EMPLOYMENT LAND LOCAL PLAN

Proposed Submission Sustainability Appraisal Report

Non-Technical Summary

Introduction

This Proposed Submission Sustainability Appraisal (SA) Report presents the sustainability implications of the Employment Land Local Plan. The SA/SEA aims to ensure that sustainability considerations (the environment, social and economic effects) are taken into account during the preparation of the Employment Land Local Plan.

The Proposed Submission Sustainability Appraisal Report has been published for representations alongside the Proposed Submission Employment Land Local Plan for an 8 week period between 12 December 2014 and 6 February 2015.

What difference has the process made?

Each stage of the SA process has generated a deeper understanding of the sustainability issues relevant to the Employment Land Local Plan, and how the objectives can be achieved within the context of international, national, regional and local policies, plans, programmes, strategies and initiatives (PPPSIs).

The process has enabled the consideration of sustainability impacts of the Employment Land Local Plan. It has assisted in choosing the most sustainable strategy for the delivery of employment land in Eastbourne, and has assessed the policies proposed to support that strategy, identifying the potential impacts. The process also highlighted any limitations or insufficiencies, and a number of potential mitigation measures have been identified.

How to Comment

The Employment Land Local Plan and its Sustainability Appraisal Report are available from the Council’s website at www.eastbourne.gov.uk/ellp. Representations can be made on-line via the consultation portal, or responses can be sent to: planning.policy@eastbourne.gov.uk. Representations can also be sent via post to:

Specialist Advisory Team
Customer First
1 Grove Road
Eastbourne
BN21 4TW
Background and Methodology

The Employment Land Local Plan is a planning policy document that 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.

An SA/SEA of the Proposed Submission Employment Land Local Plan has been undertaken in accordance with the following legislation:

- The Planning and Compulsory Purchase Act 2004;
- The European Directive 2001/EC, known as the ‘Strategic Environmental Assessment (SEA) Directive’; and
- The Environmental Assessment of Plans and Programmes Regulations 2005 (the ‘SEA Regulations’).


The first stage in the process of SA/SEA was the ‘scoping stage’, which involved a review of key planning policy and available information to identify the key social, economic and environmental issues relating to Employment Land. Taking these issues into consideration, a number of sustainability objectives were identified which could be used to appraise the emerging Employment Land Local Plan, and the proposed scope of the SA/SEA was defined. The results of SA/SEA scoping stage was documented in the ‘Scoping Report’ issued on 8 August 2013 for consultation with statutory consultees. Comments were received from Natural England, Environment Agency, Sovereign Harbour Ltd and Aldi Stores Ltd. As a result some minor amendments were made to the sustainability framework.

Following the completion of the scoping report, an Initial SA/SEA Report was produced alongside the Draft Employment Land Local Plan to document the SA/SEA process and report on the identified sustainability effects on the draft plan. The Report presented outline proposals for monitoring related to sustainability effects. Stakeholders were asked to comment on the Draft Employment Land Local Plan and its Initial SA/SEA Report during a 12 week consultation period between December 2013 and March 2014.

A total of 33 representations were received from 10 responders during the consultation on the Draft Employment Land Local Plan and the Initial SA report, and the comments received were considered. A Proposed Submission Employment Land Local Plan and Proposed Submission SA Report were prepared as a result. These are subject to representations on issues of soundness between 12 December 2014 and 6 February 2015. Following this, they will be submitted for independent examination by a Planning Inspector. Following adoption of the Employment Land Local Plan, a Post-Adoption SEA Statement will be prepared to summarise the process, how the SA/SEA has influenced preparation of the Employment Land Local Plan and the results of consultation on the SA/SEA reports.
Context and Sustainability Issues

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.

The Economic Issues identified are:

- 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 encouraging economic competitiveness through attracting increased investment and new and innovative businesses, whilst supporting the existing sectors within the town.

- 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. 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.

- 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 may result 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.

- 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.

- Approximately 90% of the existing office stock in Eastbourne is located within the Town Centre. This 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.

- Eastbourne’s economy is reliant on 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.

- 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.
The number of jobs in Eastbourne has been falling over recent years, and there are only 0.71 jobs per Eastbourne resident. The Employment Land Local Plan should increase 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.

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.

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.

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.

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.

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.

The Social Issues identified are:

- Eastbourne has relatively high levels of economic deprivation and a number of households are considered to be in ‘poverty’. 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.

- 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 an issue in Eastbourne. The Employment Land Local Plan should seek to enhance the number of job opportunities available in the town.

- 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.
The Environmental Issues identified are:

- Large parts of Eastbourne are in zones of Flood Risk. 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 waterbodies or increase the risk of flooding elsewhere.

- 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.

- 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 forwards 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 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.

- 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.

**Sustainability Objectives**

Based on the identified key sustainability issues, a number of sustainability objectives have been developed to assess the Proposed Submission Employment Land Local Plan, alongside the Sustainability Objectives identified for the Core Strategy. The Employment Land Local Plan Sustainability Objectives are set out in Table A.

**Table A - Sustainability Objectives**

<table>
<thead>
<tr>
<th>Ref</th>
<th>Sustainability Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>EL-SA1</td>
<td>To promote sustainable economic growth</td>
</tr>
<tr>
<td>EL-SA2</td>
<td>To maximise use of existing employment land</td>
</tr>
<tr>
<td>EL-SA3</td>
<td>To diversify the local economy and support businesses across a range of sectors</td>
</tr>
<tr>
<td>EL-SA4</td>
<td>To increase the overall number of business enterprises operating in the town</td>
</tr>
<tr>
<td>EL-SA5</td>
<td>To promote and encourage business start ups and small businesses</td>
</tr>
<tr>
<td>EL-SA6</td>
<td>To increase the number and range of employment opportunities in the town</td>
</tr>
<tr>
<td>EL-SA7</td>
<td>To support existing businesses to continue trading in Eastbourne</td>
</tr>
<tr>
<td>EL-SA8</td>
<td>To improve local business linkages</td>
</tr>
<tr>
<td>EL-SA9</td>
<td>To reduce economic deprivation in the resident population</td>
</tr>
</tbody>
</table>
Assessing the Plan Objectives

The Employment Land Local Plan contains a number of Plan Objectives. The Plan Objectives describe what the Employment Land Local Plan is trying to achieve. These are identified in Table B.

Table B - Plan Objectives

<table>
<thead>
<tr>
<th>Ref</th>
<th>Plan Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>ELLP1</td>
<td><strong>Stimulate Economic Growth</strong> - 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</td>
</tr>
<tr>
<td>ELLP2</td>
<td><strong>Encourage Small and Start-up Businesses</strong> - 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</td>
</tr>
<tr>
<td>ELLP3</td>
<td><strong>Diversify the Local Economy</strong> - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish</td>
</tr>
<tr>
<td>ELLP4</td>
<td><strong>Support Existing Businesses</strong> - 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’</td>
</tr>
<tr>
<td>ELLP5</td>
<td><strong>Promote Sustainable Employment Locations</strong> - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.</td>
</tr>
</tbody>
</table>

The assessment of the Plan Objectives against the Sustainability Objectives shows that they would generally have positive effects, especially in relation to economic-based issues such as promoting sustainable economic growth. However there may be the possibility that some of the objectives have a negative effect in relation to some environmental SA objectives, unless mitigation measures can be incorporated into the Employment Land Local Plan.

Assessing the Options

A number of strategic options were identified through the Draft Employment Land Local Plan and the Initial SA/SEA Report for how additional employment land can be delivered in the future. These six objectives were assessed against the Sustainability Objectives to determine the sustainability effects of each option and assist in choosing the most appropriate and sustainable option to take forward in the Employment Land Local Plan.

The options identified were:
- 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 5: Sovereign Harbour
- Scenario 6: Greenfield Development

As a result of a representation on the Draft Employment Land Local Plan and the Initial SA/SEA Report, an additional option was identified. The additional option (Scenario 4A) involved the increased provision of office space in the Town Centre over Scenario 4.

The results of the appraisal of the options showed that the two options for the Town Centre were the most sustainable options due to positive effects resulting from its sustainable location. However, it was not possible to take both Town Centre options forward and therefore one option should be chosen over the other. The appraisal found Scenario 4: Town Centre to be slightly more sustainable than the new option (Scenario 4A: Town Centre – Increased Provision of office space). This is mainly due to the lack of choice provided in terms of location for businesses with different needs, which could have an effect on the economy.

The second most sustainable option was Scenario 1: Intensification of Industrial Estates, which provides positive impact, particularly in relation to high efficiency in land use and maximising use of existing employment land, promotion of business start-ups and small businesses, and improvement in business linkages. However, there are negative impacts relating to travel as the Industrial Estates are most commonly accessed by road.

Scenario 2: Extensions to Industrial Estates would have a number of negative environmental impacts due to this option involving Greenfield development. These include potential adverse effects on biodiversity, landscape, flooding, water quality and travel by car.

Scenario 3: Redevelopment of sites outside Industrial Estates provides some positive impacts, especially as it would involve redevelopment of previous developed land but the impact on residential areas and on the delivery of housing means that this is not a sustainable option.

Scenario 5: Sovereign Harbour was also one of the most sustainable options as it provides the potential for significant employment development that could encourage innovation and new businesses, but also provide space for existing businesses to expand and occupy premises that better meet their needs. Despite this, there may be negative impacts in relation to travel and accessibility.

Scenario 6: Greenfield Development has been assessed as the least sustainable option. It would create a number of significant negative environmental impacts in relation to biodiversity, landscape, flooding, water quality and travel by car. In addition, most sites within this option would require significant infrastructure delivery.

Table C summarises the scoring and results of the appraisal of the options.
Table C - Summary appraisal scoring of the options

<table>
<thead>
<tr>
<th>Scenario</th>
<th>✔️</th>
<th>✔️</th>
<th>0</th>
<th>?</th>
<th>✗</th>
<th>✗</th>
<th>Score</th>
<th>Rank</th>
</tr>
</thead>
<tbody>
<tr>
<td>Scenario 1: Intensification of existing</td>
<td>5</td>
<td>16</td>
<td>10</td>
<td>3</td>
<td>3</td>
<td>0</td>
<td>23</td>
<td>=2</td>
</tr>
<tr>
<td>Industrial Estates</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scenario 2: Extensions to Industrial Estates</td>
<td>8</td>
<td>10</td>
<td>6</td>
<td>3</td>
<td>4</td>
<td>6</td>
<td>10</td>
<td>4</td>
</tr>
<tr>
<td>Scenario 3: Redevelopment of sites outside</td>
<td>2</td>
<td>13</td>
<td>10</td>
<td>3</td>
<td>8</td>
<td>1</td>
<td>7</td>
<td>5</td>
</tr>
<tr>
<td>Industrial Estates</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scenario 4: Town Centre</td>
<td>9</td>
<td>9</td>
<td>14</td>
<td>3</td>
<td>2</td>
<td>0</td>
<td>25</td>
<td>1</td>
</tr>
<tr>
<td>Scenario 4A: Town Centre (Increased provision</td>
<td>7</td>
<td>10</td>
<td>15</td>
<td>3</td>
<td>2</td>
<td>0</td>
<td>23</td>
<td>=2</td>
</tr>
<tr>
<td>of office space</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Scenario 5: Sovereign Harbour</td>
<td>8</td>
<td>8</td>
<td>9</td>
<td>3</td>
<td>9</td>
<td>0</td>
<td>15</td>
<td>3</td>
</tr>
<tr>
<td>Scenario 6: Greenfield Development</td>
<td>3</td>
<td>13</td>
<td>3</td>
<td>3</td>
<td>6</td>
<td>8</td>
<td>-3</td>
<td>6</td>
</tr>
</tbody>
</table>

As the most sustainable options would not be able to meet the requirement for employment floorspace on their own, it will be necessary to combine the options. Therefore it was recommended that the options that should be taken forward in the Employment Land Local Plan were:

- Scenario 1 – Intensification of Industrial Estates
- Scenario 4 – Town Centre
- Scenario 5 – Sovereign Harbour

Assessing the Policies

The policies contained in the Proposed Submission Employment Land Local Plan were assessed against the sustainability objectives to identify any negative effects and where positive contributions could be enhanced. The Proposed Submission Employment Land Local Plan policies are generally beneficial in terms of sustainability. The policies would promote sustainable economic growth through the provision of new high quality employment space, which will help to attract new businesses and inward investment. The policies promote the provision of smaller units within Industrial Estates, which will encourage indigenous businesses and increase the number and diversity of businesses within the town, and subsequently increase the number and range of employment opportunities. Additionally, there would be positive effects with regard to the redevelopment of previously developed land and maximising the use of existing employment land. This has minimised the potential significant negative impacts that the plan may have had in relation to biodiversity, water quality, flooding and landscape if development had been proposed for undeveloped, Greenfield sites.

The Proposed Submission Employment Land Local Plan policies would have a beneficial effect in terms of supporting existing businesses that operate in the town by providing space for relocation or expansion and to occupy premises that meet their needs, as well as helping to improve and create business linkages by concentrating employment into specific locations. It is anticipated that there may be indirect effects of the policies on poverty and economic deprivation through reducing unemployment and increasing average incomes.
There are some uncertainties with regards to the effect of the Proposed Submission Employment Land Local Plan policies on issues relating to waste creation, the use of renewable forms of energy and other resource use within commercial premises. However, the implementation of other Development Plan policies will help reduce and mitigate any potential negative impact as a result of these uncertainties.

The main cumulative effects relate to economic benefits, which whilst considered individually the effects of the policies would be considered at a local level, taken as a whole they would serve to promote Eastbourne as a business location. Therefore the cumulative effect is likely to represent a regional beneficial impact.

**Summary and Next Stage of the Planning Process**

The SA/SEA process has helped to inform preparation of the Proposed Submission Employment Land Local Plan. The process has identified that broadly the policies are in line with sustainability objectives.

However, there are some negative effects and these can be mitigated through the implementation of other development plan policies. The sustainability effects of the Employment Land Local Plan will be monitored by a number of indicators as part of the Local Monitoring Report.

The next step is for the Proposed Submission Employment Land Local Plan and the Proposed Submission SA Report to be published for receipt of representations on issues of soundness. This consultation will commence on 12 December 2014 for an 8 week period until 6 February 2015.

Once the representation period is completed, the Employment Land Local Plan will be submitted to the Secretary of State for public examination. Once this has been undertaken and the Employment Land Local Plan is adopted, a Post-Adoption SA/SEA Statement will be prepared to summarise the SA/SEA process and the results of consultation.