirements have been met within the document.

#### 3.2 Planning Policy and Sustainable Development

- 3.2.1 The National Planning Policy Framework (NPPF) was published in March 2012. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Planning policies and decisions must also reflect and, where appropriate, promote relevant EU obligations and statutory requirements.
- 3.2.2 The purpose of the planning system is to contribute to the achievement of sustainable development as defined in the Bruntland definition. The definition of sustainable development is also set out in the UK Sustainable development Strategy 'Securing the future - delivering the UK Sustainable Development Strategy, 2005'. The document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development:
- Living within environmental limits
  - Ensuring a strong, healthy and just society
  - Achieving a sustainable economy
  - Promoting good governance
  - Using sound science responsibly

The Strategy also gives the following priorities for action:

- Sustainable consumption and production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities.

#### 3.3 The Sustainability Appraisal Process

- 3.3.1 The Revised Sustainability Appraisal of the RELLP has been carried out by Jam consult Ltd in consultation with Council officers, in accordance with the relevant Regulations and Government policy and guidance, as set out below:
- European Directive 2001/42/EC (The Strategic Environmental Assessment Directive)
  - EC Guidance on the SEA Directive – Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment, September 2003
  - Environmental Assessment of Plans and Programmes Regulations 2004, Section 12
  - The Planning and Compulsory Purchase Act 2004, Section 19(5)
  - Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, Planning Inspectorate, August 2009 and update February 2010
  - Local Development Frameworks: Examining Development Plan Documents – Learning from Experience, September 2009
  - National Planning Policy Framework (NPPF), 2012
  - National Planning Practice Guidance (NPPG)

### 3.4 Stages of the SA Process

3.4.1 The NPPG sets out the stages that should be followed when carrying out a Sustainability Appraisal in relation to the plan preparation as set out below. The RSA covers Stages B and C of the process.

Sustainability Appraisal Stages	ELLP Preparation
<b>STAGE A: SCOPING REPORT</b>	
A1: Identify other relevant plans, programmes and sustainability objectives	<b>Evidence gathering and engagement</b>
A2: Collect baseline information	
A3: Identify sustainability issues and problems	
A4: Develop SA framework, including objectives, indicators and targets	
A5: Consult the consultation bodies on the Scope of the SA report	
<b>STAGE B: DRAFT SUSTAINABILITY REPORT</b>	<b>Consult on draft ELLP</b>
B1: Test the plan objectives against the Sustainability Appraisal framework	
B2: Develop the plan options including reasonable alternatives	
B3: Evaluate the likely effects of the plan and alternatives	
B4: Consider ways of mitigating adverse effects and maximising beneficial effects	
B5: Propose measures to monitor the significant effects of implementing the plan	
<b>STAGE C: PREPARE THE SA REPORT</b>	Prepare the publication version of the ELLP
C1: Prepare the Sustainability Appraisal Report	
<b>STAGE D: CONSULT ON THE SA REPORT</b>	<b>CONSULT ON THE ELLP</b>
D1: Consult on the draft plan and SA Report	Submit draft ELLP and supporting documents for Examination
D2: Assess any significant changes as a result of the consultation	Outcome of Examination - consider implications for SA
D3: Finalise Sustainability Report	<b>Local Plan Adopted</b>
<b>STAGE E: POST ADOPTION REPORTING AND MONITORING</b>	<b>Monitor and Report on the implementation of the ELLP</b>
E1: Prepare and publish post-adoption statement	
E2: Monitor significant effects of implementing the plan	
E3: Respond to adverse effects	

### 3.5 Method of Assessment

3.5.1 The RELLP has been assessed against the SA framework to establish the likely significant effects, both positive and negative, of the policies. The SA framework sets out the Sustainability Objectives, Indicators and Targets, which are used to assess the likely impacts of the plan. The SA framework is based on the framework developed to assess the Core Strategy with the addition of objectives and indicators of relevance to the ELLP. The SA framework has been developed in consultation with the statutory consultees and other key local stakeholders.

3.5.3 The SA predicts the likely significant effects of the RELLP, including alternatives, and then evaluates the effects of the plan. The assessment is carried out in the form of a matrix and includes the identification of potential mitigation measures. The assessment has included the prediction and evaluation of the likely significant effects including:

- short, medium and long term effects
- temporary and permanent, direct and indirect effects
- cumulative or synergistic effects
- consideration of mitigation measures
- proposals to monitor the effects of the plan

The results will be scored as follows:

Major Positive	++
Minor Positive	+
Uncertain	?
Minor Negative	-
Major Negative	--
No Significant Impact	

3.5.3 A commentary accompanies the matrix to explain the reasons for the scoring. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary effects. The assessment of alternative options includes a clear audit trail of the details for selection and rejection in order to document a transparent approach.

3.5.4 The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the area too small to support the species at all.

## 3.6 Results of Consultation

- 3.6.1 A wide range of consultation measures has informed the development of the RELLP, from the initial inception of the development of options to the specific policies.

Consultation has been undertaken on the following documents:

- Scoping Report for the Core Strategy, 2005
- Scoping Report of ELLP, October 2013
- Consultation Draft of the ELLP, November 2013
- Initial Sustainability Appraisal, November 2013
- Proposed Submission ELLP, November 2014
- Proposed Submission SA Report, November 2014

- 3.6.2 Formal consultation has been undertaken by EBC in line with regulatory and best practice guidance in relation to the plan making and associated Sustainability Appraisal process. The consultees included the Statutory Consultees: Natural England; The Environment Agency; and English Heritage, as well as key local stakeholders. Full details of the consultation measures undertaken, and responses received, are set out within the [Statement of Consultation and Representations, November 2014](#).

- 3.6.3 The representations made in relation to the [Scoping Report, 2013](#) can be found at [Appendix 2](#) of the Scoping Report. The responses to the Proposed Submission SA are provided at Appendix A9 of this report. The Revised SA has taken all the representations into account in the assessment, to make sure that the issues raised have been properly addressed.

### [Summary of Representations on the Proposed Submission SA, November 2014](#)

- 3.6.4 A total of 12 representations were received to the consultation on the ELLP and SA including responses from the statutory consultees; the Environment Agency and Natural England.

The [Environment Agency](#) (EA) did not identify any issues of soundness with regard to the plan. The sites identified in the Town Centre and Sovereign Harbour locations as well as the intensification (no expansion) of the existing industrial estates have no fluvial or tidal flood risk aspects, which the EA considers would affect their deliverability. Business uses (B1,B2,B8) are considered as 'less vulnerable' development types and are compatible uses in flood zone 3 areas subject to sequential and exception test requirements as defined in the National Planning Policy Guidance.

- 3.6.5 [Natural England](#) (NE) supports the policy to use the existing industrial estates, town centre and available space within Sovereign Harbour. NE also welcomes the commitment to maintain Eastbourne Park as a "green heart" of the town.

- 3.6.6 Eastbourne falls within the buffer zones of several SSSI, including the internationally important site of Pevensey Levels. The industrial estates mostly border the Eastbourne, Langney and Willingdon Levels, which link hydrologically to Pevensey so industrial uses which may create significant run-off or discharge into ditches need to be carefully considered and include appropriate measures to protect water courses. Care should also be taken that development at Sovereign Harbour does not impact on the nearby areas of vegetated shingle. Eastbourne also falls within buffer zones for the South Downs National Park and any significant landscape impact, such as wind turbines, also needs to be assessed. The Plan does not anticipate the need for any widespread increases in infrastructure provision; however, any local proposals will need to be assessed on an individual basis.

3.6.7 Only one specific representation was received in relation to the Proposed Submission SA of the ELLP, which was made by Teal Planning on behalf of Sovereign Harbour Ltd and raised the following key concerns:

- A failure to assess all reasonable alternatives
- Inaccurate and inconsistent scoring
- A flawed approach - the SA does not secure the most sustainable, deliverable option
- The conclusions do not translate back
- The reduction in town centre stock has not been taken into consideration
- The justification for 3,000 sqm in the town centre has not been established
- A failure to test alternative floorspace figures or mix of employment at Sovereign Harbour
- Issues regarding transport capacity at Sovereign Harbour and the viability of the Quality Bus Corridor
- The allocation will lead to an inappropriate balance of development at Sovereign Harbour, which will lead to negative sustainability effects

The full responses can be found in [Appendix A9](#).

## 3.7 Review of the SA Process

3.7.1 As a consequence of the representation received from Teal Planning, EBC commissioned Jam Consult Ltd to undertake a review of the SA process in support of the ELLP. The review of the sustainability appraisals and supporting documents found that a considerable amount of work has been undertaken, the majority of which supports a robust plan. Some defects in the SA process, however, were identified, which needed to be corrected if the evidence base for the ELLP was to be considered suitably robust when subjected to Examination in Public (EiP).

3.7.2 In particular, the review found the assessment of options should be revisited in respect of the representations received, with specific reference to the quantum of office space that should be provided in the Town Centre and at Sovereign Harbour. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence. The revised SA would also enable greater clarity to be provided on the reasons for the selection and rejection of alternatives.

3.7.3 The review also recommended that the numerical scoring of the assessment be removed. Guidance on SA recommends the quantitative or qualitative prediction of effects. However, the guidance recognises that quantitative predictions are not always practicable and that broad brushed qualitative predictions expressed as very positive (++) to very negative (--) can be more effective. The introduction of numerical scoring into the matrix adds further confusion to the assessment given the number and range of different effects and varying levels of information available, which can be misleading.

3.7.4 It was therefore recommended that the SA be revisited to take into consideration the representations received in order to ensure a robust process. The numerical scoring system has been removed as recommended and instead the assessment provides a commentary, which links to supporting evidence. The assessment of options and policies has also been reviewed and a further assessment carried out, as set out in [Section 8](#) of the report and the [Appendices](#).

### 3.8 Difficulties encountered in carrying out the SA

- 3.8.1 The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development.
- 3.8.2 Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications. Specific attention should be given to the uncertain impacts identified when considering the planning applications. Details of the proposed mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed.
- 3.8.3 Monitoring of the impacts will be addressed through the Local Monitoring Report (LMR). There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

## 4 Baseline and Context

### 4.1 Links to other policies and programmes

A detailed review of the policies, plans and programmes, which could influence the ELLP and its Sustainability Appraisal are set out in the [Scoping Report 2013, Appendix 3](#). A summary of the information is included for ease of reference in [Appendix A2](#) of this report,

### 4.2 Changes to baseline Information

Changes to the baseline information since the Proposed Submission SA November 2014 include:

- The National Planning Practice Guidance (NPPG) which has now replaced the ODPM guidance on SA/SEA. The guidance is provided online and is updated regularly.
- The population forecasts have been revised upwards since the previous SA, which is reflected in the information below.

### 4.3 Summary of updated baseline information

- 4.3.1 An extensive search for baseline data was undertaken at the SA scoping stage, which was updated at the previous stages of the SA. The baseline information provides the basis for predicting and monitoring the environmental and sustainability effects of planning policy. A summary of the updated baseline information is provided below. Further information on the baseline data can be found in the [Scoping Report 2013, Appendix 4](#).

#### Population

- 4.3.2 Eastbourne's population has been growing over recent years and reached 101,547 in 2014 (ONS Mid-2014 Population Estimates), with the rate of growth 8.3% since 2004, compared to an increase of 6.4% for East Sussex as a whole. It is estimated that this growth will continue over the next 20 years, with an estimated population of 110,348 in 2027 and 117,797 in 2037 (ONS Population projections trend base 2012-37, May 2014).

#### Workforce and Economic Activity

- 4.3.3 The proportion of Eastbourne's population that is of working age has been declining slightly over recent years to 59%, with the overall workforce projected to decrease by approximately 1.9% up to 2027. A high proportion of Eastbourne's working age population (approximately 67%) is economically active which has fallen slightly over recent years but is only slightly below the average for England and Wales of approximately 70%. Unemployment is a problem in the town with 11.3% of the working age population claiming benefits in February 2015 compared to 9.4% for East Sussex. The unemployment rate has increased since 2010 from 6.7% to 7.1% in 2014, which compares to 5.0% for East Sussex. A higher than average percentage of economically inactive people want a job, but the rate of economically active people who are unemployed, and the rate of people claiming jobseekers allowance in Eastbourne is second only to Hastings in East Sussex.

#### Deprivation and Earnings

- 4.3.4 The residence-based average earnings in Eastbourne are lower than average, but the work-place based average earnings in Eastbourne are higher than average. This would suggest that many of the better paid jobs are occupied by people who live outside of Eastbourne. Eastbourne has relatively high levels of economic deprivation when compared to the rest of East Sussex, which could be related to the lower than average income. Over one third of households in Eastbourne are considered to be in 'poverty' and there is a high rate of personal insolvencies.

### Employment Land and Premises

- 4.3.5 Eastbourne has seven designated Industrial Estates located in three broad areas, covering a total of approximately 72 hectares. In addition, there are employment uses in the Town Centre and a number of other smaller estates scattered around the town. There are approximately 2,900 commercial premises in Eastbourne, of which approximately 11% are located on designated industrial estates. It is estimated that 10% of the commercial premises in Eastbourne are vacant.
- 4.3.6 There has been a net increase in employment land over the past ten years, although this has been mainly due to redevelopment on the Brampton Road, Courtlands Road and Highfield Industrial Estates in the mid-2000s. There has been an overall increase in the amount of Storage and Distribution uses, however there has been a net loss of all other employment uses. There has been a particularly significant loss in Office uses in the last two years.
- 4.3.7 There is a small amount of employment land committed, the majority of which is within Light Industry and Storage & Distribution uses. Until recent years the amount of employment land lost to residential had not been particularly significant. However, amount of employment land, particularly Office use lost to residential has increased recently due to the recent changes to the Permitted Development rights. There was a significant loss in 2014/15 when the total amount of employment land lost in the financial year (4,826 sqm) was equivalent to the total losses over the previous nine years (**Source: Local Monitoring Data**). The trend of employment land being lost to residential use is expected to continue over coming years following the Government's recent announcement to make the temporary changes to Permitted Development Rights from office to residential use permanent.

### Business Enterprises

- 4.3.8 Businesses in Eastbourne tend to be smaller enterprises employing less than five people and turning over less than £250k per year, with approximately 64% of businesses falling into this category in 2014. There was a net decrease in the number of business enterprises in Eastbourne in 2011, and the rate of new business registrations per capita is low compared to other areas. Although the number of enterprises increased slightly in 2014, the figure is still below 2010 levels. Over half of business enterprises in Eastbourne have been running for less than 10 years. There is a lack of large business in the town with only 10 that employ 250 people or more, and 50 businesses that turn over £5 million or more.
- 4.3.9 Around 18% of businesses in Eastbourne have been looking to relocate or expect to in the next two years, and the vast majority are looking to stay within Eastbourne. There is high demand for office space and some demand for light industrial space, but there doesn't appear to be significant demand for heavy industrial or warehouse space from the businesses looking to relocate.

### Economic Performance

- 4.3.10 The indicators show that Economic Performance of Eastbourne is relatively poor. The value of goods and services in Eastbourne can be measured through Gross Value Added (GVA) and the figure for Eastbourne in 2013 was £1644.6 million, although GVA per capita is lower in Eastbourne than the Great Britain average. The GVA forecast for 2015 is £1721.80 million with £1901.3 million forecast for 2020 and £2097.2 million for 2025. In addition, Eastbourne has very poor economic competitiveness and poor productivity. However Eastbourne has seemed to cope with the recession better than a number of areas and performs well in terms of the short-term change in number of employees compared to the national average, and has experienced an overall increase in GVA per capita since 2001.
- 4.3.11 Businesses in Eastbourne are optimistic about their future prospects. 54.1% of businesses in Eastbourne expect the market for their goods/services to be growing steadily over the next 2-3 years, with the proportion of businesses of this view increasing over recent years. In addition, 44.2% of businesses expect to take on more staff in the next 2-3 years. There is confidence that businesses can grow in the next three to five years, with 64.5% aiming to grow. Also, nearly 20% are looking to expand their geographical markets. (**Source: East Sussex Business Survey 2014**).



## Employment

- 4.3.12 Employment in the public sector in Eastbourne is high, and this could be related to the high proportion of people employed within Public Admin, Education and Health Industries. Employment in creative industries is relatively low. In terms of occupations, the most common is Professional occupations despite the proportion of people employed in these occupations falling over recent years. Although it is the least common occupation, Process, Plant and Machine Operative occupations have seen a significant increase since 2004. Eastbourne has a comparably high number employed in sales and customer service occupations followed by administrative and secretarial occupations.
- 4.3.13 Around 6.8% of Eastbourne's population are unemployed, which compares to 6.5% for East Sussex, 5.9% for the South East and 8.1% for Great Britain. In addition, 13.7% are classified as out of work within Eastbourne, compared to 11.7% in East Sussex, 8.8% in the South East and 12.5% for Great Britain. In total the proportion of the working age population in Eastbourne, which is economically inactive is 19.8%, however, 40.3 % of the inactive resident population are looking for work.

## Transport

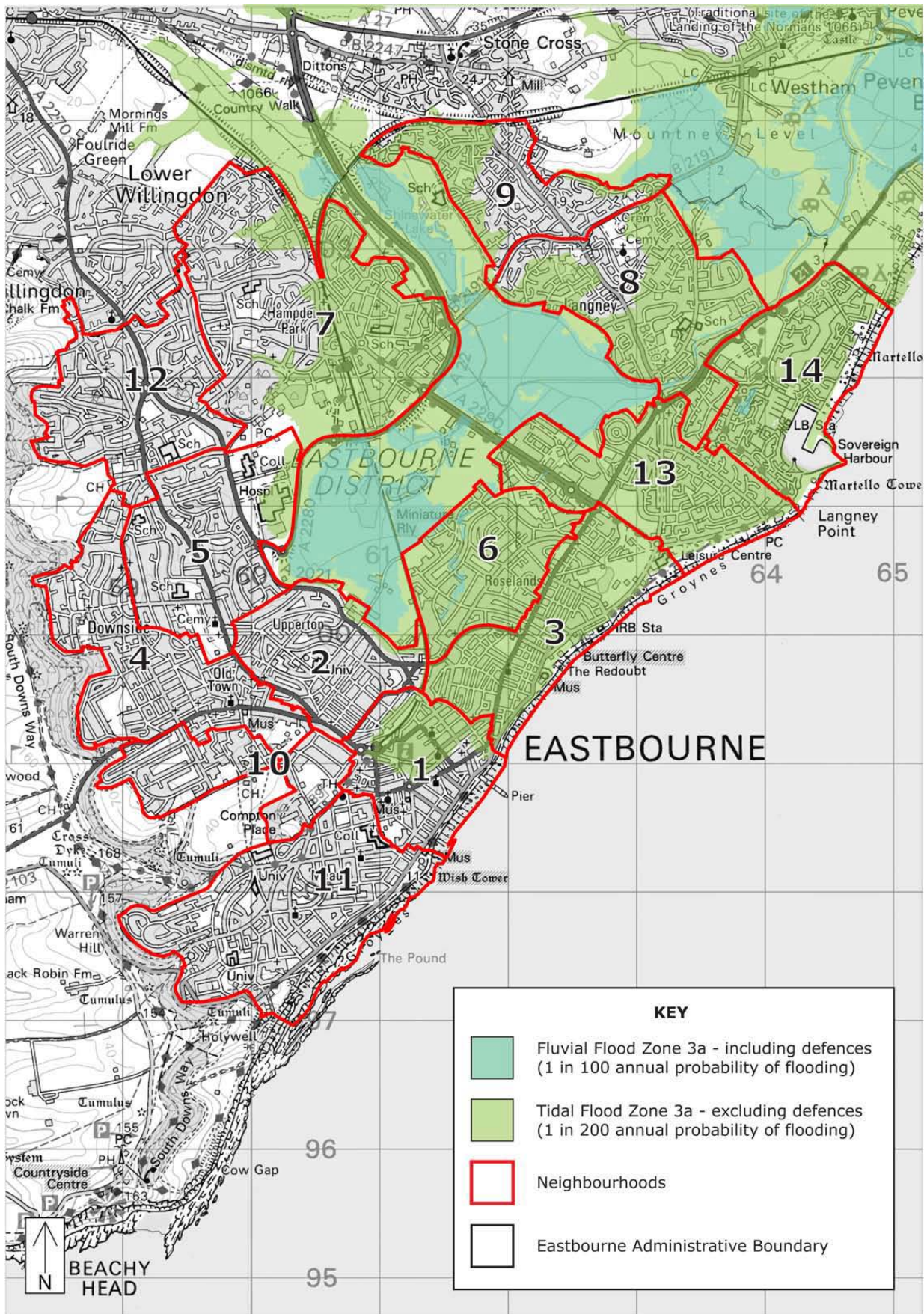
- 4.3.14 Eastbourne is still very car-reliant, despite the fact that much of Eastbourne's population lives locally. Public transport is not well used by working people on their journeys to work (11.4%), and the number of those working from home is not as common in Eastbourne (9.5%) as it is across the rest of the County (13.1%). In 2011, there was a net commute of -561 people commuting out of Eastbourne to work.
- 4.3.15 There are a significant proportion of households (29% 2011) that do not have a car, second only to Hastings in East Sussex. There are 46,658 vehicles in Eastbourne, averaging just over 1 vehicle per household, the majority of which are in the lower CO<sub>2</sub> emissions groups.

## Hydrology

- 4.3.16 Significant parts of Eastbourne are at risk of flooding. Over a third of the built-up area is within a high flood risk zone, as is the majority of Eastbourne Park, which also includes considerable areas of functional floodplain. The Sovereign Harbour neighbourhood also lies within Tidal Flood Zone 3a (1 in 200 annual probability of flooding) ([Flood risk map overleaf](#))
- 4.3.17 Water quality in Eastbourne was considered to be good in 2013 as 100% of the river lengths in Eastbourne were classified as of high or good quality in terms of biological status. The overall status of water bodies in the Cuckmere and Pevensey Levels catchment area gives an indication of the water quality in the area. The majority of the water bodies are of moderate quality.

## Resource Use

- 4.3.18 Overall, resource use in Eastbourne is lower than average and has been falling over recent years. Resource use from commercial and industrial consumers, however, is relatively high, especially electricity consumption which has been rising over recent years despite the overall reduction. A third of businesses have accessed advice on reducing energy costs, indicating that there is awareness regarding resource use and the potential issues regarding future supply and costs.
- 4.3.19 Carbon dioxide emissions in Eastbourne have been falling over recent years and are lower than the average at 4.4t p/sector compared to 5.4 t for East Sussex. Freight road transport energy consumption is low compared to other areas of East Sussex, and there is a lower percentage of registered vehicles in the higher emission groups compared to the rest of the county.



Eastbourne Areas of Flood Risk

### Biodiversity and Habitats

- 4.3.20 Over 40% of the Borough is within the South Downs National Park, and approximately 8.5% of the Borough is in a Site of Special Scientific Interest. Approximately 40% of the Borough is also subject to an Environmental Stewardship Agreement.
- 4.3.21 There are large areas of 'Coastal & floodplain grazing marsh', 'Deciduous woodland' and 'Lowland calcareous grassland' habitats in Eastbourne. There are also 196 records of protected species, 1052 records of Biodiversity Action Plan species, 1403 records of rare species and 993 records of notable birds.
- 4.3.22 Nearly two thirds of Eastbourne is part of an identified habitat in the Biodiversity Assessment, although the majority of this area is within Eastbourne Park and the Downs land. 21.15% of the built up area is within an identified habitat area in the Biodiversity Assessment.

### Landscape

- 4.3.23 Eastbourne Borough includes areas that are considered to be areas of relative remoteness and areas of exceptional remoteness, although these are located on the Downland. Six landscape character types have been identified in Eastbourne: Open Downland, Major Scarps, Scarp footslopes, the Levels, Rugged Coast and Smooth Coastal Strip.

### Difficulties and limitation of baseline data

- 4.3.24 The collection of data for an SA is an on-going exercise, and will need to continue to be reviewed as part of the monitoring exercise. The data that is presented in this SA Report is considered as up to date as possible and sufficient to determine the key sustainability issues for the Employment Land Local Plan.
- 4.3.25 Outstanding data was identified in terms of up to date statistics on flow data for travel to work. This data was collected during the 2011 Census and has now been updated.
- 4.3.26 It should be noted that in the long-term, the requirement to monitor the sustainability of the Employment Land Local Plan will provide further detailed and focused baseline information for use in subsequent Sustainability Appraisals and revisions and amendments to Local Plan policies.

## 5 Sustainability Issues and Objectives

### 5.1 Sustainability Issues for the Plan

5.1.1 The key sustainability issues that need to be considered in the Employment Land Local Plan and its Sustainability Appraisal have been identified through the PPPSI review and the analysis of the baseline data, including consideration of the recent information as mentioned above. Of particular relevance has been the Employment Land Review document and subsequent alterations and updates prepared by Bilfinger GVA including:

- Employment Land Review, October 2013
- Employment Land Supplementary Evidence, November 2014
- Viability Briefing Note, May 2014
- Eastbourne Office Deliverability Assessment, October 2015

### ECONOMIC ISSUES

#### Economic Growth

5.1.2 The Eastbourne economy is underperforming, although there is optimism amongst businesses and there have been signs that the economy has coped reasonably well with the recession. The Employment Land Local Plan should plan for sustainable economic growth in Eastbourne by setting out a clear economic vision and strategy, and encourage economic competitiveness through attracting increased investment and new and innovative businesses, whilst supporting the existing sectors within the town.

#### Employment Land

5.1.3 The Employment Land Review, 2013 shows that the following quantum of development is needed:

Office	20,766 sqm
Industrial	11,467 sqm
Warehouse	7,339 sqm

This equates to a total of **39,572** sqm (43,000 sqm gross) and is a reduction on the Core Strategy figures of 55,430 sqm (63,600 sqm gross).

#### Office Space

5.1.4 Office space is defined in the NPPF as a 'Town Centre use' and would be appropriate as part of a mix of uses on sites identified for development in the Town Centre Local Plan. However, the quantum of office space that should be provided in the Town Centre is not identified in the Town Centre Local Plan. The Employment Land Local Plan should identify the amount of office floorspace that would be appropriate to be delivered in the Town Centre. The ELLP should also maintain the vitality and viability of the Town Centre.

5.1.5 Approximately 90% (c. 93,000 sqm - ELR Supplementary Report, Nov. 2014) of the existing office stock in Eastbourne is located within the Town Centre. This is an unusual concentration of office activity in the Town Centre compared to out-of-town locations, which does not fully reflect or respond to market signals. The Employment Land Local Plan should help to re-balance office provision to help attract office occupiers whose needs are not currently catered for.

5.1.6 BGVA's Office Deliverability Assessment 2015 considers that it is unlikely that the delivery of office space outside the town centre would harm the viability or vitality of Eastbourne Town Centre. Instead, it is more likely that providing a greater range and choice of location will enhance the economic prospects of the borough as a whole, which in turn will have positive benefits for the town centre. In addition, a new out of town offer will need to be of a sufficient scale in order to make a significant impact in the market and create a cluster of activity that can become self-sustaining.

- 5.1.7 Sovereign Harbour will benefit from the catalytic impact of the Innovation Park, which will help establish the area as a new economic hub, allowing a larger cluster to be developed around this first phase. A failure to protect employment land at Sovereign Harbour, however, is likely to result in the loss of a major opportunity to make a 'step change' in the market positioning of the borough.

### Industrial Land

- 5.1.8 The ELR showed that there is a finite resource of developable land within the borough and therefore the retention and improvement of existing industrial estates and sites is vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the borough's future potential.
- 5.1.9 The market for industrial property has also shown signs of improvement recently, with the increase in demand and known requirements within the market outstripping the availability of good quality space.

### Residential Development

- 5.1.10 There is a high demand for residential development in Eastbourne, which means that land is more likely to come forward for residential development than employment development. The Town Centre Local Plan also identifies the need to provide 450 net residential units across the Development Opportunity Sites. Any office provision within the town centre will need to ensure that the ability of the Town Centre to meet its housing requirements is not compromised.
- 5.1.11 A significant amount of employment land has been identified as having potential for residential development and may be lost over the plan period. In addition, the relaxation of permitted development rights has resulted in the loss of additional office space. The Employment Land Local Plan should take account of identified losses of employment land and plan for its replacement. In addition, Eastbourne has a limited number of existing employment locations, therefore the Employment Land Local Plan should maximise the use of existing employment land through redevelopment and intensification, where appropriate.

### Types of Business

- 5.1.12 Eastbourne's economy is reliant on the public sector. The Employment Land Local Plan should encourage diversification of jobs and businesses by providing suitable and flexible employment space that could be used by a range of different businesses. There has been a decrease in the number of business enterprises in Eastbourne. The Employment Land Local Plan should support the retention of businesses in Eastbourne by providing employment land where they can relocate, which will create churn and allow other businesses to find more appropriate business space.

### New Business

- 5.1.13 The rate of new business registrations per capita is low compared to other areas. The Employment Land Local Plan should encourage businesses to start-up and locate in Eastbourne by providing additional employment land that is appropriate to business needs. It should also provide flexible spaces for small and start-up businesses.

### Employment

- 5.1.14 The number of jobs in Eastbourne has increased over the last few years following an increase between 2009 and 2011, with 0.79 jobs per Eastbourne resident of working age. The Employment Land Local Plan should increase the number of jobs and breadth of employment opportunities. Eastbourne has a net loss of workers to other areas. The Employment Land Local Plan should provide sufficient opportunities for employment development that will retain workers in Eastbourne. The Employment Land Local Plan should ensure that existing employment space is suitable for business needs, and where existing space is not, should allow redevelopment or refurbishment to raise it to appropriate standards.

### Occupier Density

- 5.1.15 The Employment Land Local Plan should take into account changing employment densities and the potential of new development to accommodate more employees within less floorspace, in line with the HCA's Employment Density Guide. BGVA's Employment Land Supplementary Evidence, November 2014 assessed whether the identified general office density of 12sqm per employee was appropriate in response to representations. The assessment concluded that based on the ELR, the assumption of an occupier density of 12sqm per employee was appropriate for the potential growth sectors identified for Eastbourne.

### Viability

- 5.1.16 In identifying sites for employment development, the Employment Land Local Plan should take account of viability issues to ensure that development comes forward and to avoid the long-term protection where there is no reasonable prospect of a site being used for employment development, in accordance with the NPPF.
- 5.1.17 The Sovereign Harbour SPD identifies that there are potential viability issues associated with delivering development on the remaining sites in Sovereign Harbour. There is a requirement for all development sites to contribute to harbour infrastructure costs in Sovereign Harbour, as previous development has done in the past. In addition, development will need to be able to cover the costs associated with providing new infrastructure, services and facilities, such as the need to increase the capacity of the electricity supply to cater for further development, to provide additional sewerage capacity and to provide community facilities. Options to improve the viability of development by assisting in funding the infrastructure requirements should also be investigated.
- 5.1.18 BGVA produced a viability briefing note in May 2014, which set out a high level assessment of the viability of industrial land in Eastbourne through the use of an illustrative development scenario. The assessment showed that sites protected for B1/B2/B8 activity can be shown to be viable for the purposes of planning.
- 5.1.19 BGVA's Supplementary Evidence Report, November 2014 also considered the viability of development at Sovereign Harbour in response to representations received. The assessment showed that there was an expected negative residual value, representing 5.6% of development costs and 6% of development value, which would suggest that immediate delivery of commercial floorspace may be challenged. However, a sensitivity analysis of differences in core construction costs and rent levels showed that a viable development could be achieved as a result of higher rents or reduced construction costs. The report also showed that the Innovation Park could provide a catalyst for economic activity rather than a constraint on economic activity.
- 5.1.20 The Eastbourne Office Deliverability Assessment Report, October 2015, examined the issue of viability further, in relation to development within the Town Centre or Out of Town (i.e. Sovereign Harbour). The results showed that whilst development in both locations is likely to have a negative residual value, the town centre scheme was less viable at 118% lower than the out of town schemes. The analysis also didn't include land costs, which are likely to be higher in the Town Centre, making town centre development even less viable.

### Accessibility

- 5.1.21 In identifying sites for employment development, the Employment Land Local Plan should consider the accessibility of locations to local residents and commuters, and the established local business links that can be enhanced and improved. Connectivity is a weakness for Eastbourne due to its distance from major economic hubs of the South East and the quality of the road and rail network. There are also internal problems, particularly at Lottbridge Drove where there is congestion at peak time. These challenges act as a brake on the potential of the local market to attract occupiers and inward investment.

## SOCIAL ISSUES

### Economic Deprivation

- 5.1.22 Eastbourne has relatively high levels of economic deprivation and a number of households are considered to be in 'poverty', with 5 Super Output Areas in the top 10% most deprived areas in employment in England. The Employment Land Local Plan should aim to reduce economic deprivation by supporting businesses to provide a wide range of additional job opportunities appropriate to a range of skill levels.
- 5.1.23 Residents of Eastbourne have low average incomes and many of the better paid jobs are occupied by people travelling into the town from other areas. The Employment Land Local Plan should aim to increase average income by providing additional and a more diverse range of employment opportunities for local people. Unemployment is also an issue in Eastbourne. The Employment Land Local Plan should seek to enhance the number of job opportunities available in the town.

### Education and Skills

- 5.1.24 Since 2007, Eastbourne has improved its skills base and is becoming more qualified. 52% of the population in Eastbourne in 2011 achieved NVQ level 3 and above compared to 51.5% in East Sussex, 56.7 % in the South East, and 52.7% in Great Britain. However, the percentage of high-level professionals living in Eastbourne is lower than the county, region and national levels at 39.6%. The area also has lower labour productivity, which is evidenced in earnings significantly below average earnings for the South East and Great Britain.

### Travel

- 5.1.25 Despite a falling trend, a large number of people travel to work by private car, even though they travel relatively short distances. The Employment Land Local Plan should encourage people to travel to work by sustainable modes of transport such as walking, cycling and public transport. The Employment Land Local Plan should contribute to the sustainability of Eastbourne's neighbourhoods by meeting the needs of local communities and providing a choice of local employment opportunities.

## ENVIRONMENTAL ISSUES

### Flood Risk

- 5.1.26 Approximately 30% of Eastbourne's built up area and all of the area in the centre of Eastbourne Park is within Tidal Flood Zone 3a. This includes the Sovereign Harbour neighbourhood, the eastern Town Centre and all of the town's industrial estates. Large areas of Eastbourne are in zones of Flood Risk.
- 5.1.27 There should be a sequential approach to considering lower risk areas first for employment development before higher risk areas are considered. The Employment Land Local Plan should also ensure that new employment development is not located in areas of unacceptable flood risk, and that new employment development does not have an adverse effect on water bodies or increase the risk of flooding elsewhere. Development will also need to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water drainage, in accordance with Core Strategy D9: Natural Environment.

### Biodiversity

- 5.1.28 There are a number of identified biodiversity habitats and networks in Eastbourne, and the Employment Land Local Plan should ensure biodiversity is not adversely affected by development, and should take a precautionary approach to avoiding biodiversity loss. It should also ensure that any employment development properly assesses the impact of development on biodiversity, and consider whether the sites present opportunities for mitigation and enhancement.

5.1.29 Eastbourne Park is the most significant area of open space and biodiversity in the Borough. The Park is a flat, low-lying landscape of approximately 400 hectares of grazed wetland at the centre of Eastbourne, which provides a 'green heart' for the town and an important asset for the residents and visitors of Eastbourne. The Park's primary role is as an essential flood storage area with a fundamental role in mitigating the effects on flooding on many of the surrounding built environment. Eastbourne Park has been almost completely surrounded by urban development following the town's expansion over recent years and it is vital that the Park itself is protected from encroachment from inappropriate development if it is to continue to function effectively as an important area of ecology, and as a flood storage and mitigation area.

### Landscape

5.1.30 Eastbourne has a unique landscape, particularly views to the South Downs and across Eastbourne Park, and the Employment Land Local Plan should ensure that the landscape is protected by only identifying locations for employment development that have sufficient capacity in landscape terms to accommodate such development.

### Energy Resources

5.1.31 Overall, resource use has fallen in Eastbourne, apart from at commercial and industrial premises, which has risen over recent years. The Employment Land Local Plan should take forward all reasonable opportunities to encourage employment development that is energy efficient to improve the energy performance of commercial buildings. This will also help to reduce emissions and improve air quality.

### Noise

5.1.32 Noise could potentially be an issue with employment land, and the Employment Land Local Plan should ensure that new employment development does not generate excessive noise that would have an impact on residential areas or tranquil areas.

### Infrastructure

5.1.33 As part of development proposed on the remaining sites at Sovereign Harbour, new and/or improved sewerage infrastructure may be required before additional flows from a new development can be accommodated.

### Sustainable Design

5.1.34 Any development should have regard to the Sustainable Building Design Supplementary Planning Document (SPD), which provides detailed guidance on the acceptable design of development. The SPD expands upon the sustainability policies in the Eastbourne Core Strategy Local Plan and requires all planning applications to demonstrate that the development proposed is as sustainable as possible. The SPD is designed to assist applicants in the consideration of a number of sustainable initiatives including:

- the incorporation of energy reduction measures
- renewable energy measures
- minimisation of water consumption
- reducing the risk of flooding and surface water run-off
- Improving waste recycling
- Improving air quality
- Using sustainable transport options
- Provision and protection of wildlife habitats.



## 5.2 Sustainability Objectives for the Plan

The Sustainability Objectives for the plan include the Core Strategy sustainability objectives as well as specific objectives of relevance to the ELLP as set out below. A review of the sustainability objectives was undertaken and an additional objective added on infrastructure - EL16.

Ref	SUSTAINABILITY OBJECTIVES
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work
CS5	<b>CRIME</b> To reduce crime and the fear of crime
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance

Ref	SUSTAINABILITY OBJECTIVES
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To ensure streets and public places are clean, safe and attractive
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne
EL8	<b>LINKAGES</b> To improve local business linkages
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network

Ref	SUSTAINABILITY OBJECTIVES
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth

### 5.3 Compatibility Assessment

5.3.1 In order to ensure that the Sustainability Objectives are compatible a compatibility assessment was carried out which found the objectives to be broadly compatible or neutral (no link) with a couple of potential incompatible objectives identified.

The objectives where there is potential incompatibility are CS19 Climate Change and CS21 Waste. The potential areas of incompatibility are objectives:

- CS1 Homes
- CS8 Economy
- CS9 Economic Growth
- CS10 Economics

5.3.2 The building of new homes and businesses is likely to have a negative impact on climate change owing to the increases in CO<sub>2</sub> emissions that will result. However such impacts should be able to be mitigated through the design and approach to development, which will be managed by the development management policies, in particular:

- Policy D1 Sustainable Development
- Policy D5 Housing
- Policy D8 Sustainable Travel

5.3.3 Similarly the building of new homes and economic growth is likely to increase the amount of waste produced for disposal. Again such impacts should be able to be mitigated through the design process in particular the application of Policy D1 Sustainable Development, including the conservation of scarce resources, the utilisation of sustainable construction techniques and site waste management practices.

5.3.4 Where uncertain relationships are shown, the likely impact could be positive or negative depending on implementation. These impacts have been shown to highlight any potential incompatibilities.

The full assessment can be found in [Appendix A5](#).

## 6 Sustainability Appraisal Framework

### 6.1 The SA Framework

6.1.1 The SA Framework for the Employment Land Local Plan was developed during [Stage A](#) of the SA process and was set out in the SA Scoping Report 2005 and 2013. The SA Framework consists of a series of sustainability objectives and sub-objectives supported by indicators, which form the assessment criteria.

6.1.2 The SA Framework for the Core Strategy has been used as the starting point for the assessment in accordance with guidance. The SA framework has been reviewed and, where appropriate, specific objectives and indicators relevant to the ELLP have been added. The SA Framework therefore contains the existing Sustainability Objectives from the Core Strategy as well as a set of new Sustainability Objectives that are specifically relevant to the Employment Land Local Plan and set out in the Previous SA reports for the ELLP.

### 6.2 Revisions to the SA Framework

6.2.1 The review of the SA Framework revealed that objectives and indicators in relation to the capacity and supply of infrastructure had not been included in the previous SAs. An additional objective and indicators have therefore been added to address these issues. The additional objectives and indicators are as follows:

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
EL 16	<p><b>INFRASTRUCTURE</b></p> <p>To ensure the necessary provision of infrastructure to support economic growth</p>	The capacity of existing infrastructure	Will there be a sufficient supply and capacity of infrastructure to support the proposed development?	<ul style="list-style-type: none"> <li>• Capacity and supply of physical infrastructure -                             <ul style="list-style-type: none"> <li>– Energy (electricity, gas, renewables)</li> <li>– Water (water and sewerage)</li> <li>– Waste</li> <li>– Transport (rail, road)</li> </ul> </li> </ul>

The full SA framework is provided overleaf.

## Sustainability Appraisal Framework

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
CS1	<p><b>HOMES</b></p> <p>To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>	Average property price compared against average earnings	<p>Will it increase the range and affordability of housing for all social groups?</p> <p>Will it reduce homelessness?</p>	<ul style="list-style-type: none"> <li>Annual housing completions compared with regional guidance</li> <li>Affordable housing completions</li> <li>Average property price compared against average earnings</li> <li>Households on the housing register</li> <li>Number of unfit homes per 1000</li> <li>Number of unauthorized encampments by gypsies and travellers</li> </ul>
CS2	<p><b>HEALTH</b></p> <p>To improve the health and wellbeing of the population and reduce inequalities in health</p>	Life expectancy	<p>Will it reduce death rates?</p> <p>Will it have a positive affect on the health of local residents?</p>	<ul style="list-style-type: none"> <li>Death rates from circulatory disease and cancer</li> <li>Infant mortality rates</li> <li>Conceptions among girls under 18 years</li> <li>Life expectancy (from birth)</li> <li>Percentage of population with limiting long term illness</li> <li>People providing unpaid care as a proportion of the total population</li> </ul>
CS3	<p><b>SOCIAL EXCLUSION</b></p> <p>To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town</p>	Indicators related to poverty and social exclusion	Will it narrow the gap between those experiencing social exclusion and deprivation and the rest of the population?	<ul style="list-style-type: none"> <li>Percentage of population of working age who are claiming key benefits</li> <li>Proportion of population who live in the areas that rank in the most deprived 20% of areas nationally</li> <li>Households with no earner as a percentage of all households</li> <li>Percentage of households in fuel poverty</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
CS4	<p><b>EDUCATION</b></p> <p>To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</p>	Qualifications of young people	<p>Will it improve the qualifications and skills of young people?</p> <p>Will it improve qualifications and skills of adults?</p> <p>Will it provide children with good educational opportunities?</p>	<ul style="list-style-type: none"> <li>• Proportion of 15 year olds pupils achieving 5 GCSEs A*-C or equivalent</li> <li>• Annual number of adults enrolling in educational programmes</li> <li>• Pupil/Teacher ratios: primary and secondary schools</li> </ul>
CS5	<p><b>CRIME</b></p> <p>To reduce crime and the fear of crime</p>	Recorded crime and fear of crime indicators	<p>Will it reduce actual levels of crime?</p> <p>Will it reduce the fear of crime?</p>	<ul style="list-style-type: none"> <li>• Total number of notifiable offences recorded by the police: burglaries, violent offences, and vehicle crime</li> <li>• People who feel safe in their local area at daytime</li> </ul>
CS6	<p><b>COMMUNITIES</b></p> <p>To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town</p>	Community spirit	Will it help create mixed, balanced, sustainable communities?	<ul style="list-style-type: none"> <li>• Percentage of people satisfied with their local area as a place to live</li> <li>• Percentage of people who feel their area is a place where people from different backgrounds can live harmoniously</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
CS7	<p><b>ACCESSIBILITY</b></p> <p>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</p>	Access to key services	<p>Will it improve accessibility to high quality services?</p> <p>Will it improve access to health care?</p> <p>Will it improve employment opportunities?</p> <p>Will it improve access to education?</p>	<ul style="list-style-type: none"> <li>Percentage of people who use the following facilities/services: sports/leisure, museums/galleries, theatres /concert halls, parks/open space, general practitioner</li> <li>Percentage of people within 30 mins of the town centre by public transport between the hours of 07.00-10.00 am and 16-19.00 pm</li> <li>Numbers of General Practitioners and dentists</li> <li>Percentage change in the number of jobs (excluding the self employed)</li> <li>Percentage of 14-19 year olds not in education, employment or training (NEETS)</li> </ul>
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>	Economic activity	<p>Will unemployment levels be minimised?</p> <p>Will it improve the resilience of business and the economy and encourage entrepreneurship?</p> <p>Will it encourage footloose employment?</p> <p>Will the tourism sector continue to flourish?</p>	<ul style="list-style-type: none"> <li>Percentage of economically active that are employed</li> <li>Proportion of people claiming JSA who have been out of work for more than a year</li> <li>The number of VAT registered businesses at year end</li> <li>Percentage of people who work from home</li> <li>Percentage of jobs in the tourism sector</li> <li>Number of visitors staying overnight and overnight spend</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
CS9	<p><b>ECONOMIC GROWTH</b></p> <p>To ensure development is Master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth</p>	Total output of the economy (GVA)	Will it support economic growth in years to come?	<ul style="list-style-type: none"> <li>GVA per capita</li> <li>Net gain or loss in land developed for employment</li> <li>Percentage of new employment land development that is master planned</li> </ul>
CS10	<p><b>NEW ECONOMIES</b></p> <p>To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities</p>	Employment in new and thriving economies	Will it promote growth in key sectors?	<ul style="list-style-type: none"> <li>Percentage of total employment in cultural industries</li> <li>Percentage of total population employed in growth and high value added sectors</li> </ul>
CS11	<p><b>SKILLS</b></p> <p>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</p>	Matching jobs and skills	Will it lead to improved skills levels?	<ul style="list-style-type: none"> <li>Percentage of residents aged 17- 74 who have attained educational levels 4/5</li> <li>Percentage of population of working age qualified to NVQ level 3 or equivalent</li> </ul>



Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
CS12	<p><b>BIODIVERSITY</b></p> <p>To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability</p>	Populations of wild birds	<p>Will it conserve and enhance natural and semi-natural habitats?</p> <p>Will it maintain and enhance sites designated for their nature conservation interest?</p> <p>Will it conserve and enhance species diversity and in particular avoid harm to protected species?</p> <p>Will it conserve and enhance natural and semi-natural habitats, and protect the character of the landscape</p> <p>Will it reduce actual noise levels, and the impact of noise pollution on sites designated for their nature conservation importance?</p>	<ul style="list-style-type: none"> <li>• Population of wild birds including sea birds</li> <li>• Condition of SSSI's</li> <li>• Percentage of Priority Habitat Areas infringed by planning applications</li> <li>• Area of farmland under Environmental Stewardship Schemes</li> <li>• Annual net gain/loss of trees in the public realm</li> <li>• Levels of ambient noise</li> </ul>
CS13	<p><b>NATURAL &amp; HISTORIC ENVIRONMENT</b></p> <p>To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment</p>	<p>Will it increase access to areas of tranquility?</p> <p>Historically significant buildings at risk</p>	<p>Will it improve access to recreational green space?</p> <p>Will it optimise appropriate access to the natural environment?</p> <p>Will it protect historically significant listed buildings and preserve the character of urban conservation areas?</p> <p>Will it conserve sites of archaeological interest and their settings?</p>	<ul style="list-style-type: none"> <li>• Area in hectares of green spaces, amenity areas, parks and gardens managed to Industry Best Practice Standard</li> <li>• Percentage of Rights of Way that are open and easy to use</li> <li>• Retention of listed buildings</li> <li>• Retention of Will it protect historically significant listed buildings</li> <li>• Number and condition of archaeological sites</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
CS14	<p><b>LAND USE</b></p> <p>To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</p>	Development on brownfield sites	Will it reduce the amount of derelict, degraded and underused land?	<ul style="list-style-type: none"> <li>• Development on previously developed land</li> <li>• Empty properties</li> </ul>
CS15	<p><b>LANDSCAPE &amp; TOWNSCAPE</b></p> <p>To maintain and enhance the quality of landscapes and townscapes</p>	Maintenance of quality landscapes and townscapes	<p>Will it decrease litter in towns and the countryside?</p> <p>Will it decrease graffiti in towns and the countryside?</p> <p>Will it decrease fly posting in towns and the countryside?</p>	<ul style="list-style-type: none"> <li>• Local street and environmental cleanliness (litter)</li> <li>• Local street and environmental cleanliness (graffiti)</li> <li>• Local street and environmental cleanliness (fly-posting)</li> </ul>
CS16	<p><b>AIR QUALITY</b></p> <p>To reduce air pollution and ensure air quality continues to improve</p>	Days when pollution is moderate or higher	Will it improve air quality?	<ul style="list-style-type: none"> <li>• Daily mean per annum of the following pollutants: NO<sub>2</sub>; PM<sub>10</sub></li> <li>• Number of Air Quality Management Areas established</li> <li>• Number of sites with Pollution Prevention and Control Permit</li> </ul>
CS17	<p><b>WATER QUALITY</b></p> <p>To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment</p>	Rivers or waterways of good or fair quality	<p>Will it improve the quality of inland water?</p> <p>Will it improve the quality of coastal waters?</p>	<ul style="list-style-type: none"> <li>• Waterways of good or fair chemical and biological water quality Compliance with EU Bathing Waters Directive</li> </ul>
CS18	<p><b>FLOOD RISK</b></p> <p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	Properties at risk from flooding	Will it minimise the risk of effluvial and tidal flooding to people and property?	<ul style="list-style-type: none"> <li>• Number of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
<b>CS19</b>	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts	Climate change mitigation and adaptation measures	Will it reduce the emissions of greenhouse gases by reducing energy consumption?  Will it improve preparedness for climate change impacts?	<ul style="list-style-type: none"> <li>Annual reduction in domestic energy consumption</li> <li>Level of preparedness to manage risks from climate change</li> </ul>
<b>CS20</b>	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys	Rebalance the transport system in favour of non-car modes	Will it increase the proportion of journeys using modes other than the car?  Will it reduce traffic volumes?	<ul style="list-style-type: none"> <li>Percentage of homes with/without cars</li> <li>Percentage of people aged 16-74 in employment using public transport to get to and from work</li> <li>Traffic growth</li> </ul>
<b>CS21</b>	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting	Household waste and recycling	Will it reduce household waste?  Will it increase waste recovery and recycling?	<ul style="list-style-type: none"> <li>Total tonnage of household waste collected within the Borough for disposal</li> <li>Percentage of the total tonnage of household waste that has been recycled or composted</li> </ul>
<b>CS22</b>	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	Average fuel efficiency of housing stock	Will it increase the proportion of energy needs being met from renewable sources?  Will it reduce the demand for energy?  Will it reduce the demand for natural resources?	<ul style="list-style-type: none"> <li>% of new developments fitted with renewable energy equipment</li> <li>Thermal efficiency of housing stock</li> <li>Amount of secondary/recycled aggregates used compared with virgin aggregates</li> </ul>

## ELLP SPECIFIC OBJECTIVES AND INDICATORS

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
EL 1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth	The total output of the Economy (GVA)	Will it result in increased business starts? Will it result in reduced business deaths?	<ul style="list-style-type: none"> <li>GVA per capita</li> <li>Productivity Index</li> <li>Economic Competitive Index</li> <li>Number of business starts</li> <li>Number of business deaths</li> <li>Amount of employment floorspace developed</li> </ul>
EL 2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land	The amount of employment floorspace within designated employment areas	Will it result in densification of Industrial Estates?	<ul style="list-style-type: none"> <li>Number of business premises on Industrial Estates</li> <li>Amount and % of new employment floorspace developed in Industrial Estates</li> </ul>
EL 3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors	The levels of business activity in different sectors	Will it result in businesses in a wider range of sectors?	<ul style="list-style-type: none"> <li>Number of business enterprises by sector</li> <li>% of people employed in Public sector</li> </ul>
EL 4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town	The number of businesses operating in Eastbourne	Will it result in more businesses operating in Eastbourne?	<ul style="list-style-type: none"> <li>Number of active businesses enterprises</li> </ul>
EL 5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses	The rate of business start-ups The number of small business enterprises	Will it result in more business starts? Will it result in an increased number of small businesses?	<ul style="list-style-type: none"> <li>New business registration rate</li> <li>Number of business starts</li> <li>Number of small businesses</li> </ul>
EL 6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town	The number of jobs in different sectors	Will it result in the creation of more jobs? Will it create jobs in different sectors?	<ul style="list-style-type: none"> <li>Number of people employed by sector</li> <li>Number of people employed by occupation</li> <li>Job Density</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
EL 7	<p><b>EXISTING BUSINESS</b></p> <p>To support existing businesses to continue trading in Eastbourne</p>	<p>Number of business enterprises</p> <p>Number of businesses by length of time trading</p>	<p>Will it maintain the number of business enterprises?</p> <p>Will it assist existing business to trade in Eastbourne?</p>	<ul style="list-style-type: none"> <li>• Number of business enterprises by age of business</li> <li>• Number of business enterprises by turnover</li> <li>• Number and % of empty commercial hereditaments</li> </ul>
EL 8	<p><b>LINKAGES</b></p> <p>To improve local business linkages</p>	<p>Number of business enterprises within a neighbourhood</p>	<p>Will it improve linkages between businesses</p>	<ul style="list-style-type: none"> <li>• Number of businesses by neighbourhood</li> </ul>
EL 9	<p><b>DEPRIVATION</b></p> <p>To reduce economic deprivation in the resident population</p>	<p>The amount of economic deprivation in Eastbourne</p>	<p>Will it reduce economic deprivation in Eastbourne?</p> <p>Will it reduce the number of households in poverty?</p>	<ul style="list-style-type: none"> <li>• Rank of average rank in Economic Deprivation Index</li> <li>• Number of people claiming work related benefit</li> <li>• The number and % of households in poverty</li> </ul>
EL10	<p><b>INCOMES</b></p> <p>To increase the average incomes of residents in the town</p>	<p>The average income of residents</p>	<p>Will it result in increased incomes?</p> <p>Will it results in more people being employed?</p>	<ul style="list-style-type: none"> <li>• Average annual household income</li> <li>• Average weekly earnings (residence-based)</li> <li>• Number of people unemployed</li> <li>• Number of people by occupation</li> </ul>
EL11	<p><b>UNEMPLOYMENT</b></p> <p>To reduce levels of unemployment</p>	<p>The number and percentage of people who are unemployed</p>	<p>Will unemployment levels reduce?</p>	<ul style="list-style-type: none"> <li>• % of economically active people who are employed</li> <li>• % of residents claiming JSA</li> </ul>
EL12	<p><b>ROAD NETWORK</b></p> <p>To ensure no adverse impact on the road network</p>	<p>The number of cars on the road during peak hours</p>	<p>Will it increase the proportion of journeys using modes other than the car?</p> <p>Will it reduce traffic volumes?</p>	<ul style="list-style-type: none"> <li>• Bus journeys per year</li> <li>• Annual vehicle kilometres</li> <li>• % Journey to work by mode</li> <li>• % Journey to work by distance</li> <li>• Growth in Traffic</li> <li>• % of people who work from home</li> </ul>

Ref	Headline Objective	Headline Indicator	Decision Making Criteria	Detailed Indicators
EL13	<p><b>SUSTAINABLE TRANSPORT</b></p> <p>To provide employment opportunities in locations that are accessible for local people and commuters</p>	<p>The number of people travelling to work by sustainable modes of transport</p>	<p>Will it increase the number of employment opportunities in accessible locations?</p>	<ul style="list-style-type: none"> <li>• % Journey to work by mode</li> <li>• % Journey to work by distance</li> <li>• Bus journeys per year</li> </ul>
EL14	<p><b>RESOURCE USE</b></p> <p>To reduce resource use from commercial &amp; industrial premises</p>	<p>The amount of resources used by commercial premises</p> <p>The amount of emissions from commercial premises</p>	<p>Will it help to reduce the overall consumption of gas and electricity from commercial premises?</p> <p>Will it reduce emissions from commercial premises?</p>	<ul style="list-style-type: none"> <li>• Average annual gas and electricity consumption from commercial &amp; industrial consumers in kWh</li> <li>• Energy Consumption in GWh</li> <li>• Carbon Dioxide Emissions per capita in tonnes</li> </ul>
EL15	<p><b>NOISE</b></p> <p>To reduce the impact of noise from commercial premises on residential areas</p>	<p>The amount of noise generated from commercial premises</p>	<p>Will it reduce the amount of noise from commercial premises?</p> <p>Will it reduce noise heard from residential premises?</p>	<ul style="list-style-type: none"> <li>• Number of noise complaints</li> <li>• Amount of new employment floorspace located within 100m of residential areas</li> </ul>
EL16	<p><b>INFRASTRUCTURE</b></p> <p>To ensure the necessary provision of infrastructure to support economic growth</p>	<p>The capacity of existing infrastructure</p>	<p>Will there be a sufficient supply and capacity of infrastructure to support the proposed development?</p>	<ul style="list-style-type: none"> <li>• Capacity and supply of physical infrastructure - <ul style="list-style-type: none"> <li>– Energy (electricity, gas, renewables)</li> <li>– Water (water and sewerage)</li> <li>– Waste</li> <li>– Transport (rail, road)</li> </ul> </li> </ul>

## 7 Employment Land Local Plan Options

### 7.1 Assessment of Plan Objectives against SA Framework

7.1.1 The plan objectives were assessed against the sustainability objectives to check their compatibility. The assessment shows that the RELLP objectives are largely compatible. Two areas of potential incompatibility are with regards to RELLP Objective 1 - Stimulate Economic Growth in relation to CS19 Climate Change and CS21 Waste.

7.1.2 The building of new homes and businesses is likely to have a negative impact on climate change and waste owing to the increase in CO<sub>2</sub> emissions and waste that will be produced. However, mitigation of potential negative impacts should be considered in the SA of the options and policies and through the design and approach to development, which will be managed by development management policies, in the application of the planning policies, including in particular:

Core Strategy Policy B2:	Creating Sustainable Neighbourhoods
Core Strategy Policy C1:	Town Centre Neighbourhood Policy
Core Strategy Policy C6:	Roselands & Bridgemere Neighbourhood Policy
Core Strategy Policy C7:	Hampden Park Neighbourhood Policy
Core Strategy Policy C13:	St Anthony's & Langney Point Neighbourhood Policy
Core Strategy Policy C14	Sovereign Harbour Neighbourhood Policy
Core Strategy Policy D1	Sustainable Development
Core Strategy Policy D8	Sustainable Travel
Borough Plan Policy NE5	Minimisation of Construction Industry Waste
Borough Plan Policy UHT1	Design of New Development
Borough Plan Policy BI7	Design Criteria

Town Centre Local Plan  
Sustainable Building Design SPD  
Sovereign Harbour SPD

7.1.3 Where uncertain relationships were found, the likely impact could be positive or negative depending on implementation. These impacts have been shown to highlight any potential incompatibilities and for suitable mitigation measures to be identified during the SA process.

The full results can be found in [Appendix A4](#).

## 7.2 Development of the Plan Options

- 7.2.1 A number of strategic options were identified through the preparation of the ELLP, with regard to the delivery of additional employment land in the future. The strategic options were developed in consultation with the Local Plan Steering Group using existing policies and strategies identified in the preparation of the Core Strategy. Evidence prepared to inform the Core Strategy was used to inform the options including the following:
- Strategic Housing Land Availability Assessment
  - Employment Land Review
  - Sites previously allocated for employment and housing development in the Borough Plan
  - A review of employment and housing sites.

The strategic options were also subject to public consultation through the Draft Employment Land Local Plan, the Initial SA and the Proposed Submission SA.

### Initial SA

- 7.2.2 The Initial SA/SEA Report considered each option to determine whether they would have positive, negative or neutral effects against the SA objectives. This assisted choosing between the strategic options to take forward in the Employment Land Local Plan. The likely effects of the options were predicted and evaluated using a panel of specialist advisers made up of officers from across the Council. The findings were consequently broad based and qualitative.

The [Six Strategic Options](#) identified were as follows:

#### 1: Intensification of Existing Industrial Estates

The provision of additional employment floorspace on the existing Industrial Estates by the redevelopment of low density plots at a higher density in order to intensify the employment use.

#### 2: Extensions to Industrial Estates

The provision of additional employment floorspace through extensions to existing Industrial Estates, where it would be possible to develop land on the edge of industrial estates and within Eastbourne Park for employment use.

#### 3: Redevelopment of sites outside Industrial Estates

The development of sites outside the existing Industrial Estates for employment use, the majority of which would be located outside of existing employment areas, and mostly within predominantly residential areas.

#### 4: Town Centre

The delivery of employment land through the regeneration of the Town Centre, which is identified in the Core Strategy as a Sustainable Centre, in which housing growth will be balanced by significant improvements in the provision of services and facilities. Employment opportunities within the neighbourhood are an important element of creating a sustainable centre.

#### 5: Sovereign Harbour

The development of land at Sovereign Harbour for employment use, to balance housing growth with the provision of services and facilities, and as an important element of creating a sustainable centre.

#### 6: Greenfield Development

Allocation of greenfield sites outside of the built-up area boundary and not adjacent to existing Industrial Estates for employment use, some of which were previously identified for development but were de-allocated through the Core Strategy process.



7.2.3 As a result of consultation on the options, Sovereign Harbour Ltd (SHL) made a representation, which stated that the provision of 3,000sqm of office space in the Town Centre was not objectively assessed and that the Town Centre had capacity for an increased amount of office space. As a consequence, an increased provision of office space in the Town Centre was an option that should be tested through the Sustainability Appraisal process. SHL also undertook a re-appraisal of the some of the options within their representation, including the additional option of increased office provision in the Town Centre.

7.2.4 Representations received also suggested that the intensification of existing industrial estates is likely to cause problems due to increased traffic in heavily used areas, loss of car parking and the loss of open spaces. Also, Sovereign Harbour is within tidal flood zone 3a, which means that it has a theoretical risk of flooding, although tidal defences protect the area.

### Proposed Submission SA

7.2.5 Following the consultation on the Initial SA and ELLP it was decided to include an additional option: [4A – Town Centre \(Increased Provision of Office Space\)](#) to be tested alongside the other 6 Strategic Options already identified. The issues identified above as a result of the consultation on the Initial SA were also taken into account in the appraisal of the options. The points raised within SHL's separate appraisal were also considered in the re-appraisal of the options in the SA Report, although not all points raised were accepted.

7.2.6 In response to the consultation, SHL made a further representation criticising the approach to the assessment of options and justification for the decisions made. In particular SHL considered that the most sustainable, deliverable option had not been selected. The full response can be found in [Appendix A9](#).

### Revised SA

7.2.7 As a result of the representation from SHL, the Council commissioned Jam Consult Ltd to review the SA work undertaken to date in relation to the ELLP, with specific attention to the selection of options.

7.2.8 The review of the sustainability appraisals and supporting documents found there were some defects in the SA process, which needed to be corrected if the evidence base for the ELLP was to be considered suitably robust when subjected to Examination in Public (EiP).

7.2.9 In particular, the review found the assessment of options should be revisited in respect of the representations received, with specific reference to the quantum of office space that should be provided in the Town Centre and at Sovereign Harbour. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence. The revised SA would also enable greater clarity to be provided on the reasons for the selection and rejection of alternatives.

### Revision of Options

7.2.10 The review of the options revealed that some of the options could not be considered 'realistic alternatives' as defined by the regulations because they included the development of greenfield land and were contrary to Core Strategy policy regarding the protection of areas of landscape and biodiversity value. The options that fell into this category included:

[2: Extensions to Industrial Estates](#)

[3: Redevelopment of sites outside Industrial Estates](#)

[6: Greenfield Development](#)

- 7.2.11 Following discussion with the Council it was decided that given the previous results of the SAs and taking into consideration the conflict with Core Strategy policy the inclusion of Options 3 and 6 could not be supported. However, it was decided that Option 2 should be retained in order to address developer interest in land adjacent to industrial estates and to verify the sustainability impacts of such proposals.
- 7.2.12 In addition, it was considered that options should include a different quantum of office space in both the town centre and at Sovereign Harbour in order to address the concerns raised in SHL's representations. SHL's representations proposed that an option should include a reduction in office floorspace at Sovereign Harbour to 11,000 sqm with 9,000 sqm of office space in the Town Centre and 3,000 sqm at other out of town locations. The inclusion of this option was considered but rejected as no other out of town sites were identified that could accommodate the additional 3,000 sqm. It was therefore decided to test the inclusion of 9,000 sqm of space within the town centre but with 14,000 sqm at Sovereign Harbour (**Option 3b**). It was also decided that a slight modification to this option should be considered as a comparison (**Option 3c**).
- 7.2.13 The revised options selected were therefore as follows:
- 1:** **As existing (No Plan)**  
90% office provision in Town Centre (**TC**); 10% Out of Town Centre (**OTC**); Industrial as existing.
  - 2a:** **Intensification of industrial land (update of proposed submission SA)**
  - 2b:** **Extensions to industrial land (update of proposed submission SA)**
  - 3a:** **As proposed by EBC**  
76% office TC: 24% OTC (3,000 sqm TC: 20,000 sqm Sovereign Harbour (SH))
  - 3b:** **As proposed by SHL**  
80% office TC: 20% OTC (9,000 sqm TC: 14,000 sqm SH)
  - 3c:** **Alternative Option for comparison**  
77% office TC: 23% SH (5,000 sqm TC: 18,000 sqm SH)

## 8 Sustainability Effects of the Plan

### 8.1 How has sustainability been considered in the development of the Plan?

8.1.1 Sustainability has been considered from the outset of the development of the plan and has been subject to Sustainability assessment throughout including the following documents:

- Scoping Report, 2013
- Initial Sustainability Appraisal, 2013
- Proposed Submission SA, 2014
- Revised Proposed Submission SA, 2015 (this document)

8.1.2 The RELLP seeks to guide job growth and economic development in Eastbourne up to 2027 by identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a place where people want to live and work. The Employment Land Local Plan needs to ensure it provides the right space in the right locations for inward investment but also provide the range of sites and premises required to ensure existing businesses are retained and can grow.

8.1.3 The Vision for the RELLP is:

“By 2027, Eastbourne will be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work”

8.1.4 The Employment Land Local Plan vision and objectives seek to ensure that the requirement for employment land in Eastbourne over the plan period is delivered in sustainable locations. A number of different strategic options for the distribution of employment land within the town have been considered as part of the production of the Revised Proposed Submission Employment Land Local Plan.

8.1.5 The Plan has sought to allocate employment land in the most sustainable and effective way, through intensifying development in existing employment locations and directing development toward the Sustainable Centres at the Town Centre and Sovereign Harbour that have been identified in the Eastbourne Core Strategy Local Plan 2006-2027. This approach will allow all sites within the Borough to ‘work together’ to meet future requirements, providing a functioning supply of sites that are deliverable and provide sufficient choice to support indigenous businesses and inward investment.

8.1.6 All the development must also comply with the NPPF, the Core Strategy and Supplementary Planning Documents including the Town Centre Local Plan, Sovereign Harbour and Sustainable Building Design.

## 8.2 Significant sustainability effects of the Options

- 8.2.1 A summary of the findings for the appraisal of the revised strategic options is provided below. The full results can be found in [Appendix A6](#).

### **OPTION 1: As existing (No Plan)**

#### **90% office provision in Town Centre (TC): 10% Out of Town Centre (OTC); Industrial as existing**

- 8.2.2 This option tests the current ratio of floorspace of 90:10 between the Town Centre and Out of Town provision, with the existing provision for industrial land. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that such a ratio was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual. The ELR also identified the need for 11,467 sqm of industrial space and 7,339 sqm of warehouse space, which could not be accommodated in this option.
- 8.2.3 The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses and employment opportunities being lost to elsewhere in the region. As a consequence there is likely to be a lack of choice within the market to capture economic interest and new business, which could lead to the loss of jobs and a constraint on economic growth for the future, particularly in the long term.
- 8.2.4 Whilst the provision of office space within the town centre may encourage more people to use sustainable modes of transport, the lack of choice within the town for business may force business outside the town, which could result in further out-commuting. The concentration of office accommodation within the town centre could also lead to an over concentration of congestion of the road network in the town centre.
- 8.2.5 Measures would need to be identified to prevent the loss of businesses and jobs from the town and constraints on economic growth. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should also be identified.

### **OPTION 2a: Intensification of industrial land update of proposed submission SA**

- 8.2.6 This option tests the intensification of industrial land within the current industrial estates. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential. The ELR also identified the need for 11,467 sqm of industrial space and 7,339 sqm of warehouse space, which could be accommodated in this option.
- 8.2.7 The retention and improvement of existing sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. However, other uses that are not suitable in industrial areas may be disadvantaged.
- 8.2.8 The intensification of industrial land is likely to result in an increase in the use of natural resources and to have negative impacts upon climate change, waste, and resource use. Mitigation measures will need to be identified that encourage sustainable design and management.

### **OPTION 2b: Extensions to industrial land update of proposed submission SA**

- 8.2.9 This option tests the extension of industrial land on the edges of Industrial Estates for employment development. These sites are mainly greenfield sites located within Eastbourne Park. The option could accommodate the requirement for employment space, as well as a range of different B class uses and size of floorplate.
- 8.2.10 The extension of industrial land will provide opportunities for existing businesses to remain in the borough by relocating to more appropriate premises as well as enabling businesses to expand. However, such development will require the use of greenfield sites of a high landscape and biodiversity value. In particular, such development is likely to have a significant negative impact upon Eastbourne Park, which is protected by Core Strategy Policy D11 as an area of high landscape and biodiversity importance.
- 8.2.11 The extension of industrial land is likely to result in an increase in the use of resources. The development of greenfield sites within a tidal flood zone is also likely to have a negative impact upon flood risk, which will result in greater run-off to Eastbourne Park as well as increased costs. Mitigation measures would need to be identified that encourage sustainable design and management and encourage efficiency.

### **OPTION 3a: As proposed by EBC 76% office TC: 24% OTC (3,000 sqm TC: 20,000 sqm Sovereign Harbour (SH))**

- 8.2.12 This option tests a revised floorspace of 76:24 between the Town Centre and Out of Town provision in response to GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014), which showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. This option is closer the more usual split of floorspace of 70:30.
- 8.2.13 The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at Sovereign Harbour should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the Sovereign Harbour SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining.
- 8.2.14 By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the Town Centre can be retained for residential purposes in order to meet the established housing need of 450 units across the five Development Opportunity Sites, identified in the Town Centre Local Plan.
- 8.2.15 Development within the town centre is well served by public transport. Development at Sovereign Harbour is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
- 8.2.16 The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

**OPTION 3b: As proposed by SHL - 80% office TC: 20% OTC (9,000 sqm TC: 14,000 sqm SH)**

- 8.2.17 This option tests a revised split of floorspace of 80:20 between the Town Centre and Out of Town provision in response to SHL's representations, which proposed 9,000 sqm of office provision in the town centre and 14,000 sqm at Sovereign Harbour, as a more sustainable option.
- 8.2.18 The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand, and is less viable and deliverable. Development at Sovereign Harbour also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
- 8.2.19 Whilst the provision of office space within the town centre may encourage more people to use sustainable modes of transport, the lack of choice within the town for business may force business outside the town, which could result in further out-commuting. The concentration of office accommodation within the town centre could also lead to an over concentration of congestion of the road network in the town centre.
- 8.2.20 The development is likely to result in an increase in the use of resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable forms energy given the small fragmented development sites available. A smaller quantum of development at SH may also reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

**OPTION 3c: Alternative Option for comparison - 77% office TC: 23% SH (5,000 sqm TC: 18,000 sqm SH)**

- 8.2.21 This option tests a revised split of floorspace of 77:23 between the Town Centre and Out of Town provision by way of comparison to see the impact of an alternative option somewhere in between the Council's option and oL's option.
- 8.2.22 The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at Sovereign Harbour should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the Sovereign Harbour SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth.
- 8.2.23 The increase in the provision of town centre floorspace reduces the viability of this option, retaining an over reliance on town centre stock and smaller floorplates, which conflicts with demand. Development at SH should still be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
- 8.2.24 Development within the town centre is well served by public transport. Development at Sovereign Harbour is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
- 8.2.25 The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

## 8.3 Selection and Rejection of Options

### Option 1

- 8.3.1 The assessment showed that maintaining the current situation within Eastbourne would result in the retention of an unbalanced, under performing employment market with an over provision of office space within the Town Centre, as well as providing increasing constraints upon the future economic growth.

**This option was therefore rejected.**

### Option 2a and 2b

- 8.3.2 Neither of the options would provide for all the employment provision for the borough on their own so will need to be combined with the best performing of **Option 3**.
- 8.3.3 **Option 2a** would enable current industrial space to be protected, whilst providing new opportunities for the identified need. The option also maximises the use of existing employment land and brownfield land having a minimal impact upon biodiversity and landscape.
- 8.3.4 **Option 2b** would enable further industrial land to be provided and thereby provide opportunities for the identified need. However this option would result in significant environmental effects upon biodiversity and landscape as it will require the development of greenfield land within Eastbourne Park, which is contrary to Core Strategy Policy D11, which protects Eastbourne Park as an area of high landscape and biodiversity importance.

**Option 2a was selected as the preferred option for industrial land.**

**Option 2b was rejected as a result of the significant environmental impacts.**

### Option 3a, 3b and 3c

- 8.3.5 Again none of the options can meet the employment land requirements on their own, so the best option will need to be combined with the best performing of **Option 2**. In addition, it was considered that options should include a different quantum of office space in both the town centre and at Sovereign Harbour in order to address the concerns raised in SHL's representations.
- 8.3.6 SHL's representations proposed that an option should include a reduction in office floorspace at Sovereign Harbour to 11,000 sqm with 9,000 sqm of office space in the Town Centre and 3,000 sqm at other out of town locations. The inclusion of this option was considered but rejected as no other out of town sites were identified that could accommodate the additional 3,000 sqm. It was therefore decided to test the inclusion of 9,000 sqm of space within the town centre but with 14,000 sqm at Sovereign Harbour (**Option 3b**). It was also decided that a slight modification to this option should be considered as a comparison (**Option 3c**).
- 8.3.7 **Option 3a** addresses the balance of employment provision within the town to result in provision closer to market norms, improving the future health of the town centre by providing opportunities for a more diverse business offer and opportunities for businesses to move to larger premises, which are in great demand. This option performs the best in terms of viability and deliverability as a greater quantum of development is provided at Sovereign Harbour, which was shown to be a more viable location for office development.
- 8.3.8 **Option 3b** will improve the balance of employment provision within the town but provide fewer opportunities for business growth and flexibility. The option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand, and is less viable and deliverable. Development at Sovereign Harbour also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining, the reduction in floorspace reduces the option's potential in this regard. The option potentially offers the scope for more sustainable travel, however the lack of choice in office provision could result in further out commuting.

- 8.3.9 **Option 3c** provides a better balance of uses within the Borough offering greater choice and flexibility to the market. The increase in the provision of town centre floorspace reduces the viability of this option, retaining an over reliance on town centre stock and smaller floorplates, which conflicts with demand.
- 8.3.10 All of the options scored poorly with regard to the use of resources, climate change, biodiversity, air quality and waste as the increase in development is likely to have significant negative impacts upon these issues. Suitable mitigation measures will need to be identified.

**Option 3a was selected as the best performing option overall.  
Option 3b and 3c were rejected because they failed to meet market demand and were less viable, deliverable sustainable solutions.**

### Preferred Option

- 8.3.11 The Preferred Option is a result of the best performing options that were assessed, which includes:
- |                  |   |
|------------------|---|
| <b>Option 2A</b> | Intensification of Industrial Estates   |
| <b>Option 3A</b> | 76: 24 split of Town Centre: Out of town Centre development with 3,000 sqm of office space in the TC and 20,000 sqm at Sovereign Harbour. |
- 8.3.12 The Preferred Option was then subject to SA to verify the results. The Preferred Option is as follows:
- 76% office Town Centre (3,000 sqm): 24% office Sovereign Harbour (20,000 sqm) + Intensification of Industrial Estates (20,000 sqm)**
- 8.3.13 The preferred option tests a revised floorspace of 76:24 between the Town Centre and Out of Town provision with 3,000 sqm of space provided in the Town Centre, 20,000 sqm of office space provided at Sovereign Harbour and 20,000 sqm provided through the intensification of industrial estates. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the Town Centre can be retained for residential purposes in order to meet the established housing need of 450 units across the five Development Opportunity Sites, identified in the Town Centre Local Plan. Industrial land is unlikely to be used for housing, enabling other sites to be used for residential development.
- 8.3.14 The ELR also showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential.
- 8.3.15 The preferred option provides a better balance of uses within the Borough offering greater choice and flexibility to the market. The office provision at Sovereign Harbour should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the Sovereign Harbour SPD 2013, although the impact is unlikely to be realised in the short term. Sovereign Harbour will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled which should result in a positive impact upon economic growth in the medium to long term.



- 8.3.16 In addition, the viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole, particularly in the medium to long term. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining. The provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre.
- 8.3.17 The retention and improvement of existing industrial sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. Such benefits should be achievable in the short term as well as medium to long term, which will have a greatly needed positive impact on the market
- 8.3.18 Development within the town centre is well served by public transport. Development at Sovereign Harbour and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development could make the viability of improved public transport services more likely in the long term.
- 8.3.19 The development is likely to result in an increase in the use of natural resources. However, the reduction in office space within the town centre provides the opportunity for new, more energy efficient accommodation to be provided, particularly in the medium to long term. A larger quantum of development at Sovereign Harbour could also increase the potential for renewable forms of energy to be incorporated. The increase in development is likely to cause an increase in the levels of pollutants, greenhouse gas emissions and the amount of waste produced in both construction and operation. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.
- 8.3.20 The revised SA has shown that the Preferred Option, as selected in the Proposed Submission SA, is still the most sustainable option for the RELLP. A table showing a summary of results for the options is attached overleaf including the Preferred Option. The full results can be found in [Appendix A5](#).

## Summary Results of RELLP Options - including Preferred Option (PO)

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home							
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health							
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town							
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work							
CS5	<b>CRIME</b> To reduce crime and the fear of crime							
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town							
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone							
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth							
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth							

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities	Orange	Yellow	Light Green	Green	Light Green	Green	Green
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities	Yellow	Light Green	Light Green	Light Green	Yellow	Light Green	Light Green
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability	Light Green	Light Green	Red	Orange	Orange	Orange	Orange
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment	Grey	Light Green	Orange	Yellow	Yellow	Yellow	Yellow
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	Yellow	Green	Red	Green	Yellow	Yellow	Green
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes	Grey	Light Green	Orange	Light Green	Light Green	Light Green	Light Green
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve	Yellow	Orange	Orange	Orange	Orange	Orange	Orange
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment	Grey	Yellow	Yellow	Yellow	Yellow	Yellow	Yellow
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	Grey	Yellow	Orange	Yellow	Yellow	Yellow	Yellow

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts							
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys							
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting							
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources							
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth							
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land							
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors							
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town							
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses							

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town	Major positive impact	Minor positive impact	Major positive impact	Major positive impact	Uncertain impact	Uncertain impact	Minor positive impact
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne	Minor negative impact	Uncertain impact	Major positive impact	Major positive impact	Uncertain impact	Minor positive impact	Minor positive impact
EL8	<b>LINKAGES</b> To improve local business linkages	Minor negative impact	Uncertain impact	Minor positive impact	Minor positive impact	Uncertain impact	Minor positive impact	Minor positive impact
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population	Uncertain impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town	Uncertain impact	Uncertain impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment	Uncertain impact	Minor positive impact	Minor positive impact	Minor positive impact	Uncertain impact	Minor positive impact	Minor positive impact
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network	Uncertain impact	Uncertain impact	Uncertain impact	Minor negative impact	Uncertain impact	Uncertain impact	Uncertain impact
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters	Minor positive impact	Minor positive impact	Minor positive impact	Minor negative impact	Uncertain impact	Uncertain impact	Minor positive impact
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises	Uncertain impact	Minor negative impact	Minor negative impact	Minor negative impact	Minor negative impact	Minor negative impact	Minor negative impact
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas	No significant impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact	Minor positive impact	Uncertain impact
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth	Uncertain impact	Uncertain impact	Minor positive impact	Minor positive impact	Uncertain impact	Minor positive impact	Uncertain impact

**KEY**

	<b>Major negative impact</b>
	<b>Minor negative impact</b>
	<b>Uncertain impact</b>
	<b>Minor positive impact</b>
	<b>Major positive impact</b>
	<b>No significant impact</b>

## 9 The Plan Policies

### 9.1 Development of the Plan Policies

- 9.1.1 The Revised Employment Land Local Plan will contain a number of policies that will implement the preferred option and help achieve the objectives. These policies are:
- Policy EL1: Economy and Employment Land
  - Policy EL2: Industrial Estates
  - Policy EL3: Town Centre
  - Policy EL4: Sovereign Harbour
- 9.1.2 An additional bullet point and supporting text has been added to strengthen [Policy EL1](#) with regard to local employment and training, to reflect the significant number of jobs that will be created through the construction and operation of the employment development and the potential for local employment and skills development in the future:
- [Seeking Local Labour Agreements on all development of 1,000sqm or more, including change of use, to secure local employment and training measures as part of development proposals.](#)
- 9.1.3 The appraisal of the options and selection of the preferred option revealed that the Council's original approach to the policy development was substantiated by the SA. A summary appraisal of the policies contained within the Revised Proposed Submission Employment Land Local Plan is provided below. [Appendix A6](#) contains a full appraisal of each of the policies.

### 9.2 Significant sustainability effects of the Policies

#### [Policy EL1: Economy and Employment Land](#)

- 9.2.1 The policy supports job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The retention and improvement of existing sites will enable future economic growth, which will support the development of housing and the generation of jobs. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development.
- 9.2.2 The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training are encouraged, which are all likely to encourage economic growth particularly in the long term.
- 9.2.3 The policy encourages more diverse employment opportunities, which should result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. Sovereign Harbour will offer space for both new and relocating businesses within the area in the medium to long term.
- 9.2.4 The policy encourages the maximisation of land in existing employment locations as well as the use of previously developed land both at Sovereign Harbour and the Town Centre. No greenfield sites are identified for development. Whilst the town centre is not located next to any sensitive sites of biodiversity, Sovereign Harbour will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.
- 9.2.5 Development within the town centre is well served by public transport. Development at Sovereign Harbour is likely to be car reliant and may result in increased congestion in areas that are already congested.

- 9.2.6 The increase in development is likely to increase the amount of pollutants, greenhouse gas emissions and waste produced in both construction and operation. The development is also likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at Sovereign Harbour may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.

### Policy EL2: Industrial Estates

- 9.2.7 The policy supports the redevelopment and intensification of vacant or under used sites to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas.
- 9.2.8 The policy supports the redevelopment and intensification of vacant or under used sites. Retaining development within the industrial estates uses previously developed land rather than greenfield land, improving efficiency in land use, particularly in the medium to long term.
- 9.2.9 The majority of the Industrial Estates are within Tidal Flood Zone 3a. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
- 9.2.10 The development is likely to result in an increase in non-renewable forms of energy, carbon emissions, waste and other natural resources. Mitigation measures will need to be identified that encourage sustainable design and management.
- 9.2.11 The provision of new floorspace provides the opportunity for new infrastructure to be provided that will enable economic growth in the future. The capacity of existing infrastructure will need to be checked to see if the amount of development can be supported.

### Policy EL3: Town Centre

- 9.2.12 The policy minimises the amount of new office space within the Town centre in order to provide a greater balance of uses within the borough, offering more choice and flexibility to the market and a more sustainable and inclusive community. By limiting the quantum of floorspace to 3,000 sqm, other sites will be available for the need to provide 450 residential units on the Development Opportunity Sites within the town centre as identified in the Town Centre Local Plan.
- 9.2.13 The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses outside the town centre.
- 9.2.14 Development is on previously developed land and promotes more efficient use of the land. The development is within a built up area and is unlikely to have an adverse impact on the landscape. The quality of the development will be managed through the Town Centre Local Plan to ensure that any adverse impacts identified are suitably mitigated.
- 9.2.15 76% of office provision will be provided in the town centre, which is a very sustainable location with good links via public transport. The reduction of office space within the town centre may result in an increase in car use to other areas but could also increase the viability of public transport to areas out of the town centre in the long term.
- 9.2.16 Development is likely to result in an increase in non-renewable forms of energy, greenhouse gas emissions, pollutants, waste and other natural resources both in construction and operation. Suitable mitigation measures will need to be identified that encourage sustainable design and management.

### Policy EL4: Sovereign Harbour

- 9.2.17 The Policy provides for 20,000 sqm of additional B1 floorspace to be accommodated at Sovereign Harbour. This should be delivered predominantly on Sites 6 and 7, however Site 4 could accommodate a small amount of office space. The B1 floorspace should be provided in a flexible format that will allow businesses to adapt their operations depending on circumstances. Other employment generating uses that are compatible with the residential area (with the exception of class A1, A3 and A5 uses) will be acceptable on any remaining land on Sites 6 and 7 following the delivery of the 20,000 sqm of B1 floorspace.
- 9.2.18 Development at Sovereign Harbour is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market. Development in Sovereign Harbour is more viable than within the town centre but is less likely to be delivered in the short term. Sovereign Harbour will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled which should result in a positive impact upon economic growth in the medium to long term.
- 9.2.19 Development at Sovereign Harbour is on previously developed land in a 'Sustainable Centre'. The policy will enable the office market to become more balanced within the borough and enable homes to be provided within the town.
- 9.2.20 The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses, which are all likely to reduce levels of unemployment in the medium to long term.
- 9.2.21 Development at Sovereign Harbour is in a built up area and is unlikely to have an adverse impact on the landscape. The quality of the development will be managed through the Sovereign Harbour SPD to ensure that any potential adverse impacts are suitably mitigated. However, development at Sovereign Harbour will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.
- 9.2.22 Development at Sovereign Harbour is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of an improved public transport service more likely in the future.
- 9.2.23 Development is likely to result in an increase in non-renewable forms of energy, greenhouse gas emissions, pollutants, waste and other natural resources both in construction and operation. Suitable mitigation measures will need to be identified that encourage sustainable design and management. A larger quantum of development at Sovereign Harbour may allow more scope for renewable forms of energy to be applied e.g. through district networks. Development at Sovereign Harbour may also provide the opportunity for new infrastructure to be provided that will enable economic growth in the future.
- 9.2.24 A table showing a summary of results for the options is attached overleaf including the likely Cumulative Impacts. The full results can be found in [Appendix A6](#).



## Summary Results of ELLP Policies

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	Cumulative
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					
CS5	<b>CRIME</b> To reduce crime and the fear of crime					
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	Cumulative
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	Cumulative
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					
EL8	<b>LINKAGES</b> To improve local business linkages					
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	Cumulative
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					

## 9.3 Cumulative Impacts

### Positive impacts

- 9.3.1 21 Policies result in a likely positive cumulative impact, with 12 of those achieving a major positive impact, particularly the objectives concerning economic issues. The RELLP policies support job growth and economic prosperity in Eastbourne in order to make Eastbourne a place where people want to both live and work. The policies support the diversification of the market as well as the provision of education and training opportunities through Local Labour Agreements. The RELLP seeks to create a more balanced market, with a better mix of spaces within sustainable centres, which provide opportunities for businesses to grow or relocate, in order to address current demand and existing constraints.

### Negative Impacts

- 9.3.2 6 Policies result in a likely minor negative cumulative impact, which mainly concern environmental issues, including for example air quality, natural resources and climate change. The impacts are likely to occur both in construction and operation of the development, although the impacts during construction are likely to be of a short-term and temporary nature. Suitable mitigation measures will need to be identified through the development management process to mitigate any likely impacts and ensure that sustainable design and management measures are incorporated.

### Uncertain Impacts

- 9.3.3 8 Policies result in an uncertain cumulative impact, again with regard to environmental issues. The uncertainty is largely because of different impacts in different areas of development, as well as the possibility of impacts changing over time. For example, with regard to transport, whilst the impact is likely to be negative in the short term as a result of dependence on car travel, this impact could change in the medium-long term as public transport becomes a more viable option. The uncertainty of impacts should be reduced as a result of further work and information that will be required as part of the detailed planning applications. Suitable mitigation measures will need to be identified to reduce uncertainty of the impacts. Any changes in the impacts will be reviewed as a part of the monitoring and changes to policies and baseline information will be made where necessary.

### No significant impact

- 9.3.4 No significant impacts were identified in relation to the issues of Health, Crime and Noise.

## 9.4 Proposed mitigation measures

The proposed mitigation measures are set out below:

### Accessibility and Transport

9.4.1 Creating better public transport connectivity within and beyond Eastbourne is a key factor in encouraging sustainable travel, especially for people travelling into Eastbourne from surrounding areas. It is recognised that in the short term development could have a minor negative impact upon the road network by increasing congestion in areas that are already congested and result in a loss of on-site car parking in the industrial estates. However, the increase in development in the industrial estates and at Sovereign Harbour should make public transport more viable in the longer term, reducing this impact. All development will also need to comply with Core Strategy [Policy D8: Sustainable Travel](#).

9.4.2 Transport Assessments will be needed to establish the likely impacts and key areas of concern in order to identify suitable mitigation measures. Travel Plans will also be required for development that is expected to create a significant number of additional trips in line with East Sussex County Council's 'Guidance on Travel Plans for New Developments' and Core Strategy Policy D8: Sustainable Travel. Policy D8 requires that new development should:

- Reduce the need to travel
- Make walking, cycling and accessibility to public transport a priority in the design of their layouts
- Provide for the needs of pedestrians and cyclists, including people with disabilities and mobility difficulties
- Contribute towards sustainable travel schemes and activities, including the County Council's Local Sustainable Accessibility Improvement Contributions
- Support safe and effective traffic movement along existing highways.

New development should also provide for the travel demand that they create through a balanced provision for access by powered two wheelers, public transport, cycling and walking.

Development proposals will be assessed in relation to their compliance with approved maximum car and cycle parking standards, related to the accessibility and location of the site.

9.4.3 At Sovereign Harbour, development will be required to provide additional car parking spaces in accordance with adopted parking standards, along with a holistic approach to transport planning. Transport modelling has been undertaken to assess the impacts of future development at Sovereign Harbour on the highway network. The analysis indicated that the impact of development at Sovereign Harbour on the highway network is slight when compared to the impact of all development proposals in the Core Strategy. There is no clear indication that further mitigation will be needed, specifically to accommodate the marginal impacts of the Sovereign Harbour developments. However, all development in Eastbourne including development at Sovereign Harbour, must contribute to the delivery of the whole transport interventions package, the most important of which for Sovereign Harbour is the Seaside Quality Bus Corridor.

### Open Space and Biodiversity

9.4.4 All of the employment land that has been allocated is brownfield land, in order to minimise the impact of development upon open space and biodiversity, in particular Eastbourne Park, an area of biodiversity and landscape significance. In addition, development will need to comply with Core Strategy [Policy D9: Natural Environment](#), which requires development proposals to improve the quality and quantity of green spaces and address local deficiencies in accessible green space, where appropriate.

- 9.4.5 Furthermore, all developments over 500m<sup>2</sup> will be required to produce a Biodiversity Survey to ensure development does not impact on species of importance. The Survey must also include proposals to show how any impacts will be addressed by enhancement and mitigation measures.
- 9.4.6 There is an identified lack of usable open green space in the Sovereign Harbour neighbourhood. However, it is recognised that the beach frontage provides a significant area of accessible open space. [Policy C14 Sovereign Harbour Neighbourhood Policy](#) states that the amount of appropriately landscaped, usable open space should be increased through the development of the remaining sites. In addition, there is an opportunity to upgrade the shingle bank off Harbour Quay to form a more usable open space.

### Climate Change and Natural Resources

- 9.4.7 The Eastbourne Landscape Character Assessment (2007) indicates that Eastbourne is likely to be disproportionately affected by climate change resulting in rises in river levels, frequent summer droughts and winter flooding, changes in habitats and species composition, habitat fragmentation and changes in soils, agricultural land use, recreation and tourism and cultural heritage. It is therefore imperative for schemes to consider the potential effects of climate change and other environmental damage from the outset.
- 9.4.8 The Core Strategy sets out a requirement for all non-residential development over 1000m<sup>2</sup> to meet the BREEAM 'Very Good' standard. BREEAM standards include measures for water efficiency, reducing waste, enhancing a site's ecology and reductions in CO<sub>2</sub> emissions.
- 9.4.9 The scale of development is likely to result in an increase in greenhouse gas emissions and non-renewable sources of energy. All development, however, will need to comply with the Core Strategy's [Policy D1: Sustainable Development](#), which should ensure that suitable mitigation is identified and applied. The scale of development at Sovereign Harbour should allow more scope for renewable forms of energy such as district networks to be applied. The Policy states:
- "All development proposals will need to demonstrate that:
- The Energy Opportunities Plan (EOP) has been considered, ensuring that:
  - Planning applications for new development demonstrate how they contribute to the current Energy Opportunities Plan. Contributions towards national energy and CO<sub>2</sub> targets, applications for standalone energy generation and other CO<sub>2</sub> reductions in Eastbourne will be considered favourably
  - Developments in areas designated as having potential for Combined Heat and Power (CHP) should install the secondary elements of a district heating network (i.e. from the wider network to buildings). Where appropriate, applicants may be required to provide land, buildings and/or equipment for an energy centre to serve existing or new development.
  - New development should be designed to maximise the opportunities to accommodate a district heating solution, considering: density, mix of use, layout and phasing.
  - Developments where this is shown to be unviable will be subject to a financial payment into a Carbon Buyout Fund."

9.4.10 The Eastbourne Environment Strategy 2010-2013 places considerable emphasis on reducing CO<sub>2</sub> emissions across the town and proposes a reduction in carbon emissions from household energy and businesses by 40% by 2020. The Council's Renewable Energy Potential Study also identifies the need for all new buildings in the town to reduce CO<sub>2</sub> emissions and advises that this can be achieved by incorporating renewable energy technologies into new and existing buildings. These technologies range from small scale such as solar technologies, to larger-scale renewable forms of energy. The Council's Energy Opportunities Plan identifies all potential opportunities for renewable energy technologies across the town.

### Waste Management

- 9.4.11 The preparation of a Waste and Minerals Development Framework is the responsibility of East Sussex County Council and this determines how and where waste is dealt with. East Sussex no longer has any landfill sites for waste disposal; as a result all non-recyclable waste is exported out of the County. Alternative options to disposing of waste to landfill are therefore needed to reduce the environmental impact of transporting Eastbourne's waste out of Eastbourne.
- 9.4.12 Development will need to demonstrate how site waste generation will be minimised and the specific measures that will be incorporated into schemes to increase waste recycling in accordance with Core Strategy [Policy D1](#) and [Borough Plan Policy NE5: Minimisation of Construction Industry Waste](#) .

### Water Resources, Water Quality and Flood plain

- 9.4.13 Approximately 30% of Eastbourne's built up area and all of the area in the centre of Eastbourne Park is within Tidal Flood Zone 3a. This includes the Sovereign Harbour neighbourhood, the eastern Town Centre and all of the town's industrial estates. A risk based sequential approach will be required to determine the suitability of land for development.
- 9.4.14 In addition, Core Strategy [Policy D9: Natural Environment](#), set outs the measures that should be taken to minimise the risk of flooding with development, including:
- Ensuring that development is subject to a flood risk assessment which conforms to national policy, in order to demonstrate it will be safe, without increasing flood risk elsewhere.
  - Liaising closely with the Environment Agency when determining applications for development.
  - Applying a sequential test for assessment of applications for development.
  - Requiring development to incorporate Sustainable Urban Drainage Systems (SUDS) to manage surface water drainage.
- 9.4.15 The proximity of Sovereign Harbour to the harbour may also result in a negative impact upon the marine environment. Suitable mitigation measures will need to be identified as part of any planning application

### Air Quality

- 9.4.16 All new development is likely to cause an increase in air pollution during construction as a result of the increase in traffic from the development. Mitigation measures in relation to transport are detailed above. Impacts during construction will be short term and temporary in nature and should be controlled through conditions applied in the planning application process.



## 9.5 Any uncertainties and risks

- 9.5.1 The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications for development. Specific attention should be given to the uncertain impacts identified when reviewing proposals.
- 9.5.2 Details of the specific mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed. Monitoring of the impacts will be addressed through the Local Monitoring Report, produced annually.
- 9.5.3 There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

## 10 Implementation

### 10.1 What are the next steps?

- 10.1.1 The Revised Proposed Submission Sustainability Appraisal has been issued for consultation with the RELLP. Following the consultation period the RELLP and RSA will be submitted to the Planning Inspectorate for Examination in Public. Should the Inspector require any Major Modifications to the RELLP, these will be reviewed to see if the modifications would need to be subject to further SA. Any alterations would be subject to further consultation. The RELLP will subsequently be adopted by the Council and a Post Adoption Statement on the SA process, summarising the findings of the assessment, will be published.

### 10.2 How the plan will be implemented

- 10.2.2 The Council will use the RELLP when determining planning applications in relation to the employment land policies. The RELLP will be used alongside the Core Strategy and Supplementary Planning Documents, in particular the Town Centre Local Plan, Sovereign Harbour and Sustainable Design SPDs.

### 10.3 Proposals for monitoring

- 10.3.1 In December each year, Eastbourne Borough Council publishes the Local Monitoring Report (LMR) covering the previous monitoring year from March to April. The LMR is the main mechanism for assessing the performance of the planning policies adopted by Eastbourne Borough Council. The requirements for the LMR are set out in Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The monitoring report sets out how the Council's planning policies have been implemented and whether the planning policies are addressing the required issues.
- 10.3.2 The RELLP should be monitored regularly to check that the policies are achieving the desired results and to accommodate any changes in circumstances. The indicators set out in the Sustainability Appraisal Framework should be incorporated into the Local Monitoring Report (LMR). The LMR will monitor the type of development occurring in the borough and the impact that the Council's planning policies are having upon sustainable development. If the LMR identifies any changes that should be made to the policies, such changes will be reviewed and a further SA undertaken if it is considered necessary.

## 11 Conclusions

- 11.1.1 This document provides a Sustainability Appraisal (SA) of the Revised Proposed Submission Employment Land Local Plan (RELLP). The Employment Land Local Plan will form part of the Development Plan for Eastbourne, alongside other planning policy documents such as the Eastbourne Core Strategy Local Plan. The Employment Land Local Plan will replace [Core Strategy Policy D2: Economy](#), but will otherwise have to conform to other policies set out in the Core Strategy Local Plan as well as national planning policy and supplementary planning documents. The Employment Land Local Plan will guide job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development.
- 11.1.2 The Revised Proposed Submission ELLP and SA have been amended to take into consideration: the consultation responses to the Proposed Submission SA in 20, additional evidence, and to ensure that the process has complied with the regulations.

### Selection and Rejection of Options

- 11.1.3 Following a review of the previous SA and discussion with the Council it was decided that the options needed to be revised to ensure that they were 'realistic alternatives'. In particular, it was considered that options should include a different quantum of office space in both the town centre and at Sovereign Harbour in order to address the concerns raised in Sovereign Harbour Ltd's (SHL) representations.
- 11.1.4 SHL's representations proposed that an option should include a reduction in office floorspace at Sovereign Harbour to 11,000 sqm with 9,000 sqm of office space in the Town Centre and 3,000 sqm at other out of town locations. The inclusion of this option was considered but rejected as no other out of town sites were identified that could accommodate the additional 3,000 sqm. It was therefore decided to test the inclusion of 9,000 sqm of space within the town centre but with 14,000 sqm at Sovereign Harbour (**Option 3b**). It was also decided that a slight modification to this option should be considered as a comparison (**Option 3c**).
- 11.1.5 As a consequence, the SA has assessed six revised options as set out below.

**1: As existing (No Plan)**

90% office provision in Town Centre (TC); 10% Out of Town Centre (OTC); Industrial as existing.

**2a: Intensification of industrial land (update of proposed submission SA)**

**2b: Extensions to industrial land (update of proposed submission SA)**

**3a: As proposed by EBC**

76% office TC: 24% OTC (3,000 sqm TC: 20,000 sqm Sovereign Harbour (SH))

**3b: As proposed by Sovereign Harbour Ltd**

80% office TC: 20% OTC (9,000 sqm TC: 14,000 sqm SH)

**3c: Alternative Option for comparison**

77% office TC: 23% SH (5,000 sqm TC: 18,000 sqm SH)

### The Preferred Option

- 11.1.6 The SA showed that the Preferred Option for development was a combination of [Option 2a: Intensification of Industrial Estates \(20,000 sqm\)](#) and [Option 3a: 76% office TC: 24% OTC \(3,000 sqm TC: 20,000 sqm Sovereign Harbour \(SH\)\)](#). The Preferred Option was then subjected to further SA to verify the results.

- 11.1.7 The preferred option provides a better balance of uses within the Borough offering greater choice and flexibility to the market. The office provision at Sovereign Harbour should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the Sovereign Harbour SPD 2013, although the impact is unlikely to be realised in the short term. Sovereign Harbour will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled, which should result in a positive impact upon economic growth in the medium to long term.
- 11.1.8 GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 of office provision within the Town Centre was unusual and does not fully reflect or respond to market signals; the imbalance in the provision within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the Town Centre can be retained for residential purposes in order to meet the established housing need of 450 units across the five Development Opportunity Sites, identified in the Town Centre Local Plan.
- 11.1.9 The ELR also showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential. The retention and improvement of existing industrial sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. Such benefits should be achievable in the short term as well as medium to long term, which will have a greatly needed positive impact on the market
- 11.1.10 The viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole, particularly in the medium to long term. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining. The provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre.
- 11.1.11 Development within the town centre is well served by public transport. Development at Sovereign Harbour and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development could make the viability of improved public transport services more likely in the long term.
- 11.1.12 The development is likely to result in an increase in the use of natural resources. However, the reduction in office space within the town centre provides the opportunity for new, more energy efficient accommodation to be provided, particularly in the medium to long term. A larger quantum of development at Sovereign Harbour could also increase the potential for renewable forms of energy to be incorporated. The increase in development is likely to cause an increase in the levels of pollutants, greenhouse gas emissions and the amount of waste produced in both construction and operation. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.
- 11.1.13 The revised SA has shown that the Preferred Option, as selected in the Proposed Submission SA, is still the most sustainable option for the RELLP. The full results can be found in [Section 8](#) and [Appendix A5](#).

## RELLP Policies

- 11.1.14 The Revised Employment Land Local Plan will contain a number of policies that will implement the preferred option and help achieve the objectives. These policies are:
- Policy EL1: Economy and Employment Land
  - Policy EL2: Industrial Estates
  - Policy EL3: Town Centre
  - Policy EL4: Sovereign Harbour
- 11.1.15 An additional bullet point and supporting text has been added to strengthen [Policy EL1](#) with regard to local employment and training, to reflect the significant number of jobs that will be created through the construction and operation of the development and the potential for local employment and skills development in the future
- 11.1.16 The appraisal of the options and selection of the preferred option revealed that the Council's original approach to the policy development was substantiated by the SA. The results of the RSA have shown that the RELLP performs well, with the majority of the impacts regarded as positive. Some uncertain and minor negative impacts are identified with regard to environmental issues, particularly in the short term as a result of construction. Suitable mitigation measures will need to be identified through the development management process.
- 11.1.17 The Plan has sought to allocate employment land in the most sustainable and effective way, through intensifying development in existing employment locations and directing development toward the Sustainable Centres at the Town Centre and Sovereign Harbour that have been identified in the Eastbourne Core Strategy Local Plan 2006-2027. This approach will allow all sites within the Borough to 'work together' to meet future requirements, providing a functioning supply of sites that are deliverable and provide sufficient choice to support indigenous businesses and inward investment.
- 11.1.18 The policies support job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The retention and improvement of existing sites will enable future economic growth, which will support the development of housing and the generation of jobs. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development specifically the 450 units across the five Development Opportunity Sites, identified in the Town Centre Local Plan.
- 11.1.19 The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training are encouraged, which are all likely to encourage economic growth particularly in the long term.
- 11.1.20 Policy EL2 supports the redevelopment and intensification of vacant or under used sites in industrial estates to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas.
- 11.1.21 The policies encourage more diverse employment opportunities, which should result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. Sovereign Harbour will offer space for both new and relocating businesses within the area in the medium to long term.

- 11.1.22 The policies encourage the maximisation of land in existing employment locations as well as the use of previously developed land both at Sovereign Harbour and the Town Centre. No greenfield sites are identified for development. Whilst the town centre is not located next to any sensitive sites of biodiversity, Sovereign Harbour may result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.
- 11.1.23 Development within the town centre is well served by public transport. Development at Sovereign Harbour and the Industrial Estates is likely to be car reliant and may result in increased congestion in areas that are already congested. The quantum of development may make the viability of an improved public transport service more likely in the future.
- 11.1.24 The increase in development is likely to increase the amount of pollutants, greenhouse gas emissions and waste produced in both construction and operation. The development is also likely to result in an increase in non-renewable forms of energy and other natural resources. However, a larger quantum of development at Sovereign Harbour may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.

The full results can be found in [Section 9](#) of this report and [Appendix A6](#).

**Eastbourne Borough Council**

Revised Proposed Submission  
**Employment Land Local Plan**



Revised Proposed Submission  
**Sustainability Appraisal**

**APPENDICES**

November 2015

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## Appendices

- A1 SA and SEA requirements
- A2 Summary of Policies, Plans and Programmes
- A3 Compatibility Matrix of Sustainability Objectives
- A4 Assessment of ELLP Objectives
- A5 Assessment of ELLP Options
- A6 Assessment of ELLP Policies
- A7 Cumulative Impact Assessment
- A8 Summary of Policy Changes from Consultation to Draft Submission
- A9 Representations from Teal Planning on behalf of Sovereign Harbour Ltd

## A1 SA and SEA requirements

A Sustainability Appraisal is required Under Section 19(5) of the Planning and Compulsory Purchase Act 2004 (the 2004 Act). Sustainability Appraisal (SA) of all Local Development Documents (LDD), including Development Plan Documents (DPD), is mandatory.

Sustainability Appraisals also need to satisfy the requirements of the European Directive 2001/42/EC (transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 12), which requires formal Strategic Environmental Assessment (SEA) of certain plans and programmes that are likely to have significant effects on the environment. The focus of SEA is environmental effects.

Whilst the Directive defines the environment broadly, in that it includes factors such as population, human health and cultural heritage, SA goes further by examining all the sustainability related effects of plans, whether they are social, environmental or economic. SA under the 2004 Act incorporates the requirements of the SEA Directive.

The requirements of the Directive and the location of the information within the SA report are set out overleaf.

### Information required in the Environment Report according to the SEA Directive

Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated. The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Article 5.2). The information to be given in the report is set out in Article 5 and Annex I of the Directive as follows:

SEA Directive Requirements		Location in SA Report
a	An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plan and programmes	Non-technical summary and Sections 1, 2 and 4
b	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	Scoping report and Section 4
c	The environmental characteristics of areas likely to be significantly affected	Sections 4 and 5
d	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC	Sections 4 and 5
e	The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation	Sections 4 and 5, Appendix A4
f	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.  These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects)	Section 8 and 9, Appendices A3-A7
g	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme	Section 9 and Appendices A5-A7
h	An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Sections 7 and 8, Appendix A5
i	A description of measures envisaged concerning monitoring in accordance with Article 10 Sections 2 and 9	Section 10
j	A non-technical summary of the information provided under the above headings.	Non-technical summary

<b>SEA Directive Requirements</b>		<b>Location in SA Report</b>
<b>Consultation:</b>		
	<ul style="list-style-type: none"> <li>authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).</li> </ul>	Scoping report issued to statutory consultees for consultation. Details provided in Section 3 and Section 4 of the Scoping Report
	<ul style="list-style-type: none"> <li>authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</li> </ul>	Scoping Report, October 2013 Initial SA Report, November 2013 Proposed Submission SA Report, Nov 2014 Revised SA Report, Nov 2015
	<ul style="list-style-type: none"> <li>other EU Member States, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).</li> </ul>	N/A
<b>Taking the environmental report and the results of the consultations into account in decision-making (Art. 8) Provision of information on the decision:</b>		
	<p>When the plan or programme is adopted, the public and any countries consulted under Art.7 shall be informed and the following made available to those so informed:</p> <ul style="list-style-type: none"> <li>the plan or programme as adopted</li> <li>a statement summarising how environmental considerations have been integrated into the plan or programme and how the environmental report pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of consultations entered into pursuant to Article 7 have been taken into account in accordance with Article 8, and the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with the measures decided concerning monitoring (Art. 9 and 10)</li> </ul>	N/A
<b>Monitoring</b>		
	<ul style="list-style-type: none"> <li>of the significant environmental effects of the plan's or programme's implementation (Art. 10)</li> </ul>	N/A
<b>Quality assurance:</b>		
	<ul style="list-style-type: none"> <li>environmental reports should be of a sufficient standard to meet the requirements of the SEA checklist Directive (Art. 12).</li> </ul>	

### A2 Summary of Additional Policies, Plans and Programmes

The full review of Policies, Plans and Programmes can be found in the **Scoping Report 2013, Section 5**. A summary of the key messages from the review that need to be taken into account in the ELLP and the SA are set out below.

Key Theme	Relevant PPSs	Specific Targets/Implications
<b>ECONOMIC</b>		
Sustainable Economic Growth	<ul style="list-style-type: none"> <li>DCLG: National Planning Policy Framework (2012)</li> <li>EBC: Corporate Plan (2012)</li> <li>Community Strategy (2008)</li> <li>ESCC: East Sussex Economic Development Strategy (2012)</li> <li>ESCC: East Sussex Local Economic Assessment (LEA)</li> </ul>	<p>Ensure that the ELLP encourages sustainable economic growth and economic competitiveness through attracting new and innovative businesses.</p> <p>The ELLP should aim to increase investment in Eastbourne through the provision of additional employment land that meets the needs of new businesses, and allows existing businesses to move to new premises where appropriate.</p>
Diversification of Economy	<ul style="list-style-type: none"> <li>Community Strategy (2008)</li> <li>Eastbourne/Hailsham Triangle Masterplan (2009)</li> <li>ESCC: East Sussex Economic Development Strategy (2012)</li> </ul>	<p>Ensure that the ELLP encourages a diversification in the local economy through the provision of suitable employment land. Flexible employment space that can be used by small and start-up businesses</p>
Employment Opportunities	<ul style="list-style-type: none"> <li>EBC: Core Strategy (2013)</li> <li>EBC: Corporate Plan (2012)</li> <li>Community Strategy (2008)</li> <li>European Spatial Development Perspective Report (1999)</li> <li>EU European Employment Strategy (1997, revised 2005)</li> <li>ESCC: East Sussex Economic Development Strategy (2012)</li> <li>ESCC: East Sussex Local Economic Assessment (LEA)</li> </ul>	<p>Ensure that the ELLP takes forward all reasonable opportunities to provide a wide range of employment opportunities.</p> <p>The ELLP should support the growth of jobs and employment in the borough across a range of sectors and should support existing jobs.</p> <p>In addition, it should help to provide well-paid employment opportunities.</p>
Small and start-up business	<ul style="list-style-type: none"> <li>Community Strategy (2008)</li> <li>ESCC: East Sussex Economic Development Strategy (2012)</li> </ul>	<p>Ensure that the ELLP considers the needs of small and start-up businesses when identifying future employment land supply. The space should be flexible in order to make it easier for small businesses to occupy.</p>

Key Theme	Relevant PPSIs	Specific Targets/Implications
<b>ECONOMIC</b>		
Retention of existing businesses	<ul style="list-style-type: none"> <li>DCLG: National Planning Policy Framework (2012)</li> <li>Eastbourne/Hailsham Triangle Masterplan (2009)</li> <li>EBC/GVA: Employment Land Supplementary Evidence Report (2014)</li> </ul>	Ensure that the ELLP supports existing business sectors and meets current business needs by providing suitable employment space for local businesses who want to grow or relocate within Eastbourne.
Travel to Work	<ul style="list-style-type: none"> <li>EBC: Core Strategy (2013)</li> <li>Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</li> <li>UN Framework Convention on Climate Change (1992)</li> <li>Department for Transport: Transport White Paper - The Future of Transport – A Network for 2030 (2004)</li> <li>ESCC: East Sussex Local Transport Plan 3 (2011-2026)</li> <li>ESCC: Guidance on Car Parking at Non-Residential Development (2012)</li> <li>EBC/ESCC/WDC/TPI: South Wealden and Eastbourne Transport Study (2010)</li> <li>EBC: Eastbourne Cycling Strategy (2012) ONS Flow Data (2011 Census)</li> </ul>	<p>Ensure that the ELLP improves economic competitiveness and growth, whilst ensuring all reasonable opportunities are taken forward to reduce reliance on private cars.</p> <p>It should encourage travel to work via walking, cycling and public transport.</p> <p>The ELLP should encourage appropriate amounts of car and cycle parking at new commercial and employment development.</p>
Connectivity	<ul style="list-style-type: none"> <li>ESCC: East Sussex Local Transport Plan 3 (2011-2026)</li> <li>EBC/GVA: Employment Land Review (2013)</li> </ul>	<p>Physical connectivity is a weakness for Eastbourne due to its distance from major economic hubs of the South East and the quality of the road and rail network. There are also internal problems, particularly at Lottbridge Drove where there is congestion at peak time.</p> <p>The increased provision of employment land is likely to increase demand for travel, so employment should be located in sustainable locations. In addition, the impact on the road network should be considered.</p>

Key Theme	Relevant PPPSIs	Specific Targets/Implications
<b>ECONOMIC</b>		
Employment Land	<ul style="list-style-type: none"> <li>• DCLG: National Planning Policy Framework (2012)</li> <li>• Community Strategy (2008)</li> <li>• Eastbourne/Hailsham Triangle Masterplan (2009)</li> <li>• EBC/GVA: Employment Land Review (2013)</li> <li>• Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2013</li> <li>• HCA: Employment Densities Guide 2<sup>nd</sup> Edition (2010)</li> <li>• EBC/GVA: Employment Land Supplementary Evidence Report (2014)</li> </ul>	<p>Ensure that the ELLP provides for an appropriate amount of employment floorspace over the plan period in order to provide additional employment land to meet future requirements. It should take into account employment densities outlined in the HCA guidance.</p> <p>The ELLP should consider the impact of loss of employment land to residential use, and particularly the implications of the relaxation of permitted development in identifying the need for employment land in the future.</p>
Quality of commercial premises	<ul style="list-style-type: none"> <li>• ESCC: East Sussex Local Economic Assessment (LEA)</li> </ul>	<p>The ELLP should help to improve the quality and quantity of commercial premises so that they are appropriate to business needs.</p>
Viability of development	<ul style="list-style-type: none"> <li>• DCLG: National Planning Policy Framework (2012)</li> <li>• EBC/DTZ: Eastbourne Park Sites Development Feasibility Study (2006)</li> <li>• EBC/GVA: Employment Land Supplementary Evidence Report (2014)</li> </ul>	<p>Ensure that the ELLP takes into account viability issues when identifying sites for employment development.</p>
Building design	<ul style="list-style-type: none"> <li>• Department for Business, Innovation and Skills: Sustainable Construction Strategy (2008)</li> <li>• BREEAM (Building Research Establishment Environmental Assessment Method) (2008)</li> <li>• DETR/CABE: By Design – Urban design in the planning system: towards better practice (2000)</li> </ul>	<p>Ensure that the ELLP promotes promote high standards of design in commercial and employment development. It should also support environmentally sustainable commercial development which both limits short term impacts during construction and limits longer term impacts on a range of environmental receptors.</p>

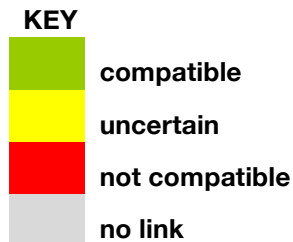
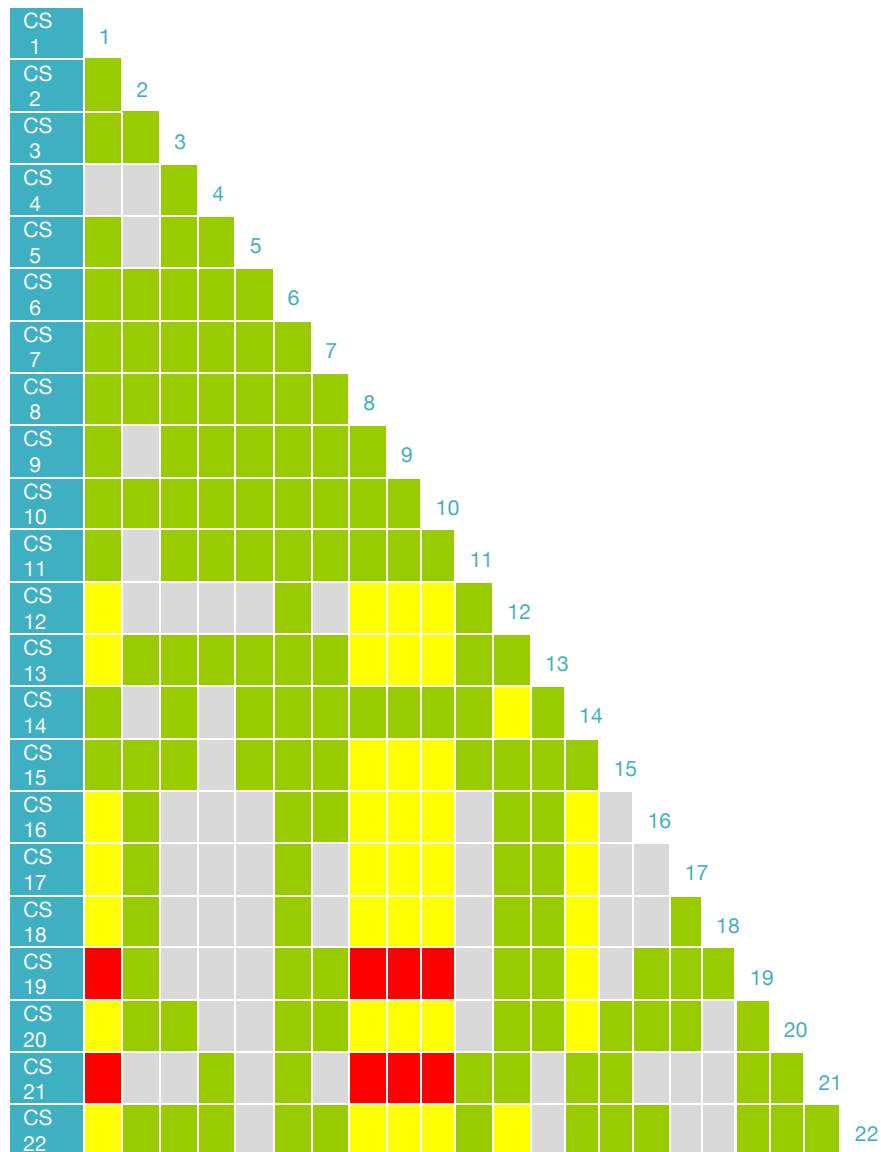
Key Theme	Relevant PPSIs	Specific Targets/Implications
<b>SOCIAL</b>		
Economic Deprivation	<ul style="list-style-type: none"> <li>EU Sustainable Development Strategy 2002 (revised 2006) (reviewed 2009)</li> </ul>	Ensure that the ELLP assists in reducing economic deprivation by providing additional well-paid jobs.
Sustainable Centres	<ul style="list-style-type: none"> <li>EBC: Core Strategy (2013)</li> <li>EBC: Town Centre Local Plan (2013)</li> <li>EBC: Sovereign Harbour SPD (2013)</li> <li>DCLG: National Planning Policy Framework (2012)</li> </ul>	<p>Ensure that the ELLP take into account the desire to create two sustainable centres at the Town Centre and Sovereign Harbour.</p> <p>The ELLP should identify the quantum of additional office space that should be accommodated in the Town Centre. The ELLP should maintain the vitality and viability of the Town Centre.</p>
Neighbourhoods	<ul style="list-style-type: none"> <li>EBC: Core Strategy (2013)</li> </ul>	Ensure that the ELLP takes into account the desire to create sustainable neighbourhoods in Eastbourne by providing job opportunities close to where people live. It should also consider the visions and policy for each neighbourhood.
<b>ENVIRONMENTAL</b>		
Biodiversity	<ul style="list-style-type: none"> <li>UN Convention on Biological Diversity (1992)</li> <li>EU Biodiversity Strategy (1998)</li> <li>EU Biodiversity Action Plan (2006)</li> <li>Wildlife and Countryside Act 1981 (as amended)</li> <li>The Wildlife Trusts: A Living Landscape for the South East (2006)</li> </ul>	Ensure that the ELLP takes a 'precautionary principle' approach to avoiding biodiversity loss and ensure that biodiversity is not adversely affected by development. It should also ensure that any employment development properly assesses the impact of development on biodiversity.



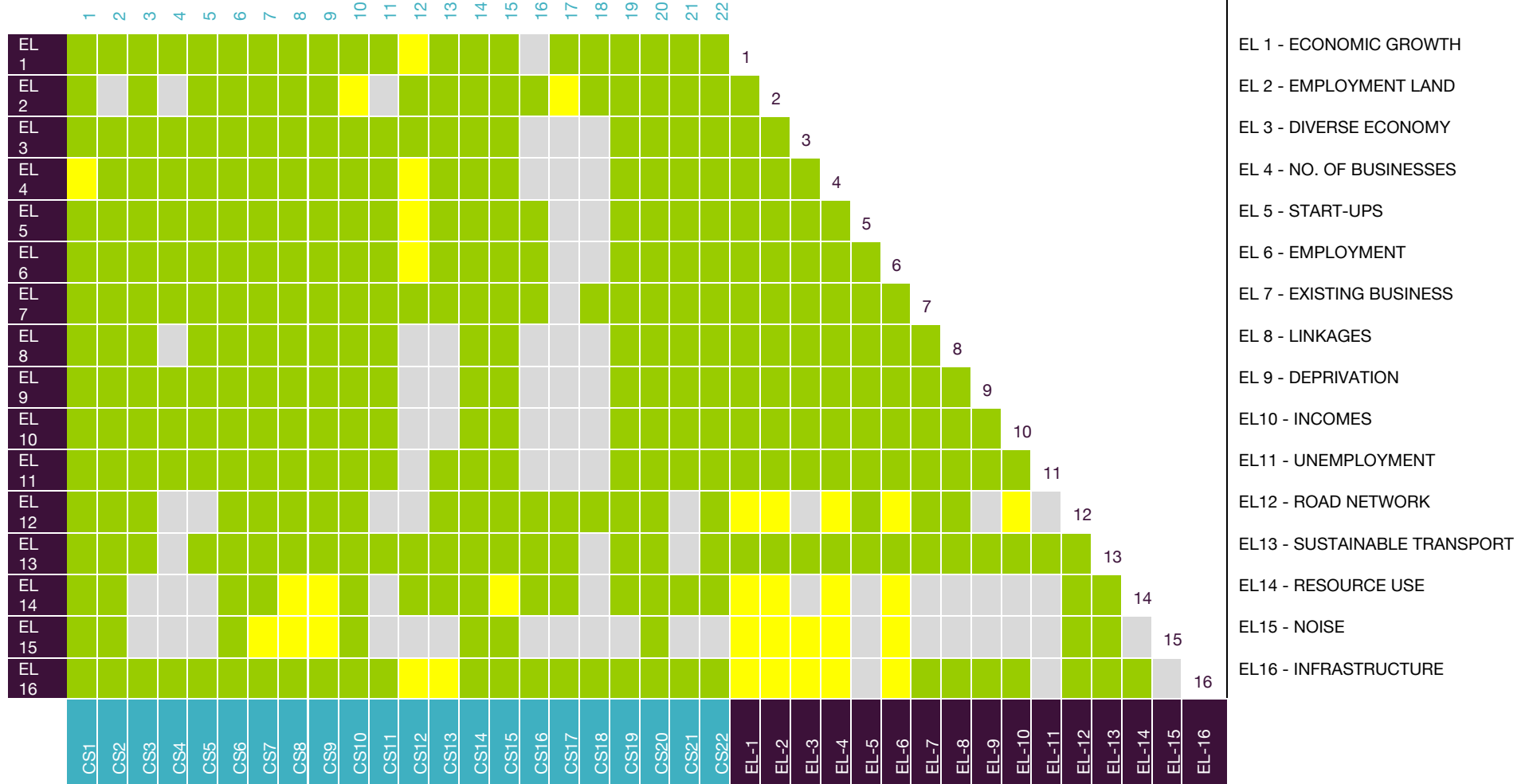
Key Theme	Relevant PPSIs	Specific Targets/Implications
<b>ENVIRONMENTAL</b>		
Water and Flooding	<ul style="list-style-type: none"> <li>• DCLG: National Planning Policy Framework (2012)</li> <li>• Floods Directive (EU Directive 2007/60/EC)</li> <li>• DEFRA: The Water Environment (Water Framework Directive) (England and Wales) Regulations (2003)</li> <li>• DCLG: Technical Guidance to the National Planning Policy Framework (2012)</li> <li>• EBC/Scott Wilson: Strategic Flood Risk Assessment Level 2 (2009)</li> <li>• EBC: Eastbourne Park Supplementary Planning Document (2013)</li> </ul>	<p>Ensure that the ELLP considers the issue of flooding in Eastbourne by avoiding development on areas of flood risk and promoting flood mitigation. It should also ensure that development does not increase the risk of flooding or have an adverse effect on waterbodies.</p> <p>The ELLP should take into account surface run-off during and after construction, which may lead to an increase risk of surface water flooding elsewhere.</p> <p>Employment development should not be located within Flood Zone 3b (Functional Floodplain).</p>
Energy Efficiency	<ul style="list-style-type: none"> <li>• EBC: Core Strategy (2013)</li> <li>• Kyoto Protocol to the UN Framework Convention on Climate Change (1997)</li> <li>• UN Framework Convention on Climate Change (1992)</li> <li>• Energy Performance of Buildings (EU Directive 2002/91/EC)</li> <li>• BREEAM (Building Research Establishment Environmental Assessment Method) (2008)</li> </ul>	<p>Ensure that the ELLP takes forward all reasonable opportunities to encourage development that is energy efficient. The ELLP should aim to improve the energy performance of commercial and industrial buildings.</p>
Low carbon town	<ul style="list-style-type: none"> <li>• The UK Low Carbon Transition Plan (2009)</li> <li>• East Sussex County Council: East Sussex Climate Change Strategy (2009)</li> </ul>	<p>The ELLP should improve the energy efficiency of commercial premises, help facilitate the growth of green jobs and supporting the development of environmental technologies locally.</p>
Air Quality	<ul style="list-style-type: none"> <li>• Air Quality Framework Directive (96/62/EC) and daughter Directives (99/30/EC), (2000/69/EC), (2002/3/EC)</li> <li>• Air Quality Standards Regulations (2010)</li> </ul>	<p>The ELLP should aim to reduce emissions from commercial and industrial premises in order to improve air quality.</p>

Key Theme	Relevant PPSIs	Specific Targets/Implications
<b>ENVIRONMENTAL</b>		
Noise	<ul style="list-style-type: none"> <li>• Assessment and Management of Environmental Noise (END Directive 2002/49/EC)</li> <li>• DEFRA: Noise Policy Statement for England (2010)</li> </ul>	Ensure that the ELLP does not identify sites for employment uses that generate excessive noise and would have a significant noise impact on residential areas.
Landscape	<ul style="list-style-type: none"> <li>• The Pan-European Biological and Landscape Diversity Strategy (1995)</li> <li>• EBC/CBA: Landscape Capacity Guidance (2009)</li> <li>• EBC: Eastbourne Park Supplementary Planning Document (2013)</li> </ul>	Ensure that the ELLP protects the landscape by only identifying locations for employment development that have sufficient capacity in landscape terms of such development.
Cultural and archaeological assets	<ul style="list-style-type: none"> <li>• EBC: Core Strategy (2013)</li> <li>• Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)</li> <li>• Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992)</li> <li>• UK Renewable Energy Strategy (2009)</li> </ul>	<p>Ensure that the ELLP considers the impact on cultural heritage assets when identifying sites for employment land.</p> <p>Archaeological assets, both potential and realised should be provided with full consideration through the ELLP.</p>
Soils and agricultural land	<ul style="list-style-type: none"> <li>• DEFRA: Safeguarding our Soils: A Strategy for England (2009)</li> <li>• Soils and the Natural Heritage - a Vision by the Soils LCN for the Protection of the UK</li> <li>• Soil Resource and Sustainable Use of Soils, Soils Lead Coordination Network (2007)</li> </ul>	The ELLP should limit the loss of the highest quality agricultural land, support a reduction of soil loss and erosion, and reduced the amount of land that becomes contaminated.

### A3 Compatibility Matrix of Sustainability Objectives



- CS1 - HOMES
- CS2 - HEALTH
- CS3 - SOCIAL EXCLUSION
- CS4 - EDUCATION
- CS5 - CRIME
- CS6 - COMMUNITIES
- CS7 - ACCESSIBILITY
- CS8 - ECONOMY
- CS9 - ECONOMIC GROWTH
- CS10 - NEW ECONOMIES
- CS11 - SKILLS
- CS12 - BIODIVERSITY
- CS13 - NATURAL & HISTORIC ENVIRONMENT
- CS14 - LAND USE
- CS15 - LANDSCAPE & TOWNSCAPE
- CS16 - AIR QUALITY
- CS17 - WATER QUALITY
- CS18 - FLOOD RISK
- CS19 - CLIMATE CHANGE
- CS20 - TRANSPORT
- CS21 - WASTE
- CS22 - NATURAL RESOURCES



## Compatibility Assessment Results

### KEY

	<b>compatible</b>
	<b>uncertain</b>
	<b>not compatible</b>
	<b>no link</b>

The Sustainability Appraisal Scoping Report for the ELLP 2013 set out a Compatibility Matrix of the Sustainability Objectives within Section 9 of the document. The above matrix provides an update of that assessment.

The colour coding above provides a clear overview of the relationship of the Sustainability Objectives. It is an important strategic exercise to ensure that the overarching Objectives are not at odds with one another.

Quick analysis of the matrix shows that the relationships between the Sustainability Objectives are predominantly compatible or neutral (no link) with a couple of potential incompatible objectives identified.

The objectives where there is potential incompatibility are CS19 Climate Change and CS21 Waste. The potential areas of incompatibility are objectives:

- CS1 Homes
- CS8 Economy
- CS9 Economic Growth
- CS10 Economics

The building of new homes and businesses is likely to have a negative impact on climate change owing to the increases in CO<sub>2</sub> emissions that will result. However such impacts should be able to be mitigated through the design and approach to development, which will be managed by the development management policies, in particular:

- Policy D1 Sustainable Development
- Policy D5 Housing
- Policy D8 Sustainable Travel

Similarly the building of new homes and economic growth is likely to increase the amount of waste produced for disposal. Again such impacts should be able to be mitigated through the design process in particular the application of Policy D1 Sustainable Development, including the conservation of scarce resources, the utilisation of sustainable construction techniques and site waste management practices.

Where uncertain relationships are shown, the likely impact could be positive or negative depending on implementation. These impacts have been shown to highlight any potential incompatibilities.

## A4 Assessment of ELLP Objectives

### Employment Land Local Plan Objectives

The ELLP Objectives listed below have been assessed against the Sustainability Objectives to check that they are compatible.

ELLP1	<b>Stimulate Economic Growth</b> - To stimulate sustainable economic growth to meet the needs of the community within environmental constraints and encourage economic competitiveness through attracting increased investment and new and innovative businesses
ELLP2	<b>Encourage Small and Start-up Businesses</b> - To deliver a variety of new employment opportunities by providing a range of flexible employment spaces that can be used by existing businesses and new start-up businesses
ELLP3	<b>Diversify the Local Economy</b> - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish
ELLP4	<b>Support Existing Businesses</b> - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.
ELLP5	<b>Promote Sustainable Employment Locations</b> - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.

Sustainability Objectives		ELLP Objectives				
		1	2	3	4	5
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					
CS5	<b>CRIME</b> To reduce crime and the fear of crime					
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					

Sustainability Objectives		ELLP Objectives				
		1	2	3	4	5
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					



Sustainability Objectives		ELLP Objectives				
		1	2	3	4	5
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys	Yellow	Green	Yellow	Yellow	Green
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting	Red	Yellow	Yellow	Yellow	Yellow
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	Yellow	Yellow	Yellow	Yellow	Yellow
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth	Green	Green	Green	Green	Green
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land	Green	Green	Green	Green	Green
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors	Green	Green	Green	Green	Green
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town	Green	Green	Green	Green	Green
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses	Green	Green	Green	Green	Green
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town	Green	Green	Green	Green	Green
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne	Green	Green	Green	Green	Green
EL8	<b>LINKAGES</b> To improve local business linkages	Green	Green	Green	Green	Green

Sustainability Objectives		ELLP Objectives				
		1	2	3	4	5
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					

### KEY

	<b>compatible</b>
	<b>uncertain</b>
	<b>not compatible</b>
	<b>no link</b>

### Results of Assessment of ELLP Objectives

The assessment shows that the ELLP objectives are largely compatible. Two areas of potential incompatibility are shown with regards to ELLP Objective 1 - Stimulate Economic Growth in relation to CS19 Climate Change and CS21 Waste.

The building of new homes and businesses is likely to have a negative impact on climate change and waste owing to the increases in CO<sub>2</sub> emissions and waste that will be produced. However, mitigation of potential negative impacts should be considered in the SA of the options and policies and through the design and approach to development, which will be managed by the development management policies, in particular:

- Policy D1        Sustainable Development
- Policy D5        Housing
- Policy D8        Sustainable Travel

Where uncertain relationships are shown, the likely impact could be positive or negative depending on implementation. These impacts have been shown to highlight any potential incompatibilities and for suitable mitigation measures to be identified during the SA process.

## A5 Assessment of ELLP Options

The options that have been assessed are as follows:

- Option 1:** As existing (No Plan) - 90% office provision in Town Centre (**TC**); 10% out of Town Centre (**OTC**); Industrial as existing.
- Option 2a:** Intensification of industrial land (update of proposed submission SA)
- Option 2b:** Extensions to industrial land (update of proposed submission SA)
- Option 3a:** 76% office TC: 24% OTC (3,000 sqm TC: 20,000 sqm Sovereign Harbour (SH))
- Option 3b:** 80% office TC: 20% OTC (9,000 sqm TC: 14,000 sqm SH)
- Option 3c:** 77% office TC: 23% SH (5,000 sqm TC: 18,000 sqm SH)
- Preferred Option:** 76% office TC: 24% SH (3,000 sqm TC: 20,000 sqm SH) + Intensification of Industrial Estates (20,000 sqm)

### KEY

	Major negative impact
	Minor negative impact
	Uncertain impact
	Minor positive impact
	Major positive impact
	No significant impact

### Summary Results of ELLP Options

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home	Yellow	Light Green	Light Green	Light Green	Orange	Yellow	Light Green
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health	Grey	Grey	Grey	Grey	Grey	Grey	Grey
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town	Orange	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work	Yellow	Light Green	Light Green	Light Green	Light Green	Light Green	Light Green
CS5	<b>CRIME</b> To reduce crime and the fear of crime	Grey	Grey	Grey	Grey	Grey	Grey	Grey
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town	Yellow	Yellow	Yellow	Light Green	Yellow	Yellow	Light Green
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	Yellow	Light Green	Yellow	Yellow	Light Green	Yellow	Yellow
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth	Orange	Yellow	Dark Green	Dark Green	Light Green	Light Green	Dark Green
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth	Orange	Light Green	Light Green	Dark Green	Light Green	Dark Green	Dark Green

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities							
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities							
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability							
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment							
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance							
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes							
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve							
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment							
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment							

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts							
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys							
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting							
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources							
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth							
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land							
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors							
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town							
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses							

Sustainability Objectives		ELLP Options						
		1	2A	2B	3A	3B	3C	PO
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town	Yellow	Green	Green	Green	Yellow	Yellow	Green
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne	Orange	Yellow	Green	Green	Yellow	Green	Green
EL8	<b>LINKAGES</b> To improve local business linkages	Orange	Yellow	Green	Green	Yellow	Green	Green
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population	Yellow	Green	Green	Green	Green	Green	Green
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town	Yellow	Yellow	Yellow	Green	Green	Green	Green
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment	Yellow	Green	Green	Green	Yellow	Green	Green
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network	Yellow	Yellow	Yellow	Orange	Yellow	Yellow	Yellow
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters	Green	Green	Green	Orange	Yellow	Yellow	Green
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises	Yellow	Orange	Orange	Orange	Orange	Orange	Orange
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas	Grey	Green	Green	Green	Green	Green	Yellow
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth	Yellow	Yellow	Green	Green	Yellow	Green	Yellow



### Detailed Results of SA of Options

Sustainability Objectives		Option 1: 90% office in TC: 10% OTC, Industrial as existing				Commentary
		1	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					Retaining 90% of office accommodation within the TC may prevent the redevelopment of sites that are more suitable for housing or mixed-use development, as well as restricting economic growth within the Borough.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The lack of choice within the market to capture economic interest and new business could lead to the loss of jobs and prosperity for the town in the future and result in a negative impact upon poverty and social exclusion
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					The lack of choice within the market to capture economic interest and new business could lead to the loss of jobs and a lack of opportunities for new skills for the town in the future.
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The lack of choice in the market could result in the exclusion of sectors of the community who are unable to participate in the future of the town.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					The lack of new business opportunities may prevent opportunities to improve accessibility outside of the Town Centre. However, the location of a high percentage of office provision within the town centre may enable a higher level of sustainable modes of transport.

Sustainability Objectives		Option 1: 90% office in TC: 10% OTC, Industrial as existing				Commentary
		1	S	M	L	
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					The lack of choice within the market to capture economic interest and new business is likely to constrain economic growth and the potential for more diverse employment opportunities, which could become more significant over the long term.
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					The retention of the current market split will provide fewer opportunities for larger development to come forward that can provide, larger floorplates and improved infrastructure and enable economic growth.
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses being lost to elsewhere in the region.
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					The lack of choice within the market to capture economic interest and new business could lead to the loss of jobs and a lack of opportunities for new skills for the town in the future.
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					By retaining 90% of the office provision within the town centre and not increasing the out of town or industrial provision there is likely to be a positive impact on sites of biodiversity interest as such sites will not be threatened by development.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					No significant impact
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					By retaining 90% of office use within the town centre the potential to reuse previously developed land and existing buildings is likely to be constrained as there will be fewer opportunities for businesses to relocate to alternative accommodation, particularly larger floorspace

Sustainability Objectives		Option 1: 90% office in TC: 10% OTC, Industrial as existing				Commentary
		1	S	M	L	
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					No significant impact
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					The high concentration of office use within the Town Centre may encourage more sustainable modes of transport. However, new business opportunities may be forced to locate elsewhere in the region which could result in out-commuting and increased car journeys
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					No significant impact
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					No significant impact
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Whilst town centre locations for business are likely to encourage more sustainable modes of transport to be used, the potential for mixed development and new transport measures are less likely to be realised.

Sustainability Objectives		Option 1: 90% office in TC: 10% OTC, Industrial as existing				Commentary
		1	S	M	L	
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					No significant impact
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The potential for new energy efficient development powered by renewables is less likely to be realised within the town centre. Older stock could be retrofitted but often this is more difficult to achieve than new build.
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The retention of the current market split will provide fewer opportunities for new development to come forward that can provide new opportunities and enable economic growth.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					By retaining 90% of office use within the town centre with no new out of town provision, the potential to reuse previously developed land and existing buildings is likely to be constrained as there will be fewer opportunities for businesses to relocate to alternative accommodation, particularly larger floorspace.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses being lost to elsewhere in the region.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses being lost to elsewhere in the region.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could discourage start-ups and small businesses from locating in the borough.
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses being lost to elsewhere in the region and a failure to increase the number and range of employment opportunities.

Sustainability Objectives		Option 1: 90% office in TC: 10% OTC, Industrial as existing				Commentary
		1	S	M	L	
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					By retaining 90% of office use within the town centre with no new out of town provision, the potential to reuse previously developed land and existing buildings is likely to be constrained as there will be fewer opportunities for businesses to relocate to alternative accommodation, particularly larger floorspace.
EL8	<b>LINKAGES</b> To improve local business linkages					The concentration of office space within the town centre is likely to prevent opportunities for new business elsewhere in the borough and the improvement of linkages between neighbourhoods.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest. New businesses and employment opportunities could be lost to elsewhere in the region, which could result in an increase in economic deprivation for the resident population.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest. New businesses and employment opportunities could be lost to elsewhere in the region, which could have a negative impact upon incomes.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses and employment opportunities being lost to elsewhere in the region.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Whilst town centre locations for business may encourage more sustainable modes of transport to be used, the potential for mixed development and new transport measure are less likely to be realised. The pressure on the road network will also be concentrated within the Town Centre.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					The emphasis on the town centre location for business is more likely to encourage more sustainable modes of transport to be used,
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The potential for new energy efficient development powered by renewables is less likely to be realised within the town centre. Older stock could be retrofitted but often this is more difficult to achieve than new build.

Sustainability Objectives		Option 1: 90% office in TC: 10% OTC, Industrial as existing				Commentary
		1	S	M	L	
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					No significant impact
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The retention of the current market split will provide fewer opportunities for larger development to come forward that can provide improved infrastructure and enable economic growth. Capacity of the infrastructure within the town centre will need to be examined.

### Summary of findings:

This option tests the current ratio of floorspace of 90:10 between the Town Centre and Out of Town provision, with the existing provision for industrial land. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that such a ratio was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual. The ELR also identified the need for 11,467 sqm of industrial space and 7,339 sqm of warehouse space, which could not be accommodated in this option.

The retention of the current market split is unlikely to provide the necessary choice and flexibility to respond to the market and accommodate any future development or occupier interest, which could result in new businesses and employment opportunities being lost to elsewhere in the region. As a consequence there is likely to be a lack of choice within the market to capture economic interest and new business, which could lead to the loss of jobs and a constraint on economic growth for the future, particularly in the long term.

Whilst the provision of office space within the town centre may encourage more people to use sustainable modes of transport, the lack of choice within the town for business may force business outside the town, which could result in further out-commuting. The concentration of office accommodation within the town centre could also lead to an over concentration of congestion of the road network in the town centre.

Measures would need to be identified to prevent the loss of businesses and jobs from the town and constraints on economic growth. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should also be identified.

Sustainability Objectives		Option 2A: Intensification of Industrial Land				Commentary
		2A	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					The retention and improvement of existing sites will enable future economic growth, which will support the development of housing. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The intensification of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity in the town and a positive impact upon poverty and social exclusion.
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					The retention and expansion of industrial floorspace should provide opportunities for the creation of jobs and opportunities for new skills for the town in the future.
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The intensification of industrial land will retain existing jobs and should provide new opportunities for the community. However, the potential for jobs and opportunities in new locations within the Borough may not be realised as a consequence.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					The intensification of industrial land and the increased number of jobs should increase the viability of public transport from existing neighbourhoods
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					The retention and improvement of existing sites will enable future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. However, other uses that are not suitable in industrial areas may be disadvantaged.

Sustainability Objectives		Option 2A: Intensification of Industrial Land				Commentary
		2A	S	M	L	
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					Intensification of industrial land will make use of existing infrastructure and will enable continued economic growth.
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					Intensification may offer the opportunity for smaller units, suitable for start-up businesses. However, other uses that are not suitable in industrial areas may be disadvantaged.
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					The retention and expansion of industrial floorspace should provide opportunities for the creation of jobs and new skills for the town in the future as well as protecting existing provision.
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					Intensification of industrial land will encourage the use of previously developed land, which should have less impact upon biodiversity and the landscape.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					Intensification of industrial land should reduce the pressure for development upon greenfield land, in particular Eastbourne park, and reduce the impact upon the historic environment, enabling such areas to be protected and enhanced.
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					Intensification of industrial land will encourage the use of previously developed land and the re-use of existing buildings.
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					Intensification of industrial land will retain such development within specific designated areas, thereby minimising the impacts upon landscape and townscape
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					The intensification of industrial land has the potential to cause an increase in the levels of pollutants by concentrating potentially polluting activity in one area. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.



Sustainability Objectives		Option 2A: Intensification of Industrial Land				Commentary
		2A	S	M	L	
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					The impact on the water quality will be dependant on the type of industrial activities undertaken. Suitable mitigation would need to be identified in consultation with the regulatory authorities to ensure that water quality is maintained or improved where possible.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					The use of previously developed land is likely to involve the use of land, which is subject to less risk of flooding. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					The intensification of industrial land will result in an increase in greenhouse emissions as a result of any new development. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					The intensification of industrial land could result in greater traffic congestion in areas that are already congested. However, the increase in development can also increase the opportunities for sustainable transport measures such as improved public transport or car sharing.
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The intensification of industrial land is likely to result in an increase in non-renewable forms of energy and other natural resources. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		Option 2A: Intensification of Industrial Land				Commentary
		2A	S	M	L	
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					Intensification of industrial land should enable continued economic growth.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					Intensification of industrial land will encourage the use of previously developed land and the re-use of existing buildings.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					Intensification may offer the opportunity for smaller units, suitable for start-up businesses. However, other uses that are not suitable in industrial areas may be disadvantaged.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					Intensification should result in an increase in the overall number of jobs in the town. However, other sectors that are not suitable in industrial areas may be disadvantaged.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					Intensification may offer the opportunity for smaller units, suitable for start-up businesses. However, other uses that are not suitable in industrial areas may be disadvantaged.
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					Intensification should result in an increase in the overall number of jobs in the town. However, other sectors that are not suitable in industrial areas may be disadvantaged.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					Intensification may offer the opportunity for businesses to relocate to small but modern premises but may not offer larger premises that others require to enable their businesses to grow or new space for other sectors in the town.
EL8	<b>LINKAGES</b> To improve local business linkages					Intensification of industrial land will enable existing links to be strengthened but may limit the potential for new links to be established in other areas.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The intensification of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity in the town and a positive impact upon deprivation in the medium to long term.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					The intensification of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity in the town. However, it is not clear whether this would have a positive impact on incomes.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The intensification of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity in the town.

Sustainability Objectives		Option 2A: Intensification of Industrial Land				Commentary
		2A	S	M	L	
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					The intensification of industrial land could result in greater traffic congestion in areas that are already congested. However, the increase in development can also increase the opportunities for sustainable transport measures such as improved public transport or car sharing.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					The intensification of industrial land could increase the opportunities for sustainable transport measures such as improved public transport or car sharing.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The intensification of industrial land is likely to result in an increase in resources. Mitigation measures will need to be identified that encourage sustainable design and management of premises and encourage efficiency.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					The intensification of industrial land is likely to result in increased noise levels within these areas but to minimise the impact of noise upon residential areas.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The intensification of industrial land will use existing infrastructure. The capacity of the existing infrastructure will need to be examined to ensure that it can cope with any additional development.

**Summary of findings:**

This option tests the intensification of industrial land within the current industrial estates. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential. The ELR also identified the need for 11,467 sqm of industrial space and 7,339 sqm of warehouse space, which could be accommodated in this option.

The retention and improvement of existing sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. However, other uses that are not suitable in industrial areas may be disadvantaged.

The intensification of industrial land is likely to result in an increase in the use of natural resources and to have negative impacts upon climate change, waste, and resource use. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		Option 2B: Extensions to Industrial Land				Commentary
		2B	S	M	L	
CS1	<p><b>HOMES</b></p> <p>To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>					The extension of existing sites will enable future economic growth, which will support the development of housing. The sites adjacent to industrial land are less likely to be attractive for housing, enabling other available sites to be developed for residential development. The effect is unlikely to be realised in the short term.
CS2	<p><b>HEALTH</b></p> <p>To improve the health and wellbeing of the population and reduce inequalities in health</p>					No significant impact
CS3	<p><b>SOCIAL EXCLUSION</b></p> <p>To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town</p>					The extension of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity in the town and a positive impact upon poverty and social exclusion in the medium to long term.
CS4	<p><b>EDUCATION</b></p> <p>To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</p>					The extension of industrial land should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.
CS5	<p><b>CRIME</b></p> <p>To reduce crime and the fear of crime</p>					No significant impact
CS6	<p><b>COMMUNITIES</b></p> <p>To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town</p>					The extension of industrial land will enable existing jobs to be retained and should provide new opportunities for the community. However, the potential for jobs and opportunities in new locations within the Borough may not be realised as a consequence.
CS7	<p><b>ACCESSIBILITY</b></p> <p>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</p>					The extension of industrial land and the increased number of jobs should increase the viability of public transport from existing neighbourhoods, however the new sites may require new infrastructure to make them accessible.
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					The ELR has shown that the industrial market is forecast to grow over the plan period, and that additional space will need to be provided to accommodate such growth. The extension of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity in the town

Sustainability Objectives		Option 2B: Extensions to Industrial Land				Commentary
		2B	S	M	L	
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					The ELR has shown that the industrial market is forecast to grow over the plan period, and that additional space will need to be provided to accommodate such growth. The extension of industrial land provides the opportunity for larger sites to be masterplanned to ensure that suitable infrastructure is provided to support economic growth
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					The extension of industrial land provides the opportunity for larger sites to be developed that can offer a wider range of space and uses to be provided to a more diverse market.
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					The extension of industrial land should provide opportunities for the creation of jobs and opportunities for existing and new skills for the town.
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					The extension of industrial land will require the development of greenfield sites of a high landscape and biodiversity value. In particular, such development is likely to have a significant negative impact upon Eastbourne Park, which is protected by Core Strategy policy D11 as an area of high landscape and biodiversity importance.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					The extension of industrial land will require the development of greenfield land within Eastbourne Park an area protected for its high landscape and biodiversity value. Whilst the industrial development may improve accessibility to areas of open space it is unlikely to protect or enhance the natural environment.
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					The extension of industrial land will require the development of greenfield sites of a high landscape and biodiversity value. In particular, such development is likely to have a significant negative impact upon Eastbourne Park, which is protected by Core Strategy policy D11 as an area of high landscape and biodiversity importance.
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The extension of industrial land is likely to have a negative impact upon the quality of the landscape.

Sustainability Objectives		Option 2B: Extensions to Industrial Land				Commentary
		2B	S	M	L	
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					The extension of industrial land has the potential to cause an increase in the levels of pollutants as the result of increased polluting activity and concentrating potentially polluting activity in one area. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					The impact on the water quality will be dependant on the type of industrial activities undertaken. The increase in development will result in an increase in the impermeable area, resulting in an increase in surface water runoff. Suitable mitigation would need to be identified in consultation with the regulatory authorities to ensure that water quality is maintained or improved where possible.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					The development of greenfield sites within a tidal flood zone is likely to have a negative impact upon flood risk, which will result in greater run-off to Eastbourne Park. Suitable mitigation would need to be identified in consultation with the regulatory authorities to ensure that buildings are designed to be flood resistant and to minimise any impacts of run-off.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					The extension of industrial land will result in an increase in greenhouse emissions as a result of any new development. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					The extension of industrial land could result in greater traffic congestion in areas that are already congested and may require the provision of new infrastructure. However, the increase in development can also increase the opportunities for sustainable transport measures such as improved public transport or car sharing.
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The extension of industrial land is likely to result in an increase in non-renewable forms of energy and other natural resources. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		Option 2B: Extensions to Industrial Land				Commentary
		2B	S	M	L	
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The ELR has shown that the industrial market is forecast to grow over the plan period, and that additional space will need to be provided to accommodate such growth. The extension of industrial land provides the opportunity for larger sites to be developed to provide a variety of spaces.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					The extension of industrial land will require the development of greenfield land and will therefore not maximise the existing employment land.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					The extension of industrial land provides the opportunity for larger sites to be developed that can offer a wider range of space and uses to be provided to a more diverse market.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The expansion of industrial areas should result in an increase in the overall number of jobs in the town. However, other sectors that are not suitable in industrial areas may be disadvantaged.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					The extension of industrial sites may not offer the opportunity for smaller units, suitable for start-up businesses and other uses that are not suitable in industrial areas may be disadvantaged.
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The extension of industrial land will provide opportunities for the creation of new jobs and for existing businesses to expand.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					The extension of industrial land will provide opportunities for existing businesses remain in the borough by relocating to more appropriate premises as well as enabling businesses to expand.
EL8	<b>LINKAGES</b> To improve local business linkages					The extension of industrial land will enable existing links to be strengthened between businesses but may limit the potential for new links to be established in other neighbourhoods.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The extension of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity and a positive impact upon deprivation in the medium to long term.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					The extension of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity. However, it is not clear whether this would have a positive impact on incomes.

Sustainability Objectives		Option 2B: Extensions to Industrial Land				Commentary
		2B	S	M	L	
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The extension of industrial land will enable future economic growth, which should lead to the creation of jobs and increased prosperity.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					The extension of industrial land could result in greater traffic congestion in areas that are already congested and may require the provision of new infrastructure. However, the increase in development can also increase the opportunities for sustainable transport measures such as improved public transport or car sharing.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					The increase in development can increase the opportunities for sustainable transport measures such as improved public transport or car sharing as well as the potential for new infrastructure.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The extension of industrial land is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					The intensification of industrial land is likely to result in increased noise levels within these areas but to minimise the impact of noise upon residential areas.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The extension of industrial land provides the opportunity for new infrastructure to be provided or existing provision to be upgraded.

### Summary of findings:

This option tests the extension of industrial land on the edges of Industrial Estates for employment development. These sites are mainly greenfield sites located within Eastbourne Park. The option could accommodate the requirement for employment space, as well as a range of different B class uses and size of floorplate.

The extension of industrial land will provide opportunities for existing businesses to remain in the borough by relocating to more appropriate premises as well as enabling businesses to expand. However, such development will require the use of greenfield sites of a high landscape and biodiversity value. In particular, such development is likely to have a significant negative impact upon Eastbourne Park, which is protected by Core Strategy Policy D11 as an area of high landscape and biodiversity importance.

The extension of industrial land is likely to result in an increase in the use of resources. The development of greenfield sites within a tidal flood zone is also likely to have a negative impact upon flood risk, which will result in greater run-off to Eastbourne Park as well as increased costs. Mitigation measures would need to be identified that encourage sustainable design and management and encourage efficiency.



Sustainability Objectives		Option 3A: 76% Office TC: 24% SH (3,000sqm TC: 20,000sqm SH)				Commentary
		3A	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the TC can be retained for residential purposes in order to meet the established housing need.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon poverty and social exclusion.
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					The option provides greater choice and flexibility to the market, which should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market and a more sustainable and inclusive community.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					76% of office provision will still be provided within the town centre, which is a very sustainable location with good links via public transport. The provision of 24% of the allocation may increase car use but could also provide more opportunity for the viability of public transport in the future as a result of economic growth.

Sustainability Objectives		Option 3A: 76% Office TC: 24% SH (3,000sqm TC: 20,000sqm SH)				Commentary
		3A	S	M	L	
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability assessment of this option has the best score as the town centre is 118% less viable than out of town sites.</p>
CS9	<p><b>ECONOMIC GROWTH</b></p> <p>To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth</p>					<p>The development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites. Sovereign Harbour is a master planned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1a Office). Options to improve the viability of development by assisting in funding the infrastructure requirements should also be investigated.</p>
CS10	<p><b>NEW ECONOMIES</b></p> <p>To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth.</p>
CS11	<p><b>SKILLS</b></p> <p>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013.</p>
CS12	<p><b>BIODIVERSITY</b></p> <p>To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability</p>					<p>Whilst the town centre is not located to any sensitive site of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.</p>
CS13	<p><b>NATURAL &amp; HISTORIC ENVIRONMENT</b></p> <p>To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment</p>					<p>Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Any loss will need to be mitigated through new provision.</p>

Sustainability Objectives		Option 3A: 76% Office TC: 24% SH (3,000sqm TC: 20,000sqm SH)				Commentary
		3A	S	M	L	
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					Development is on previously developed land in both locations and promotes more efficient use of the land, which will create a more balanced office market, whilst enabling homes to be provided within the town.
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The development is in built up areas and is unlikely to have an adverse impact on the landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated.
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the levels of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although could provide more opportunity for the viability of public transport in the future as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable mitigation measures should be identified in consultation with the regulatory authorities.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					Development is unlikely to reduce the risk of flooding and SH could be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.

Sustainability Objectives		Option 3A: 76% Office TC: 24% SH (3,000sqm TC: 20,000sqm SH)				Commentary
		3A	S	M	L	
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability assessment of this option has the best score as the town centre is 118% less viable than out of town sites.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					The town centre sites may not be in employment use at present. The land at SH has already been identified for employment use.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. The vacation of existing space within the town centre will enable opportunities for new businesses. SH will offer space for both new and relocating businesses within the area.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					A greater balance of provision within the borough should result in more spaces for start-ups and small businesses

Sustainability Objectives		Option 3A: 76% Office TC: 24% SH (3,000sqm TC: 20,000sqm SH)				Commentary
		3A	S	M	L	
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.
EL8	<b>LINKAGES</b> To improve local business linkages					The provision of 76% office provision within the town centre will enable opportunities for local business linkages to be retained and strengthened. The new development at SH will help create new business linkages.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon deprivation.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					Increasing opportunities for business and the location of new businesses in the area is likely to have a positive impact upon the incomes of residents.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

Sustainability Objectives		Option 3A: 76% Office TC: 24% SH (3,000sqm TC: 20,000sqm SH)				Commentary
		3A	S	M	L	
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					Office use is unlikely to have significant negative impacts of noise upon residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The provision of 3,000 sqm within the town centre will have little effect on the existing infrastructure within the town centre. The provision of 20,000 sqm provides the opportunity for new infrastructure to be provided that will enable economic growth in the future.

### Summary of findings:

This option tests a revised floorspace of 76:24 between the Town Centre and Out of Town provision. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual.

The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining

Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.

The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					By increasing the amount of new development within the Town Centre and providing 14,000 sqm at Sovereign Harbour, sites within the TC will be lost for residential purposes, which will increase the pressure on meeting the established housing need and provide less homes within the town centre.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon poverty and social exclusion.
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					The option provides greater choice and flexibility to the market, which should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market and a more sustainable and inclusive community. However, the increase in office space provision within the town centre fails to address current demand for larger floorplates in out of town locations. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					80% of office provision will still be provided within the town centre, which is a very sustainable location with good links via public transport. The provision of 20% of the allocation may increase car use but could also provide more opportunity for the viability of public transport in the future as a result of economic growth.

Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					<p>The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. However, the viability of town centre development is 118% less viable and less deliverable than out of town sites. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.</p>
CS9	<p><b>ECONOMIC GROWTH</b></p> <p>To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth</p>					<p>The development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites. Sovereign Harbour is a master planned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1a Office). The reduction in floorspace at SH and increase in the TC is less viable and deliverable.</p>
CS10	<p><b>NEW ECONOMIES</b></p> <p>To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities</p>					<p>The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. However, development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.</p>
CS11	<p><b>SKILLS</b></p> <p>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market, however it retains an over reliance on town centre stock and smaller floorplates. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. However, development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.</p>
CS12	<p><b>BIODIVERSITY</b></p> <p>To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability</p>					<p>Whilst the town centre is not located to any sensitive site of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.</p>



Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Any loss will need to be mitigated through new provision.
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					Development is on previously developed land in both locations and promotes more efficient use of the land. However physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability. Failure to maximise the potential of employment land at SH would also waste a major opportunity to rebalance the market and address demand for larger floorplates.
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The development is in built up areas and is unlikely to have an adverse impact on the landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated.
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the levels of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although could provide more opportunity for the viability of public transport in the future as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable mitigation measures should be identified in consultation with the regulatory authorities.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					Development is unlikely to reduce the risk of flooding and SH could be also be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.

Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
CS20	<p><b>TRANSPORT</b></p> <p>To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys</p>					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
CS21	<p><b>WASTE</b></p> <p>To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting</p>					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<p><b>NATURAL RESOURCES</b></p> <p>To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</p>					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable forms energy given the small fragmented development sites available. A smaller quantum of development at SH may reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<p><b>ECONOMIC GROWTH</b></p> <p>To promote sustainable economic growth</p>					The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. However, the viability of town centre development is 118% less viable and less deliverable than out of town sites. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
EL2	<p><b>EMPLOYMENT LAND</b></p> <p>To maximise use of existing employment land</p>					The town centre sites may not be in employment use at present. The land at SH has already been identified for employment use. Physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability. Failure to maximise the potential of employment land at SH would also waste a major opportunity to rebalance the market and address demand for larger floorplates.

Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market, however it retains an over reliance on town centre stock and smaller floorplates. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. However, development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. However, fewer opportunities will be provided for existing businesses to expand or relocate to more appropriate larger premises. The provision of town centre space is also less viable and deliverable. SH will offer space for both new and relocating businesses within the area but may not provide the critical mass to create a cluster of activity that can be self-sustaining.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					A greater balance of provision within the borough should result in more spaces for start-ups and small businesses.
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					A greater balance of uses within the borough will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. However, the option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
EL8	<b>LINKAGES</b> To improve local business linkages					The provision of 80% office provision within the town centre will enable opportunities for local business linkages to be retained and strengthened. The new development at SH will also help create new business linkages. However, development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.

Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon deprivation.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					Increasing opportunities for business and the location of new businesses in the area is likely to have a positive impact upon the incomes of residents.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in the use of resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable forms energy given the small fragmented development sites available. A smaller quantum of development at SH may reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

Sustainability Objectives		Option 3B: 80% TC: 20% SH (9,000sqm TC: 14,000sqm SH)				Commentary
		3B	S	M	L	
EL15	<p><b>NOISE</b></p> <p>To reduce the impact of noise from commercial premises on residential areas</p>					Office use is unlikely to have significant negative impacts of noise upon residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied.
EL16	<p><b>INFRASTRUCTURE</b></p> <p>To ensure the necessary provision of infrastructure to support economic growth</p>					The provision of 9,000 sqm within the town centre may put constraints on the existing infrastructure within the town centre. The provision of 14,000 sqm at SH provides the opportunity for new infrastructure to be provided that will enable economic growth in the future but may not provide the critical mass required.

**Summary of findings:**

This option tests a revised split of floorspace of 80:20 between the Town Centre and Out of Town provision. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that such the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual. This option also responds to representations received that proposed 9,000 sqm of office provision in the town centre and 14,000 sqm at SH.

The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.

Whilst the provision of office space within the town centre may encourage more people to use sustainable modes of transport, the lack of choice within the town for business may force business outside the town, which could result in further out-commuting. The concentration of office accommodation within the town centre could also lead to an over concentration of congestion of the road network in the town centre.

The development is likely to result in an increase in the use of resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable forms energy given the small fragmented development sites available. A smaller quantum of development at SH may reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

Sustainability Objectives		Option 3C: 77% Office TC: 23% SH (5,000 TC: 18,000sqm SH)				Commentary
		3C	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					By increasing the amount of new office space to 5,000 sqm within the Town Centre and providing 18,000 sqm at Sovereign Harbour, there will be increased pressure on competing land uses for sites that are required for residential purposes in order to meet the established housing need.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon poverty and social exclusion.
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					The option provides greater choice and flexibility to the market, which should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market and a more sustainable and inclusive community. However, the increase in office space provision within the town centre fails to address current demand for larger floorplates in out of town locations. Office space within the town is also less viable and deliverable.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					77% of office provision will still be provided within the town centre, which is a very sustainable location with good links via public transport. The provision of 23% of the allocation may increase car use but could also provide more opportunity for the viability of public transport in the future as a result of economic growth.

Sustainability Objectives		Option 3C: 77% Office TC: 23% SH (5,000 TC: 18,000sqm SH)				Commentary
		3C	S	M	L	
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. However the viability and deliverability assessment of town centre space is 118% less viable than out of town sites.</p>
CS9	<p><b>ECONOMIC GROWTH</b></p> <p>To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth</p>					<p>The development will form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites. Sovereign Harbour is a master planned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1a Office). Options to improve the viability of development by assisting in funding the infrastructure requirements should also be investigated.</p>
CS10	<p><b>NEW ECONOMIES</b></p> <p>To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities</p>					<p>The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth.</p>
CS11	<p><b>SKILLS</b></p> <p>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013.</p>
CS12	<p><b>BIODIVERSITY</b></p> <p>To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability</p>					<p>Whilst the town centre is not located next to any sensitive sites of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.</p>
CS13	<p><b>NATURAL &amp; HISTORIC ENVIRONMENT</b></p> <p>To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment</p>					<p>Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Any loss will need to be mitigated through new provision.</p>

Sustainability Objectives		Option 3C: 77% Office TC: 23% SH (5,000 TC: 18,000sqm SH)				Commentary
		3C	S	M	L	
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					Development is on previously developed land in both locations and promotes more efficient use of the land. However physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The development is in built up areas and is unlikely to have an adverse impact on the landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated.
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the levels of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although could provide more opportunity for the viability of public transport in the future as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable mitigation measures should be identified in consultation with the regulatory authorities.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					Development is unlikely to reduce the risk of flooding and SH could be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.



Sustainability Objectives		Option 3C: 77% Office TC: 23% SH (5,000 TC: 18,000sqm SH)				Commentary
		3C	S	M	L	
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of 56inimization, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. However the viability and deliverability assessment of town centre space is 118% less viable than out of town sites.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					The town centre sites may not be in employment use at present. The land at SH has already been identified for employment use. However physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					A greater balance of uses within the borough will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					A greater balance of provision within the borough should result in more spaces for start-ups and small businesses

Sustainability Objectives		Option 3C: 77% Office TC: 23% SH (5,000 TC: 18,000sqm SH)				Commentary
		3C	S	M	L	
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stock and smaller floorplates, which conflicts with demand and is less viable and deliverable.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					A greater balance of uses within the borough will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.
EL8	<b>LINKAGES</b> To improve local business linkages					The provision of 77% office provision within the town centre will enable opportunities for local business linkages to be retained and strengthened. The new development at SH will help create new business linkages.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon deprivation.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					Increasing opportunities for business and the location of new businesses in the area is likely to have a positive impact upon the incomes of residents.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.

Sustainability Objectives		Option 3C: 77% Office TC: 23% SH (5,000 TC: 18,000sqm SH)				Commentary
		3C	S	M	L	
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in the use of resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					Office use is unlikely to have a significant impact on noise upon residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The provision of 5,000 sqm within the town centre should be able to work with existing infrastructure within the town centre. The provision of 18,000 sqm provides the opportunity for new infrastructure to be provided that will enable economic growth in the future.

### Summary of findings:

This option tests a revised split of floorspace of 77:23 between the Town Centre and Out of Town provision. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual.

The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. The increase in the provision of town centre floorspace reduces the viability of this option, retaining an over reliance on town centre stock and smaller floorplates, which conflicts with demand. Development at SH should still be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.

Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.

The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.

Sustainability Objectives		Preferred Option: 76% TC: 24% SH & Intensification of Industrial				Commentary
		PO	S	M	L	
CS1	<p><b>HOMES</b></p> <p>To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>					By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the TC can be retained for residential purposes in order to meet the established housing need. Industrial land is unlikely to be used for housing, enabling other sites to be used for residential development.
CS2	<p><b>HEALTH</b></p> <p>To improve the health and wellbeing of the population and reduce inequalities in health</p>					No significant impact
CS3	<p><b>SOCIAL EXCLUSION</b></p> <p>To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town</p>					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The new office provision at SH and intensification of industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon poverty and social exclusion.
CS4	<p><b>EDUCATION</b></p> <p>To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</p>					The option provides greater choice and flexibility to the market, which should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.
CS5	<p><b>CRIME</b></p> <p>To reduce crime and the fear of crime</p>					No significant impact
CS6	<p><b>COMMUNITIES</b></p> <p>To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town</p>					The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market and a more sustainable and inclusive community.
CS7	<p><b>ACCESSIBILITY</b></p> <p>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</p>					76% of office provision will still be provided within the town centre, which is a very sustainable location with good links via public transport. Development at SH and intensification of the industrial land may increase car use but could also provide more opportunity for the viability of public transport in the future as a result of economic growth.

Sustainability Objectives		Preferred Option: 76% TC: 24% SH & Intensification of Industrial				Commentary
		PO	S	M	L	
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. Development at SH and intensification of the industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability of the out of town sites is much greater than the town centre sites.</p>
CS9	<p><b>ECONOMIC GROWTH</b></p> <p>To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth</p>					<p>The development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites. Sovereign Harbour is a master planned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1a Office). Options to improve the viability of development by assisting in funding the infrastructure requirements should also be investigated.</p>
CS10	<p><b>NEW ECONOMIES</b></p> <p>To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. Development at SH and intensification of the industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth.</p>
CS11	<p><b>SKILLS</b></p> <p>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</p>					<p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. Development at SH and intensification of the industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.</p>
CS12	<p><b>BIODIVERSITY</b></p> <p>To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability</p>					<p>Whilst the town centre is not located adjacent to any sensitive sites of biodiversity, SH will result in the loss of shingle habitat. The intensification of industrial land will encourage the use of previously developed land, which should have less impact upon biodiversity and the landscape. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.</p>
CS13	<p><b>NATURAL &amp; HISTORIC ENVIRONMENT</b></p> <p>To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment</p>					<p>Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Intensification of industrial land should reduce pressure for development upon greenfield land, in particular Eastbourne Park and reduce the impact upon the historic environment. Any loss will need to be mitigated through new provision.</p>

Sustainability Objectives		Preferred Option: 76% TC: 24% SH & Intensification of Industrial				Commentary
		PO	S	M	L	
CS14	<p><b>LAND USE</b></p> <p>To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</p>					Development is on previously developed land in all locations and promotes more efficient use of the land, which will create a more balanced office market, encourage the reuse of existing buildings and enable homes to be provided within the town.
CS15	<p><b>LANDSCAPE &amp; TOWNSCAPE</b></p> <p>To maintain and enhance the quality of landscapes and townscapes</p>					The development is in built up areas and is unlikely to have an adverse impact on the landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated. Intensification of industrial land will retain such development within designated areas, minimising impacts upon landscape and townscape.
CS16	<p><b>AIR QUALITY</b></p> <p>To reduce air pollution and ensure air quality continues to improve</p>					Development is likely to cause an increase in the levels of pollutants both in construction and operation. Development at SH and the intensification of industrial land may also result in more transport by car, although could provide more opportunity for the viability of public transport in the future as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<p><b>WATER QUALITY</b></p> <p>To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment</p>					Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. The impact from industrial land will be dependant on the type of industrial activities undertaken. Suitable mitigation measures should be identified in consultation with the regulatory authorities.
CS18	<p><b>FLOOD RISK</b></p> <p>To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>					Development is unlikely to reduce the risk of flooding and SH could be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<p><b>CLIMATE CHANGE</b></p> <p>To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts</p>					Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.

Sustainability Objectives		Preferred Option: 76% TC: 24% SH & Intensification of Industrial				Commentary
		PO	S	M	L	
CS20	<p><b>TRANSPORT</b></p> <p>To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys</p>					Development within the town centre is well served by public transport. Development at SH the industrial land is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
CS21	<p><b>WASTE</b></p> <p>To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of 62inimization, reuse, recycling and composting</p>					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<p><b>NATURAL RESOURCES</b></p> <p>To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</p>					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<p><b>ECONOMIC GROWTH</b></p> <p>To promote sustainable economic growth</p>					A greater balance of uses within the town will be provided offering more choice and flexibility to the market. Development at SH and intensification of the industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability of the out of town sites is much greater than the town centre sites.
EL2	<p><b>EMPLOYMENT LAND</b></p> <p>To maximise use of existing employment land</p>					The town centre sites may not be in employment use at present. The land at SH has already been identified for employment use. The intensification of industrial land will encourage the reuse of previously developed land and reuse of existing buildings.
EL3	<p><b>DIVERSE ECONOMY</b></p> <p>To diversify the local economy and support businesses across a range of sectors</p>					A greater balance of uses within the town will be provided offering more choice and flexibility to the market. Development at SH and intensification of industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.

Sustainability Objectives		Preferred Option: 76% TC: 24% SH & Intensification of Industrial				Commentary
		PO	S	M	L	
EL4	<p><b>NO. OF BUSINESSES</b></p> <p>To increase the overall number of business enterprises operating in the town</p>					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. The vacation of existing space within the town centre will enable opportunities for new businesses. SH and the Intensification of industrial land will offer space for both new and relocating businesses within the area, which should result in an increase in the overall number of jobs in the town
EL5	<p><b>START-UPS</b></p> <p>To promote and encourage business start-ups and small businesses</p>					A greater balance of provision within the borough should result in more spaces for start-ups and small businesses
EL6	<p><b>EMPLOYMENT</b></p> <p>To increase the number and range of employment opportunities in the town</p>					The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation.
EL7	<p><b>EXISTING BUSINESS</b></p> <p>To support existing businesses to continue trading in Eastbourne</p>					A greater balance of uses within the town will be provided offering more choice and flexibility to the market. Development at SH and the intensification of industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.
EL8	<p><b>LINKAGES</b></p> <p>To improve local business linkages</p>					The provision of 76% office provision within the town centre will enable opportunities for local business linkages to be retained and strengthened. The new development at SH will help create new business linkages. Intensification of industrial land will enable existing links to be strengthened.
EL9	<p><b>DEPRIVATION</b></p> <p>To reduce economic deprivation in the resident population</p>					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. Development at SH and the intensification of industrial land should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon deprivation.
EL10	<p><b>INCOMES</b></p> <p>To increase the average incomes of residents in the town</p>					Increasing opportunities for business and the location of new businesses in the area is likely to have a positive impact upon the incomes of residents in the medium to long term.
EL11	<p><b>UNEMPLOYMENT</b></p> <p>To reduce levels of unemployment</p>					The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.



Sustainability Objectives		Preferred Option: 76% TC: 24% SH & Intensification of Industrial				Commentary
		PO	S	M	L	
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development within the town centre is well served by public transport. Development at SH and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development within the town centre is well served by public transport. Development at SH and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in the use of resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					Office use is unlikely to have significant negative impacts of noise upon residential areas. The intensification of industrial land is likely to result in increased noise levels but in areas with less impact upon residential development. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The provision of 3,000 sqm within the town centre will have little effect on the existing infrastructure within the town centre. The provision of 20,000 sqm provides the opportunity for new infrastructure to be provided that will enable economic growth in the future. The intensification of industrial land will use existing infrastructure. The capacity of the existing infrastructure will need to be examined to ensure that it can cope with any additional development.

### Summary of findings:

The preferred option tests a revised floorspace of 76:24 between the Town Centre and Out of Town provision with 3,000 sqm of space provided in the Town Centre, 20,000 sqm of office space provided at Sovereign Harbour and 20,000 sqm provided through the intensification of industrial estates. GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual.

The ELR also showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential.

Sustainability Objectives	Preferred Option: 76% TC: 24% SH & Intensification of Industrial				
	PO	S	M	L	Commentary
<p>By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour, sites within the TC can be retained for residential purposes in order to meet the established housing need of 450 homes across the five Development Opportunity Sites, identified in the Town Centre Local Plan. Industrial land is unlikely to be used for housing, enabling other sites to be used for residential development.</p> <p>The preferred option provides a greater balance of uses within the Borough offering greater choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013, although the impact is unlikely to be realised in the short term. SH will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled which should result in a positive impact upon economic growth in the medium to long term.</p> <p>In addition, the viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole, particularly in the medium to long term. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining.</p> <p>The retention and improvement of existing industrial sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. Such benefits should be achievable in the short term as well as medium to long term, which will have a greatly needed positive impact on the market</p> <p>Development within the town centre is well served by public transport. Development at SH and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development could make the viability of improved public transport services more likely in the long term.</p> <p>The development is likely to result in an increase in the use of natural resources. However, the reduction in office space within the town centre provides the opportunity for new, more energy efficient accommodation to be provided, particularly in the medium to long term. A larger quantum of development at SH could also increase the potential for renewable forms of energy to be incorporated. The increase in development is likely to cause an increase in the levels of pollutants, greenhouse gas emissions and the amount of waste produced in both construction and operation. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.</p>					

### A6 Assessment of AAP Policies

An assessment of each of the ELLP Policies has been undertaken against each of the Sustainability Objectives and the results follow in this section. For ease of reference, the full text of each of the ELLP Policies is set out below.

Policy Title	Full Policy Wording
<p><b>ELLP 1:</b> <b>Economy and Employment Land</b></p>	<p>Job growth and economic prosperity in Eastbourne will be supported in order to enable the achievement of a sustainable economy and make Eastbourne a town where people want to live and work. This will be achieved by:</p> <ul style="list-style-type: none"> <li>• Taking a positive approach that reflects a presumption in favour of sustainable economic development;</li> <li>• Meeting the requirement for 43,000 sqm of additional employment floorspace over the plan period through employment development within the Sustainable Centres (Town Centre and Sovereign Harbour) and through maximising the use of land in existing employment locations;</li> <li>• Promoting development which provides units for new start-up businesses and small enterprises;</li> <li>• Encouraging key businesses and their supply chains to grow existing specialisms;</li> <li>• Encouraging development which supports improvements in the local jobs market through creation of additional jobs and employment diversification;</li> <li>• Seeking Local Labour Agreements on all development of 1,000 sqm or more, including change of use, to secure local employment and training measures as part of development proposals; and</li> <li>• Supporting the Education and Training sector of the Eastbourne economy through a flexible approach to expansion proposals.</li> </ul>
<p><b>ELLP 2:</b> <b>Industrial Estates</b></p>	<p>Within the designated Industrial Estates, redevelopment and intensification of vacant and under-utilised sites to provide class B use floorspace will be supported in order to meet the target of providing 20,000 sqm of B1c, B2 and B8 floorspace over the plan period. Proposals for the refurbishment of existing class B floorspace will also be supported. Proposals for the redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> <li>• The proposed alternative use is an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or</li> <li>• The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and</li> <li>• The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.</li> <li>• Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated to the satisfaction of the Council that that there is no reasonable prospect of the site continuing to be used for class B use.</li> </ul>

Policy Title	Full Policy Wording
<p><b>ELLP 3:</b> <b>Town Centre</b></p>	<p>The quantum of office space that should be provided in the Town Centre is 3,000 sqm of floorspace. The requirement for office floorspace in the Town Centre should be provided across Development Opportunity Site 2 and Development Opportunity Site 3 as identified in the Town Centre Local Plan. Office development should be high quality class B1a floorspace that is flexible to meet multi-occupier needs. Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.</p>
<p><b>ELLP 4:</b> <b>Sovereign Harbour</b></p>	<p>Sovereign Harbour should accommodate 20,000 sqm of additional B1 floorspace. This should be delivered predominantly on Sites 6 and 7, however Site 4 could accommodate a small amount of office space. The B1 floorspace should be provided in a flexible format that will allow businesses to adapt their operations depending on circumstances. Other employment generating uses that are compatible with the residential area (with the exception of class A1, A3 and A5 uses) will be acceptable on any remaining land on Sites 6 and 7 following the delivery of the 20,000 sqm of B1 floorspace.</p>

### Summary Results of ELLP Policies

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	C
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					
CS5	<b>CRIME</b> To reduce crime and the fear of crime					
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	C
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth	Green	Light Green	Light Green	Green	Green
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities	Light Green	Grey	Light Green	Light Green	Green
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities	Light Green	Light Green	Light Green	Light Green	Green
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability	Orange	Light Green	Grey	Orange	Yellow
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment	Yellow	Grey	Grey	Yellow	Yellow
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	Green	Green	Green	Green	Green
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes	Light Green	Light Green	Light Green	Light Green	Light Green
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve	Orange	Orange	Orange	Orange	Orange
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment	Yellow	Yellow	Grey	Yellow	Yellow

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	C
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	Yellow	Yellow	Grey	Orange	Yellow
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts	Orange	Orange	Orange	Orange	Orange
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys	Yellow	Yellow	Yellow	Yellow	Yellow
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting	Orange	Orange	Orange	Orange	Orange
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	Orange	Orange	Yellow	Yellow	Orange

Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	C
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					
EL8	<b>LINKAGES</b> To improve local business linkages					
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					



Sustainability Objectives		ELLP POLICIES				
		1	2	3	4	C
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					

### Detailed Results of ELLP Policies

Sustainability Objectives		ELLP1: Economy and Employment Land				Commentary
		1	S	M	L	
CS1	<p><b>HOMES</b></p> <p>To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>					The policy supports job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The retention and improvement of existing sites will enable future economic growth, which will support the development of housing. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development.
CS2	<p><b>HEALTH</b></p> <p>To improve the health and wellbeing of the population and reduce inequalities in health</p>					No significant impact
CS3	<p><b>SOCIAL EXCLUSION</b></p> <p>To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town</p>					The policy supports the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training, which are all likely to reduce poverty and social exclusion in the medium to long term.
CS4	<p><b>EDUCATION</b></p> <p>To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</p>					Support of the educational and training sector is likely to raise educational achievement and provide opportunities to develop new skills in the medium to long term.
CS5	<p><b>CRIME</b></p> <p>To reduce crime and the fear of crime</p>					No significant impact
CS6	<p><b>COMMUNITIES</b></p> <p>To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town</p>					The policy supports job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The retention and improvement of existing sites will enable future economic growth, supported by the development of additional floorspace to provide a more balanced mix of space available within sustainable centres.
CS7	<p><b>ACCESSIBILITY</b></p> <p>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</p>					The retention and improvement of existing sites, supported by additional floorspace within sustainable centres, is likely to improve accessibility and the viability of public transport as well as the potential for linked trips.

Sustainability Objectives		ELLP1: Economy and Employment Land				Commentary
		1	S	M	L	
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					The main aim of the policy is to support job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training are encouraged, which are all likely to encourage economic growth particularly in the medium to long term.
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					The policy particularly relates to the Town Centre and Sovereign Harbour, which are both areas where new office development is to be masterplanned for continued economic growth.
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					The policy encourages provision for start-ups and new businesses as well as the diversification and expansion of existing businesses, through the provision of new and larger floorspace and a greater balance of uses within the borough offering more choice and flexibility to the market.
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					Support of the educational and training sector, through Local Labour Agreements on all development of 1,000sqm, including change of use, is likely to raise educational achievement and provide opportunities to develop new skills particularly in the medium to long term.
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					Whilst the town centre is not located next to any sensitive sites of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Any loss will need to be mitigated through new provision.
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					The policy encourages the maximisation of land in existing employment locations as well as the use of previously developed land both at SH and the Town Centre. No greenfield sites are identified for development.

Sustainability Objectives		ELLP1: Economy and Employment Land				
		1	S	M	L	Commentary
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The development is in built up areas and is unlikely to have an adverse impact on the landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated.
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the levels of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although could provide more opportunity for the viability of public transport in the future as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable mitigation measures should be identified in consultation with the regulatory authorities.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					Development is unlikely to reduce the risk of flooding and SH could be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.

Sustainability Objectives		ELLP1: Economy and Employment Land				Commentary
		1	S	M	L	
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The main aim of the policy is to support job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training are encouraged, which are all likely to encourage economic growth particularly in the medium to long term.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					The policy encourages the maximisation of land in existing employment locations as well as the use of previously developed land both at SH and the Town Centre. No greenfield sites are identified for development.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					A greater balance of uses within the borough will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The policy encourages more diverse employment opportunities, which should result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					The policy promotes development that provides units for start-up and small businesses. A greater balance of provision within the borough should result in more spaces for start-ups and small businesses
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The policy encourages more diverse employment opportunities, which should result in a positive impact upon employment. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area.
EL8	<b>LINKAGES</b> To improve local business linkages					Maximising land use in existing employment locations is likely to improve linkages between businesses. New floorspace will provide opportunities for new linkages to be made.

Sustainability Objectives		ELLP1: Economy and Employment Land				Commentary
		1	S	M	L	
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The policy supports the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training, which are all likely to reduce deprivation in the medium to long term.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					The provision of new employment space is likely to encourage economic growth and job opportunities, which could result in an increase in incomes in the medium to long term.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The provision of new employment space and the inclusion of Local Labour Agreements is likely to encourage economic growth and job opportunities, which should result in reduced unemployment in the medium to long term.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development within the town centre is well served by public transport. Development at SH is likely to be car reliant. However, the quantum of development may make the viability of improved public transport service more likely in the future.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					Policy EL1 is unlikely to have a significant impact on noise in residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The provision of new floorspace provides the opportunity for new infrastructure to be provided that will enable economic growth in the future. The capacity of existing infrastructure will need to be checked to see the amount of development that can be supported.

### Summary of findings:

The policy supports job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The retention and improvement of existing sites will enable future economic growth, which will support the development of housing and the generation of jobs. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development.

The main aim of the policy is to support job growth and economic prosperity to enable a sustainable economy to make Eastbourne a place where people want to live and work. The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses and support of education and training are encouraged, which are all likely to encourage economic growth particularly in the medium to long term.

The policy encourages more diverse employment opportunities, which should result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area in the medium to long term.

The policy encourages the maximisation of land in existing employment locations as well as the use of previously developed land both at SH and the Town Centre. No greenfield sites are identified for development. Whilst the town centre is not located next to any sensitive sites of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.

Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested.

The increase in development is likely to increase the amount of pollutants, greenhouse gas emissions and waste produced in both construction and operation. The development is also likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		ELLP2: Industrial Estates				Commentary
		2	S	M	L	
CS1	<p><b>HOMES</b></p> <p>To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>					The retention and improvement of existing industrial sites is likely to enable future economic growth, which will support the development of housing. The intensification of industrial land is unlikely to be used for housing, enabling other available sites to be developed for residential development.
CS2	<p><b>HEALTH</b></p> <p>To improve the health and wellbeing of the population and reduce inequalities in health</p>					No significant impact
CS3	<p><b>SOCIAL EXCLUSION</b></p> <p>To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town</p>					The retention and improvement of existing industrial sites should support economic growth and the creation of new job opportunities, which are likely to help in the reduction of poverty and social exclusion.
CS4	<p><b>EDUCATION</b></p> <p>To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</p>					No significant impact
CS5	<p><b>CRIME</b></p> <p>To reduce crime and the fear of crime</p>					No significant impact
CS6	<p><b>COMMUNITIES</b></p> <p>To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town</p>					No significant impact
CS7	<p><b>ACCESSIBILITY</b></p> <p>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</p>					Maximising the use of employment land within the industrial estates could make public transport a more viable option.
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					The policy supports the redevelopment and intensification of vacant or under used sites to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas.



Sustainability Objectives		ELLP2: Industrial Estates				Commentary
		2	S	M	L	
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					The industrial estates already have suitable infrastructure in place to support the required development.
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					No significant impact
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					The protection of the industrial estates will maintain the current skilled workforce in these areas and provide opportunities for growth
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					Retaining development within the industrial estates uses previously developed land rather than greenfield land, enabling the protection of areas of landscape and biodiversity importance.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					No significant impact
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					The policy supports the redevelopment and intensification of vacant or under used sites. Retaining development within the industrial estates uses previously developed land rather than greenfield land, improving efficiency in land use, particularly in the medium to long term.
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					Retaining development within the industrial estates uses previously developed land rather than greenfield land, enabling the protection of areas of landscape and townscape value.

Sustainability Objectives		ELLP2: Industrial Estates				Commentary
		2	S	M	L	
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the levels of pollutants both in construction and operation. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					Development within the existing industrial estates is unlikely to have a negative impact on water, however consultation with the regulatory authorities to identify any necessary mitigation measures.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					The majority of the Industrial Estates are within Tidal Flood Zone 3a. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Development is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		ELLP2: Industrial Estates				Commentary
		2	S	M	L	
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The policy supports the redevelopment and intensification of vacant or under used sites to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					The policy supports the redevelopment and intensification of vacant or under used sites. Retaining development within the industrial estates uses previously developed land rather than greenfield land, improving efficiency in land use, particularly in the medium to long term.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					The protection of the industrial estates is likely to maintain the current skilled workforce in industrial areas and may provide opportunities for growth of other uses elsewhere in the borough.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The policy supports the redevelopment and intensification of vacant or under used sites to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas, which should lead to an increase in the overall number of businesses.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					The policy supports the redevelopment and intensification of vacant or under used sites, which should provide smaller units suitable for start-ups or small businesses
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The protection of the industrial estates is likely to maintain the current jobs in industrial areas and may provide opportunities for new employment opportunities elsewhere in the borough.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					The policy supports existing industrial uses and may provide opportunities for start-ups and small businesses but is unlikely to support those looking for larger premises.
EL8	<b>LINKAGES</b> To improve local business linkages					The redevelopment and intensification of vacant or under used sites within existing industrial estates should provide greater opportunities for business linkages.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The retention and improvement of existing industrial sites should support economic growth and the creation of new job opportunities, which are likely to help in the reduction of deprivation.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					No significant impact

Sustainability Objectives		ELLP2: Industrial Estates				Commentary
		2	S	M	L	
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The retention and improvement of existing industrial sites should support economic growth and the creation of new job opportunities, which is likely to help in the reduction of unemployment
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development is likely to be car reliant and may result in increased congestion in areas that are already congested.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					The quantum of development may make the viability of an improved public transport service more likely in the future.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in non-renewable forms of energy and other natural resources. Mitigation measures will need to be identified that encourage sustainable design and management.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					Containing industrial uses within the industrial estates should reduce the impact of noise upon in residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The provision of new floorspace provides the opportunity for new infrastructure to be provided that will enable economic growth in the future. The capacity of existing infrastructure will need to be checked to see if the amount of development can be supported.

**Summary of findings:**

The policy supports the redevelopment and intensification of vacant or under used sites to ensure there is sufficient B use floorspace in the borough over the plan period. The policy protects the need for 20,000 of B1c, B2 and B8 floorspace, whilst allowing other B uses to locate in more suitable areas.

The policy supports the redevelopment and intensification of vacant or under used sites. Retaining development within the industrial estates uses previously developed land rather than greenfield land, improving efficiency in land use, particularly in the medium to long term.

The majority of the Industrial Estates are within Tidal Flood Zone 3a. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.

The development is likely to result in an increase in non-renewable forms of energy, carbon emissions, waste and other natural resources. Mitigation measures will need to be identified that encourage sustainable design and management.

The provision of new floorspace provides the opportunity for new infrastructure to be provided that will enable economic growth in the future. The capacity of existing infrastructure will need to be checked to see if the amount of development can be supported.

Sustainability Objectives		ELLP3: Town Centre				Commentary
		3	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					By limiting the quantum of floorspace to 3,000 sqm, other sites will be available for the need to provide 450 residential units within the town centre.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses, which are all likely to reduce poverty and social exclusion in the medium to long term.
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					No significant impact
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The policy minimises the amount of new office space within the Town centre in order to provide a greater balance of uses within the borough, offering more choice and flexibility to the market and a more sustainable and inclusive community.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					76% of office provision will be provided in the town centre, which is a very sustainable location with good links via public transport. The reduction of office space within the town centre may result in an increase in car use to other areas but could also increase the viability of public transport to areas out of the town centre.

Sustainability Objectives		ELLP3: Town Centre				Commentary
		3	S	M	L	
CS8	<p><b>ECONOMY</b></p> <p>To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth</p>					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses outside the town centre, which are all likely to result in economic growth.
CS9	<p><b>ECONOMIC GROWTH</b></p> <p>To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth</p>					The development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across the sites
CS10	<p><b>NEW ECONOMIES</b></p> <p>To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities</p>					The policy seeks to rebalance the provision of office space within the borough thereby supporting the provision of new high quality office accommodation across the borough and the creation of opportunities for the expansion and diversification of existing businesses.
CS11	<p><b>SKILLS</b></p> <p>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</p>					The policy seeks to rebalance the provision of office space within the borough thereby offering more choice and flexibility to the market, which is likely to result in economic growth and the need to retain existing skills or support new skill sets.
CS12	<p><b>BIODIVERSITY</b></p> <p>To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability</p>					No significant impact
CS13	<p><b>NATURAL &amp; HISTORIC ENVIRONMENT</b></p> <p>To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment</p>					No significant impact
CS14	<p><b>LAND USE</b></p> <p>To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</p>					Development is on previously developed land and promotes more efficient use of the land. The policy will result in a more balanced office market, whilst enabling houses to be provided within the town.

Sustainability Objectives		ELLP3: Town Centre				Commentary
		3	S	M	L	
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The development is within a built up area and is unlikely to have an adverse impact on the landscape. The quality of the development will be managed through the Town Centre Local Plan to ensure that any adverse impacts identified are suitably mitigated.
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the levels of pollutants both in construction and operation. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					No significant impact
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					No significant impact
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse gas emissions both in construction and operation. Mitigation that minimises the impacts of climate change and enables suitable adaptation measures to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					76% of office provision will be provided in the town centre, which is a very sustainable location with good links via public transport. The reduction of office space within the town centre may result in an increase in car use to other areas but could also increase the viability of public transport to areas out of the town centre.
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					Development is likely to cause an increase in the amount of waste produced both in construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.

Sustainability Objectives		ELLP3: Town Centre				Commentary
		3	S	M	L	
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					Development is likely to result in an increase in non-renewable forms of energy and other natural resources both in construction and operation. Suitable mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses outside the town centre, which are all likely to result in economic growth.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					Development is on previously developed land and promotes more efficient use of the land. The policy will result in a more balanced office market, whilst enabling houses to be provided within the town.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses outside the town centre
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The policy seeks to rebalance the provision of office space within the borough, which may have a positive impact upon the overall number of businesses in the town.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses but not necessarily within the town centre
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses but not necessarily within the town centre.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses within Eastbourne.
EL8	<b>LINKAGES</b> To improve local business linkages					The provision of office space within the town centre will enable opportunities for local business linkages to be retained and strengthened
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses, which are all likely to reduce deprivation in the medium to long term.



Sustainability Objectives		ELLP3: Town Centre				Commentary
		3	S	M	L	
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					Increasing opportunities for new businesses by providing high quality office space in the town centre may have a positive effect on incomes in the medium to long term.
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses, which are all likely to reduce levels of unemployment in the medium to long term.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					76% of office provision will be provided in the town centre, which is a very sustainable location with good links via public transport. The reduction of office space within the town centre may result in an increase in car use to other areas but could also increase the viability of public transport to areas out of the town centre in the long term.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					76% of office provision will be provided in the town centre, which is a very sustainable location with good links via public transport. The reduction of office space within the town centre may result in an increase in car use to other areas but could also increase the viability of public transport to areas out of the town centre in the long term.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					Development is likely to result in an increase in non-renewable forms of energy and other natural resources both in construction and operation. Suitable mitigation measures will need to be identified that encourage sustainable design and management.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					No significant impact
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					No significant impact

### Summary of findings:

The policy minimises the amount of new office space within the Town centre in order to provide a greater balance of uses within the borough, offering more choice and flexibility to the market and a more sustainable and inclusive community. By limiting the quantum of floorspace to 3,000 sqm, other sites will be available for the need to provide 450 residential units within the town centre as identified in the Town Centre Local Plan.

The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses outside the town centre.

Development is on previously developed land and promotes more efficient use of the land. The development is within a built up area and is unlikely to have an adverse impact on the landscape. The quality of the development will be managed through the Town Centre Local Plan to ensure that any adverse impacts identified are suitably mitigated.

76% of office provision will be provided in the town centre, which is a very sustainable location with good links via public transport. The reduction of office space within the town centre may result in an increase in car use to other areas but could also increase the viability of public transport to areas out of the town centre in the long term.

Development is likely to result in an increase in non-renewable forms of energy, greenhouse gas emissions, pollutants, waste and other natural resources both in construction and operation. Suitable mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		ELLP4: Sovereign Harbour				Commentary
		4	S	M	L	
CS1	<b>HOMES</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home					The provision of office space on employment land enables other more appropriate sites to be retained for housing in order to meet the established need.
CS2	<b>HEALTH</b> To improve the health and wellbeing of the population and reduce inequalities in health					No significant impact
CS3	<b>SOCIAL EXCLUSION</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town					The provision of new office space at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, which should have a positive impact upon poverty and social exclusion in the medium to long term.
CS4	<b>EDUCATION</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work					The policy provides greater choice and flexibility to the market, which should provide greater opportunities for the creation of jobs and opportunities and for new skills in the medium to long term.
CS5	<b>CRIME</b> To reduce crime and the fear of crime					No significant impact
CS6	<b>COMMUNITIES</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town					The policy provides a greater balance of uses within the borough offering more choice and flexibility to the market and a more sustainable an inclusive community within the 'Sustainable Centre' at SH.
CS7	<b>ACCESSIBILITY</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone					Access is likely to be predominantly by car, given the out of town location. However, public transport could become more viable in the future as more development comes forward.
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market. Development in SH is more viable than within the town centre but is less likely to be delivered in the short term.

Sustainability Objectives		ELLP4: Sovereign Harbour				Commentary
		4	S	M	L	
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					SH is a master planned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1a Office)
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					The provision of office space at SH offers a greater balance of uses within the borough providing more choice and flexibility to the market. The space at SH should encourage economic growth, increased jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should enable more diverse employment opportunities in the medium to long term.
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					The provision of office space at SH offers a greater balance of uses within the borough providing more choice and flexibility to the market. The space at SH should encourage economic growth, increased jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should enable more diverse employment opportunities and the potential for a broader skill set in the medium to long term.
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					Development at SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					Development at SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Any loss will need to be mitigated through new provision.
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					Development at SH is on previously developed land in a 'Sustainable Centre'. The policy will enable the office market to become more balanced within the borough and enable homes to be provided within the town
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					Development at SH is in a built up area and is unlikely to have an adverse impact on the landscape. The quality of the development will be managed through the SH SPD to ensure that any potential adverse impacts are suitably mitigated.

Sustainability Objectives		ELLP4: Sovereign Harbour				
		4	S	M	L	Commentary
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					Development is likely to cause an increase in the level of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although it could also provide more opportunity for the viability of public transport in the future. Suitable mitigation measures will need to be identified.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					The proximity of development at SH to the harbour may result in a negative impact upon the marine environment. Suitable mitigation measures should be identified in consultation with the regulatory authorities
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					Development at SH could be at risk from flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of an improved public transport service more likely in the future.
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The increase in development is likely to increase the amount of waste produced both in construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					Development is likely to result in an increase in the use of non-renewable forms of energy and other natural resources. The quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through a district network. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		ELLP4: Sovereign Harbour				Commentary
		4	S	M	L	
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market. Development in SH is more viable than within the town centre but is less likely to be delivered in the short term.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					Development at SH is on previously developed land in a 'Sustainable Centre'. The policy will enable the office market to become more balanced within the borough and enable homes to be provided within the town.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market, which should result in an increase in the number of businesses.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market including the provision for start-ups and small businesses.
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market.
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, which will also make other sites available to the market.
EL8	<b>LINKAGES</b> To improve local business linkages					Development at SH will provide the opportunity for new linkages to be established in the medium to long term.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The provision of new office space at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, which should have a positive impact upon deprivation in the medium to long term.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					Increasing opportunities for new businesses by providing high quality office space at SH is likely to have a positive effect on incomes in the medium to long term.

Sustainability Objectives		ELLP4: Sovereign Harbour				Commentary
		4	S	M	L	
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses, which are all likely to reduce levels of unemployment in the medium to long term.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of an improved public transport service more likely in the future.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development at SH is likely to be car reliant and relatively inaccessible. However, the quantum of development may make the viability of an improved public transport service more likely in the future making it more accessible for local people and commuters.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					Development is likely to result in an increase in non-renewable forms of energy and other natural resources both in construction and operation. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Suitable mitigation measures will need to be identified that encourage sustainable design and management.
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					There may be a negative impact as a result of construction. Suitable mitigation measures will need to be identified. There is unlikely to be a significant impact from noise once operational.
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					Development at SH may provide the opportunity for new infrastructure to be provided that will enable economic growth in the future.

### Summary of findings:

The Policy provides for 20,000 sqm of additional B1 floorspace to be accommodated at Sovereign Harbour. This should be delivered predominantly on Sites 6 and 7, however Site 4 could accommodate a small amount of office space. The B1 floorspace should be provided in a flexible format that will allow businesses to adapt their operations depending on circumstances. Other employment generating uses that are compatible with the residential area (with the exception of class A1, A3 and A5 uses) will be acceptable on any remaining land on Sites 6 and 7 following the delivery of the 20,000 sqm of B1 floorspace.

Development at SH is likely to encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, providing greater choice and flexibility to the market. Development in SH is more viable than within the town centre but is less likely to be delivered in the short term. SH will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled which should result in a positive impact upon economic growth in the medium to long term.

Development at SH is on previously developed land in a 'Sustainable Centre'. The policy will enable the office market to become more balanced within the borough and enable homes to be provided within the town.

The policy seeks to rebalance the provision of office space within the borough thereby supporting the creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses, which are all likely to reduce levels of unemployment in the medium to long term.

Development at SH is in a built up area and is unlikely to have an adverse impact on the landscape. The quality of the development will be managed through the SH SPD to ensure that any potential adverse impacts are suitably mitigated. However, development at SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities. Development at SH will assist in opening up part of the site for park as set out in the SPD but will also result in the loss of some open space. Any loss will need to be mitigated through new provision.

Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of an improved public transport service more likely in the future.

Development is likely to result in an increase in non-renewable forms of energy, greenhouse gas emissions, pollutants, waste and other natural resources both in construction and operation. Suitable mitigation measures will need to be identified that encourage sustainable design and management. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Development at SH may provide the opportunity for new infrastructure to be provided that will enable economic growth in the future.



## A7 Cumulative Impacts Assessment

### Summary of Impacts

Sustainability Objectives		Cumulative Impacts				Commentary
		C	S	M	L	
CS1	<p><b>HOMES</b></p> <p>To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home</p>					The RELLP policies support job growth and economic prosperity in Eastbourne in order to enable the achievement of a sustainable economy and make Eastbourne a place where people want to both live and work. The allocation of employment land enables sites for residential development to be safeguarded, whilst providing suitable sites for new and expanding business. The impact should become more positive over time as development is completed.
CS2	<p><b>HEALTH</b></p> <p>To improve the health and wellbeing of the population and reduce inequalities in health</p>					No significant impact
CS3	<p><b>SOCIAL EXCLUSION</b></p> <p>To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town</p>					The policies support the diversification of the market and the support of education and training through Local Labour Agreements, which should lead to increased job opportunities in the medium to long term and a corresponding reduction in poverty and social exclusion.
CS4	<p><b>EDUCATION</b></p> <p>To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</p>					Support of education and training particularly through Local Labour Agreements, should raise educational achievements and the development of the necessary skills to find work locally in the medium to long term.
CS5	<p><b>CRIME</b></p> <p>To reduce crime and the fear of crime</p>					No significant impact
CS6	<p><b>COMMUNITIES</b></p> <p>To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town</p>					The policies support the provision of employment land that will enable future economic growth providing a more balanced market with a better mix of spaces within sustainable centres, enabling sustainable communities to be created in the medium to long term.
CS7	<p><b>ACCESSIBILITY</b></p> <p>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</p>					The policies provide the opportunity for accessibility by sustainable modes of transport to increase in the long-term as the viability of public transport is likely to increase as well the opportunities for more linked trips between facilities.

Sustainability Objectives		Cumulative Impacts				Commentary
		C	S	M	L	
CS8	<b>ECONOMY</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth					The RELLP policies support job growth and economic prosperity in Eastbourne in order to enable the achievement of a sustainable economy and make Eastbourne a place where people want to both live and work. The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses are likely to have an increasingly positive impact over time as development is implemented.
CS9	<b>ECONOMIC GROWTH</b> To ensure development is master planned to provide effective commercial infrastructure that will support and enable continued economic growth, and not just housing growth					The policies include development both within the Town Centre and at Sovereign Harbour, which are both areas where development is to be masterplanned to ensure continued economic growth within Eastbourne.
CS10	<b>NEW ECONOMIES</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities					The policies encourage provision for start-ups and small business as well as the diversification and expansion of existing business.
CS11	<b>SKILLS</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities					The policies support the diversification of the market and the support of education and training through Local Labour Agreements, which should lead to increased job opportunities and skills in the medium to long term
CS12	<b>BIODIVERSITY</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability					All the employment land allocations are on brownfield land, thereby minimising the impacts upon biodiversity. However, development at SH is likely to result in the loss of shingle habitat and suitable mitigation measures will need to be identified.
CS13	<b>NATURAL &amp; HISTORIC ENVIRONMENT</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment					Whilst development within the town centre and the industrial estates will have little impact upon the natural and historic environment, development at SH will result in opening up part of the site for park but will also result in the loss of some open space. Any loss will need to be mitigated through new provision to ensure that there isn't a cumulative negative impact.
CS14	<b>LAND USE</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance					The policies encourage the maximisation of land in existing employment locations as well as the use of previously developed land. No greenfield sites are identified for development and the land allocated will enable opportunities for business growth and diversification.

Sustainability Objectives		Cumulative Impacts				Commentary
		C	S	M	L	
CS15	<b>LANDSCAPE &amp; TOWNSCAPE</b> To maintain and enhance the quality of landscapes and townscapes					The proposed development will be in built up areas and is unlikely to have an adverse impact on the landscape. The quality of the development on the townscape will be managed through the Town Centre Local Plan and SH SPD. The intensification of the industrial areas will keep industrial uses away from residential areas.
CS16	<b>AIR QUALITY</b> To reduce air pollution and ensure air quality continues to improve					The proposed development will result in an increase in emissions both in construction and operation, however, the extent of the cumulative impact is uncertain. Impacts during construction will be short term in nature. The development at SH is likely to increase car trips in the short term, until public transport becomes a more viable option. A Transport Assessment will be needed to establish the likely impacts and identify suitable mitigation measures.
CS17	<b>WATER QUALITY</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment					Development within the town centre and industrial estates is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable mitigation measures should be identified in consultation with the regulatory authorities.
CS18	<b>FLOOD RISK</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment					Sovereign Harbour, the eastern part of the Town Centre and the Industrial Estates are all within Tidal Flood Zone 3a. Development is unlikely to reduce the risk of flooding. A sequential approach to development will need to be followed to ensure that areas of lower risk are considered before areas of higher risk. Suitable mitigation measures will need to be identified to ensure that suitable flood management and flood resistant designs are achieved.
CS19	<b>CLIMATE CHANGE</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts					The proposed development will result in an increase in emissions both in construction and operation, however, the extent of the cumulative impact is uncertain. Impacts during construction will be short term in nature. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.
CS20	<b>TRANSPORT</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car, and shortening the number, length and duration of journeys					Development at SH and the Industrial Estates is likely to be car reliant and may result in increased congestion in areas that are already congested. The development is likely to increase car trips in the short term, until public transport becomes a more viable option. A Transport Assessment will be needed to establish the likely impacts and identify suitable mitigation measures.

Sustainability Objectives		Cumulative Impacts				
		C	S	M	L	Commentary
CS21	<b>WASTE</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting					The proposed development will result in an increase in waste both in construction and operation, however, the extent of the cumulative impact is uncertain. Impacts during construction will be short term in nature. Suitable mitigation and management measures will need to be identified to minimise such impacts.
CS22	<b>NATURAL RESOURCES</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources					The development is likely to result in an increase in the use of non-renewable forms of energy and other natural resources, in both construction and operation. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.
EL1	<b>ECONOMIC GROWTH</b> To promote sustainable economic growth					The RELLP policies support job growth and economic prosperity in Eastbourne in order to enable the achievement of a sustainable economy and make Eastbourne a place where people want to both live and work. The creation of jobs for start-ups and small businesses as well as the expansion and diversification of existing businesses are likely to have an increasingly positive impact over time as development is implemented.
EL2	<b>EMPLOYMENT LAND</b> To maximise use of existing employment land					The policies encourage the maximisation of land in existing employment locations as well as the use of previously developed land. No greenfield sites are identified for development and the land allocated will enable opportunities for business growth and diversification.
EL3	<b>DIVERSE ECONOMY</b> To diversify the local economy and support businesses across a range of sectors					The policies encourage provision for start-ups and small business as well as the diversification and expansion of existing business.
EL4	<b>NO. OF BUSINESSES</b> To increase the overall number of business enterprises operating in the town					The policies encourage more diverse employment opportunities, which should result in a positive impact upon employment. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area.
EL5	<b>START-UPS</b> To promote and encourage business start-ups and small businesses					The policies encourage provision for start-ups and small business as well as the diversification and expansion of existing business.
EL6	<b>EMPLOYMENT</b> To increase the number and range of employment opportunities in the town					The policy encourages more diverse employment opportunities, which should result in a positive impact upon employment. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. SH will offer space for both new and relocating businesses within the area.

Sustainability Objectives		Cumulative Impacts				Commentary
		C	S	M	L	
EL7	<b>EXISTING BUSINESS</b> To support existing businesses to continue trading in Eastbourne					Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises, where there is great demand. SH will offer space for both new and relocating businesses within the area
EL8	<b>LINKAGES</b> To improve local business linkages					Maximising land use in existing employment locations is likely to improve linkages between businesses. The new floorspace provided will also provide opportunities for new linkages to be made.
EL9	<b>DEPRIVATION</b> To reduce economic deprivation in the resident population					The policies support the diversification of the market and the support of education and training through Local Labour Agreements, which should lead to increased job opportunities in the medium to long term and a corresponding reduction in deprivation in the long term.
EL10	<b>INCOMES</b> To increase the average incomes of residents in the town					The provision of new and more appropriate employment space is likely to encourage economic growth and job opportunities, which could result in an increase in incomes, in the longer term
EL11	<b>UNEMPLOYMENT</b> To reduce levels of unemployment					The provision of new and more appropriate employment space is likely to encourage economic growth and job opportunities, which could result in a reduction in unemployment in the longer term.
EL12	<b>ROAD NETWORK</b> To ensure no adverse impact on the road network					Development within the town centre is well served by public transport. Development at SH and the Industrial Estates is likely to be car reliant and may result in increased congestion in areas that are already congested. The development is likely to increase car trips in the short to medium term, until public transport becomes a more viable option. A Transport Assessment will be needed to establish the likely impacts and identify suitable mitigation measures.
EL13	<b>SUSTAINABLE TRANSPORT</b> To provide employment opportunities in locations that are accessible for local people and commuters					Development within the town centre is well served by public transport. Development at SH and the Industrial Estates is likely to be car reliant in the short - medium term and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of public transport a more viable option in the long term.
EL14	<b>RESOURCE USE</b> To reduce resource use from commercial & industrial premises					The development is likely to result in an increase in the use of non-renewable forms of energy and other natural resources, in both construction and operation. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.

Sustainability Objectives		Cumulative Impacts				Commentary
		C	S	M	L	
EL15	<b>NOISE</b> To reduce the impact of noise from commercial premises on residential areas					No significant impact
EL16	<b>INFRASTRUCTURE</b> To ensure the necessary provision of infrastructure to support economic growth					The provision of new floorspace will provide the opportunity for new infrastructure to be provided that will enable economic growth in the future. The capacity of existing infrastructure will need to be checked to ensure that it can support the amount of development proposed.

### Summary of findings:

#### Positive impacts

21 Policies result in a likely positive cumulative impact, particularly the objectives concerning economic issues. The RELLP policies support job growth and economic prosperity in Eastbourne in order to make Eastbourne a place where people want to both live and work. The policies support the diversification of the market as well as the provision of education and training opportunities through Local Labour Agreements. The RELLP seeks to create a more balanced market, with a better mix of spaces within sustainable centres, which provide opportunities for businesses to grow or relocate, in order to address current demand and existing constraints.

#### Negative Impacts

6 Policies result in a likely negative cumulative impact, which mainly concern environmental issues, including air quality, natural resources and climate change. The impacts are likely to occur both in construction and operation of the development, although the impacts during construction are likely to be of a short-term and temporary nature. Suitable mitigation measures will need to be identified through the development management process to mitigate any likely impacts and ensure that sustainable design and management measures are incorporated.

#### Uncertain Impacts

8 Policies result in an uncertain cumulative impact, again with regard to environmental issues. The uncertainty is largely because of different impacts in different areas of development as well as the possibility of impacts changing over time. For example, with regard to transport, whilst the impact is likely to be negative in the short term as a result of dependence on car travel, this impact could change in the long-term as public transport becomes a more viable option. Suitable mitigation measures will need to be identified to minimise any likely negative impacts. Any changes in the impacts will be reviewed as a part of the monitoring and changes to policies and baseline information will be made where necessary.

#### No significant impact

No significant impacts were identified in relation to the issues of Health, Crime and Noise.

A8 Summary of Policy Changes from Consultation to Draft Submission

Consultation Draft	Change / Comment
<p><b>Policy EL1: Economy and Employment Land</b></p>	<p><b>Policy EL1 –</b> Job growth and economic prosperity in Eastbourne will be supported in order to enable the achievement of a sustainable economy and make Eastbourne a town where people want to live and work. This will be achieved by:</p> <ul style="list-style-type: none"> <li>• Taking a positive approach that reflects a presumption in favour of sustainable economic development;</li> <li>• Meeting the requirement for 43,000 sqm of additional employment floorspace over the plan period through employment development within the Sustainable Centres (Town Centre and Sovereign Harbour) and through maximising the use of land in existing employment locations;</li> <li>• Promoting development which provides units for new start-up businesses and small enterprises;</li> <li>• Encouraging key businesses and their supply chains to grow existing specialisms;</li> <li>• Encouraging development which supports improvements in the local jobs market through creation of additional jobs and employment diversification;</li> <li>• Seeking Local Labour Agreements on all development of 1,000sqm or more, including change of use, to secure local employment and training measures as part of development proposals</li> <li>• Supporting the Education and Training sector of the Eastbourne economy through a flexible approach to expansion proposals.</li> </ul> <p><b>Additional Supporting Text</b> The level of employment development required in Eastbourne will create a significant number of jobs and there is opportunity to create local employment at both construction and operational stages of this development. Eastbourne Borough Council will seek to secure Local Labour Agreements and associated contributions on developments of 1,000sqm or more (including change of use) in order to secure local employment and training measures as part of development proposals, with the objective of improving training and skills in the town for the future economic development of the Borough. This will be achieved through Section 106 Agreements related to specific development proposals, which will secure contributions from development that will support and benefit the local labour market and economy, enabling employment growth, raising skills and giving local people opportunities generated by new developments. A Local Labour Agreement Supplementary Planning Document (SPD) will be prepared to guide the implementation of this policy.</p>

<b>Consultation Draft</b>	<b>Change / Comment</b>
<b>Policy EL2: Industrial Estates</b>	No Change
<b>Policy EL3: Town Centre</b>	No Change
<b>Policy EL4: Sovereign Harbour</b>	No Change



A9 Representations from Teal Planning on behalf of Sovereign Harbour, 2014

**See Separate Attachment**



Revised Proposed Submission  
**Sustainability Appraisal**  
**APPENDIX A9**

October 2015

# **Draft ELLP Submission Statement 2**

On behalf of:  
**Sovereign Harbour Ltd**

In respect of:  
**Sustainability Appraisal Report and Non-Technical Summary**  
**December 2014**

Date: 2 February 2015

Reference: 12001/Reps/14/SS02



## 1.0 Background

- 1.1 Representations were submitted on behalf of SHL in response to the Initial ELLP Sustainability Appraisal Report and its accompanying Non-Technical Summary 2013.
- 1.2 These stressed **agreement to the core vision and objectives of the ELLP and its SE/SEA**.
- 1.3 Objections however were made on the grounds that the Initial Report:
- Appraised only six options, whilst a **clear additional alternative** is for an **increased level of office space** being allocated to the **town centre**, balanced by an allocation for a **more mixed employment park with a lower office allocation at Sovereign Harbour**.
  - EBC's **scoring of the options that were tested did not appropriately reflect the sustainability impacts** that would result from a low office allocation for the town centre and a high allocation at the Harbour.
  - The approach taken was **flawed and failed to meet the required SA/SEA regulations and statutory planning guidance** that seek to secure the **most sustainable, deliverable development option**.
- 1.4 The objections were accompanied by what we consider to be a more objective scoring of the options presented by EBC for the town centre and the Harbour and based upon our understanding of the local market at that time.
- 1.5 EBC's updated Sustainability Appraisal 2014, its confirmed **sustainability objectives**, its **rescoring of the original town centre and Harbour development options**, and the **inclusion of a further option** to increase the level of office development within the town centre, **are all welcomed**.
- 1.6 EBC's summary conclusions that the proposed allocation of 20,000sq.m. of B1 development at the Harbour is the 4<sup>th</sup> most sustainable of the seven options now tested is also welcomed. This confirms the position that has been expressed by SHL throughout EBC's current Plan making processes; i.e. that the **town centre is the most sustainable location for new office development**.
- 1.7 The updated SA/SEA however is **still flawed**.
- 1.8 The **conclusions** reached by the **updated Appraisal** do not translate back to and are **not best placed to achieve the underlying sustainability objectives of the ELLP**.
- 1.9 The **SA and the resulting proposed allocations policies must be revisited further**, taking into account the following key considerations.

## 2.0 Detailed Matters

- 2.1 The draft ELLP allocations for **new office floorspace** are based upon:
- A forecast demand for additional new floorspace 15,977sq.m.
  - An allowance for windfall losses and churn in office stock (essentially within the town centre) 4,789 sq.m.
  - Resulting in a total allocation requirement of **20,766 sq.m.**
  - Translated into two formal allocations of:
    - o The Town Centre 3,000sq.m.

- Sovereign Harbour **20,000sq.m.**
- Overall Total 23,000sq.m.

2.2 As stressed within our previous representations, **the proposed allocation at the Harbour is to effectively provide for (1) all of the new additional space required in the Borough and (2) a significant proportion of the space that is forecast to be lost to other uses within the town centre.**

2.3 The acceptance within EBC's draft policies is that the town centre's office stock will reduce.

2.4 GVA's ELR 2013 and Supplementary ELR 2014 have advised EBC that this is acceptable within the context of (1) the shortfalls of Eastbourne's town centre stock which is considered dated and to lack flexibility to meet current space requirements and (2) the benefits that new out of town centre space would offer in terms of bringing new high quality stock and a choice of space to the Eastbourne market.

2.5 This balancing of the issues to settle upon a recommended allocation of just 3,000 sq.m. of new space within the centre, however, misses a number of significant sustainable planning points.

**Reduction in Town Centre Stock**

2.6 The Council's AMRs confirm that the town centre has experienced a net reduction in stock almost year on year over an extended period.

Year	Town Centre Space
	Net Change sq.m. B1a space ^
2005-2006	-155
2006-2007	-285
2007-2008	-268
2008-2009	-108
2009-2010	-81
2010-2011	54
2011-2012	-623
2012-2013	-424
2013-2014	-2,055
<b>Total 2012-2014</b>	<b>-2,479</b>
<b>Total 2005-2014</b>	<b>-3,945</b>

Source: EBC AMRs (^ rounded)

2.7 The most recent evidence from 2012, the start of the proposed ELLP, shows that:

- The **last two monitoring years** to March 2104 saw **-2,479sq.m. of office space** removed from the stock, compared with 3,000sq.m. of new space that is proposed to be built in the centre through to 2027.
- GVA's Supplementary Report 2014 further refers to **12 Prior Approval Notifications** being submitted to EBC since May 2013 equating to **5,500sq.m. of floorspace**.
- Our own monitoring of EBC's weekly planning lists below, highlights that new proposals for the loss of office space have continued to come forward since EBC's last AMR (i.e. since March 2014).

Site	Ref	Date Opened	Proposal	Status	B1 change of use floorspace loss
27 St Leonards Rd BN21 3UU	141030	02.08.14	<b>Prior Notification for Conversion of offices in to 12 self contained flats</b> under Class J of The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013.	Pending	<b>881sqm</b>
Unit 2 Hawthorn Rd BN23 6QA	141262	16.08.14	<b>Proposed change of use from Class B1/B8</b> (Business/Storage and Distribution) to B2 (General Industrial) for garage for servicing, repair and MOT testing of vehicles.	Approved 26.11.14	<b>Loss of 928sqm</b> of B1(b) Research and Development and 928sqm of B8 Storage and distribution proposed (gross internal)
<i>Willingdon Methodist Church Wish Hill BN20 9HE</i>	141115	30/09/2014	<i>Lawful development certificate for an existing use of the church as office space for beachy head chaplaincy.</i>	<i>Approved 04.12.14</i>	<i>App form not on Council website</i>
Eastbourne Borough Council Devonshire Park College Rd BN21 4JJ	141315	15/10/2014	<b>Temporary change of use from B1a (Offices) to D1c (Non-residential Institution)</b> . For use by Eastbourne College to house a number of classrooms until 31 January 2017, whilst building works on its site are underway.	Approved 24.11.14	<b>344.9sqm</b> (temporary until 31 January 2017)
Smith Osborne Associates Ltd 31A Cornfield Rd BN21 4QG	141368	28/10/2014	<b>Change of use from B1 (office) to D1 (massage and therapy clinic)</b> . There will be no changes to external or internal layout.	Pending	<b>152.46sqm</b>
<b>Total</b>					<b>2306.36 sq.m.</b>
<b>Total Clear Loss of B1a Space</b>					<b>1378.36 sq..m.</b>

2.8 The reduction of office space within the centre has thereby been a long term trend, but one that has been accelerated by the current permitted development rights and that will be encouraged even further by EBC's proposed policy to allow further net losses as a result of its allocations policies.

2.9 Whilst not all of the existing prior approvals may ultimately be implemented:

- others may still come forward;
- the permitted development right time limit may be extended or be made permanent, providing more time for landowners to bring additional change of use schemes forward under this regime; and
- formal change of use applications will undoubtedly and in any case come forward outside of the permitted development route, i.e. following long term trends in the Eastbourne market as stock becomes more dated and also directly as a result of EBC's policies to encourage more residential development in the town centre.

2.10 **The actual result will thereby be a potentially marked reduction in office stock within the town's most sustainable office location.**

2.11 **Notwithstanding this, EBC's updated SA still maintains that a low office allocation will have positive benefits in supporting and encouraging new office jobs with linked benefits for the centre and the town. This cannot be the case when space will reduce.**

### ***Mitigation Options***

- 2.12 **GVA's Supplementary Evidence Report (para 2.21)** recognises that the current time limited PD rights may be made permanent. Both GVA and EBC then propose that Article 4 directions may be used to limit the loss of space within the town centre if necessary to curtail the negative impacts that would result on the town's office stock.
- 2.13 The ability of LPAs to use Article 4 Directions to remove such rights however has been restricted by central government in order to help support the delivery of new homes.
- 2.14 Article 4 directions cannot therefore be fully relied upon as a mitigation option should the loss of offices become a major concern within Eastbourne.
- 2.15 The main mitigation for EBC should therefore be to plan positively and proactively for the replacement and enhancement of new high quality, flexible office space within the town centre, through the identification of clear and more substantial allocations.

### ***Reduced Quality and Choice of Space***

- 2.16 Throughout GVA and EBC's appraisals of the Eastbourne office market, they acknowledge that the town centre's stock is dated, lacks flexibility and does not cater for all occupier requirements, in particular new start up businesses that require flexible serviced accommodation and larger re-locators who look for high quality, flexible space.
- 2.17 Whilst they acknowledge that the town centre office market has attracted some investment in the form of office refurbishment schemes, their answer to addressing the town's overall quality issue through strategic plan allocations is to accept the further downgrading of stock in the town centre by pushing the majority of new prime stock out to the Harbour.
- 2.18 By proposing that only a small amount of new floorspace should be provided within the town centre, EBC and GVA are in effect proposing that the quality of the town centre's office stock and the choice available should proportionality worsen further in actual and in relative terms.
- 2.19 By proposing that all of the new out of town centre stock is pushed to the Harbour, also only proposes to offer a single location option for those who are willing or wanting to relocate – with this being to a location on the north-eastern edge of the Borough, at some distance from substantial parts of the town. This single out of town centre option itself will result in a lack of choice in the location, environment and quality of new space provided.
- 2.20 **EBC's SA appraisal however still provides a positive score of the low town centre allocation option, which is nonsensical when it will again result in a net downgrading in the amount, quality and choice of the centre's office space.**

### ***Business Links***

- 2.21 Beyond the direct impacts that will result from EBC's proposed allocations policy, wider business link benefits will also be undermined if the town centre's office stock is reduced.
- 2.22 Within the town centre itself, the loss of office based companies will mean a direct loss of business. This will in particular affect retail and café/ restaurant type businesses and the town centre's weekday evening economy.
- 2.23 At the Harbour, whilst some support services are available (e.g. Class A uses) these do not and cannot replicate the breadth of suppliers that are needed, such as banks, printers, stationers, legal and accounting firms etc; continued access to which from the Harbour will be far less convenient and will require additional business trips.



- 2.24 EBC's policies indeed assume that companies which will be displaced from the town centre will be happy to relocate to the fringe location of Sovereign Harbour even if the costs to their business will be greater (i.e. through increased commuting costs, increased costs to link back to the town centre's service suppliers, and higher rents at the Harbour).
- 2.25 This is a very bold assumption.
- 2.26 Some businesses, for which a town centre location is important, may in fact relocate from the town altogether; choosing another centre rather than a fringe business park location.
- 2.27 EBC acknowledges some of these issues but not all and still does not put sufficient weight to the issue within the SA/SEA scoring.
- 2.28 EBC's own evidence indeed is that the actual strength and vitality of Eastbourne town centre does need to be bolstered.
- 2.29 The Council's most recent AMR 2014 highlights that Class A1 space as well as office space has continued to experienced a net decline within the town centre.

Year	Town Centre Space
	Net Change sq.m. A1 space
2005-2006	-1,334.6
2006-2007	-60
2007-2008	-1,574.6
2008-2009	-738.25
2009-2010	-605
2010-2011	67
2011-2012	-87
2012-2013	+706
2013-2014	-270

EBC AMRs

- 2.30 Whilst the new Arndale extension scheme will provide a significant investment in the centre, this will be focused on commercial retail and leisure businesses only, i.e. those that rely upon footfall.
- 2.31 EBC's policy to encourage more residential development within the centre will also locate people close to the centre's services.
- 2.32 The planned reduction in office space and therefore of office workers within Eastbourne town centre will however have a significant negative impact on the wider town centre economy; directly as a result of workers being relocated elsewhere. Also following the ambitions of EBC's strategic thinking, many of the new residents of the town centre may find themselves working outside of the centre, such that their potential contribution to its important weekday local economy will be undermined.
- 2.33 Further to this, the recent announcement by Cineworld that it is to close its existing cinema at the Harbour in favour of a relocation to the new Arndale Centre extension scheme demonstrates the relative commercial benefits of a town centre location for businesses.
- 2.34 A local newspaper report of Cineworld's decision (see **Annex B**) highlights the operator's decision being made as '*... the time is right to take up a more central location within the town.*' and to this being supported by Eastbourne politicians '*... as a giant leap forward for the town centre's evening economy*'.
- 2.35 A central location thereby has clear commercial benefits, both for the individual companies involved but also for the wider town centre economy that benefits from their presence.

- 2.36 The counter to this is that the Harbour as a fringe location has been unable to retain a key employer and attraction as it remains a weaker location in accessibility terms. The attractions that should help to attract and support office based businesses and their staff will be weakened further once the cinema has relocated. Any reuse of the current cinema site at the Harbour will not be able to provide a full range of business service functions that office based operations require – they will still be peripheral to many of the facilities they need.
- 2.37 The development of Site 4 at the Harbour for commercial uses as an extension to the Waterfront will add to the specialist attractions at the Harbour. The ability to develop the rest of Site 4 and Site 7a fully for non office, but other supporting employment uses, will also provide new attractions that can support and help to retain B1 functions that are best focused on Site 6.
- 2.38 An office allocation of 20,000sq.m. at the Harbour that will require Sites 4 and 7a to be substantially if not fully developed for offices also will not enable these business support benefits to be realised.
- 2.39 Again, EBC's SA does not properly reflect these issues in terms of the wider linkages that businesses seek, the location choices that businesses are making within Eastbourne on access and business linkage grounds, and the implications of this for both the town centre and the Harbour.

#### ***Actual Town Centre Site Capacity***

- 2.40 EBC has still not justified why the 3,000sq.m. allocation should be limited to this amount as a formal requirement.
- 2.41 Further to representations that we have made previously on this point, the accompanying Statement now produced by rCOH for SHL (**see Annex C,**) further shows how the proposed two main town centre allocation sites (Sites 2 and 3) can on their own accommodate a much larger amount of office space without undermining the Council's ambitions in respect of new housing provision. The size of the sites will also enable a choice of new office stock to be provided in the town centre.
- 2.42 This is notwithstanding any additional town centre sites that are available or may come forward, and for which provision is made to be investigated within the adopted Eastbourne Town Centre Local Plan (2013).
- 2.43 The development options available for the two sites can indeed include a mix of prime office types, which could include a new service centre or centres targeted at providing good value, flexible supported accommodation for new business start-ups, growing firms and in-movers, who need flexibility to respond to changing office requirements.
- 2.44 EBC and GVA emphasise the new innovation mall, Pacific House that is under construction on Site 6 at the Harbour. There however is no good reason why the Council should limit its ambitions to providing such serviced accommodation here and indeed many good reasons why the provision of additional facilities should also be provided within the town centre.
- 2.45 These include: the introduction of choice within the serviced office sector; proximity of town centre stock to a higher proportion of the town's existing and planned new resident population; accessibility generally; proximity to convenient business linkages; and overall environmental sustainability benefits, linked with a greater proportion of business related trips being able to be undertaken by non car means.
- 2.46 GVA and EBC still do not recognise the full potential of the town centre to provide replacement and enhanced office space. By restricting the strategic allocation for the town centre, will in effect limit the range of new office space that will be promoted and provided here.

### **Sovereign Harbour Office Market**

- 2.47 EBC's consideration of the recent outline planning submission for the Harbour resulted in EBC officers accepting that Site 6 is the priority location for new office space at the Harbour.
- 2.48 They also set out a need for a market and not just design led approach to be taken when appraising the capacity of Site 6 to accommodate new office space; i.e. a market view must be taken of what level of space can be supported here.
- 2.49 With input from Seachange Sussex this highlighted that Seachange's expectations for Site 6 is for a relatively low density office-led campus which will require a high level of car parking provision in order to attract occupiers. i.e. they do not expect that Site 6 can support the full extent of office space that can be accommodated in physical space planning terms.
- 2.50 The outcome of this, through the legal agreement linked with the new outline planning permission for the Harbour, is that Site 6 is required to provide **at least 11,100sq.m. NIA of B1 space**. There is no requirement to provide a greater amount than this but it is possible that this can be increased.
- 2.51 Importantly, in terms of market expectations for the Harbour, Seachange Sussex originally sought for the allocation of Site 6 to be reduced to 10,000sq.m. NIA. This was only increased by EBC when officers accepted that the Site could physically accommodate more than this and that Sites 4 and 7a could not physically accommodate more to make up for any shortfall in what Site 6 delivers.
- 2.52 EBC has also sought clarification from ESCC Highways that a higher parking ratio will be accepted at the detailed design stage, above that set out within the outline scheme.
- 2.53 The following table provides a summary of the assumptions that were set out in the outline application for Site 6, which importantly **were agreed by EBC's Local Plans team in consultation on the proposals**, and the details ultimately negotiated by EBC officers once a **market-led view** had also been taken into account on Seachange Sussex's insistence.

<b>Site 6 Space Planning</b>	<b>SHL Outline Planning Application Assumptions</b>	<b>Details Outlined by EBC / ESCC Highways in Consideration of Site 6's Development Potential</b>	<b>Difference</b>
<b>B1 Floorspace</b>	15,000 sq.m. GEA  Equates to <b>12,750 sq.m.</b> NIA based on a 85% GE NIA ratio	Minimum 11,100 sq.m. NIA  There is no requirement to go above this.  This also represents a higher level than was originally sought which totalled just 10,000sq.m. NIA	1,650 sq.m. NIA additional space capacity over the Site 6 minimum space requirement.
<b>Parking Ratio</b>	ESCC optimum ratio 1 space per 35sq.m. of B1a	Applied 1 space per 25 sq.m. for the innovation mall  Consider 1 space per 30 sq.m. acceptable	Equates to a higher proposed parking provision which will require additional land take within Site 6 and demonstrates an expectation that car trips to the site will be high.

- 2.54 This points to the owners of Site 6 being very cautious about the market potential of the Harbour in terms of the quantum of space it can attract – a view that is consistent with the numerous market appraisals that have been undertaken of the employment land at the Harbour<sup>1</sup> and with the view consistently expressed by and on behalf of SHL.
- 2.55 The supplementary Statement that has been provided by Stiles Harold Williams (SHW) on behalf of SHL and that is appended to Submission Statement 1 of our representations, further addresses the key market considerations of the Harbour.
- 2.56 Given this input by EBC and Seachange and by SHW on behalf of SHL, this must be translated back into a realistic understanding and expectation of what will be delivered at the Harbour and then into what can and must be directed back to the town centre and potentially to other locations within the town, in order to meet EBC's forecast growth requirements alongside sustainable planning objectives.
- 2.57 As outlined above,
- the two town centre strategic allocation sites can accommodate the full 8,900 sq.m. NIA of floorspace assigned to Sites 4 and 7a at the Harbour, without prejudicing new housing provision.
  - this still leaves an allocation of **at least 11,100sq.m. NIA on Site 6** to be developed by 2027, which can be improved upon. This minimum requirement still equates to 70% of the town's total forecast requirement for additional new B1a floorspace.

### ***Additional Alternative Scenarios***

- 2.58 Whilst EBC has added Town Centre Option 4a to its SA work, it has still not reappraised the additional development scenarios that provide further alternative options for the town.
- 2.59 Alongside appraising a higher allocation within the town centre, it is necessary to appraise the more mixed employment park that could be developed at the Harbour. As set out in our representations to the original SE/SEA 2013, this has clear sustainability benefits over an office only park at the Harbour.
- 2.60 Nor does EBC appraise the benefit of distributing office accommodation beyond the proposed two strategic locations of the town centre and Sovereign Harbour; for example, in favour of providing new space within additional locations that relate better to and form part of the Eastbourne Hailsham corridor. This is especially relevant given that EBC, throughout the ELLP related papers, consistently identifies the corridor as an established key economic driver for growth.

### ***Scoring of Traffic and Related Environmental Impacts***

#### *Small Town Centre Office Allocation*

- 2.61 A reduced office stock in the town centre balanced by the provision of significant new space at the Harbour, will increase the level of cross commuting that is undertaken by car within and to Eastbourne.
- 2.62 Seachange's requirement to provide a high level of car parking on Site 6 confirms this expectation.
- 2.63 This in turn will result in linked environmental impacts associated with car travel.

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<sup>1</sup> Wealden and Eastbourne ELR 2008; South East Plan Panel Report August 2007; Sovereign Harbour Business Park Site Evaluation May 2007.

- 2.64 Whilst EBC acknowledges this in part, the scoring applied within the SA/SEA to a low town centre office allocation for impacts on traffic, air quality and other linked environmental impacts is not applied consistently.
- 2.65 If a consistent approach is correctly applied, the outcome will be a negative score for the town centre low allocation scenario for all such traffic and traffic related impact criteria.

*Higher Town Centre Office Allocation*

- 2.66 EBC again acknowledges some of the transport benefits that result from a higher town centre allocation but does not apply the scoring system logically when compared with the lower town centre allocation option.
- 2.67 The accessibility analysis of the town centre and Sovereign Harbour that was provided within the representations to the Initial Sustainability Appraisal is provided again here at **Annex D** for ease of reference. It demonstrates how the town centre compares so much more favourably than Sovereign Harbour in accessibility terms.
- 2.68 The sustainability benefits of the centre will improve even further when new planned housing is taken into account.
- 2.69 Whilst completions of new homes during the last monitoring year provide only a snapshot of new housing development, they do demonstrate that the town centre and its adjoining areas are delivering new housing in accordance with the more significant housing allocations that have been assigned to them.
- 2.70 In contrast, the adjoining neighbourhoods to the Harbour are assigned relatively small levels of housing growth through the current Plan period and completions are broadly following their allocations.
- 2.71 The relative sustainability benefits of the town centre are therefore set to increase even more when new housing allocations are also taken into account, i.e. which will concentrate even more people within walking / cycling / readily public transport access of the centre.

<b>Housing Allocations and Delivery 2013-14</b>					
<b>Town Centre and Neighbouring Neighbourhoods</b>			<b>Sovereign Harbour and Adjoining Areas</b>		
	<b>CSLP Allocation to 2027</b>	<b>Delivered 2013-14</b>		<b>CSLP Allocation to 2027</b>	<b>Delivered 2013-14</b>
Town Centre	1,190	36 (3%)	SH	150	0
Meads	358	69 (19%)	Langney	178	19 (11%)
Summerdown & Saffrons	40	1 (3%)	St Anthonys and Langney Point	25	6 (24%)
Upperton	399	2 (1%)			
Seaside	448	93 (21%)			
<b>Total</b>	<b>2,435</b>	<b>201 (8%)</b>	<b>Total</b>	<b>353</b>	<b>26 (7%)</b>

- 2.72 As demonstrated by the site capacity testing undertaken by rCOH, the development of Sites 2 and 3 within the town centre for part office development will not prejudice the delivery of new housing delivery in the centre.
- 2.73 In sustainability terms the maintenance of a good quality office stock and an improved level of stock within the centre will instead complement the new planned residential development and retain and locate more jobs within the Borough's most sustainable office location.

- 2.74 This must be borne out further within the SA/ SEA scoring that has been assigned by EBC to the higher town centre office scenario.

*High Office Allocation at the Harbour*

- 2.75 Whilst there are benefits to providing new employment at the Harbour, the extent of office development proposed that will require high levels of commuting from across Eastbourne and beyond the town, whilst the town centre is being planned to contract as an office hub, does not follow the logic and core objectives of sustainable development.
- 2.76 The relative weighting that EBC has given to the Sovereign Harbour option in the SA/SEA in this regard is still too high.
- 2.77 It downplays the significance of the high level of car travel that would be generated by a large office park of 20,000 sq.m. NIA and the linked environmental effects this would have on peak traffic congestion, such as associated air quality impacts.
- 2.78 It also does not consistently appraise other linked impacts that follow from the concentration of the high level of office space proposed in this fringe urban location (e.g. access to town's existing parks and the town's historic environment).
- 2.79 The new outline scheme for Sites 4, 6 and 7 indeed appraised the traffic and travel effects of the development of these sites on the local network.
- 2.80 This tested the effect of up to 25,268 sq.m. GEA of additional office space at the Harbour as the proposed maximum that might be physically accommodated on the three sites available, subject to the ELLP process. Of this total: 15,000sq.m. GEA was assumed to be located on Site 6; 6668sq.m. GEA on Site 7; and 3,600 sq.m. GEA on Site 4.
- 2.81 This level of development was appraised as resulting in a number of junctions outside of the Harbour approaching or exceeding the generally accepted thresholds for queuing and congestion (i.e. the St Anthony's Avenue Approach, the A259 Pevensey Bay Road junction and the Langney Rise junction).
- 2.82 These outcomes were considered against background traffic levels and projections and the impacts also being considered to be likely worst case scenarios. For instance the outcomes can be improved upon if work based journeys to the Harbour are more spread, following from the amount of office space being reduced in favour of other activities that result in different trip patterns.
- 2.83 East Sussex County Highways in its review of the outline planning scenarios confirmed the technical results presented but sought contributions towards a new Quality Bus Corridor (QBC) to connect between Sovereign Harbour and the town centre. This was to mitigate the impacts of peak commuter traffic and to promote more sustainable transport generally between the Harbour and the town centre.
- 2.84 The request for a financial contribution towards the QBC however could not be met on viability grounds.
- 2.85 This very clearly demonstrates:
- the actual expected effect of a large scale office development at the Harbour on the local network but also how

- in spite of this, due to viability constraints of such development in this location, the required mitigation scheme cannot be funded by the impacting development.

2.86 **EBC has not taken this further background and understanding into consideration as part of the ELLP SA/SEA review. The SA/SEA in its scoring of traffic and transport related issues are therefore flawed.**

### **3.0 SA / SEA Re-Appraisal**

3.1 EBC's scoring of the two town centre and one Sovereign Harbour allocation options is again provided here at **Annex A**. Our re-appraisal of these is at **Annex E** and our previous appraisal of the Mixed Employment Park option at the Harbour is reattached at **Annex F**.

3.2 Our re-appraisal takes into account a number of key assumptions that we consider have not been taken into account by EBC. Setting these from the outset should help to ensure consistency in the logic that is applied to the scoring of the options as well as help to focus on the core objective which is to clearly identify the most sustainable development option for the Borough. The core underpinning assumptions are:

- a. The town centre is inherently the most accessible location.
- b. A larger allocation of space within the centre will place the greater amount of development within the easiest reach by the most sustainable transport means by the greatest number of people.
- c. The town centre allocation sites are of a size, configuration and location that can accommodate a choice of modern, flexible new office space including for innovation and start-up businesses within supported business centre type environments.
- d. Without new office accommodation being actively planned for, the centre's office stock will contract and the choice of accommodation available to occupiers within the town's most accessible location will reduce, resulting in job losses within the town centre and a weakening of business links, to the detriment of the wider town centre local economy and to the image of Eastbourne centre as a business and investment hub.
- e. An allocations policy that reduces the town's office stock whilst pushing new stock to a fringe urban location will have significant transport and traffic related environmental effects. These negative attributes must be assigned to the low town centre allocation option as well as to the fringe allocation scenario. Only a higher town centre allocation will have positive transport related benefits.
- f. Sovereign Harbour can accommodate office development but if this is of a scale and concentration that is so significant, its sustainability attributes will turn from positives to negatives. The right balance must be struck which is not achieved through EBC's proposed development scenario which will require the whole of Site 6, all of the upper floors of Site 4 and the majority if not all of Site 7a to be developed for B1 space.
- g. This lack of balance will have significant transport impacts that cannot be mitigated by the development itself (*i.e. no contributions will not be made to the proposed QBC*)
- h. The lack of balance of employment uses at the Harbour will also undermine its attractiveness for office occupiers due to its lack of on-site business support services. A more mixed park will be able to better address this (e.g. enabling a hotel and children's nursery to be provided).

3.3 EBC's assessment and the re-assessment provided here results in the following SA scores.

	<b>Scenario 4 Town Centre (3000sq.m.)</b>	<b>Scenario 4a (Town Centre Increased Office Provision)</b>	<b>Scenario 5 Sovereign Harbour 20,000sq.m. Allocation</b>	<b>Scenario 5A Sovereign Harbour Reduced Allocation within Mixed Employment Park</b>
<b>EBC Updated SA 2014</b>	25	23	15	Not Assessed
<b>Teal Planning Re- Appraisal 2015</b>	-7	+40	+10	+19

3.4 Leading from this, if both EBC and Teal Planning's appraisals are translated into office space allocations that should be assigned to the Town Centre and the Harbour on sustainability grounds, **the weighing must be in favour of a higher allocation for the town centre.**

3.5 If the weighing of the sustainability scores given to these two locations is assigned proportionality to the total 23,000sq.m. NIA of office space that is being planned for, this would result in new space allocations as follows.

	<b>Scenario 4 Town Centre (3000sq.m.)</b>	<b>Scenario 4a (Town Centre Increased Office Provision)</b>	<b>Scenario 5 Sovereign Harbour 20,000sq.m. Allocation</b>	<b>Total Sq. m</b>
<b>EBC Updated SA 2014</b>	25 (62%)		15 (38%)	(40) (100%)
<b>Sq.m.</b>	<b>14,260 sq.m.</b>		<b>8,740 sq.m.</b>	<b>23,000</b>
<b>Teal Planning Re-Appraisal 2015</b>		+40 (80%)	+10 (20%)	(50) (100%)
<b>Sq.m.</b>		<b>18,400 sq.m.</b>	<b>4,600 sq.m.</b>	<b>23,000</b>

3.6 Sustainability testing and market reservations about the actual potential of the office market at the Harbour both point to a reduced allocation of B1a space here, significantly below the 20,000sq.m. NIA proposed by EBC.

3.7 In market terms, SHL has very strong reservations about the potential for the Harbour to accommodate a substantial amount of office space at the Harbour. EBC officers and Seachange Sussex, in applying a market view to the actual capacity of Site 6, also share these reservations, which have rang through all of the independent appraisals that have been undertaken of the Harbour.

3.8 An allocation of at least 11,100 sq.m. NIA on Site 6 at the Harbour to reflect the new outline permission for the Site, with Sites 4 and 7a released of any policy requirement to deliver a specified amount of B1a space, will still go over and above what the sustainability testing and market views suggest should be directed here.

3.9 Nonetheless such an allocation will set EBC and Site 6's other promoters an ambition (and challenge) to achieve this minimum amount and to establish an office park that EBC wishes to see here.

3.10 Allowing other uses on Sites 4 and 7a alongside this allocation will provide better support to Site 6 and improve its chances of being built out fully for B1 space and of retaining the occupiers who are attracted here.



- 3.11 In setting an allocation for the Harbour however this must not be to the full detriment of achieving sound sustainable planning objectives or to meeting the needs of the Eastbourne office market.
- 3.12 The allocation of new office space to the town centre must be increased in order to (1) ensure space that is lost within the town centre is replaced in the centre, (2) to ensure that the amount, quality and choice of the town centre stock is improved upon, and (3) sustainable policy objectives are still met.

#### 4.0 **Summary and Required Changes**

4.1 The inconsistencies that have been applied to the scoring of the different development options, the failure to take account of relevant evidence and market indicators, and the failure to appraise all relevant alternative options mean that the SA:

- has **not been positively prepared**; and
- that the proposed allocations policy that it concludes should be adopted **has not been justified** and will **not be effective** in sustainability or in sound planning terms.

4.2 The Proposed Submission Sustainability Appraisal Report is therefore **Unsound**.

4.3 A reassessment of the SA/SEA based upon EBC's own evidence base and the application of a consistent and logical scoring of the different scenarios tested, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.

4.4 A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here and that shall have less transport impacts, also has more significant benefits for Eastbourne, the Harbour and its new occupiers.

4.5 A higher office allocation for the town centre and mixed employment allocation for the Harbour also fits with:

1. the physical capacity that exists within the town centre to accommodate more office accommodation.
2. a less ambitious but more realistic and deliverable market expectation of what the Harbour sites can accommodate in terms of new office space.

4.6 **The SA must be reappraised on this basis.**

4.7 This supports our core objections to the current draft ELLP that are set out within accompanying Submission Statement 1 on behalf SHL.

**ANNEX A**  
**ELLP PROPOSED SUSTAINABILITY APPRAISAL REPORT**  
**NOVEMBER 2014**  
**EBC TABLE 4 SUMMARY OF APPRAISAL OPTIONS**



Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development
CS1	To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✘✘	○	✘	○	✓
CS2	To improve the health and well-being of the population and reduce inequalities in health	○	○	○	○	○	○	○
CS3	To reduce poverty and social exclusion and to close the gap between the more deprived areas in the Borough and the rest of the town	○	✓	○	○	○	○	✓
CS4	To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work	○	○	○	○	○	○	○
CS5	To reduce crime and the fear of crime	○	○	○	○	○	○	○
CS6	To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town	○	○	✓	○	○	✓	✓
CS7	To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	✓	✘	✓	✓	✓✓	✘	✘
CS8	To develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth	✓	✓✓	✓	✓✓	✓	✓✓	✓
CS9	To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth	✓	✓	✓	✓✓	✓✓	✓✓	✓
CS10	To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities	✓	✓✓	✓	✓	✓	✓	✓
CS11	To develop and maintain a skilled and adaptable workforce to match local employment opportunities	✓	✓	○	✓	✓	✓	✓
CS12	Conserve and enhance the Borough's biodiversity and landscape, and ensure species sustainability	✓	✘✘	○	○	○	✘	✘✘
CS13	To protect, enhance, exploit the learning potential and make accessible for enjoyment by	○	○	○	○	○	○	✘✘

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development
	sustainable modes of transport the Borough's parks, gardens, countryside, recreation areas and historic environment							
CS14	To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	✓✓	✗✗	✓✓	✓✓	✓✓	✓✓	✗✗
CS15	To maintain and enhance the quality of landscapes and townscapes	✓	✗	✓	0	0	0	✗✗
CS16	To reduce air pollution and ensure air quality continues to improve	✗	✗	✗	✗	0	✗	✗
CS17	To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment	0	✗✗	0	0	0	0	✗✗
CS18	To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	0	✗✗	0	0	0	✗	✗✗
CS19	To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change	✗	✗✗	✗	✗	0	✗	✗✗
CS20	To reduce road congestion and pollution levels by encouraging mixed-use development, traffic calming measures, improving travel choice, reducing the need for travel by car, and shortening the number, length and duration of journeys	0	0	✗	✓	✓✓	✗	✗
CS21	To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting	?	?	?	?	?	?	?
CS22	Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	?	?	?	?	?	?	?
EL-SA1	To promote sustainable economic growth	✓	✓✓	✓	✓✓	✓	✓✓	✓✓
EL-SA2	To maximise use of existing employment land	✓✓	✗✗	✗	0	0	✓	✗✗
EL-SA3	To diversify the local economy and support businesses across a range of sectors	✓	✓✓	✓	✓✓	✗	✓✓	✓✓
EL-SA4	To increase the overall number of business enterprises operating in the town	✓	✓	✓	✓✓	0	✓	✓

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development
EL-SA5	To promote and encourage business start ups and small businesses	✓✓	✓	✓✓	✓	✓	✓✓	✓
EL-SA6	To increase the number and range of employment opportunities in the town	✓✓	✓✓	✓	✓✓	✓	✓✓	✓
EL-SA7	To support existing businesses to continue trading in Eastbourne	✓	✓✓	✓	✓✓	✓	✓✓	✓✓
EL-SA8	To improve local business linkages	✓✓	✓✓	✗	✓	✓✓	0	✗
EL-SA9	To reduce economic deprivation in the resident population	✓	✓	✓	✓	✓	✓	✓
EL-SA10	To increase the average incomes of residents in the town	0	✓✓	0	✓✓	✓	✓	✓
EL-SA11	To reduce levels of unemployment	✓	✓	✓	✓	✓	✓	✓
EL-SA12	To ensure no adverse impact on the road network	✗	✗	✗	0	✓✓	✗	✗
EL-SA13	To provide employment opportunities in locations that are accessible for local people and commuters	✓	✓	✗	✓	✓✓	✗	✗
EL-SA14	To reduce resource use from commercial & industrial premises	?	?	?	?	?	?	?
EL-SA15	To reduce the impact of noise from commercial premises on residential areas	✓	✓	✗	0	0	✗	?
<b>Score</b>		<b>23</b>	<b>10</b>	<b>7</b>	<b>25</b>	<b>23</b>	<b>15</b>	<b>-3</b>





## **ANNEX B**

### **TOWN CENTRE VS SOVEREIGN HARBOUR LOCATION BENEFITS**



# Cineworld to pull out of Sovereign Harbour



Cineworld revealed this week it would be pulling out of Sovereign Harbour to move to the heart of Eastbourne to take up pride of place in the new extension at the Arndale Centre.

The move into a brand new purpose-built digital cinema will take place in late 2017 or early 2018, once the Arndale extension is completed.

Cineworld says it hopes to continue operating from its current site in the Sovereign Harbour Retail Park and is aiming for a seamless transition into its new home. The company has approached its current landlord to achieve this outcome and says that will ensure film-lovers in Eastbourne and the surrounding area will continue to have access to a wide range of films and event cinema.

Cineworld's Kevin Frost said, "Sovereign Harbour has been a great home for us over the years and we have been made to feel very welcome by the community there. But we now feel the time is right to take up a more central location within the town and we are delighted to be moving into the new Arndale extension towards the end of 2017 or early 2018.

"By continuing to trade until our moving date we will both safeguard jobs and continue to offer the people of Eastbourne a welcoming cinema to watch all the latest movies."

News of the Cineworld move was welcomed as a giant leap forward for the town centre's evening economy by politicians from the two main parties.

Eastbourne MP Stephen Lloyd said, "This will quite simply revolutionise the evening life-style of the town centre. We will have seven new restaurants on the first floor of the Arndale extension, a brand new cinema to entice people of all ages to come into the town centre and all this will increase trade for all our town centre restaurants. This is great news for our town."

Conservative councillor David Elkin said he would be sad to see Cineworld leaving Sovereign Harbour, but hoped it would be able to continue trading there for at least another three years.



**ANNEX C**  
**TOWN CENTRE SITES 2 AND 3**



**The Employment Land Local Plan**  
**Proposed Submission Version**  
**Sites 2 & 3**

Capacity study and policy review  
January 2015

## Introduction

The purpose of this study is to demonstrate the development capacity for employment uses on two sites in Eastbourne town centre and comment on their contribution to the Employment Land Local Plan. It includes illustrative layouts, site areas and building areas that have been prepared and calculated using OS Vectormap.

The two sites are referred to as Site 2 and Site 3 using the same designation as in Eastbourne Borough Council's Proposed Policy 6: EL3 : Town Centre

Given their scale and location there is the potential for these sites to make a significant contribution to (the regeneration of) the town centre. They form a key element in realising the potential for a vibrant, mixed use quarter around the station which would provide a more attractive employment offer for Eastbourne. The successful development of these sites will have wider, positive impacts for the town centre and Eastbourne.

This is a key area of the town centre that demands an approach that is ambitious and deliverable and any proposals for redevelopment need to consider not just capacity and use, but also the urban design context and placemaking.

## Site 2

### The urban design context

Site 2 is located on the northern side of Eastbourne railway station which is in the town centre and part of the main shopping and retail area around Terminus Road. It is also part of an established town centre administration and office hub with a number of existing office uses and businesses in nearby streets including the Council offices in Grove Road opposite the site.

Eastbourne has a relatively compact and attractive town centre with clearly defined elements including the station and the main shopping area in and around the Arndale Centre which is adjacent to the station.

A £90 million plan to transform the Arndale Centre was approved in May 2014 which will provide up to twenty four new shops in an extension between the existing Arndale Centre and the railway station, seven new restaurants and a multiplex cinema.

In addition to this, Eastbourne Borough Council have developed plans for significant public realm improvements to the pedestrian environment along Terminus Road around the station area that are aimed at delivering an improved environment that is "*befitting a key gateway into the Town Centre*". These improvements are planned to be carried out alongside the Arndale Centre extension.



The implementation of both schemes will increase the attractiveness, value and accessibility of the station site.

## The site

The station site is currently characterised by a combination of uses that have developed in an unplanned way and fail to make the most of the opportunities for this area to be an attractive town centre hub. Apart from the station and enterprise centre building, both of which have character and some historic value, the remainder of the site is an unattractive backland given over to parking, storage and other lower grade uses that makes a poor setting for the arrival into Eastbourne by train.

**Land use:** the northern edge of the site is bounded by a mix of commercial and residential uses along St Leonards Road and Commercial Road, with the commercial uses generally being low grade in poor quality buildings. The exception to this is the Enterprise Centre which is a large scale Victorian industrial shed occupied by small scale craft and retail businesses, and the three storey building block fronting Upperton Road with commercial uses at ground level. The Enterprise Centre, set back behind the Upperton Road block, has no street frontage and is set in a large unattractive car park area.

**Access:** the main vehicular access to the parking area is off Terminus Road with a drop off for the station, with a further vehicular access to the parking area opposite St Anne's Road at the St Leonards Road and Commercial Road junction.

**Parking:** There are around 232 parking spaces serving the station, mostly in one large block on the northern side. There are also a number of other parking areas to the east of these serving adjacent commercial premises and storage areas. There are two large multi storey car parks within 200m of the station (3 – 4 minutes walk).

Along the southern side of the station there is an extensive covered area which is limited to pick up and drop off, but otherwise unused.

## Capacity

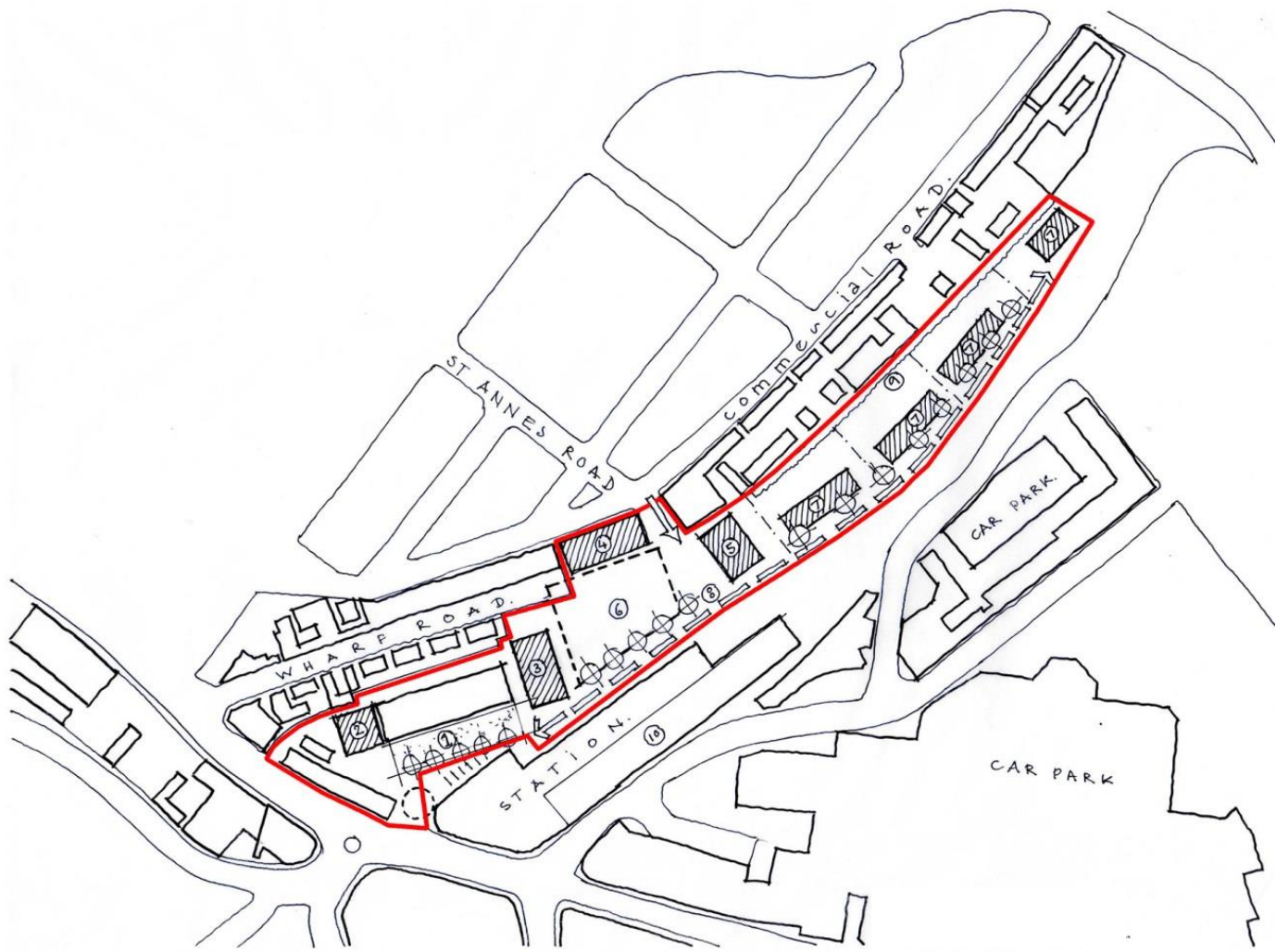
In considering the development capacity of this site, the following assumptions have been made: **vehicular access will remain unchanged**, the **Enterprise Centre** and the buildings fronting Upperton Road will be **retained** and **station parking** will be **re-provided in its current location at 150 – 200 spaces**, depending on the level of development.

The layout shown in **illustration 1** is based on a development framework that builds on the public realm improvements proposed by Eastbourne Borough Council and creates a more attractive setting for the station and a new employment hub with the following:

- 1 A landscaped 'station square' retaining disabled parking and drop off
- 2 Additional employment space (Block A) as extension/addition to Enterprise Centre
- 3 New employment space (Block B) as bookend to station square
- 4 Redeveloped building (Block C) as employment/mixed use and improved gateway to station square
- 5 New employment space (Block D) as bookend to parking square
- 6 Landscaped parking square
- 7 New employment space (Blocks E1 – E4) as railway edge, gateway
- 8 Landscaped 'green link' as railway edge, gateway and pedestrian route to station square
- 9 Landscaped buffer to existing residential edge
- 10 Potential for an additional 100 parking spaces plus a pick up and drop off area in the underused covered station area

This framework would completely change the character of the area, making it more attractive to potential tenants and providing a structure for the phasing and development of the site. It will also improve the approach to the station and the amenity of existing local residents. There will be a balance to be struck between the amount of parking to be retained to serve the station, the amount of new development and its parking and the space given over to landscape, and there is the flexibility in this approach to adapt to changing circumstances and market demands.

The illustrative framework has been used to produce the schedule of accommodation below which takes a balanced view of the site's capacity. There are a number of other possible layouts and design approaches each of which would be capable of delivering a similar level of development:



**Illustration 1: Site 2 - Station Site**

**KEY**

- 1 Landscaped 'station square'
- 2 Block A
- 3 Block B
- 4 Block C
- 5 Block D
- 6 Landscaped parking square
- 7 Blocks E1 – E4
- 8 Green Link
- 9 Landscaped buffer
- 10 Additional parking spaces

### **Schedule of accommodation: option A – employment**

Block A:	400m <sup>2</sup> x 3 floors - 1,200m <sup>2</sup> GFA	B1a, studios, start up
Block B:	675m <sup>2</sup> x 3 floors - 2,025m <sup>2</sup> GFA	B1a
Block C:	936m <sup>2</sup> x 3 floors - 2,808m <sup>2</sup> GFA	B1a, studios, start up, live/work
Block D:	450m <sup>2</sup> x 3 floors - 1,350m <sup>2</sup> GFA	B1a, studios, start up
Block E1:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E2:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E3:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E4:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up

**Total** **10,263m<sup>2</sup> GFA**  
**8,724 m<sup>2</sup> NIA**

(NOTE: NIA based on 85% net/gross)

### **Schedule of accommodation: option B – employment and residential**

For this option it has been assumed that blocks D and E1 to E4 would be residential, with the remainder for employment uses as option 1, located on the south part of the site as set out in paragraph 4.27 of the ELLP

Block A:	400m <sup>2</sup> x 3 floors - 1,200m <sup>2</sup> GFA	B1a, studios, start up
Block B:	675m <sup>2</sup> x 3 floors - 2,025m <sup>2</sup> GFA	B1a
Block C:	936m <sup>2</sup> x 3 floors - 2,808m <sup>2</sup> GFA	B1a, studios, start up
Block D:	450m <sup>2</sup> x 3 floors - 1,350m <sup>2</sup> GFA	residential
Block E1:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E2:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E3:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E4:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential

**Total** **6,033m<sup>2</sup> GFA employment**  
**5,128m<sup>2</sup> NIA**

**5,670m<sup>2</sup> GFA residential (up to 74 dwellings, 2-bedroom)**

(NOTE: Residential numbers based on 85% net/gross & 65m<sup>2</sup> unit sizes)

## **Conclusion**

This is an important and undervalued site in terms of its location and the contribution it could make to the setting and character of the town centre and the perception of those arriving by rail. It has the capacity for, and requires a level of development that is sufficient to make a significant change if its potential is to be realised.

This capacity study, although not a definitive design proposal, gives a sensible indication of the scale of development that could be achieved and is likely to be required to realise the site's potential and provide a more attractive and flexible town centre employment offer.

## Site 3

### The urban design context

This site occupies a landmark position in the town centre where a number of roads come together and has a visual relationship with both the railway station and the council offices. The block provides an architectural waypoint at this junction with Grove Road heading south towards the seafront and Upperton Road north west to Old Town. The block also marks the boundary between the town centre and the residential areas to the west and south, with the eastern part opposite the station and site 2 as described above. The building at the south eastern end of this block, which is to be retained and is of architectural merit, sets a standard for the scale and character of the redevelopment of the rest of the site. The character of Upperton Road along this stretch is larger scale with five and six storey buildings, whereas the southern side of the site is part of a more domestic, smaller scale setting of Southfields Road.

**Land use:** the site is occupied by a mix of building types with the majority taken up by the post office building and an associated parking/service area. The post office building is of architectural merit, and although for this exercise it has been assumed that the whole of the site could be redeveloped, this building could be retained and converted without making a significant difference to the development capacity. The north western part of the site is occupied by a more modern two storey building that has been vacant and on the market for a few years.

**Access and parking:** There are five existing vehicular access points to the parking and service areas off Southfields Road with two off Upperton Road serving the vacant building on the north western part of the site. There is also a level difference between Southfields Road and Upperton Road such that the parking areas sit below the level of Upperton Road. The station is approximately 100m from the eastern part of the site and there are two large multi storey car parks approximately 400m from the site (4 – 5 minutes walk).

### Capacity

In considering the development capacity of this site, the following assumptions have been made: **building scale will be four storeys** in line with the retained corner building and the general context, **building blocks will be 18m deep** with a footprint to allow for **parking and landscape setting**, **existing vehicular access** will be used, level difference between Southfields Road and Upperton Road can be used to accommodate **undercroft parking**.

The layout shown in **illustration 2** is based on developing the site as three plots which relate to the existing buildings and ownerships giving the following:

- 1 Redevelopment of post office building (Block A) retaining street frontage with vehicle access off Southfields Road and undercroft parking. Four storeys with setback upper floor. A class uses at ground floor, B1 uses on upper floors
- 2 Redevelopment of post office parking/service yard (Block B) continuing street frontage with vehicle access off Southfields Road and undercroft parking. Four storeys with B1 uses on lower two floors and residential on upper floors
- 3 Redevelopment of vacant building site (Block C) continuing street frontage with vehicle access off Upperton Road and undercroft parking. Four storeys all residential

This framework has the flexibility to be developed in a number of other different employment/residential mixes to meet market demands. For this study a split of around 50/50 has been assumed which reflects the change from commercial to residential along Upperton Road. There are a number of other possible layouts each of which would be capable of delivering a similar level of development:

### **Schedule of accommodation**

Block A: 864m<sup>2</sup> x 4 floors = 3,456m<sup>2</sup> GFA

A1/A3 846m<sup>2</sup>

B1a 2,538m<sup>2</sup>

Block B: 900m<sup>2</sup> x 4 floors = 3,600m<sup>2</sup> GFA

B1a 1,800m<sup>2</sup>

Residential 1,800m<sup>2</sup>

Block C: 1,080m<sup>2</sup> x 4 floors = 4,320m<sup>2</sup> GFA

Residential 4,320m<sup>2</sup>

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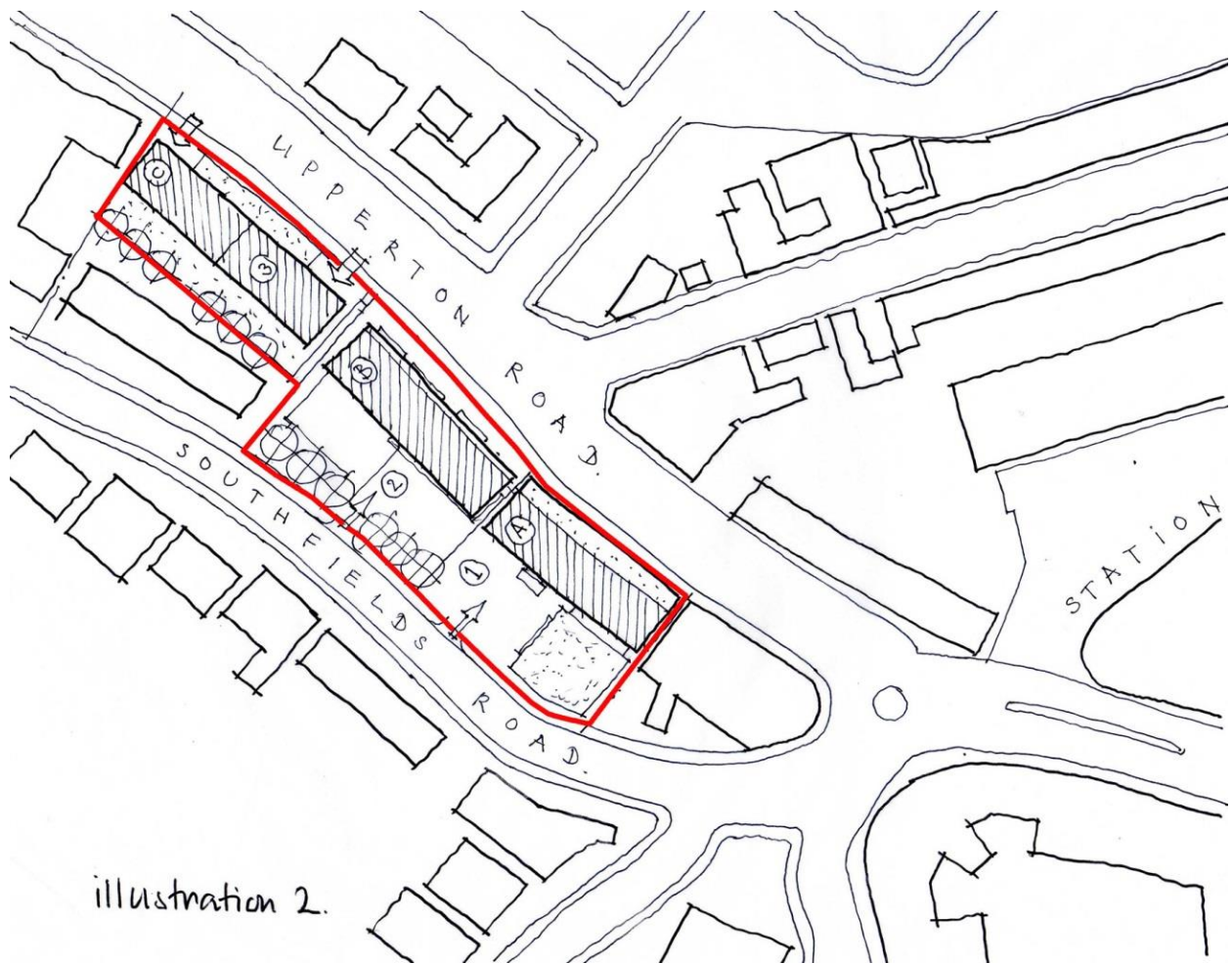
**Total 11,376m<sup>2</sup> GFA**

**846m<sup>2</sup> GEA / 720m<sup>2</sup> NIA - A1/A3**

**4,338m<sup>2</sup> GEA / 3,687m<sup>2</sup> NIA - B1**

**6,120m<sup>2</sup> – Residential (up to 80 dwellings, 2-bedroom)**

NOTE: Residential numbers based on 85% net/gross & 65m<sup>2</sup> unit sizes  
Employment NIA based on 85% net/gross



**Illustration 2: Site 3 – Southfields Road Site**

## **Conclusion**

The mixed use development of this site with three or more separate building blocks would provide the flexibility for the development to meet market demands and to be adaptable over the long term. There would be additional value in having employment related uses on the parts of the site closest to the town centre and for the station site opposite. All uses would benefit from the proximity of the railway station and would contribute to the vibrancy of the station site if it were to be redeveloped as described above. In terms of town centre planning development it would be expected that a masterplan would be prepared as a basis for exploring the collective potential of both sites, and assessing their capacity and mix of uses.



## Summary

The level of development proposed in the town centre at an additional 3,000m<sup>2</sup> would be insufficient to establish a new employment offer that would attract new investors, tenants, businesses and employers.

If delivered on sites 2 and 3 it would equate to a small three storey building with a footplate of about 15m x 33m which would be next to insignificant on both sites and would be nowhere near enough to generate either a sense of place or an employment offer that has enough critical mass to attract businesses and meet the 'in town vibrancy and wider amenity' (as aspired to in **paragraph 4.21. of the Employment Land Local Plan - Proposed Submission Version**).

The Plan should provide for a wider range of users than just 'start ups' if it is to "broaden the stock types available and attract greater levels of demand over the plan period" as stated in **paragraph 4.22**. It needs good quality follow on space too to provide a more rounded, more attractive offer that will give 'vibrancy' and somewhere for start-ups to grow into. It needs to create critical mass and variety, which would be impossible with a couple of small buildings over the Plan period.

Given the "considerable constraints" and "very limited supply of developable land that Eastbourne suffers" (**paragraph 2.25**), Sites 2 and 3 offer an excellent opportunity to achieve this and the following **objectives** of the **Employment Land Local Plan - Proposed Submission Version**, to;

Provide "**flexible, 'mixed' units** that allow businesses to have combined office, workshop and production space within one building". (**Paragraph 2.14**)

"further the **development of 'clusters'**.... as an opportunity to grow existing specialisms through promotion and provision of appropriate space". (**Paragraph 3.12**)

"**maintain the role of offices as a key town centre use** and **sustain the vibrancy and vitality of the town centre**, but also to **broaden the stock types available** and attract greater levels of demand over the plan period." (**Paragraph 4.22**)

**Resist "The loss of office stock within the Town Centre"** (**Paragraph 4.30**)

(Because the Town Centre is under additional pressure of loss of employment space, through residential conversion, an additional allowance, or increased 'headroom' should be made as part of the Plan.)

A more comprehensive development of these two sites will also meet the following **Vision Objectives** set out in **paragraph 2.42** of the Employment Land Local Plan - Proposed Submission Version, which taken together are more or less a brief for creating a mixed business quarter around the station;

- **ELLP2 - Encourage Small and Start-up Businesses** - To deliver a variety of new employment opportunities by providing a range of flexible employment spaces that can be used by existing businesses and new start-up businesses
- **ELLP3 - Diversify the Local Economy** - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish
- **ELLP4 - Support Existing Businesses** - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.
- **ELLP5 - Promote Sustainable Employment Locations** - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.

The allocation of only 7% of the employment requirement over the Plan period to the Town Centre (paragraph 3.10) seems to fly in the face of the Plans overall objectives, and if adopted could prove to be detrimental to future prosperity of the Town Centre.

#### Summary tables:

<b>Option A: employment uses only on Site 2; mixed use on Site 3</b>					
	<b>office</b>		<b>commercial</b>		<b>residential</b>
	<b>GFA</b>	<b>NIA</b>	<b>GFA</b>	<b>NIA</b>	
Site 2	10,263	8,724	-	-	-
Site 3	4,338	3,687	846	720	80
<b>Total</b>	<b>14,601m2</b>	<b>12,411m2</b>	<b>846m2</b>	<b>720m2</b>	<b>80</b>

<b>Option B: employment and residential on Site 2, mixed use on Site 3</b>					
	<b>office</b>		<b>commercial</b>		<b>residential</b>
	<b>GFA</b>	<b>NIA</b>	<b>GFA</b>	<b>NIA</b>	
Site 2	6,033	5,128	-	-	74
Site 3	4,338	3,687	846	720	80
<b>Total</b>	<b>10,371m2</b>	<b>8,815m2</b>	<b>846m2</b>	<b>720m2</b>	<b>154</b>

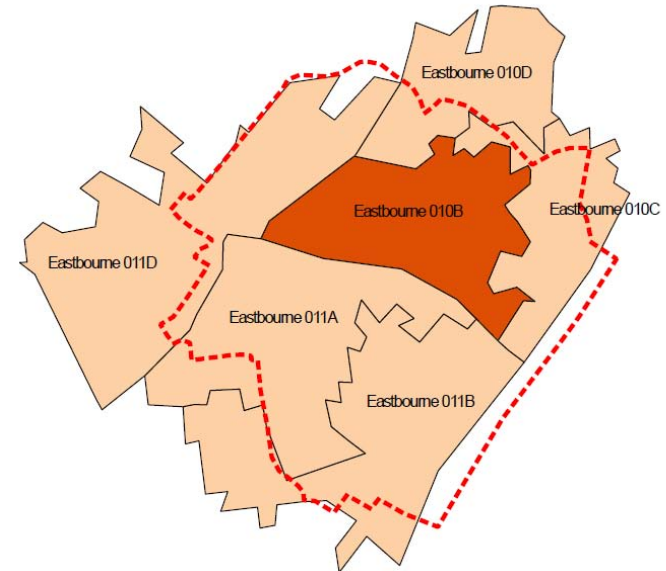
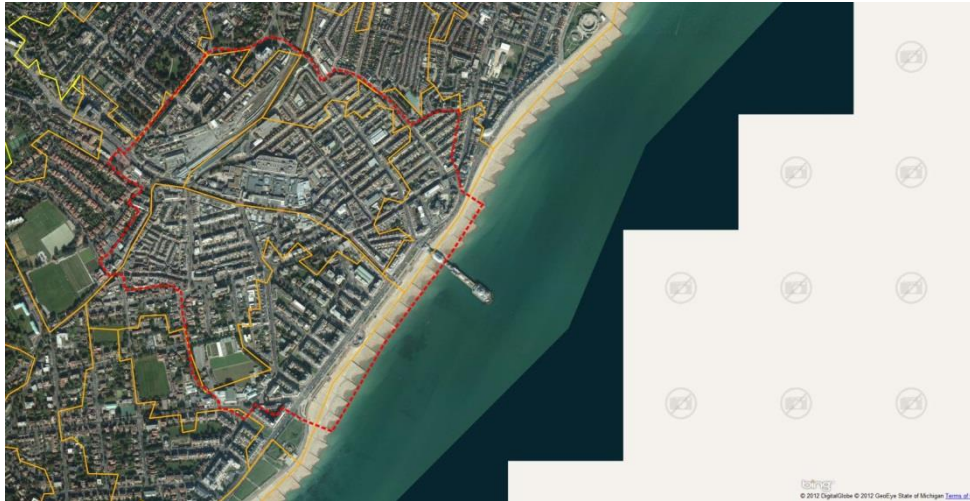
(Study prepared by Brendan O'Neill BA Hons, Dip AA who is a registered architect and director or rCOH)

**ANNEX D**

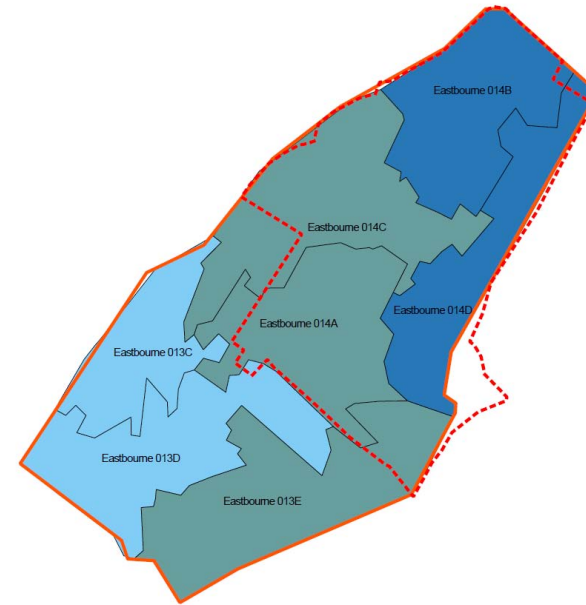
**TOWN CENTRE AND SOVEREIGN HARBOUR**

**SUSTAINABLE NEIGHBOURHOOD ASSESSMENT DATA**





LSOA11NM	Population Census 2011	Working Age People (16-74)	All working	Work mainly at or from home	Public transport	Private vehicle	Foot or cycle	Other
<b>Eastbourne 010B</b>	<b>1990</b>	<b>1671</b>	<b>1036</b>	<b>35</b>	<b>175</b>	<b>423</b>	<b>390</b>	<b>13</b>
Eastbourne 010C	2035	1693	1050	41	183	412	405	9
Eastbourne 010D	1686	1274	887	35	114	453	280	5
Eastbourne 011A	1843	1441	998	64	186	387	357	4
Eastbourne 011B	1721	1135	658	47	89	285	225	12
Eastbourne 011D	1700	1201	758	41	144	358	210	5
<b>Total</b>	<b>12609</b>	<b>9558</b> <b>(76%)</b>	<b>6057</b> <b>(48%)</b>	<b>320</b> <b>(3%)</b>	<b>977</b> <b>(8%)</b>	<b>2601</b> <b>(21%)</b>	<b>2101</b> <b>(17%)</b>	<b>58</b> <b>(1%)</b>



LSOA11NM	Population Census 2011	Working Age People (16-74)	All working	Work mainly at or from home	Public transport	Private vehicle	Foot or cycle	Other
Eastbourne 014B	1578	1226	777	66	65	589	50	7
Eastbourne 014D	1338	1107	772	50	96	586	35	5
Eastbourne 013E	2004	1449	929	40	88	711	85	5
Eastbourne 014A	2455	1856	1216	80	118	893	107	18
Eastbourne 014C	1600	1140	658	36	77	470	71	4
Eastbourne 013C	1457	970	641	20	50	497	74	0
Eastbourne 013D	1412	986	533	17	43	422	50	1
Total	11844	8734 (76%)	5526 (47%)	309 (3%)	537 (5%)	4168 (35%)	472 (4%)	40 (0.2%)

**ANNEX E**

**EBC ELLP PROPOSED SUSTAINABILITY APPRAISAL REPORT**

**NOVEMBER 2014**

**RE-APPRAISAL OF THE**

**TOWN CENTRE AND SOVEREIGN HARBOUR OPTIONS**





Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development	Comment
CS1	To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✘✘	○	○	○	✓	A higher town centre allocation will not undermine new housing delivery
CS2	To improve the health and well-being of the population and reduce inequalities in health	○	○	○	○	○	○	○	
CS3	To reduce poverty and social exclusion and to close the gap between the more deprived areas in the Borough and the rest of the town	○	✓	○	○	○	○	✓	
CS4	To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work	○	○	○	○	○	○	○	
CS5	To reduce crime and the fear of crime	○	○	○	○	○	○	○	
CS6	To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town	○	○	✓	○	○	○	✓	An office allocation at the Harbour will have not greater impact on local governance than town centre allocations
CS7	To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	✓	✘	✓	X	✓✓	✘	✘	Net office provision in the town centre will reduce and accessibility to town centre services will be undermined as more commuters are pushed to the Harbour
CS8	To develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth	✓	✓✓	✓	X	✓✓	X	✓	A low town centre and high Harbour allocation will have high transport impacts and negative impacts on business linkages. A higher town centre allocation will maintain the centre's office stock and its trading strength and vitality
CS9	To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth	✓	✓	✓	✓✓	✓✓	✓✓	✓	
CS10	To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities	✓	✓✓	✓	X	✓	✓	✓	Net office provision in the town centre will reduce with the ability to support jobs within the low impact location of the town centre
CS11	To develop and maintain a skilled and adaptable workforce to match local employment opportunities	✓	✓	○	X	✓	✓	✓	
CS12	Conserve and enhance the Borough's biodiversity and landscape, and ensure species sustainability	✓	✘✘	○	○	○	✘	✘✘	
CS13	To protect, enhance, exploit the learning potential and make accessible for enjoyment by	○	○	○	X	✓✓	✓	✘✘	<p>A low office allocation will result in a net loss of office provision in the town centre.</p> <p>A higher town centre allocation will maintain and enhance supply and choice within the most sustainable location.</p> <p>II. The allocation sites at the Harbour provide access to beaches and the harbour but not to the Borough's main existing parks, gardens and historic environment</p>

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development	Comment
	sustainable modes of transport the Borough's parks, gardens, countryside, recreation areas and historic environment								
CS14	To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	✓✓	✗✗	✓✓	✓✓	✓✓	✓✓	✗✗	
CS15	To maintain and enhance the quality of landscapes and townscapes	✓	✗	✓	v	v	v	✗✗	All options will use brownfield sites and improve their townscapes.
CS16	To reduce air pollution and ensure air quality continues to improve	✗	✗	✗	✗	vv	✗	✗	A higher town centre allocation will reduce car travel and its linked impacts. This score is consistent with EBCs for CS20
CS17	To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment	0	✗✗	0	0	0	0	✗✗	
CS18	To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	0	✗✗	0	0	0	✗	✗✗	
CS19	To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change	✗	✗✗	✗	✗	vv	✗	✗✗	A higher town centre allocation will reduce car travel and its linked impacts. This score is consistent with EBCs for CS20
CS20	To reduce road congestion and pollution levels by encouraging mixed-use development, traffic calming measures, improving travel choice, reducing the need for travel by car, and shortening the number, length and duration of journeys	0	0	✗	x	✓✓	✗	✗	This score is consistent with EBCs for CS16 and CS20. A low town centre allocation will result in a net reduction of the town centre stock and more out commuting by car.
CS21	To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting	?	?	?	?	?	?	?	
CS22	Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	?	?	?	?	?	?	?	
EL-SA1	To promote sustainable economic growth	✓	✓✓	✓	x	vv	v	✓✓	A low town centre allocation will result in a net reduction in stock within the most sustainable location and on existing employment land.
EL-SA2	To maximise use of existing employment land	✓✓	✗✗	✗	x	vv	✓	✗✗	A higher town centre allocation will enhance provision in the more sustainable location on sites that are in part in employment use. The new supply will complement and extend the range of the centre's existing stock.
EL-SA3	To diversify the local economy and support businesses across a range of sectors	✓	✓✓	✓	x	vv	v	✓✓	
EL-SA4	To increase the overall number of business enterprises operating in the town	✓	✓	✓	x	vv	✓	✓	An allocation at Sovereign Harbour will provide new part replacement space but not in the more accessible location or where linkages can be maximised.

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development	Comment
EL-SA5	To promote and encourage business start ups and small businesses	✓✓	✓	✓✓	✓	vv	✓✓	✓	A higher office allocation will provide scope to provide supported serviced business accommodation for new start up within the town centre, providing choice alongside the Mall at the Harbour and in the most accessible location in the town with the strongest business linkages.
EL-SA6	To increase the number and range of employment opportunities in the town	✓✓	✓✓	✓	x	vv	✓✓	✓	
EL-SA7	To support existing businesses to continue trading in Eastbourne	✓	✓✓	✓	x	vv	✓✓	✓✓	A lower town centre allocation will result in a net loss of space overall.
EL-SA8	To improve local business linkages	✓✓	✓✓	x	✓	✓✓	o	x	
EL-SA9	To reduce economic deprivation in the resident population	✓	✓	✓	✓	✓	✓	✓	A low town centre allocation will reduce stock overall and income potential. The other options will not impact differently on income levels
EL-SA10	To increase the average incomes of residents in the town	o	✓✓	o	x	o	o	✓	The low town centre allocation will reduce stock available to accommodate new jobs increasing unemployment for those that cannot readily commute to the Harbour.
EL-SA11	To reduce levels of unemployment	✓	✓	✓	x	✓	✓	✓	A low town centre allocation will reduce stock in the centre and push more commuters to the Harbour.
EL-SA12	To ensure no adverse impact on the road network	x	x	x	x	✓✓	x	x	
EL-SA13	To provide employment opportunities in locations that are accessible for local people and commuters	✓	✓	x	✓	✓✓	x	x	
EL-SA14	To reduce resource use from commercial & industrial premises	?	?	?	?	?	?	?	
EL-SA15	To reduce the impact of noise from commercial premises on residential areas	✓	✓	x	o	o	x	?	
<b>Score</b>		<b>23</b>	<b>10</b>	<b>7</b>	<b>25</b>	<b>23</b>	<b>15</b>	<b>-3</b>	

Adjusted Score				-7	+40	+10	
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**ANNEX F**

**SOVEREIGN HARBOUR ALTERNATIVE MIXED PARK OPTION**



**EBC: SCENARIO 5: SOVEREIGN HARBOUR Windfall Subsidised B1 Provision, with mixed employment uses**

Sustainability Objective		Assessment	
CS1	To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home	○	Harbour housing allocation is unaffected by the ELLP
CS2	To improve the health and well-being of the population and reduce inequalities in health	○	Although job creation goes hand in hand with quality of life, minimal impact
CS3	To reduce poverty and social exclusion and to close the gap between the more deprived areas in the Borough and the rest of the town	○	Will create jobs, but unlikely to have a significant effect on poverty and social exclusion
CS4	To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work	○	Economic growth can support educational achievement by creating higher value jobs, but impact considered to be minimal
CS5	To reduce crime and the fear of crime	○	Unlikely to have any effect on crime
CS6	To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town	√√	Will result in the creation of employment space in a 'Sustainable Centre', improving the sustainability of the Sovereign Harbour neighbourhood
CS7	To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	X	It is located outside of existing employment areas, and access is likely to be car-based due to relatively poor public transport
CS8	To develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth	√√	The sites can provide more opportunities for all types of B1, particularly high quality space as demonstrated by the application for an Innovation Mall <b>plus additional uses</b> .
CS9	To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth	√√	The Sovereign Harbour SPD masterplans all of the remaining development sites in Sovereign Harbour.
CS10	To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities	√	Development at Sovereign Harbour can create better linkage opportunities to knowledge based economy
CS11	To develop and maintain a skilled and adaptable workforce to match local employment opportunities	√√	Will create more job opportunities, but only in uses that are compatible with residential Area
CS12	Conserve and enhance the Borough's biodiversity and landscape, and ensure species sustainability	X	Will result in the loss of shingle habitat
CS13	To protect, enhance, exploit the learning potential and make accessible for enjoyment by sustainable modes of transport the Borough's parks, gardens, countryside, recreation areas and historic environment	○	Development of office will assist in opening up part of site for park as identified in the SPD, but will result in some lost open space
CS14	To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	√√	The development is on previously developed land in a sustainable centre, and therefore has a very positive effect on efficiency in land use.
CS15	To maintain and enhance the quality of landscapes and townscapes	○	Development will be within built up, so should therefore not adverse impact on landscapes. A quality development in this location will also act as a gateway into the town.
CS16	To reduce air pollution and ensure air quality continues to improve	X	Any new development will create some form of air pollution, directly or indirectly
CS17	To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment	○	Development would be on previously developed land, but proximity to harbour may mean potential impact on marine environment
CS18	To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	X	Location within Sovereign Harbour means that there may be a potential risk of flooding.

CS19	To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change	X	Any new development will create some form of air emissions, directly or indirectly
CS20	To reduce road congestion and pollution levels by encouraging mixed-use development, traffic calming measures, improving travel choice, reducing the need for travel by car, and shortening the number, length and duration of journeys	X	Access is likely to be via car through already congested locations.
CS21	To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting	?	Impact unknown
CS22	Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	?	Impact unknown
EL-SA1	To promote sustainable economic growth	√√	High quality development in this high quality location may attract large employers and inward investment
EL-SA2	To maximise use of existing employment land	√√	Development of this land has already identified for employment use
EL-SA3	To diversify the local economy and support businesses across a range of sectors	√√	Potential to create a large number of new jobs across range of B1 sectors
EL-SA4	To increase the overall number of business enterprises operating in the town	√	More business space, especially if space available for small and start-up businesses, will increase number of businesses operating
EL-SA5	To promote and encourage business start ups and small businesses	√√	More spaces of the type of the Innovation Mall will benefit small and start-up businesses
EL-SA6	To increase the number and range of employment opportunities in the town	√√	Will result in more business space and therefore more employment opportunities
EL-SA7	To support existing businesses to continue trading in Eastbourne	√	Existing businesses can relocate to Sovereign Harbour, creating churn and making other sites available for improvement and relocation
EL-SA8	To improve local business linkages	O	There are some existing businesses within Sovereign Harbour. Will help create new business linkages
EL-SA9	To reduce economic deprivation in the resident population	√√	Will create <b>more</b> job opportunities, which will help reduce economic deprivation
EL-SA10	To increase the average incomes of residents in the town	√	High quality office space will attract higher value jobs, which will increase average income.
EL-SA11	To reduce levels of unemployment	√√	More units, more jobs, less unemployment
EL-SA12	To ensure no adverse impact on the road network	X	Access is likely to be via car, which will have adverse impact on road network
EL-SA13	To provide employment opportunities in locations that are accessible for local people and commuters	X	Sovereign Harbour not particularly accessible for local people and commuters
EL-SA14	To reduce resource use from commercial & industrial premises	?	Impact unknown
EL-SA15	To reduce the impact of noise from commercial premises on residential areas	X	It is close to existing residential areas, and therefore there may be some noise impact.
Score		19	