EMPLOYMENT LAND LOCAL PLAN

Sustainability Appraisal / Strategic Environmental Assessment

PROPOSED SUBMISSION
SUSTAINABILITY APPRAISAL REPORT

November 2014
EMPLOYMENT LAND LOCAL PLAN

SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT

Proposed Submission Sustainability Appraisal Report

November 2014

Published for representations alongside the Proposed Submission Employment Land Local Plan between:

Friday 12 December 2014 and Friday 6 February 2015.
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Introduction

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.

1.2 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.

1.3 A Draft Employment Land Local Plan was published for a 12 week consultation period in December 2013 in order to obtain the public’s and stakeholder’s views on what the ELLP ought to contain. As well as identifying the proposed strategy and approach to the employment land supply over the Core Strategy plan period up to 2027, it also identified the other options that were considered in the formulation of the plan.

1.4 Following the consultation on the draft Employment Land Local Plan, the representations were considered in the formulation of a Proposed Submission version, which will be published for representations on issues of soundness in December 2014. The Proposed Submission Employment Land Local Plan will be accompanied by a Sustainability Appraisal. Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) is a process used to demonstrate how sustainable development has been incorporated into planning policy documents prepared by local planning authorities. It involves the identification, consideration and reporting of the likely impacts of planning proposals on social, environmental and economic interests. The SA/SEA for the Employment Land Local Plan will build on the SA/SEA that was produced for the Core Strategy Local Plan.

1.5 The SA/SEA has been undertaken in accordance with the requirements of Article 9 of European Directive 2001/42/EC (2001) (known as the Strategic Environmental Assessment Directive or the SEA Directive), the Environmental Assessment of Plans and Programmes Regulations 2004 and the requirements set out by the Planning and Compulsory Purchase Act (2004).

1.6 The overall aim of the SA/SEA is to ensure that sustainability considerations are integrated into the development of the Local Plan and are taken into consideration during the plan making process. This SA/SEA report has been prepared to provide information on the sustainability implications of the Proposed Submission Version of the AAP for the purposes of Consultation.

Structure of Report

1.7 This combined SA/SEA has been undertaken in accordance with the ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ guidance, published by the ODPM in November 2005 and a Practical Guide to the Strategic Assessment Directive in September 2005.
1.8 This SA Report is structured as follows:

- **Section 1** provides the background to the SA/SEA Report;
- **Section 2** outlines the SA/SEA methodology including the requirements for SA/SEA, and the consultation process;
- **Section 3** sets out the context for the Employment Land Local Plan, including baseline information, key sustainability issues and the SA Framework used in the assessment of the Proposed Submission version;
- **Section 4** outlines the findings of the appraisal of the policy options and alternatives considered in the Draft Employment Land Local Plan, including the compatibility of the plan objectives against the SA Framework;
- **Section 5** presents an appraisal of the policies contained within the Proposed Submission Employment Land Local Plan and identifies mitigation and monitoring requirements;
- **Section 6** presents a summary of the sustainability implications of the Proposed Submission Employment Land Local Plan; and
- **Section 7** outlines the next steps in the Employment Land Local Plan and its Sustainability Appraisal.
Section 1 - Background

Background to the Employment Land Local Plan

2.1 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: Economic, particularly relating to the employment land supply. The Inspector concluded that the evidence lacks clarity and does not demonstrate that Policy D2 is the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne. Furthermore she considered that uncertainty about the viability of directing 30,000 m² of employment floorspace to Sovereign Harbour cast doubt on whether the strategy is deliverable during the Plan period. This raised the question of whether the quantum of office development proposed in the Plan is based on accurate and up to date evidence.

2.2 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. To avoid such a delay the Inspector recommended that Policy D2 be the subject of an early review, leading to its replacement with an additional Local Plan to deal specifically with employment land supply.

Purpose of the Employment Land Local Plan

2.3 The 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.

2.4 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.

Purpose of the SA and the SA report

2.5 This Proposed Submission SA/SEA Report documents the appraisal of the Proposed Submission Version being considered for the Employment Land Local Plan. It also documents a component of Stage B of the SA/SEA process, ‘Developing and Refining Options and Assessing Effects’ and comprises Stage C ‘Preparing the Sustainability Report’.

2.6 This SA/SEA was undertaken following the SA methodology and framework as set out in the SA Scoping Report for Employment Land Local Plan, which presented the findings of Stage A of the SA/SEA.

2.7 As a component of Stage C, this Proposed Submission Version of the SA/SEA Report documents the SA process to date. It also presents the consultation responses
received to date and outlines the proposed consultation process for the Proposed Submission Versions.

2.8 This Proposed Submission Version of the SA/SEA Report has been prepared to allow representations to be made on the sustainability implications of the Proposed Submission Employment Land Local Plan, which has been prepared to fulfil the requirements of Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulation 2012.

Plan objectives

2.9 A set of Plan Objectives have been identified for the Employment Land Local Plan through pre-production stakeholder engagement and through the production of the Sustainability Appraisal Scoping Report.

2.10 The Objectives for the Employment Land Local Plan are:

- **ELLP1 - Stimulate Economic Growth** - 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 - 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.
Section 2 - Appraisal and Methodology

SA/SEA Requirements

3.1 SA and SEA are very closely linked. The SEA Directive requires the ‘assessment of the effects of certain plans and policies on the environment’. Under the SEA Regulations, SEA is required of some planning policy documents where they could give rise to significant environmental effects. SAs are mandatory for Local Plans under the requirements of the Planning and Compulsory Purchase Act (2004). The Act extends this assessment of environmental effects to also incorporate economic and social aspects. Although the requirement to carry out both an SEA and SA are mandatory, it is possible to satisfy the requirements of both pieces of legislation through a single appraisal process and this is the approach advocated. As such, SA should also fully comply with the requirements of the European Directive 2001/EC, known as the Strategic Environmental Assessment (SEA) Directive when both processes are integrated. From herein, the term SA is used to represent the combined SA/SEA process.

3.2 This SA has been undertaken in accordance with the core guidance document on the methodology for carrying out SAs: ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ published by the ODPM in November 2005.

Stages in SA/SEA

3.3 The Stages in the Sustainability Appraisal process are outlined in Table 1 below.

Table 1 - Stages in Sustainability Appraisal

<table>
<thead>
<tr>
<th>SA Stages</th>
<th>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>A1 – Identifying other relevant plans, programmes, policies, strategies and initiatives</td>
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<td></td>
<td>A2 – Collecting baseline information</td>
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<td></td>
<td>A3 – Identifying Sustainability Issues</td>
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<td></td>
<td>A4 – Developing SA Objectives</td>
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<td></td>
<td>A5 – Consulting on the Scope of the SA</td>
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<td></td>
<td>Stage B: Developing and refining alternatives and assessing effects</td>
</tr>
<tr>
<td></td>
<td>B1 - Testing the plan or programme objectives against the SA objectives</td>
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<tr>
<td></td>
<td>B2 - Developing strategic alternatives</td>
</tr>
<tr>
<td></td>
<td>B3 - Predicting the effects of the plan or programme, including alternatives</td>
</tr>
<tr>
<td></td>
<td>B4 - Evaluating the effects of the plan or programme, including alternatives</td>
</tr>
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<td></td>
<td>B5 - Mitigating adverse impacts</td>
</tr>
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<td></td>
<td>B6 - Proposing measures to monitor the sustainability effects of plan or programme implementation</td>
</tr>
<tr>
<td></td>
<td>Stage C: Preparing the Sustainability Appraisal Report</td>
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<td></td>
<td>C1 - Preparing the Sustainability Appraisal Report</td>
</tr>
</tbody>
</table>
SA Stages

Stage D: Consulting on the draft plan or programme and the Sustainability Appraisal Report

D1 - Consulting the public and Consultation Bodies on the draft plan or programme and the SA Report
D2 - Assessing significant changes
D3 - Making decisions and providing information

Stage E: Monitoring the significant effects of implementing the plan or programme on sustainability

E1 - Developing aims and methods for monitoring
E2 - Responding to adverse effects

3.4 Stage A ‘Setting the context and objectives, establishing the baseline and deciding on the scope’ has been completed through the production of a Sustainability Appraisal Scoping Report. The purpose of Stage A was to identify the relevant legislative and policy context; establish the sustainability issues relevant to the Employment Land Local Plan; define the proposed scope of the SA/SEA including setting the SA/SEA framework objectives which the appraisal will be based on; and to outline the proposed content and structure of the SA/SEA Report.

3.5 The Scoping Report was issued to statutory consultees on 8 August 2013 for an 8 week consultation period. It was also available on-line for other stakeholder to comment upon. A summary of the responses received is provided in Section 2 of this report.

3.6 The preparation of the Initial SA/SEA Report, which was published for consultation alongside the Draft Employment Land Local Plan in December 2013, documented the SA process undertaken to that point, including reviewing previous work undertaken, assessing the effects of the options considered for the Draft Employment Land Local Plan and suggesting methods of mitigating adverse impacts, maximising beneficial impacts. It documented the initial findings of Stage B ‘Developing and Refining Options and Assessing Effects’, and was published for consultation alongside the Draft Employment Land Local Plan; in doing so meeting the requirements of Stage C ‘Preparing the Sustainability Appraisal Report’.

3.7 Table 2 sets out the requirements of the SEA Directive and signposts relevant Sections of the SA/SEA Report where these requirements are fulfilled.

Table 2 - Requirements of the SEA Directive

<table>
<thead>
<tr>
<th>SEA Requirements</th>
<th>Where covered in Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>a) An outline of the contents, main objectives of the plan or programme, and relationships with other relevant plans and programmes.</td>
<td>Section 3</td>
</tr>
<tr>
<td>b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.</td>
<td>Section 3</td>
</tr>
<tr>
<td>c) The environmental characteristics of areas likely to be significantly affected.</td>
<td>Section 3</td>
</tr>
<tr>
<td>d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular</td>
<td>Section 3</td>
</tr>
</tbody>
</table>
### SEA Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Where covered in Report</th>
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<tbody>
<tr>
<td>environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC</td>
<td></td>
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<tr>
<td>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.</td>
<td>Section 3</td>
</tr>
<tr>
<td>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.</td>
<td>Section 5 and Section 6</td>
</tr>
<tr>
<td>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.</td>
<td>Section 6</td>
</tr>
<tr>
<td>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.</td>
<td>Section 5</td>
</tr>
<tr>
<td>i) A description of measures envisaged concerning monitoring in accordance with Article 10.</td>
<td>Section 6</td>
</tr>
<tr>
<td>j) A non-technical summary of the information provided under the above headings</td>
<td>Non-technical summary</td>
</tr>
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</table>

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 (Art. 5.2).

### Consultation:

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).

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).

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).

### Taking the environmental report and the results of the consultations into account in decision-making (Art. 8)

Section 5 and Section 6 (further information to be included in Post-Adoption SEA Statement)

### Provision of information on the decision:

- 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:
- The plan or programme as adopted;
- A statement summarising how environmental considerations have been considered.
### SEA Requirements

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Where covered in Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>integrated into the plan or programme and how the environmental report</td>
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<tr>
<td>pursuant to Article 5, the opinions expressed pursuant to Article 6 and the</td>
<td></td>
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<tr>
<td>results of consultations entered into pursuant to Article 7 have been</td>
<td></td>
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<tr>
<td>taken into account in accordance with Article 8, and the reasons for</td>
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<tr>
<td>choosing the plan or programme as adopted, in the light of the other</td>
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<tr>
<td>reasonable alternatives dealt with; and</td>
<td></td>
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<tr>
<td>• The measures decided concerning monitoring (Art. 9 and 10)</td>
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### Consulting

3.7 The SEA Regulations require a Sustainability Appraisal Scoping Report to be produced and issued for consultation as a preliminary stage in the production of a Local Plan (Stage A).

3.8 The Employment Land Local Plan Sustainability Appraisal Scoping Report was produced in-house by the Eastbourne Borough Council Specialist Advisory team during June and July 2013.

3.9 During this time, 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.

3.11 The SA Scoping Report was sent out for consultation with the three statutory consultative bodies: the Environment Agency, Natural England and English Heritage. It was also made available for comment by other stakeholders. The Scoping Report was published for consultation on 8 August 2013 for an initial 5 week period; however, following a requested from a stakeholder, the consultation was extended for an additional three weeks to 4 October 2013.

3.12 The Initial SA/SEA Report was published alongside the Draft Employment Land Local Plan in December 2014 for a 12 week period. A total of 33 representations were received during the consultation from 10 organisations.

### Summary of Consultation Responses

**Sovereign Harbour Limited (SHL)**

3.13 Sovereign Harbour Limited (SHL) owned land at Sovereign Harbour. SHL’s representation to the Draft ELLP and Initial SA/SEA Report were in relation to the amount of office space allocated for the Town Centre.
3.14 SHL stated that the provision of 3,000sqm of office space in the Town Centre was not objectively assessed. It is stated that as a ‘Town Centre use’, office space should firstly be directed toward the Town Centre rather than out of centre locations such as Sovereign Harbour. It is maintained that the ELLP does not consider all reasonable alternatives in relation to the amount of provision of office space in the Town Centre, and that there is capacity in the Town Centre for the amount of office space to be significantly increased. Therefore the requirement for office space should be rebalanced away from Sovereign Harbour and towards the Town Centre.

3.15 It is also claimed that the proposed allocation at Sovereign Harbour is unviable in commercial terms because the longstanding viability constraints on Site 7 will be exacerbated further by subsidised provision on Site 6, against which Sites 4 and 7 will be unable to compete in financial terms.

3.16 In addition, it is claimed that the density assumptions used in the ELLP of 12 sqm per office job is too high, and should be 8-10 sqm per office job in line with the development of the Innovation Mall.

**ALDI Stores Ltd**

3.17 ALDI have an interest in the former Cosmetica site on the Brampton Road Industrial Estate. ALDI object to the Plan in relation to the proposed protection of sites within Industrial Estates from redevelopment to non-industrial uses. It is maintained that the site is genuinely redundant for Industrial uses, and policies in the ELLP would result in the site remaining vacant in the long term. They state that this approach is contrary to the National Planning Policy Framework.

**Richard Maile**

3.18 Richard Maile owns land in Eastbourne Park off Lottbridge Drove adjoining the Hammonds Drive Police Custody Centre. Mr Maile’s representation provides an analysis on all of the options considered, including comments on the advantages and disadvantages, and concludes that Option 2: Extensions to Industrial Estates should be included in the ELLP, on the basis that there is developer interest in the land off Hammonds Drive and it could provide benefits such as improved access, enhanced visual and environmental benefits and the possibility of immediate development. In addition, it could also bring with it highway benefits in providing part of the access for the St Anthony’s Link, which in itself could bring benefits in terms of the viability of the Sovereign Harbour sites.

**Sussex Police**

3.19 Sussex Police own land within the Hammonds Drive Industrial Estate. Sussex Police welcome the overall approach to employment development in Eastbourne, but object to the restriction of only allowing Industrial development within the Industrial Estates as this would prohibit further expansion of the Police Custody Centre if the need arose over the Plan period.

**East Sussex County Council**
3.20 East Sussex County Council request a number of minor additions and points of clarification. These include links to other strategies including the South East Local Economic Partnership, reference to inward investment and clarification on points of evidence.

**Gardners Books**

3.21 Gardners Books own land on the Highfield (South) Industrial Estate. Gardners Books support the proposed approach to employment land in the ELLP, and would not support development in Eastbourne Park. In addition, it is felt that there is a shortage of large office/industrial units and these sites should not be lost to other types of development such as retail.

**Southern Water**

3.22 Southern Water request amendments to policies to require employment development design and layout avoids building over Southern Water infrastructure.

3.23 Other representations were received from Natural England, the Highways Agency and the Marine Management Organisation. None of these responders had any specific comments.

**Invitation to Comment**

3.24 In accordance with guidance, this Proposed Submission SA/SEA Report has been published for representations alongside the Proposed Submission Employment Land Local Plan. The 8 week representation period commences on Friday 12 December 2014 and finishes on Friday 6 February 2015.

3.25 The Employment Land Local Plan and its Sustainability Appraisal Report are available from the Council’s website at www.eastbourne.gov.uk/elp. 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
Section 3 - Sustainability objectives, baseline and context

Links to other policies, plans, programmes, strategies and initiatives

4.1 The Employment Land Local Plan may be influenced in various ways by other plans and programmes and by external sustainability objectives such as those laid down in policies or legislation. International, national, regional and local policies, plans, programmes, strategies and initiatives (PPPSIs) relevant to the Employment Land Local Plan were reviewed as part of the SA Scoping process and Initial SA/SEA Report to determine the objectives and targets, and to identify synergies and opportunities as well as conflicts and challenges.

4.2 The Employment Land Local Plan should be compliant with the objectives of the Core Strategy. As such the SA of the Employment Land Local Plan has relied on the work undertaken for the Core Strategy and its SA in terms of wider policy and legislation that may be relevant. This follows the approach set out in the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' guidance which states: "Once SA information and objectives have been developed for a LPA’s first SA, subsequent SAs of other DPDs can also draw on this information.... use of common data and objectives may considerably reduce the amount of work."

4.3 The key messages from the PPPSI review that need to be taken into account in the Employment Land Local Plan (ELLP) and its Sustainability Appraisal are outlined in Appendix 1.

Description of the baseline characteristics

4.4 An extensive search for baseline data was undertaken at the SA scoping and Initial SA/SEA Report stages. The baseline information provides the basis for predicting and monitoring the environmental and sustainability effects of planning policy. A summary of the key baseline information is provided in Appendix 2.

Additional information applicable to the Employment Land Local Plan

4.5 Since the preparation of the Initial SA/SEA Report in 2013, there have been a number of additional evidence base documents and information made available. These have been considered through the Proposed Submission SA/SEA Report and are summarised below.

Employment Land Supplementary Evidence Report (2014)

4.6 Eastbourne Borough Council commissioned GVA to produce an Employment Land Supplementary Evidence Report to provide further analysis of the key issues raised during the consultation on the Draft Employment Land Local Plan.

4.7 The Supplementary Evidence Report shows the 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, and is markedly different from ‘market norms’ across the wider sub-region. Developers and occupiers who...
prefer out of town sites but cannot secure such sites are more likely to move their activity to another location rather than move to a town centre site.

4.8 The Supplementary Evidence Report identifies improvements in the market and industrial developments in other local areas that shows there is potential for industrial development in Eastbourne. It also identifies a market view that there will be demand for industrial space over the plan period, which justifies the protection of sites within the existing industrial estates.

4.9 The Supplementary Evidence Report states that whilst delivery of commercial development at Sovereign Harbour at current values would be challenged, the delivery of the Innovation Mall will begin to address some of the weaknesses and help to establish Sovereign Harbour as a commercial location, creating a catalyst for economic activity in the area and driving up demand and prices. This will deliver increased rents and lower risk of investment, helping to increase the viability of commercial development.

Viability Briefing Note (2014)

4.10 Eastbourne Borough Council commissioned GVA to prepare additional evidence on viability of industrial development to provide further justification for the long term allocation and protection of the existing employment land. The aim of the study was to identify the rent level at which industrial development starts to deliver a sufficient return to a developer to become an attractive investment prospect.

4.11 The Viability Briefing Note provides some high level viability appraisals that show that industrial development in Eastbourne becomes viable at a rental value of c.£8/sqft (£80/sqft) for smaller units, and £7.50/sqft (£6.9/sqm) for larger units, when compared to a benchmark land value of £450,000 per ha.

4.12 The report states that it is not unreasonable, based on market forecasts, to expect rents to reach these 'threshold' values over the Plan period. As such, there is sufficient confidence that sites protected for B1/B2/B8 activity can be shown to be viable in the future.

4.13 The Viability Briefing Note concludes that, whilst the figures are ‘high level’, the findings provide an indication that with a marginal improvement in industrial rents, there may be increased demand for industrial development. When taken in the context of a limited availability of land for further industrial development, it becomes more imperative to protect the existing industrial stock.

South East LEP – Strategic Economic Plan (2014)

4.14 The South East Local Enterprise Partnership (SELP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government’s Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been awarded for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the
‘Hailsham, Polegate and Eastbourne Sustainable Corridor’ and an Eastbourne and South Wealden walking and cycling package.

4.15 EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support, innovation, export and new technologies.

**Travel to work data**

4.16 Origin-Destination data (also known as Flow Data) from the 2011 Census was released in July 2014. This data shows the travel-to-work patterns of people in employment.

4.17 Eastbourne has a resident population in employment of 44,449, and a workplace population of 43,888. There are 27,667 people who live and work in Eastbourne, with 12,322 people commuting into Eastbourne to work, and 12,883 people commuting out of Eastbourne to work. This results in a net loss of 561 workers compared to the resident population. 29% of the resident population of Eastbourne commute out of town to work.

4.18 The largest exchange of commuters occurs with Wealden District, and Eastbourne has an overall gain of 2,307 workers from here. Eastbourne also has a net gain in workers from Rother and Hastings. However, Eastbourne has a particularly significant loss of workers to Brighton & Hove and to Lewes.

4.19 In terms of travel to work, 44.5% of people who live and work in Eastbourne travel to work by car, whilst 20.3% travel by foot. 7.9% travel by public transport and just 4% travel by bicycle. In addition, 16% of the people who live and work in Eastbourne work mainly at or from home. Of the commuters, 75% of in-commuters and 69.1% of out-commuters travel to work by car, whilst more out-commuters use public transport (20.1%) than in-commuters 14.9%.

**Main social, environment and economic issues and problems identified**

4.20 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.

**Economic Issues**

4.21 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.

**Social Issues**

4.2 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.

**Environmental Issues**

4.23 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.

The SA Framework

4.24 The SA Framework for the Employment Land Local Plan was developed during Stage A and was set out in the SA Scoping Report. It consists of a series of sustainability objectives and sub-objectives supported by indicators which form the assessment criteria.

4.25 The Sustainability Objectives for the Employment Land Local Plan need to draw down from the Core Strategy. The ODPM Guidance suggests that once the SA information and objectives have been developed for the first SA (in this case the Core Strategy), subsequent SAs can draw on this information, although they would normally have to add information more specific to the Local Plan.

4.26 The full SA Framework 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.

4.27 The Sustainability Appraisal Framework for the Employment Land Local Plan is set out in Table 3 below.
### Table 3 - SA Framework

<table>
<thead>
<tr>
<th>Ref</th>
<th>Headline Objective</th>
<th>Headline Indicator</th>
<th>Decision-making criteria</th>
<th>Detailed Indicators</th>
</tr>
</thead>
<tbody>
<tr>
<td>EL-SA1</td>
<td>To promote sustainable economic growth</td>
<td>The total output of the Economy (GVA)</td>
<td>Will it result in increased business starts? Will it result in reduced business deaths?</td>
<td>GVA per capita Productivity Index Economic Competitive Index Number of business starts Number of business deaths Amount of employment floorspace developed</td>
</tr>
<tr>
<td>EL-SA2</td>
<td>To maximise use of existing employment land</td>
<td>The amount of employment floorspace within designated employment areas</td>
<td>Will it result in densification of Industrial Estates?</td>
<td>Number of business premises on Industrial Estates Amount and % of new employment floorspace developed in Industrial Estates</td>
</tr>
<tr>
<td>EL-SA3</td>
<td>To diversify the local economy and support businesses across a range of sectors</td>
<td>The levels of business activity in different sectors</td>
<td>Will it result in businesses in a wider range of sectors?</td>
<td>Number of business enterprises by sector % of people employed in Public sector</td>
</tr>
<tr>
<td>EL-SA4</td>
<td>To increase the overall number of business enterprises operating in the town</td>
<td>The number of businesses operating in Eastbourne</td>
<td>Will it result in more businesses operating in Eastbourne?</td>
<td>Number of active businesses enterprises</td>
</tr>
<tr>
<td>EL-SA5</td>
<td>To promote and encourage business start-ups and small businesses</td>
<td>The rate of business start-ups The number of small business enterprises</td>
<td>Will it result in more business starts? Will it result in an increased number of small businesses?</td>
<td>New business registration rate Number of business starts Number of small businesses</td>
</tr>
<tr>
<td>EL-SA6</td>
<td>To increase the number and range of employment opportunities in the town</td>
<td>The number of jobs in different sectors</td>
<td>Will it result in the creation of more jobs? Will it create jobs in different sectors?</td>
<td>Number of people employed by sector Number of people employed by occupation Job Density</td>
</tr>
<tr>
<td>EL-SA7</td>
<td>To support existing businesses to continue trading in Eastbourne</td>
<td>Number of business enterprises Number of businesses by length of time trading</td>
<td>Will it maintain the number of business enterprises? Will it assist existing business to trade in Eastbourne?</td>
<td>Number of business enterprises by age of business Number of business enterprises by turnover Number and % of empty commercial hereditaments</td>
</tr>
<tr>
<td>EL-SA8</td>
<td>To improve local business linkages</td>
<td>Number of business enterprises within a neighbourhood</td>
<td>Will it improve linkages between businesses</td>
<td>Number of businesses by neighbourhood</td>
</tr>
<tr>
<td>EL-SA9</td>
<td>To reduce economic deprivation in the resident population</td>
<td>The amount of economic deprivation in Eastbourne</td>
<td>Will it reduce economic deprivation in Eastbourne? Will it reduce the number of households in poverty?</td>
<td>Rank of average rank in Economic Deprivation Index Number of people claiming work related benefit The number and % of households in poverty</td>
</tr>
<tr>
<td>Ref</td>
<td>Headline Objective</td>
<td>Headline Indicator</td>
<td>Decision-making criteria</td>
<td>Detailed Indicators</td>
</tr>
<tr>
<td>--------</td>
<td>------------------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
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<td>---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| EL-SA10| To increase the average incomes of residents in the town                            | The average income of residents                                                     | Will it result in increased incomes?                                                       | Average annual household income  
Number of people by occupation  
Number of people unemployed  
Average weekly earnings (residence-based) |
| EL-SA11| To reduce levels of unemployment                                                    | The number and percentage of people who are unemployed                             | Will unemployment levels reduce?                                                           | % of economically active people who are employed  
% of residents claiming JSA |
| EL-SA12| To ensure no adverse impact on the road network                                      | The number of cars on the road during peak hours                                     | Will it increase the proportion of journeys using modes other than the car?                | Bus journeys per year  
% Journey to work by mode  
% Journey to work by distance  
Growth in Traffic  
% of people who work from home |
| EL-SA13| To provide employment opportunities in locations that are accessible for local people and commuters | The number of people travelling to work by sustainable modes of transport            | Will it increase the number of employment opportunities in accessible locations?           | % Journey to work by mode  
% Journey to work by distance  
Bus journeys per year |
| EL-SA14| To reduce resource use from commercial & industrial premises                        | The amount of resources used by commercial premises  
The amount of emissions from commercial premises | Will it help to reduce the overall consumption of gas and electricity from commercial premises? | Average annual gas and electricity consumption from commercial & industrial consumers in kWh  
Energy Consumption in GWh  
Carbon Dioxide Emissions per capita in tonnes |
| EL-SA15| To reduce the impact of noise from commercial premises on residential areas         | The amount of noise generated from commercial premises                             | Will it reduce the amount of noise from commercial premises?  
Will it reduce noise heard from residential premises? | Number of noise complaints  
Amount of new employment floorspace located within 100m of residential areas |

4.28 The compatibility of the Sustainability Objectives were tested in the Initial SA/SEA Report, which showed that the majority of the Sustainability Objectives were compatible due to the economic emphasis placed upon them. However there were some conflicts, particularly with the Sustainability Objective relating to impact on the road network. This is because it is considered likely that economic growth will create the need for more travel, which is likely to be undertaken via car.
Section 4 – Appraisal of the policy options and alternatives

5.1 The Employment Land Local Plan has a vision and objectives that highlight the purpose and aims of the Employment Land Local Plan.

5.2 The Core Strategy contained a vision, which closely aligned to the vision from the Sustainable Community Strategy. The vision for the Employment Land in Eastbourne is specific and relevant to the economy and employment land within the class-B uses.

5.3 The objectives underpin the preparation of the Employment Land Local Plan and the policies and proposals contained within it. The objectives were tested as part of the Initial SA/SEA Report. For convenience these are located within Appendix 3.

Need for a Local Plan

5.4 Although the need to produce the Employment Land Local Plan is a requirement of the Inspector who examined the Core Strategy, the Initial SA/SEA Report appraised the need to produce an Employment Land Local Plan by comparing it against a ‘do-nothing’ scenario. The ‘Do Nothing’ option was assessed by testing the existing ‘Business and Industry’ policies within the Eastbourne Borough Plan 2001-2011 against the SA Objectives.

5.5 The appraisal found that the existing policy framework does include overarching policies that would meet some of the SA Objectives. However, one of the main sustainability issues from the ‘Do Nothing’ approach would be that the Borough Plan was reliant on Greenfield sites in Eastbourne Park for providing land for employment development, and access to these sites were dependent on the provision of new road links.

5.6 It is recognised that in the absence of the Employment Land Local Plan, some employment development could occur, however it is unlikely that it would be enough to meet requirements up to 2027 and would be piecemeal development that would mean that sustainable economic growth would not be realised. Also, opportunities for encouraging small and start-up businesses are unlikely to be as effective. It is considered that an Employment Land Local Plan would provide the mechanism to ensure that appropriate amounts of employment development comes forward in sustainable locations.

Main strategic options considered

5.7 Through the preparation of the Employment Land Local Plan, a number of strategic options were identified for how additional employment land can be delivered in future.

5.8 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 such as the Strategic Housing Land Availability Assessment and Employment Land Review, sites that have previously been allocated for employment and housing development in the Borough Plan, and a review of employment and housing sites. The strategic options were also
subject to public consultation through the Draft Employment Land Local Plan. This meets Stage B2 – Developing the Options in the Sustainability Appraisal process.

5.9 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, and in meeting Stage B3 - Predicting the effects... and Stage B4 - Evaluating the effects... of the plan or programme, including alternatives.

5.10 The likely effects of the options were predicted and evaluated using a panel of specialist advisers made up of officers from across the Council in accordance with the guidance document Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents (ODPM, November 2005) and the Plan Making Manual. The findings are consequently broad based and qualitative.

5.11 The six strategic options are identified as follows:

- **Scenario 1** – Intensification of existing Industrial Estates – the provision of additional employment floorspace on the existing Industrial Estates by redeveloping low density plots at a higher density in order to intensify the employment use.

- **Scenario 2** – Extensions to Industrial Estates – the provision of additional employment floorspace through extensions to existing Industrial Estates where it would be possible to extend the Industrial Estates by developing land on the edge of industrial estates and within Eastbourne Park for employment use.

- **Scenario 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.

- **Scenario 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.

- **Scenario 5** – Sovereign Harbour – the development of land at Sovereign Harbour for employment use to balance housing growth with the provision of services and facilities, with employment being important element of creating a sustainable centre.

- **Scenario 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.
5.12 SHL’s representation commented that the provision of 3,000sqm of office space in the Town Centre was not objectively assessed, and that the Town Centre has capacity for an increased amount of office space. Therefore, an increased provision of office space in the Town Centre is an option that should be tested in the Sustainability Appraisal.

5.13 Therefore, Scenario 4A – Town Centre (Increased Provision of Office Space) will be tested alongside the other options.

Appraisal of the Options

5.14 Each option was subject to the Sustainability Appraisal in order to assess the sustainability of the options and assist in choosing which option should be taken forward in the Employment Land Local Plan.

5.15 However, during the consultation on the Draft Employment Land Local Plan, a number of issues were raised in relation to the options and their appraisal through the Initial SA/SEA Report.

5.16 Representations received 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 the area is protected by tidal defences. These issues have been taken into account in the appraisal of the options below.

5.17 Within their representation, SHL undertook a re-appraisal of the some of the options, including the additional option of increased office provision in the Town Centre. The points raised within this separate appraisal have been considered in the re-appraisal of the options in the SA Report, although not all points raised are accepted.

5.18 Table 4 provides a summary of the appraisal of the options, and a commentary on how each option performed against the SA is provided below. The full appraisal of the options is provided in Appendix 4.

Table 4 - Summary of Appraisal of Options

- Likely to have a strong positive effect (+2)
- Likely to have a positive effect (+1)
Unlikely to have any effect (0)
- Likely to have a negative effect (-1)
- Likely to have a strong negative effect (-2)
Effect unclear/unknown (0)
<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Scenario 1: Intensification of Industrial Estates</th>
<th>Scenario 2: Extensions to Industrial Estates</th>
<th>Scenario 3: Redevelopment of sites outside Industrial Estates</th>
<th>Scenario 4: Town Centre</th>
<th>Scenario 4A: Town Centre (Increased provision of office)</th>
<th>Scenario 5: Sovereign Harbour</th>
<th>Scenario 6: Greenfield development</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✓</td>
<td>✓</td>
<td>✗</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>✓</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
</tr>
<tr>
<td>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</td>
<td>o</td>
<td>✓</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>✓</td>
</tr>
<tr>
<td>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</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>o</td>
<td>o</td>
<td>✓</td>
<td>o</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✓</td>
<td>✗</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>x</td>
</tr>
<tr>
<td>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</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>✓</td>
<td>✓</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>✓</td>
<td>✗</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>x</td>
</tr>
<tr>
<td>CS13 To protect, enhance, exploit the learning potential and make accessible for enjoyment by</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>✗</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Scenario 1: Intensification of Industrial Estates</td>
<td>Scenario 2: Extensions to Industrial Estates</td>
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<td>--------------------------</td>
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<td>---------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>CS14</td>
<td>sustainable modes of transport the Borough’s parks, gardens, countryside, recreation areas and historic environment</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>XX</td>
</tr>
<tr>
<td>CS15</td>
<td>To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✓</td>
<td>X</td>
<td>✓</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>CS16</td>
<td>To maintain and enhance the quality of landscapes and townscapes</td>
<td>✓</td>
<td>X</td>
<td>✓</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>CS17</td>
<td>To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>O</td>
<td>XX</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>O</td>
</tr>
<tr>
<td>CS18</td>
<td>To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>O</td>
<td>XX</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>X</td>
</tr>
<tr>
<td>CS19</td>
<td>To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change</td>
<td>X</td>
<td>XX</td>
<td>X</td>
<td>X</td>
<td>O</td>
<td>X</td>
</tr>
<tr>
<td>CS20</td>
<td>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</td>
<td>O</td>
<td>O</td>
<td>X</td>
<td>✓</td>
<td>✓✓</td>
<td>X</td>
</tr>
<tr>
<td>CS21</td>
<td>To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>?</td>
</tr>
<tr>
<td>CS22</td>
<td>Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>?</td>
</tr>
<tr>
<td>EL-SA1</td>
<td>To promote sustainable economic growth</td>
<td>✓</td>
<td>✓✓</td>
<td>✓</td>
<td>✓✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA2</td>
<td>To maximise use of existing employment land</td>
<td>✓✓</td>
<td>XX</td>
<td>X</td>
<td>O</td>
<td>O</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA3</td>
<td>To diversify the local economy and support businesses across a range of sectors</td>
<td>✓</td>
<td>✓✓</td>
<td>✓</td>
<td>✓✓</td>
<td>X</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA4</td>
<td>To increase the overall number of business enterprises operating in the town</td>
<td>✓</td>
<td>✓</td>
<td>✓✓</td>
<td>✓</td>
<td>O</td>
<td>✓</td>
</tr>
</tbody>
</table>
### Employment Land Local Plan – Proposed Submission Sustainability Appraisal Report

**November 2014**

#### Sustainability Objective

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

**Score** 23 10 7 25 23 15 -3

---

**Scenario 1: Intensification of existing Industrial Estates**

5.19 This option seeks to provide additional employment floorspace through the intensification and redevelopment of sites within existing Industrial Estates. This provides a number of positive sustainability impacts, particularly in relation to high efficiency in land use (CS14) and maximising use of existing employment land (EL-SA2), promotion of business start-ups and small businesses (EL-SA5) due to the fact that intensification is likely to produce smaller commercial units. The presence of existing businesses will help improve business linkages (EL-SA8). The majority of the positive impacts are related to economic sustainability issues.

5.20 The redevelopment of previously developed sites means that there is unlikely to be negative sustainability issues relating to biodiversity (CS12) and flooding (CS18). In
addition, an increased intensity of use makes sustainable modes of travel, particularly public transport, more viable (CS7).

5.21 However, there are negative impacts relating to travel (EL-SA12). The Industrial Estates are most commonly access by road, and commuters would travel to work by private car. Intensifying use in these locations would increase the amount of traffic travelling into an area that may already have congestion problems. There may also be negative impacts relating to air pollution (CS16) and climate change (CS19).

5.22 There are some unclear impacts, particularly relating to waste (CS21) and renewable energy (CS22), which would be dependent on the development rather than the strategic location.

5.23 Overall, the option is considered to be a sustainable option where the positive impacts significantly outweigh the negative impacts. The option scores 23 in the SA matrix.

Scenario 2: Extensions to Industrial Estates

5.24 This option seeks to provide additional employment floorspace through developing extensions to existing Industrial Estates. As these sites are likely to be Greenfield sites, the Sustainability Appraisal identifies a number of significant negative impacts. Many of the negative impacts are environmentally-related, including the negative impact on biodiversity (CS12) and landscape (CS15) due to the fact that the extensions are likely to be located within Eastbourne Park. This option is also likely to have an adverse impact on flooding (CS18) and water quality (CS17) by creating more impermeable surface on what was previously undeveloped land. The loss of undeveloped land would also not help prepare for impacts of climate change (CS19). In addition, the option would have a negative effect on efficiency in land use through the re-use of previously developed land (CS14), and maximising the use of existing employment land (EL-SA2).

5.25 The main positives associated with this option are related to the promoting sustainable economic growth (EL-SA1) by creating more commercial units with fewer restrictions on type and size, which gives more potential for inward investment and attracting larger employers. It will allow units to be built to specification, and will help diversify the local economy and support businesses across a range of sectors (EL-SA3). The presence of existing businesses will help improve business linkages (EL-SA8). The majority of the positive impacts are related to economic sustainability issues.

5.26 In addition, The Industrial Estates are most commonly access by road and there are negative impacts relating to travel (EL-SA12). Intensifying use in these locations would increase the amount of traffic travelling into an area that may already have congestion problems. There may also be negative impacts relating to air pollution (CS16) and climate change (CS19).

5.27 There are some unclear impacts, particularly relating to waste (CS21) and renewable energy (CS22), which would be dependent on the development rather than the strategic location.
Overall, the option is considered to be a relatively unsustainable option. The environmentally related negative impacts outweigh the positive impacts, and the option only scores 10 in the SA matrix.

Scenario 3: Redevelopment of sites outside Industrial Estates

This option seeks to provide additional employment floorspace through redeveloping sites outside of existing Industrial Estate. This provides some positive impacts, including high efficiency in land use (CS14), and promotion of business start-ups and small businesses (EL-SA5) due to the fact that this type of development is likely to produce smaller commercial units. In addition, the distribution of employment opportunities to other locations can help increase sustainability of neighbourhoods (CS6) and means that walking and cycling to work becomes a more viable option (CS7).

There are significant negative associated with this option. This option would remove the potential to develop the site for residential use, which reduces opportunities for everyone to live in decent affordable homes (CS1) and would compromise the meeting of housing targets. In addition, there may be a negative noise impact on residential communities due to location outside existing Industrial Estates (EL-SA15). There would be adverse impact on the road network (EL-SA12) as it will result in people travelling to different locations across town, which will increase number of journeys and effect on road network. This would also impact on accessibility (EL-SA13), and there would be no existing business links (EL-SA8). There may also be negative impacts relating to air pollution (CS16) and climate change (CS19).

There are some unclear impacts, particularly relating to waste (CS21) and renewable energy (CS22), which would be dependent on the development rather than the strategic location.

Overall, the option is considered to be a relatively unsustainable option. The negatives relating to isolation from other employment uses and the potential for the sites alternative use for residential outweigh the benefits. The option only scores 7 in the SA matrix.

Scenario 4: Town Centre

This option seeks to provide a replacement office space for some of the space lost in the Town Centre through the redevelopment of sites that have been identified in the Town Centre Local Plan. The replacement of lost provision will result in more office space being provided in other ‘out of town’ locations. Whilst this may reduce the positive impact of the town centre in terms of accessibility, it will provide choice and opportunities for office developers and occupiers who have different locational requirements. This means that the overall office stock across the town will be more balanced; although still allow a clear majority of office space to be located in the town centre.

A number of positive impacts are associated with this option. These include significant positives in relation to developing a broad economic base (CS8), attracting inward investment and encouraging economic growth (EL-SA1), and diversifying the
local economy (EL-SA3). It would also promote efficiency in land use (CS14) as the sites are previously developed, and it would provide some opportunities for businesses that want to be within the Town Centre to link with each other (EL-SA8). The majority of the positive impacts are related to economic sustainability issues.

5.35 There are few negatives associated with this option, particularly relating to air pollution (CS16) and climate change (CS19) as it would result in more office space being provided in out of town locations with less opportunity for public transport. Also, the potentially very positive impacts relating to accessibility are lessened for the same reason. There are some unclear impacts, particularly relating to waste (CS21) and renewable energy (CS22), which would be dependent on the development rather than the strategic location.

5.36 Overall, the option is considered to be a sustainable option where the positive impacts significantly outweigh the negative impacts. The option scores 25 in the SA matrix.

Scenario 4A: Town Centre (Increased provision of office space)

5.37 This option seeks to provide increased provision of office space in the town centre. Similar to the previous option, this will be through the redevelopment of sites that have been identified in the Town Centre Local Plan.

5.38 Many of the overall positive and negative impacts of this option of increase provision are similar to the previous options. However there are some key differences as a result of more office space being provided in the town centre, and therefore less in other out of town locations.

5.39 Increased provision of office space in the town centre will allow for an increase in accessibility and the number of people travelling to work by public transport, due to the presence of the railway station and bus hub (CS7 and EL-SA13). This will mean less people travelling to out of town locations by car and therefore less impact on road network (CS20 and EL-SA12). In addition, increase office provision in the Town Centre is likely to further increase the opportunities for linkages between businesses given the high concentration of office space in the Town Centre (EL-SA8).

5.40 However, the office market in Eastbourne is already highly concentrated within the Town Centre, which is markedly different from ‘market norms’ across the wider sub-region.

5.41 Therefore, increase provision within the town centre will further reinforce this concentration and not provide choice within the market in order to capture economic interest and potential, as some office developers and occupiers will prefer out of town locations. If these locations are not available, they are more likely to move their activity to another location than to seek a town centre location. This means that the positive benefits in relation to economic growth and inward investment and increasing the range of employment opportunities are lessened. Further, there is a negative impact in terms of diversifying the local economy, as more town centre office space will not provide choice.
In addition, there would be a negative impact on providing opportunities for everyone to live in a decent, sustainably constructed and affordable home (CS1), as the provision of an increased amount of office space on the Development Opportunity Sites in the Town Centre would compromise the ability of the Town Centre to meet the housing targets set for the area.

**Scenario 5: Sovereign Harbour**

This option seeks to provide additional employment floorspace through the development of sites within Sovereign Harbour. There are a number of positive impacts associated with this option. Development of this land, especially of the type of the proposed Innovation Mall, will enable and encourage entrepreneurship and innovation (CS8 and EL-SA5). The Sovereign Harbour SPD allows the development to be masterplanned (CS9), and the fact that the land is previously developed means that it is efficient in terms of land use (CS14). High quality development in this attractive location could attract inward investment and sustainable economic growth (EL-SA1), especially if there is a range of different types and sizes of employment space (EL-SA6). This will help diversify the economy (EL-SA3) and will also assist with businesses relocating to more appropriate space, creating churn and making other space available (EL-SA7).

The negative impacts associated with this option include the fact that access to the site would almost exclusively be via car (EL-SA12 and EL-SA13), and may add to congestion issues (CS20). There may also be negative impacts relating to air pollution (CS16), climate change (CS19) and noise impact on residential areas (EL-SA15). In addition, the site is a shingle habitat so there could be a negative impact on biodiversity (CS12) and possible flooding issues (CS18) due to close proximity to marine environment.

Although it is accepted that there are some negative aspects of this options in relation to accessibility and potential for traffic generations, overall the option is considered to be a relatively sustainable option where the positive economic impacts significantly outweigh the negative impacts. It is particularly strong in encouraging inward investment and locational choice for businesses who prefer non-town centre locations. The option scores 15 in the SA matrix.

**Scenario 6: Greenfield Development**

This option seeks to provide additional employment floorspace through the development of new Greenfield sites. As these sites are likely to be Greenfield sites, the Sustainability Appraisal identifies a number of significant negative impacts. Many of the negative impacts are environmentally-related, including the negative impact on biodiversity (CS12) and landscape (CS15) due to the fact that the extensions are likely to be located within Eastbourne Park. This option is also likely to have an adverse impact on flooding (CS18) and water quality (CS17) by creating more impermeable surface on what was previously undeveloped land. The loss of undeveloped land would also not help prepare for impacts of climate change (CS19). In addition, the option would have a negative effect on efficiency in land use through the re-use of previously developed land (CS14), and maximising the use of existing employment land (EL-SA2).
The main positives associated with this option are related to the promoting sustainable economic growth (EL-SA1) by creating more commercial units with fewer restrictions on type and size, which gives more potential for inward investment and attracting larger employers. It will allow units to be built to specification, and will help diversify the local economy and support businesses across a range of sectors (EL-SA3). The majority of the positive impacts are related to economic sustainability issues.

There are some unclear impacts, particularly relating to waste (CS21) and renewable energy (CS22), which would be dependent on the development rather than the strategic location.

Overall, the option is considered to be a relatively unsustainable option. The environmentally related negative impacts outweigh the positive impacts, and the option only scores -3 in the SA matrix.

Recommendation

The most sustainable option would be Scenario 4: Town Centre, which scores 25 in the SA matrix, closely followed by the new option Scenario 4A: Town Centre (Increased Provision of office space), which scored 23. These options are closely followed by Scenario 1: Intensification of Industrial Estates, which also scored 23. Both of these locations are existing employment locations, and new employment development would help enhance the sustainability of employment in these locations.

Scenario 3: Sovereign Harbour performed well, despite some negative impacts mainly relating to traffic and accessibility issues, and scored 15 in the SA matrix.

Both Scenario 2: Extensions to Industrial Estates and Scenario 3: Redevelopment of sites outside Industrial Estates performed similarly poorly in the SA matrix, scoring 10 and 7 respectively in the SA matrix.

The least sustainable option was assessed as Scenario 6: Greenfield development due to the significant environmental impact of developing Greenfield sites, and this option scored -3 in the SA matrix. Table 5 provides a summary assessment of the options and how they scored in the SA matrix.

Table 5 – Summary Assessment of Options using SA matrix

<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 Industrial Estates</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>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 Industrial Estates</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>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 of office space)</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>
</tbody>
</table>
Employment Land Local Plan – Proposed Submission Sustainability Appraisal Report

November 2014

Scenario 5: Sovereign Harbour

<table>
<thead>
<tr>
<th>Town Centre Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.54 As a result of consultation of the Draft Employment Land Local Plan and the Initial SA Report, an additional option was identified. This option (Scenario 4A) was for increased provision of office space in the town centre, above the 3,000sqm identified in Scenario 4.</td>
</tr>
</tbody>
</table>

Scenario 6: Greenfield Development

<table>
<thead>
<tr>
<th>Town Centre Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.55 It is not possible to take both Town Centre options forward and therefore one option should be chosen over the other. Both options are highly sustainable compared to the other options, which shows that the Town Centre is a sustainable location for office development. However, the amount of office development to be provided in the Town Centre does have sustainability implications.</td>
</tr>
</tbody>
</table>

| 5.56 The results of the Sustainability Appraisal of the two Town Centre options show that the original option (Scenario 4: Town Centre) is slightly more sustainable than the new option (Scenario 4A: Town Centre – Increased provision of office space). |

| 5.57 Whilst Scenario 4A: Town Centre – Increased provision does have increased sustainability benefits of accessibility in terms of more opportunities for travel to work by public transport and less requirement to travel to other out of centre locations, and also increased opportunities for linkages in comparison to Scenario 4: Town Centre, it does also have more negative sustainability impacts in relation to diversifying the local economy. It also reduces the significance of the positive impact in terms of economic growth and number and type of employment opportunities. This is because the Town Centre already has a very high concentration of office stock (approximately 90% of the total stock in Eastbourne), and increased provision in this location will reduce opportunities to provide choice to office developers and occupiers who have different locational requirements. It is more likely that businesses that prefer out of centre locations will not locate or move out of Eastbourne if their locational requirements cannot be met than they would relocate to Eastbourne Town Centre. Therefore, the maximum sustainability benefits in terms of the economy would be delivered through rebalancing the overall provision of office stock across the town. Scenario 4: Town Centre would help to achieve this, whilst Scenario 4A: Town Centre – Increased provision would further reinforce the negative economic impacts of the very high concentration of office stock in the Town Centre. |

| 5.58 As a result, it is considered the Scenario 4: Town Centre is a more sustainable option than Scenario 4A: Town Centre – Increased Provision, and therefore in this ‘either/or’ situation, Scenario 4 should be taken forward over Scenario 4A. |

Options to take forward

| 5.59 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 is recommended that the options that should be taken forward in the Employment Land Local Plan are: |
• Scenario 1 – Intensification of Industrial Estates
• Scenario 4 – Town Centre
• Scenario 5 – Sovereign Harbour

5.60 It is considered that these options would be the most appropriate combination of options for delivering the required amount of employment floorspace in the most sustainable way. None of the options would be able to deliver the requirement for employment floorspace on their own, so they have been combined in order to meet the requirement.

5.61 Scenario 1 – Intensification of Industrial Estates would make the most efficient use of existing employment land and would help improve the image and perception of the town’s Industrial Estates. In addition, there are few environmental issues associated with this option and it scores well in the SA matrix.

5.62 Scenario 4 – Town Centre would provide additional floorspace in a sustainable location with good transport links. It would provide opportunities for businesses that prefer to be located within the Town Centre and it would assist with the regeneration of the Town Centre through the Town Centre Local Plan. It would also allow for office space to be provided in other locations to provide choice for developers and occupiers, attracting businesses with different locational requirements to the town. It is the highest scoring option in the SA matrix.

5.63 Scenario 5 – Sovereign Harbour is a corporate priority for the Council. It is also in a sustainable centre and has the potential to provide high quality employment space in an attractive location. Funding has already been secured to help deliver employment space in this location. It is the third highest scoring option in the SA matrix, but is significantly most sustainable than the three lower scoring options.

Why other options were rejected

5.64 The other options have been discounted for a number of different reasons.

5.65 The significant environmental issues associated with Scenario 2 – Extensions to Industrial Estates and Scenario 6 – Greenfield Development mean that they will not be taken forward as they would involve development of Greenfield land in areas where there are flood risk and biodiversity issues. This is demonstrated through the low scores in the SA matrix. In addition, the implementation of these options would be contrary to Core Strategy Policy D11: Eastbourne Park.

5.66 Scenario 3 – Redevelopment of sites outside of Industrial Estates would not involve Greenfield development but would compromise the delivery of housing in meeting targets in the Core Strategy. In addition, the likely location of such sites close to residential areas means that there may be amenity issues associated with this option. This option also scores poorly in the SA matrix.

5.67 It is considered that Scenarios 2, 3 and 6 would not be appropriate options to take forward into the Employment Land Local Plan.
5.68 Scenario 4A: Town Centre – Increased Provision of Office Space is a sustainable option in its own right, however as explained above, only one of the Town Centre options can be taken forward and it is considered that Scenario 4: Town Centre is more sustainable than Scenario 4A.

**Appraisal of Preferred Option**

5.69 As described above, the preferred option recommended to be taken forward in the Employment Land Local Plan is a combination of three of the options assessed. Table 6 appraised the sustainability implication of this combined preferred option. This helps meet Stage B4 - Evaluating the effects of the plan or programme, including alternatives in the SA process.

5.70 The preferred option only identifies how the employment land will be distributed and does not take into account the type and amount of B use floorspace that should be delivered in each location.

### Table 6 – Appraisal of Preferred Option

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>CS1</strong> To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>The preferred options makes most effective use of existing employment land, but is unlikely to have a significant effect on providing opportunities for more homes</td>
</tr>
<tr>
<td><strong>CS2</strong> To improve the health and well-being of the population and reduce inequalities in health</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have any significant effect on health issues</td>
</tr>
<tr>
<td><strong>CS3</strong> 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</td>
<td>O</td>
<td>O</td>
<td>✓</td>
<td>The provision of a range of job opportunities in different locations across the town will provide more opportunities for work and may help to reduce poverty in the long term</td>
</tr>
<tr>
<td><strong>CS4</strong> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Economic growth as a result of the preferred option could support educational achievement by creating higher value jobs, but impact considered to be minimal</td>
</tr>
<tr>
<td><strong>CS5</strong> To reduce crime and the fear of crime</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have any significant effect on crime issues</td>
</tr>
<tr>
<td><strong>CS6</strong> To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>The provision of more employment opportunities within the sustainable centres will help create sustainable and vibrant communities</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
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<tr>
<td>--------------------------</td>
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</tr>
<tr>
<td>future of the town</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS7</td>
<td></td>
<td></td>
<td></td>
<td>In the short term, employment development within the Industrial estates and Sovereign Harbour may not be particularly accessible by sustainable modes. However, as the concentration of employment in these locations increases, public transport will become more viable and accessibility will increase</td>
</tr>
<tr>
<td>CS8</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>There will be a range of B uses developed across the town to help diversify employment opportunities. Development within Industrial Estates is likely to create smaller units, which could be attractive for start-up businesses, which will encourage entrepreneurship. Also, choice will be provided for businesses with different locational requirements and the overall office stock will be rebalanced over the long term</td>
</tr>
<tr>
<td>CS9</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>There are no significant infrastructure project required to help deliver the preferred option, i.e. road links etc.</td>
</tr>
<tr>
<td>CS10</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>The Sovereign Harbour sites will provide opportunities for development of knowledge based business, such as the Innovation Mall. Office space in the town centre will also have an effect.</td>
</tr>
<tr>
<td>CS11</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>The preferred option will create a range of jobs which will help to maintain a skilled workforce.</td>
</tr>
<tr>
<td>CS12</td>
<td>o</td>
<td>o</td>
<td>✓</td>
<td>Employment development will be on previously developed land, so in the long term it will help to conserve and enhance biodiversity.</td>
</tr>
<tr>
<td>CS13</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have a significant impact on accessibility to parks and gardens etc</td>
</tr>
<tr>
<td>CS14</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The preferred option relies on the redevelopment of previously developed sites so therefore improves the efficiency of land use</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
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<td>--------------------------</td>
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<tr>
<td>and encourage urban renaissance</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Development will be within built up, so should therefore not adverse impact on landscapes. It may in fact improve the townscape, depending on the design of development</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>O</td>
<td>X</td>
<td>X</td>
<td>Any employment development is likely to have some impact on air pollution and quality in the long term, unless mitigation measures can be incorporated into individual developments</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>O</td>
<td>O</td>
<td>X</td>
<td>The preferred option avoids development on greenfield sites, so it unlikely to have a significant impact on water quality. However, there may be run-off issues for development within Industrial Estates, adjacent to Eastbourne Park</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>O</td>
<td>O</td>
<td>X</td>
<td>The preferred option avoids development on greenfield sites, so it unlikely to have a significant impact on flood risk. However, there may be run-off issues and flood storage issues if development is on permeable land within Industrial Estates, adjacent to Eastbourne Park</td>
</tr>
<tr>
<td>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</td>
<td>O</td>
<td>X</td>
<td>X</td>
<td>Any employment development is likely to have some impact on emissions of greenhouse gases in the long term, unless mitigation measures can be incorporated into individual developments</td>
</tr>
<tr>
<td>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</td>
<td>X</td>
<td>X</td>
<td>O</td>
<td>Some of the development as part of the preferred option will require access predominantly via private car, which will increase car journeys. However, as the concentration of employment in these locations increases, public transport will become more viable and there will be fewer car trips to these locations</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>O</td>
<td>?</td>
<td>?</td>
<td>Employment development is likely to create waste, but disposal and recycling will depend on the individual developments</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>O</td>
<td>?</td>
<td>?</td>
<td>Employment development is unlikely to reduce use of non-renewable energy, unless renewable sources can be incorporated into individual developments</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
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</tr>
<tr>
<td>EL-SA1</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The preferred option, particularly development at Sovereign Harbour, will create high quality development in high quality locations, which may attract large employers and inward investment, as well as indigenous business growth. It will provide choice to businesses with different locational requirements.</td>
</tr>
<tr>
<td>EL-SA2</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The use of existing employment land will be maximised, particularly through the intensification of industrial estates</td>
</tr>
<tr>
<td>EL-SA3</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The preferred option will provide land for employment development in a choice of location and across all class B uses and will help diversify the local economy</td>
</tr>
<tr>
<td>EL-SA4</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The provision of additional employment space, particularly space for start-up businesses, will increase the number of businesses operating</td>
</tr>
<tr>
<td>EL-SA5</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Development on industrial estates is likely to be in the form of small units, which will encourage small businesses and business start-ups. Also, development at Sovereign Harbour such as the Innovation Mall will provide space to encourage new business</td>
</tr>
<tr>
<td>EL-SA6</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The provision of additional employment space, particularly space for start-up businesses, in different types of location will increase the number and range of employment opportunities</td>
</tr>
<tr>
<td>EL-SA7</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>Providing a choice of different types and locations of space for a range of different types of business will allow businesses to expand and more to meet their needs</td>
</tr>
<tr>
<td>EL-SA8</td>
<td>✓</td>
<td></td>
<td>✓</td>
<td>The provision of new employment floorspace in existing locations such as the town centre and industrial estates will help to improve business linkages. In addition, the development of employment space at Sovereign Harbour will enable new linkages between businesses to be created</td>
</tr>
<tr>
<td>EL-SA9</td>
<td></td>
<td></td>
<td>✓</td>
<td>The provision of a range of job opportunities in different locations across the town will provide more opportunities for work and may help to reduce economic deprivation in the long term</td>
</tr>
<tr>
<td>EL-SA10</td>
<td></td>
<td></td>
<td>✓</td>
<td>The provision of a range of job</td>
</tr>
</tbody>
</table>
### Employment Land Local Plan – Proposed Submission Sustainability Appraisal Report

#### November 2014

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>incomes of residents in the town</td>
<td></td>
<td></td>
<td></td>
<td>opportunities across the town will provide more opportunities for work and may help to increase average incomes in the long term</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>The jobs provided by the preferred option will help provide additional employment opportunities and help to reduce levels of unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>X</td>
<td>X</td>
<td>O</td>
<td>Some of the development as part of the preferred option will require access predominantly via private car, which will increase car journeys, and some of these will be through locations that are already heavy used. However, as the concentration of employment in these locations increases, public transport will become more viable and there will be fewer car trips to these locations</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>X</td>
<td></td>
<td>✓</td>
<td>In the short term, employment development within the Industrial estates and Sovereign Harbour may not be particularly accessible by sustainable modes. However, as the concentration of employment in these locations increases, public transport will become more viable and accessibility will increase</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>X</td>
<td>?</td>
<td>?</td>
<td>Employment development is unlikely reduce resource use, but the long term extent will depend on the individual developments</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>X</td>
<td>O</td>
<td>O</td>
<td>The majority of development is located outside of residential areas, although some locations are close to housing. There may be some noise impact during construction, but in the long term there should be any significant effect</td>
</tr>
</tbody>
</table>

### Commentary on SA

5.71 The preferred option is for employment development to be delivered through the intensification of existing Industrial Estates and through development within the Sustainable Centres (the Town Centre and Sovereign Harbour). The preferred option has a number of positive impacts, particularly related to economic sustainability. The majority of the positive impacts would be experienced over the long term, as the employment space provided is occupied by growing businesses. The preferred option would have a strong long term positive impact on promoting sustainable economic growth (EL-SA1) as it would provide space for indigenous business to grow, as well as new high quality space that may attract some inward investment, it would help diversify the local economy (EL-SA3) by providing a range of B use spaces, it would increase the number of businesses (EL-SA4), particularly through encouraging business start-ups (EL-SA5) in small units provided through intensification of Industrial Estates. It would also increase employment opportunities (EL-SA6) and
support existing businesses by providing space to expand to meet needs (EL-SA7). In addition, it would make efficient use of land through development of previously developed sites (CS14).

5.72 There are some negative impacts, with some being short term impacts and some being long term impacts. The short term impacts are mainly related to travel and accessibility, as some of the sites are currently not particularly accessible by sustainable modes of transport. However, an agglomeration of businesses in these locations will mean a higher concentration of workers travelling to specific areas, making public transport services a more viable proposition. Therefore there may be a negative impact in the short term, but the impact will lessen significantly as public transport services are put in place over the long term.

5.73 There may be potential long term negative impacts, particularly related to the environment such as water quality (CS17), flooding (CS18), air pollution (CS16) and emissions (CS19) due to more intensive use of areas, particularly the Industrial Estates that are adjacent to Eastbourne Park. However, there may be mitigation measures that can be put in place to address these long term impacts.

5.74 There are some unclear impacts, particularly related to waste (CS21), the use of renewable forms of energy (CS22), and resource use in commercial premises (EL-SA14). The long-term impacts of these issues will be dependent on the individual development, but there may be mitigation measures that can be put in place to address these issues.

Mitigation and Recommendations

5.75 It may be possible to mitigate some of the negative impacts associated with the preferred option, particularly those that will occur over the long term.

5.76 The sustainability issue relating to water quality and flood risk can be mitigated through incorporating Sustainable Urban Drainage Systems (SUDS) into development. This will provide on-site water storage and reduce water run-off. In addition, flood risk can be mitigated through the provision of flood storage compensation elsewhere in the town. Borough Plan Policy US4: Flood Protection and Surface Water Disposal requires all new development to make adequate provision for floodplain protection and surface water drainage. In addition, Core Strategy Policy D9: Natural Environment supports development proposals that minimise the risk of flooding, including requiring development to incorporate SUDS to manage surface water drainage. The implementation of these policies in applications for new employment development will mitigate the risk of a negative impact on water quality and flood risk.

5.77 Core Strategy Policy D1: Sustainable Development requires non-residential development over 1,000m² to meet BREEAM1 ‘very good’ standard. This will require new employment development to meet certain standards in relation to issues such as management, energy use, water use, material, waste, ecology and pollution. The implementation of this policy and the achievement of BREEAM ‘very good’ standard.

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1 BREEAM is an environmental assessment method and rating systems for buildings
would help mitigate the effects of air pollution (CS16) and emissions (CS19). It will also reduce the uncertainties surrounding reducing the use of non-renewable forms of energy (CS22).

5.78 Travel Plans are required for B use development over 1,500 m² or development that generates significant movement, which would help mitigate road congestion (CS20) and adverse impact on road network (EL-SA12). In addition, proposals for a ‘Bus gate’ at Sovereign Harbour are currently being progressed, which will enable a significantly better bus service to be provided for the Sovereign Harbour neighbourhood and help to reduce the negative impacts relating to accessibility by private car.

5.79 Policy NE6 of the Borough Plan requires development proposals employing or attracting a large number of people will be required to make provision for facilities for recycling and waste storage and collection as an integral part of the development, and Core Strategy Policy D1: Sustainable Development states that site waste generation must be minimised and specific measures incorporated into schemes to contribute towards achieving increased levels of household waste recycling. The implementation of these policies will reduce the uncertainty surrounding reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting (CS21).

5.80 The implementation of other policies will reduce and mitigate the negative impacts that may arise from employment development in the strategic locations identified through the preferred option. Therefore it is recommended that the preferred option be taken forward in the Employment Land Local Plan.
Section 5 – Testing the Proposed Submission Employment Land Local Plan

6.1 The Proposed Submission Employment Land Local Plan is split into five sections. The Introduction provides an introduction and background to the Employment Land Local Plan and outlines its relationship with other plans and strategies. The Context outlines the existing situation with regard to the economy and identifies the key issues that need to be addressed. It also contains the Vision and Objectives for the Employment Land Local Plan, which were appraised in the Initial SA Report and are contained within Appendix 3 of this report. The Strategy section outlines the distribution of employment land and the overall strategy for its provision. The Policies section contains policies for the implementation of the strategy, and the finally the Implementation and Monitoring section comments on infrastructure issues and contains the monitoring framework for the plan.

Testing the Policies in the Proposed Submission version

6.2 The 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

6.3 A summary appraisal of the policies contained within the Proposed Submission Employment Land Local Plan is provided below. Appendix 5 contains a full appraisal of each of the policies.

Policy EL1: Economy and Employment Land

6.4 Policy EL1: Economy and Employment Land sets the overall strategy towards the development of employment land in Eastbourne. It identifies the requirement for employment land up to 2027, and that this should be delivered through development in the Sustainable Centres (Town Centre and Sovereign Harbour) and through the intensification of Industrial Estates. This is the preferred option described and appraised previously in Section 4 of this report. The policy also outlines the presumption in favour of sustainable economic development, promotes development which provides units for small and start-up businesses, and encourages clusters. In addition, the policy encourages development that improves the local jobs market and creates additional jobs, and supports proposals for expansion of education and training facilities.

6.5 Policy EL1 has a number of positive impacts, particularly related to economic sustainability, across the lifetime of the plan, although the majority of them will be in the long term. It will help to promote sustainable economic growth (EL-SA1), develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities (CS8), diversify the local economy (EL-SA3) and promote start-up businesses (EL-SA5) through providing new employment floorspace, including supporting development for small and start-up businesses. It
will maximise the use of employment floorspace (EL-SA2) and make efficient use of land (CS14) by providing employment floorspace on previously development land, with the majority in existing employment locations.

6.6 The negative impacts have been assessed as being in relation to air pollution (CS16), waste (CS21), the road network (EL-SA12) and resource use (EL-SA14). The impact of these negatives is likely to be across the lifetime of the plan, unless mitigation measures can be put in place to reduce the impact. These mitigation measures have been discussed previously in the appraisal of the preferred option. These mitigation measures are likely to be put in place through policy outside the scope of the Employment Land Local Plan, such as through the implementation of the Core Strategy or Borough Plan, so it is not recommended that any changes will be needed to the policy to address the potential negative sustainability impacts.

Policy EL2: Industrial Estates

6.7 Policy EL2: Industrial Estates supports the redevelopment and intensification of vacant and under-utilised sites within existing Industrial Estates in meeting the requirements for additional employment floorspace.

6.8 It only allows the redevelopment of sites within industrial estates to non-B uses where it can be demonstrated that it is an appropriate use that cannot be located elsewhere due to their un-neighbourliness, or the site would not impact upon the long term supply of employment land in terms of quality or quantity and the site does not meet current or long term needs of businesses and cannot be upgraded to do so. However, it does permit change of use of B use to other employment generating uses where it can be demonstrated that there is no reasonable prospect of continued B use.

6.9 Policy EL2 will have a strong overall impact on economic sustainability, without having a significant negative impact on environmental or social sustainability. The policy will have particularly strong impacts in relation to efficient use of land (CS14) and maximising existing employment land (EL-SA2), and increasing the number and range of employment opportunities (EL-SA6) and improving linkages between businesses (EL-SA8). Development on existing industrial estates will create more smaller business units which will help small and start-up businesses (EL-SA5).

6.10 Although there are short-term negative impacts in relation to the need to access the majority of the Industrial Estates by car, increasing the concentration of employment uses on the Industrial Estates over the long term is likely make public transport more viable and increase access via sustainable modes of transport. However, there will still be vehicles accessing the sites, some of which are in locations where there may be congestion problems, so the impact on the road network needs to be mitigated through the use of travel plans in new developments.

6.11 The characteristics of the individual developments will govern how the policy impacts on certain issues such as resource use, waste and renewable energy, but these can be mitigated through the implementation of Core Strategy Policy D1 and the requirement to meet BREEAM standards. It is not recommended that any changes will be needed to the policy to address the potential negative sustainability impacts.
Policy EL3: Town Centre

6.12 Policy EL3: Town Centre identifies the quantum of office floorspace that should be provided in the Town Centre as being 3,000 sqm, and that this requirement should be provided on Development Opportunity Sites 2 and 3. In addition, it supports proposals for the refurbishment of existing office stock.

6.13 The implementation of this policy is likely to have a number of positive sustainability impacts, particularly related to promoting economic growth. These include significant positives in relation to developing a broad economic base (CS8), attracting inward investment and encouraging economic growth (EL-SA1), and diversifying the local economy (EL-SA3). It would also promote efficiency in land use (CS14) as the sites are previously developed, and it would provide some opportunities for businesses that want to be within the Town Centre to link with each other (EL-SA8). The majority of the positive impacts are related to economic sustainability issues.

6.14 The town centre is a sustainable centre and is highly accessible means that the policy will help improve accessibility by sustainable modes to jobs, health, shops etc (CS7), and will be accessible to local residents and commuters (EL-SA13). The office space to be provided in the town centre will help to promote business start-ups and increase numbers of businesses, although it will only suit businesses that want to be in town centre locations.

6.15 There are few negative impacts relating to this policy, and apart from air pollution (CS16) and climate change issues (CS19), which can be mitigated through the implementation of Core Strategy Policy D1, the main negative is related to the fact that the sites identified for employment development may have otherwise been available for residential development. The Town Centre Local Plan contains targets for the delivery of housing on Development Opportunities Sites, however it also contains triggers for contingency options should the requirement not be delivered.

6.16 The characteristics of the individual developments will govern how the policy impacts on certain issues such as resource use, waste and renewable energy, but these can be mitigated through the implementation of Core Strategy Policy D1 and the requirement to meet BREEAM standards. It is not recommended that any changes will be needed to the policy to address the potential negative sustainability impacts.

Policy EL4: Sovereign Harbour

6.17 Policy EL4: Sovereign Harbour identifies that 20,000 sqm of additional B1 floorspace should be provided in Sovereign Harbour, predominantly through Sites 6 and 7, although Site 4 could accommodate a small amount of office use. It also allows the development of other employment generating uses that are compatible with the residential area to be developed following the delivery of 20,000 sqm of B1 floorspace on remaining land within Sites 6 and 7.

6.18 Policy EL4 supports the provision of 20,000 sqm of B1 floorspace across identified sites in Sovereign Harbour. This policy will have a number of strong positive economic impacts, especially over the long term, although relatively poor accessibility to the site via sustainable modes means that there are also some negative impacts.
6.19 The policy will provide high quality employment development within a high quality environment, which may attract large employers and inward investment, as well as supporting and encouraging the creation of indigenous businesses (EL-SA5 and EL-SA7), and therefore supporting sustainable economic growth (EL-SA1). It also provides potential to create a large number of new jobs (EL-SA6) across range of B1 sectors (EL-SA3).

6.20 It is considered that the negative impacts that relate to the fact that the sites are predominantly accessed by private car (CS7, CS20 and EL-SA12) are short to medium term impacts, and in the long term the impact will lessen as public transport is provided due to increasing viability from more employees working in a single location. Similarly, as there are few existing businesses, there will be a short term impact on improving local business linkages (EL-SA8) but as more businesses are provided, this will create and develop new business linkages. Construction in the short term may cause noise impacts (EL-SA15), but as B1 uses are compatible with residential uses, this impact should less once development has been completed.

6.21 There are few negative impacts relating to this policy, and apart from air pollution (CS16) and climate change issues (CS19), which can be mitigated through the implementation of Core Strategy Policy D1. However, there also negative impacts relating to biodiversity (CS12) due to the presence of shingle habitats on sites and the close proximity of Pevensey Levels, and relating to flood risk due to proximity to the marina and sea. These issues can be mitigation through the requirement for applications to provide a Flood Risk Assessment to identify mitigation needed, and a Biodiversity Assessment to identify how issues relating to biodiversity can be resolved.

6.22 The characteristics of the individual developments will govern how the policy impacts on certain issues such as resource use, waste and renewable energy, but these can be mitigated through the implementation of Core Strategy Policy D1 and the requirement to meet BREEAM standards.

6.23 Overall, this policy would provider strong economic sustainability positive impacts, although the negative impacts may also be slightly more severe. Mitigation measures can be taken through the implementation of other policies in the Core Strategy and Borough Plan, as well as the Sovereign Harbour SPD, which should reduce these negative impacts. It is not recommended that any chances will be needed to the policy to address the potential negative sustainability impacts.

Summary of likely significant effects of implementing the policies by SA Objective

6.24 A summary of the likely significant effects of implementing the policies in the Proposed Submission Employment Land Local Plan is provided in Table 7.

Table 7 - Summary of likely significant effects of implementing the policies by SA Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 - To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td></td>
</tr>
</tbody>
</table>
**Sustainability Objective**

**Overall, there will be little impact upon providing opportunity for homes. However, Policy EL3 does have a slightly potential negative impact due to the potential for the sites identified to accommodate residential development as opposed to employment development. However, the contingency mechanisms in the Town Centre Local Plan mean that it is unlikely to have a significant impact.**

**CS2 - To improve the health and well-being of the population and reduce inequalities in health**

The policies are unlikely to have any significant impact on the health and well-being of the population

**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**

Overall, there may be a minor impact on reducing poverty and social exclusion through the provision of more employment opportunities, and encouraging development which supports improvements in the local jobs market will help to reduce poverty in the medium to long term. Also, some of the Industrial Estates are located close to some of the more deprived areas of the town, which will help provide jobs in those areas.

**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**

There may have a slight effect on educational achievement as Policy EL1 supports the education and training sector through a flexible approach to expansion proposals.

**CS5 - To reduce crime and the fear of crime**

It is unlikely that there will be any significant impact on crime and 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**

The promotion of employment development within the sustainable centres will help promote sustainable communities in these locations.

**CS7 - To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone**

There will be an improvement in terms of accessibility by sustainable modes to jobs etc as a result of locating employment development in the town centre, which is a very accessible location. The other locations are not particularly accessible by sustainable modes, but the concentration of employment in these locations will help make public transport provision more viable over the long term and accessibility will be increased

**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**

There should be a significant impact on developing a broad economic base and encouraging entrepreneurship through the provision of new employment space and the encouragement for premises that would suit small and start-up businesses, as well as ensuring the space at Sovereign Harbour is flexible for a range of B1 uses.

**CS9 - To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth**

There may be a slight impact in terms of infrastructure, however none of the policies require the development of significant amounts of new infrastructure, e.g. roads, and the majority of the infrastructure required is already in place.

**CS10 - To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities**

There should be a relatively significant impact on developing a dynamic and knowledge-based sector through the provision of new flexible and innovative employment space at Sovereign Harbour, an through new office space in the town centre.

**CS11 - To develop and maintain a skilled and adaptable workforce to match local employment opportunities**

The policies will encourage a range of employment uses and types that will help to meet the needs of the workforce.

**CS12 - Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability**

There may be a slight negative impact on biodiversity due to development of sites close to Eastbourne Park, and
<table>
<thead>
<tr>
<th>Sustainability Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>the potential loss of shingle habitat at Sovereign Harbour. However, the impact has been reduced through the use of previously developed sites as opposed to undeveloped Greenfield sites.</td>
</tr>
<tr>
<td><strong>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</strong></td>
</tr>
<tr>
<td>It is unlikely that there will be any significant impact on accessibility to parks and gardens. The policies do not proposed to affect any of these areas.</td>
</tr>
<tr>
<td><strong>CS14 - To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</strong></td>
</tr>
<tr>
<td>There will be a significant impact in terms of efficient in land use due to the identified sites for employment development being previously developed land as opposed to undeveloped Greenfield land.</td>
</tr>
<tr>
<td><strong>CS15 - To maintain and enhance the quality of landscapes and townscapes</strong></td>
</tr>
<tr>
<td>There is unlikely to be any significant impacts on landscape and townscapes as a result of the policies. There may be a minor impact on townscape through the development of sites, particularly vacant sites at Sovereign Harbour, although the requirement for good design should ensure that the impact on not negative.</td>
</tr>
<tr>
<td><strong>CS16 - To reduce air pollution and ensure air quality continues to improve</strong></td>
</tr>
<tr>
<td>It is likely that there will be some impact on air pollution, and any employment development is likely to improve air quality. However, the implementation of mitigation measures, such as the need to meet BREEAM standards, will reduce the significance of the impact, particularly over the long term.</td>
</tr>
<tr>
<td><strong>CS17 - To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</strong></td>
</tr>
<tr>
<td>It is unlikely that there will be a significant impact on water quality, although the development is unlikely to improve water quality. There may be issues surrounding run-off etc, but the implementation of SUDS schemes in development will reduce the impact.</td>
</tr>
<tr>
<td><strong>CS18 - To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</strong></td>
</tr>
<tr>
<td>The majority of the employment development stemming from the policies will be on previously developed and already impermeable land. However, due to some development’s location close to Eastbourne Park, run-off may be an issue. In cases where there is an issue, development will be required to make a flood storage compensation contribution, which will be used to provide additional flood storage and reduce the impact of the development on flood risk.</td>
</tr>
<tr>
<td><strong>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</strong></td>
</tr>
<tr>
<td>It is likely that there will be some impact on climate change, and any employment development is unlikely to contribute significantly to reduced emissions. However, the implementation of mitigation measures, such as the need to meet BREEAM standards, will reduce the significance of the impact, particularly over the long term.</td>
</tr>
<tr>
<td><strong>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</strong></td>
</tr>
<tr>
<td>It is likely that there will be a short-term impact on road congestion due to some development locations being accessible predominantly by car and in areas where there may already be congestion problems. However, as the concentration of employment grows in these locations, the viable of public transport will increase, and the amount of cars travelling to these locations will reduce.</td>
</tr>
<tr>
<td><strong>CS21 - To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</strong></td>
</tr>
<tr>
<td>The amount of waste created will increase as a result of employment development will increase, but the impact cannot be predicted accurately. Development management policies within the Core Strategy and Borough Plan will help mitigate the impact of this.</td>
</tr>
<tr>
<td><strong>CS22 - Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</strong></td>
</tr>
</tbody>
</table>
Sustainability Objective

It is likely that there will be some impact on energy and natural resources, and any employment development is unlikely to contribute significantly to reduced use of non-renewables. However, the implementation of mitigation measures, such as the need to meet BREEAM standards, will reduce the significance of the impact, particularly over the long term.

EL-SA1 - To promote sustainable economic growth

There will be a significant positive impact of the policies on sustainable economic growth. This is what EL1 is trying to achieve, and the provision of new high quality employment space within a high quality environment at Sovereign Harbour will help to attract new businesses and inward investment. In addition, the provision of smaller units within Industrial Estates will encourage indigenous businesses, which support sustainable economic growth.

EL-SA2 - To maximise use of existing employment land

There will be a significant impact on maximising the use of existing employment land through the intensification of existing Industrial Estate, and the provision of new space within the town centre, which is an existing employment location.

EL-SA3 - To diversify the local economy and support businesses across a range of sectors

The policies make provision for employment floorspace across the range of B use classes so therefore will have a positive impact on the diversification of the local economy and supporting businesses across a range of sectors.

EL-SA4 - To increase the overall number of business enterprises operating in the town

It is likely that there will be a significant impact on increasing the number of businesses in town as more space will be provided, and the provision of space to suit start-up businesses will be promoted, and well as providing space for businesses to move and expand where necessary. This will increase business start and help to reduce business deaths, increasing the overall number of businesses.

EL-SA5 - To promote and encourage business start ups and small businesses

There will be a positive impact on business start-up and small businesses through Policy EL1 which promotes development that will suit small and start-up businesses, and Policy EL2 which intensifies the industrial estates and likely results in more smaller units.

EL-SA6 - To increase the number and range of employment opportunities in the town

There will be a positive impact on the number and range of employment opportunities, as more space will promote more businesses, which will increase employment opportunities.

EL-SA7 - To support existing businesses to continue trading in Eastbourne

There will be a significant impact on supporting existing businesses as the provision of more space will allow businesses to move and expand to meet their needs, and occupy premises that better meet their expectations. This will help retain businesses within the town.

EL-SA8 - To improve local business linkages

In the short term, business linkage will improve within the town centre and industrial estates as more business premises are provided in these locations. There will be less impact from the Sovereign Harbour sites in the short term, but over the long term as more employment space is provided, these links between businesses will be created and improved.

EL-SA9 - To reduce economic deprivation in the resident population

The policy is likely to have an impact on economic deprivation, although the significant is likely to be slight. The provision of more jobs, and particularly the promotion of development which supports improvements in the local jobs market, will mean more people are earning and therefore deprivation may decrease.

EL-SA10 - To increase the average incomes of residents in the town

The provision of more employment opportunities and jobs, especially high quality jobs in locations such as Sovereign Harbour, will help increase average incomes, although significance will be relatively slight.

EL-SA11 - To reduce levels of unemployment

The provision of more jobs, and particularly the promotion of development which supports improvements in the local jobs market, will mean more people are employed and levels of unemployment are reduced.
Sustainability Objective

EL-SA12 - To ensure no adverse impact on the road network

It is likely that there will be a short-term adverse impact on the road network due to some development locations being accessible predominantly by car and in areas where there may already be congestion problems. However, as the concentration of employment grows in these locations, the viable of public transport will increase, and the amount of cars travelling to these locations will reduce.

EL-SA13 - To provide employment opportunities in locations that are accessible for local people and commuters

There will be an improvement in terms of accessibility by sustainable modes to jobs etc as a result of locating employment development in the town centre, which is a very accessible location. The other locations are not particularly accessible by sustainable modes, but the concentration of employment in these locations will help make public transport provision more viable over the long term and accessibility will be increased.

EL-SA14 - To reduce resource use from commercial & industrial premises

It is likely that there will be some impact on resource use, and any employment development is unlikely to contribute significantly to reduced use of resources. However, the implementation of mitigation measures, such as the need to meet BREEAM standards, will reduce the significance of the impact, particularly over the long term.

EL-SA15 - To reduce the impact of noise from commercial premises on residential areas

There may be a short term impact of noise from employment development due to construction, which may affect Sovereign Harbour due to close proximity to residential area. However, over the longer term, the B1 uses at Sovereign Harbour are compatible with residential areas so impact will be reduced, and new development within Industrial Estates will be separated from residential areas meaning less noise impact.

Recommended mitigation measures to enhance benefits or prevent uncertainty

6.25 In order to reduce the negative impacts and enhance the positive impacts of the policies in the Proposed Submission Employment Land Local Plan, mitigations measures should be put in place alongside a mechanism to monitor the effects of the policy on sustainability. This meets Key Task B5: Considering ways of mitigating adverse effects and of maximising beneficial effects and Key Task B6: Proposing measures to monitor the significant effects of implementing the DPD.

Proposed Mitigation Measures

6.26 In accordance with the SEA Directive, SEA guidance and SA guidance, measures to prevent, reduce or offset any significant adverse social, environmental or economic effects of the implementation of the policies, and to enhance any beneficial effects, have been considered.

6.27 Overall, there are few negative impacts of the Employment Land Local Plan. However, the implementation of other Development Plan policies contained within the Core Strategy and the Eastbourne Borough Plan 2001-2011 will help reduce and mitigate the negative impacts that have been predicted.

6.28 These include: the requirement for development to incorporate SUDS to manage surface water drainage and make flood storage compensation where appropriate to mitigate water-related issues; the requirement for non-residential development of 1,000sqm to meet BREEAM ‘very good’ standard to address issues related to energy use, water use, material, waste, ecology and pollution; the requirement for development generating significant movement to produce and implement a travel plan; and the requirement for development proposals employing or attracting a large
number of people to make provision for facilities for recycling and waste storage to address waste issues.

Proposals for monitoring

6.29 The SA Framework (Section 3) sets out the monitoring indicators for the Employment Land Local Plan Sustainability Objectives. The indicators for the Core Strategy Sustainability Objectives can be found in the Core Strategy Scoping Report.

6.30 The Council produces a Local Monitoring Report annually, which reviews progress against targets and timescales set out in the Local Development Scheme (LDS), and assesses performance of Local Development Document via the monitoring framework contain within each plan. The Employment Land Local Plan will contain a monitoring framework to assess how well the policies are being achieved. A number of the indicators contained within this monitoring framework and elsewhere within the LMR will assist in the monitoring of the sustainability effects of the Employment Land Local Plan.

6.31 However, it is important that the sustainability implications of the Employment Land Local Plan are fully monitored to see if benefits are being achieved. Monitoring should concentrate on monitoring negative effects to ensure that these are being mitigated.

6.32 Table 8 outlines the proposed mitigation measures and the proposals for monitoring for each policy in the Proposed Submission Employment Land Local Plan

Table 8 - Mitigation and Monitoring

<table>
<thead>
<tr>
<th>Policy</th>
<th>Proposed Mitigation Measures</th>
<th>Proposals for SA Monitoring</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy EL1 – Economy and Employment Land</td>
<td>Flood Storage Compensation Scheme, BREEAM requirements, Travel Plans, Provision of facilities for recycling and storage</td>
<td>Percentage of economically active that are employed, Development on previously developed land, Daily mean per annum of the following pollutants: NO2; PM10, Number of sites with Pollution Prevention and Control Permit, Total tonnage of household waste collected within the Borough for disposal, Percentage of the total tonnage of household waste that has been recycled or composted, GVA per capita, Amount of employment floorspace developed, Number of business premises on Industrial Estates, Amount and % of new employment floorspace developed in Industrial Estates, Number of business enterprises by sector, Number of active businesses enterprises, New business registration rate, Number of business starts, Number of small businesses, Bus journeys per year, % Journey to work by mode, % Journey to work by distance</td>
</tr>
<tr>
<td>Policy</td>
<td>Proposed Mitigation Measures</td>
<td>Proposals for SA Monitoring</td>
</tr>
<tr>
<td>--------</td>
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</tr>
</tbody>
</table>
| Policy EL2 – Industrial Estates | Flood Storage Compensation Scheme  
BREEAM requirements  
Travel Plans  
Provision of facilities for recycling and storage | Development on previously developed land  
Daily mean per annum of the following pollutants: NO2; PM10  
Number of sites with Pollution Prevention and Control Permit  
Average annual gas and electricity consumption from commercial & industrial consumers in kWh  
Number of business premises on Industrial Estates  
Amount and % of new employment floorspace developed in Industrial Estates  
New business registration rate  
Number of business starts  
Number of small businesses  
Number of people employed by sector  
Number of people employed by occupation  
Number of businesses by neighbourhood  
% Journey to work by mode |
| Policy EL3 – Town Centre | Flood Storage Compensation Scheme  
BREEAM requirements  
Travel Plans  
Provision of facilities for recycling and storage | Annual housing completions  
Percentage of people within 30 minutes of the town centre by public transport between the hours of 07.00-10.00 am and 16.00-19.00 pm  
Development on previously developed land  
Daily mean per annum of the following pollutants: NO2; PM10  
Number of sites with Pollution Prevention and Control Permit  
Average annual gas and electricity consumption from commercial & industrial consumers in kWh  
Percentage of people aged 16-74 in employment using public transport to get to and from work  
Traffic growth  
GVA per capita  
Number of businesses by neighbourhood  
% Journey to work by mode |
| Policy EL4 – Sovereign Harbour | Flood Storage Compensation Scheme  
BREEAM requirements  
Travel Plans  
Bus Gate at Sovereign Harbour  
Provision of facilities for recycling and storage  
Biodiversity Assessments | Percentage of economically active that are employed  
Percentage of new employment land development that is masterplanned  
Percentage of Priority Habitat Areas infringed by planning applications  
Development on previously developed land  
Daily mean per annum of the following pollutants: NO2; PM10  
Number of sites with Pollution Prevention and Control Permit  
Waterways of good or fair chemical and biological water quality  
Average annual gas and electricity consumption from commercial & industrial consumers in kWh  
Percentage of people aged 16-74 in employment using public transport to get to and from work  
Traffic growth GVA per capita  
Number of business enterprises by sector  
New business registration rate  
Number of business starts |
### Uncertainties and Risk

6.33 The Sustainability Appraisal process involves making predictions concerning environmental, social and economic impacts based on mostly qualitative assumptions and often either limited or inadequate data. Such errors are unavoidable but measures to correct or contain them can be taken during the monitoring phase of the Sustainability Appraisal.

6.34 Key uncertainties identified during the SA process include:

- the difficulties encountered with regard to baseline data for the Scoping Report
- the policies are not adopted at this stage and there may be a reliance on other policies for some specific parts of the implementation
- the real significance of the effects of implementing the Employment Land Local Plan will only become apparent as the plan progresses and the monitoring of the effects of the policies
Section 6 – Summary of Findings and Recommendations

7.1 This section presents a summary of the sustainability implications of the Proposed Submission Employment Land Local Plan and highlights any potential beneficial and adverse effects, including cumulative, synergistic and secondary effects and recommendations to enhance the positive effects of the Employment Land Local Plan on sustainability.

Sustainability Implications and Recommendations

7.2 The Proposed Submission Sustainability Appraisal of the Employment Land Local Plan appraises seven options identified as having potential for inclusion in the strategy for the distribution of employment land in Eastbourne. The report identifies that there are some sustainability implications for all seven options, particularly in relation to environmental sustainability issues, but three of the options are significantly more sustainable than the other three options (with two options being ‘either/or’).

7.3 Consequently it is recommended that the three most sustainable options are taken forward into the Employment Land Local Plan as the preferred option for the distribution of employment land. It is also recommended that mitigation measures are considered to reduce the negative impacts of the preferred options. Notably these relate to:

- Reducing air pollution and ensuring air quality continues to improve
- Maintaining and improving the water quality of freshwater bodies, groundwater, waterways and the marine environment
- Reducing the risk of flooding and resulting detriment to public well-being, the economy and the environment
- Addressing the causes of climate change through reducing emissions of greenhouse gases and ensuring Eastbourne is prepared for the impacts of climate change
- Reducing 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
- Reducing the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting
- Ensuring no adverse impact on the road network
- Reducing resource use from commercial & industrial premises

7.4 The Proposed Submission Sustainability Appraisal of the Employment Land Local Plan also appraised the policies that will be contained within the Proposed Submission Employment Land Local Plan that will be used to implement the preferred option. These policies are:

- Policy EL1: Economy and Employment Land
- Policy EL2: Industrial Estates
7.5 Overall, the appraisal of Proposed Submission Employment Land Local Plan policies indicates a high level of compatibility with the Sustainability Objectives. This compatibility is primarily in relation to promoting sustainable economic growth through the provision of new high quality employment space, which will help to attract new businesses and inward investment, and the provision of smaller units within Industrial Estates will encourage indigenous businesses, and increasing the number and diversity of businesses within the town, and subsequently increasing the number and range of employment opportunities. Additionally, a number of positive effects have been identified 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.

7.6 The Proposed Submission Employment Land Local Plan would have a beneficial effect in terms of supporting existing businesses that operate in the town by provision space for relocation or expansion and to occupy premises that meet 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.

7.7 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, particularly Core Strategy Policy D1: Sustainable Development, which requires non-residential developments of 1,000 sqm to meet BREEAM ‘very good’ standard, will help reduce any potential negative impact as a result of these uncertainties.

7.8 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.
Section 7 – Next Steps

8.1 The SA/SEA process has informed the preparation of the Proposed Submission Version of the Employment Land Local Plan. The process has identified that broadly the policies and proposals are in line with sustainability principles. However, ultimately, success of the policies will depend on their implementation.

8.2 Once it has been published for a representation period on matters of soundness, the Employment Land Local Plan (and the Sustainability Appraisal) will then be submitted to the Planning Inspectorate for Public Examination. Following Examination, the Employment Land Local Plan will be adopted by the Council and a Post-Adoption SEA Statement will be prepared to summarise the SA/SEA process and the representations received.
Appendices

Appendix 1 – Summary Review of PPPSIs relevant to the Employment Land Local Plan

The key messages from the PPPSI review that need to be taken into account in the Employment Land Local Plan (ELLP) and its Sustainability Appraisal are outlined in Table 9 below.

Table 9 - Key messages from PPPSI Review

<table>
<thead>
<tr>
<th>Key Theme</th>
<th>Relevant PPPSIs</th>
<th>Specific Targets/Implications</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Economic</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sustainable Economic Growth</td>
<td>DCLG: National Planning Policy Framework (2012)</td>
<td>Ensure that the ELLP encourages sustainable economic growth and economic competitiveness through attracting new and innovative businesses. 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.</td>
</tr>
<tr>
<td></td>
<td>EBC: Corporate Plan (2012)</td>
<td></td>
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<tr>
<td></td>
<td>Community Strategy (2008)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ESCC: East Sussex Local Economic Assessment (LEA)</td>
<td></td>
</tr>
<tr>
<td>Diversification of Economy</td>
<td>Community Strategy (2008)</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>Eastbourne/Hailsham Triangle Masterplan (2009)</td>
<td></td>
</tr>
<tr>
<td>Employment Opportunities</td>
<td>EBC: Core Strategy (2013)</td>
<td>Ensure that the ELLP takes forward all reasonable opportunities to provide a wide range of employment opportunities. The ELLP should support the growth of jobs and employment in the borough across a range of sectors and should support existing jobs. In addition, it should help to provide well-paid employment opportunities.</td>
</tr>
<tr>
<td></td>
<td>EBC: Corporate Plan (2012)</td>
<td></td>
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<tr>
<td></td>
<td>Community Strategy (2008)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>European Spatial Development Perspective Report (1999)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>EU European Employment Strategy (1997, revised 2005)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>ESCC: East Sussex Local Economic Assessment (LEA)</td>
<td></td>
</tr>
<tr>
<td>Small and start-up business</td>
<td>Community Strategy (2008)</td>
<td>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.</td>
</tr>
<tr>
<td>Retention of existing businesses</td>
<td>DCLG: National Planning Policy Framework (2012)</td>
<td>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.</td>
</tr>
<tr>
<td></td>
<td>Eastbourne/Hailsham Triangle Masterplan (2009)</td>
<td></td>
</tr>
</tbody>
</table>
## Key Theme

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<thead>
<tr>
<th>Relevant PPPSIs</th>
<th>Specific Targets/Implications</th>
</tr>
</thead>
</table>
| **Travel to Work**                                                             | EBC: Core Strategy (2013)  
Kyoto Protocol to the UN Framework Convention on Climate Change (1997)  
UN Framework Convention on Climate Change (1992)  
ESCC: East Sussex Local Transport Plan 3 (2011-2026)  
EBC/ESCC/WDC/TPi: South Wealden and Eastbourne Transport Study (2010)  
EBC: Eastbourne Cycling Strategy (2012)  
ONS Flow Data (2011 Census)                                                   | Ensure that the ELLP improves economic competitiveness and growth, whilst ensuring all reasonable opportunities are taken forward to reduce reliance on private cars.  
It should encourage travel to work via walking, cycling and public transport.  
The ELLP should encourage appropriate amounts of car and cycle parking at new commercial and employment development.                                                                                                                                                                                                                       |
| **Connectivity**                                                               | ESCC: East Sussex Local Transport Plan 3 (2011-2026)  
EBC/GVA: Employment Land Review (2013)                                                                                                                   | 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.  
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.                                                                                           |
Community Strategy (2008)  
Eastbourne/Hailsham Triangle Masterplan (2009)  
EBC/GVA: Employment Land Review (2013)  
Town and Country Planning (General Permitted Development) (England) (Amendment) Order 2013  
EBC/GVA: Employment Land Supplementary Evidence Report (2014)                                                                 | 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.  
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.                                                                                       |
| **Quality of commercial premises**                                              | ESCC: East Sussex Local Economic Assessment (LEA)                                                                                                                   | The ELLP should help to improve the quality and quantity of commercial premises so that they are appropriate to business needs.                                                                                                                                                                                                                       |
EBC/DTZ: Eastbourne Park Sites Development Feasibility Study (2006)  
EBC/GVA: Employment Land Supplementary Evidence Report (2014)                                                                 | Ensure that the ELLP takes into account viability issues when identifying sites for employment development.                                                                                                                                                                                                                       |
### Key Theme

<table>
<thead>
<tr>
<th>Relevant PPPSIs</th>
<th>Specific Targets/Implications</th>
</tr>
</thead>
</table>
| **Building design** | Department for Business, Innovation and Skills: Sustainable Construction Strategy (2008)  
BREEAM (Building Research Establishment Environmental Assessment Method) (2008)  
DETR/CABE: By Design – Urban design in the planning system: towards better practice (2000) | 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. |
| **Social** | | |
| **Sustainable Centres** | EBC: Core Strategy (2013)  
EBC: Town Centre Local Plan (2013)  
EBC: Sovereign Harbour SPD (2013)  
DCLG: National Planning Policy Framework (2012) | Ensure that the ELLP take into account the desire to create two sustainable centres at the Town Centre and Sovereign Harbour.  
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. |
| **Neighbourhoods** | EBC: Core Strategy (2013) | 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. |
| **Environmental** | | |
| **Biodiversity** | UN Convention on Biological Diversity (1992)  
EU Biodiversity Strategy (1998)  
Wildlife and Countryside Act 1981 (as amended)  
The Wildlife Trusts: A Living Landscape for the South East (2006) | 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. |
EBC/Scott Wilson: Strategic Flood Risk Assessment Level 2 (2009)  
EBC: Eastbourne Park Supplementary Planning Document (2013) | 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.  
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.  
Employment development should not be located within Flood Zone 3b (Functional Floodplain). |
<table>
<thead>
<tr>
<th>Key Theme</th>
<th>Relevant PPPSIs</th>
<th>Specific Targets/Implications</th>
</tr>
</thead>
</table>
| **Energy Efficiency**           | **EBC: Core Strategy (2013)**  
  Kyoto Protocol to the UN Framework Convention on Climate Change (1997)  
  UN Framework Convention on Climate Change (1992)  
  BREEAM (Building Research Establishment Environmental Assessment Method) (2008) | 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. |
| **Low carbon town**             | **The UK Low Carbon Transition Plan (2009)**  
  East Sussex County Council: East Sussex Climate Change Strategy (2009) | 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. |
  Air Quality Standards Regulations (2010) | The ELLP should aim to reduce emissions from commercial and industrial premises in order to improve air quality. |
| **Noise**                       | **Assessment and Management of Environmental Noise (END Directive 2002/49/EC)**  
  DEFRA: Noise Policy Statement for England (2010) | 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**                   | **The Pan-European Biological and Landscape Diversity Strategy (1995)**  
  EBC/CBA: Landscape Capacity Guidance (2009)  
  EBC: Eastbourne Park Supplementary Planning Document (2013) | 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** | **EBC: Core Strategy (2013)**  
  Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)  
  UK Renewable Energy Strategy (2009) | Ensure that the ELLP considers the impact on cultural heritage assets when identifying sites for employment land. Archaeological assets, both potential and realised should be provided with full consideration through the ELLP. |
  Soils and the Natural Heritage - a Vision by the Soils LCN for the Protection of the UK Soil Resource and Sustainable Use of Soils, Soils Lead Coordination Network (2007) | 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. |
Appendix 2 – Summary of Baseline Conditions

An extensive search for baseline data was undertaken at the SA scoping stage. The baseline information provides the basis for predicting and monitoring the environmental and sustainability effects of planning policy. A summary of the key baseline information is provided below.

Population

Eastbourne’s population has been growing over recent years and reached 99,412 in 2011, with the rate of growth since the previous Census being the largest in East Sussex. However it is estimated that this growth will slow down significantly over the next 10-15 years, peaking at 100,179 in 2018. The proportion of Eastbourne’s population that is of working age has been growing over recent years to over 60%, but the overall workforce is projected to decrease by approximately 6.3% up to 2026.

Workforce and Economic Activity

Eastbourne has a resident population in employment of 44,449, and a workplace population of 43,888. A high proportion of Eastbourne’s working age population is economically active and this has grown over recent years, but unemployment is a problem in the town. A higher than average percentage of economically inactive\(^2\) 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.

There are 27,667 people who live and work in Eastbourne, with 12,322 people commuting into Eastbourne to work and 12,833 people commuting out of Eastbourne to work. This is a net loss of workers to other areas of 561 workers. Eastbourne has a gain in workers from Wealden, Rother and Hastings, but loses workers to Brighton & Hove and Lewes.

Deprivation and Earnings

The residence-based average earnings in Eastbourne are lower than average, but the workplace-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

Eastbourne has seven designed 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.

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\(^2\) Economically inactive people are those people who are neither in employment or unemployed. This includes those looking after a home and family, long or short term sick, injured or disabled people, or those who are retired
There has been a net increase in employment land over the past nine years, although this has been mainly due to redevelopment on the Brampton Road, Courtlands Road and Highfield Industrial Estates in the mid-2000s. The overall increases have been in Storage & Distribution and Office uses, although over the past three years there has been a net decrease in Office space. There is a consistent net loss of all other employment uses.

There is a small amount of employment land committed, the majority of which is within Light Industry and Storage & Distribution uses. The amount of employment land lost to residential over the last eight years has not been particularly significant, although the recent changes to the Permitted Development rights are expected to result in an increase in employment land in the form of B1(a) use being lost to residential use over coming years.

**Business Enterprises**

Businesses in Eastbourne tend to be smaller enterprises employing less than five people and turning over less than £250k per year. 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. 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 40 businesses that turn over £5million or more. The most popular industry for business enterprises is the Professional, Scientific and Technical sector.

Around 10% of businesses have been looking to relocate recently, and the vast majority are looking to stay within Eastbourne. There is high demand for office space, some demand for Light Industrial space, but there doesn’t appear to be significant demand for Heavy Industrial or Warehouse space from the businesses who are looking to relocate.

**Economic Performance**

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 2011 was £1764.25 million, although GVA per capita is lower than Eastbourne than the Great Britain average. 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 national average, and has experienced an overall increase in GVA per capita since 2001.

Businesses in Eastbourne are optimistic about their future prospects. Over half of businesses in Eastbourne consider that their future prospects over the next 12 months are looking bright, and the proportion of businesses who think this has increased over recent years. There is confidence that businesses can grow in the next three to five years, with two thirds aiming to grow. In addition, nearly 20% are looking to expand their geographical markets.

**Employment**

3 The Professional, Scientific and Technical Sector comprises activities that require a high degree of expertise and training. Activities performed include: legal advice and representation; accounting, bookkeeping, and payroll services; architectural, engineering, and specialised design services; computer services; consulting services; research services; advertising services; photographic services; translation and interpretation services; veterinary services; and other professional, scientific, and technical services.
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 does have a comparatively high number employed in sales and customer service occupations followed by administrative and secretarial occupations.

Transport

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, and ‘working from home’ is not as common in Eastbourne as it is across the rest of the County. There are a significant proportion of households 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 comparatively lower CO₂ emissions groups.

Of the people who live and work in Eastbourne, 44.5% travel to work by car, 20.3% travel on foot and 7.9% use public transport. However, the rate of travel by car is significantly higher for commuters, with 75% of out-commuters and 691% of in-commuters travelling by car. The rate of commuting by public transport is higher for out-commuters than in-commuters.

Hydrology

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.

Water quality in Eastbourne was considered to be good in 2006 as 100% of the river lengths in Eastbourne were classified as good or very good in terms of chemical and biological aspects.

The overall status of waterbodies in the Cuckmere and Pevensey Levels catchment area gives an indication of the water quality in the area. The majority of the waterbodies are of moderate quality.

Resource Use

Overall, recourse use in Eastbourne is lower than average and has been falling over recent years. However, resource use from commercial and industrial consumers in Eastbourne is relatively high, especially electricity consumption, and this has been rising over recent years despite the overall reduction. However, the indication is that a third of businesses accessed advice on reducing energy costs, so they may be aware that resource use could be a future problem.
Carbon dioxide emissions in Eastbourne have been falling over recent years and are the lower than the average 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.

**Biodiversity and Habitats**

Over 40% of the Borough is within the South Downs National Park, and approximately 85 of the Borough is in a Site of Special Scientific Interest. Also, approximately 40% of the Borough has an Environmental Stewardship Agreement on it.

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.

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 Downland. 21.15% of the built up area is within an identified habitat area in the Biodiversity Assessment.

**Landscape**

There are areas of Eastbourne Borough 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.
Appendix 3 – Appraisal of 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. They have been developed using information gathered through the PPPSI Review and the collection of baseline data, and take account of the sustainability issues identified. They also take into account the responses from the pre-preparation stakeholder engagement exercise that was undertaken.

The effectiveness of the Employment Land Local Plan in achieving the Plan Objectives will be monitored using Indicators. Table 10 describes the Plan Objectives and provides some basic indicators for monitoring the extent to which the objectives are being achieved.

<table>
<thead>
<tr>
<th>Ref</th>
<th>Plan Objective</th>
<th>Basic Indicators</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>
<td>GVA per capita, Productivity Index, Economic Competitiveness Index, Total amount of employment land developed, Number of businesses by turnover</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>
<td>Number of Business Starts, Number of business with less than 50 employees</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>
<td>Number of jobs created, Job Density, Number of businesses by industry sector, Number of people employed by industry sector</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>
<td>Total number of business in Eastbourne, Number of businesses that have been existence for 10+ years</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>
<td>Amount of employment land developed by location, Number of business premises on designated Industrial Estates, Number of developments that protects or enhances the natural environment (where harm is avoided or mitigated), Number of developments where decisions fail to protect or enhance the natural environment</td>
</tr>
</tbody>
</table>

It is important that the objectives of the Employment Land Local Plan are in accordance with sustainability principles. They have therefore been tested for compatibility with the SA objectives (as presented in the SA Framework) using a matrix in Table 11. This meets Stage B1 - Testing the plan or programme objectives against the SA objectives.
### Table 11 - Appraisal of Plan Objectives

- **✓** - Likely to have a positive effect
- **✗** - Likely to have a negative effect
- **○** - Unlikely to have any effect
- **?** - Effect unclear/unknown

<table>
<thead>
<tr>
<th>SA Objectives</th>
<th>Employment Land Local Plan Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>ELLP 1</td>
</tr>
<tr>
<td><strong>Core Strategy Sustainability Objectives</strong></td>
<td></td>
</tr>
<tr>
<td>CS1</td>
<td>✓</td>
</tr>
<tr>
<td>CS2</td>
<td>✓</td>
</tr>
<tr>
<td>CS3</td>
<td>✓</td>
</tr>
<tr>
<td>CS4</td>
<td>✓</td>
</tr>
<tr>
<td>CS5</td>
<td>○</td>
</tr>
<tr>
<td>CS6</td>
<td>○</td>
</tr>
<tr>
<td>CS7</td>
<td>✗</td>
</tr>
<tr>
<td>CS8</td>
<td>✓</td>
</tr>
<tr>
<td>CS9</td>
<td>✓</td>
</tr>
<tr>
<td>CS10</td>
<td>✓</td>
</tr>
<tr>
<td>CS11</td>
<td>✓</td>
</tr>
<tr>
<td>CS12</td>
<td>✗</td>
</tr>
<tr>
<td>CS13</td>
<td>○</td>
</tr>
<tr>
<td>CS14</td>
<td>?</td>
</tr>
<tr>
<td>CS15</td>
<td>✗</td>
</tr>
<tr>
<td>CS16</td>
<td>✗</td>
</tr>
<tr>
<td>CS17</td>
<td>○</td>
</tr>
<tr>
<td>CS18</td>
<td>✗</td>
</tr>
<tr>
<td>CS19</td>
<td>✗</td>
</tr>
<tr>
<td>CS20</td>
<td>✗</td>
</tr>
<tr>
<td>CS21</td>
<td>○</td>
</tr>
<tr>
<td>CS22</td>
<td>✗</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Employment Land Local Plan Sustainability Objectives</strong></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>EL-SA1</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA2</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>○</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA3</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>○</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA4</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>○</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA5</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>○</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA6</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>○</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA7</td>
<td>✓</td>
<td>○</td>
<td>○</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA8</td>
<td>✓</td>
<td>○</td>
<td>○</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA9</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>
Commentary on the Appraisal of the Objectives

As shown in Table 11, the Employment Land Local Plan objectives would generally have positive effects, especially in relation to the economic-based SA objectives. 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. This is specifically in relation to:

- **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
- **EL-SA12** - To ensure no adverse impact on the road network
- **EL-SA14** - To reduce resource use from commercial & industrial premises
- **EL-SA15** - To reduce the impact of noise from commercial premises on residential areas

The Employment Land Local Plan Objectives are heavily focused on the economy and therefore the majority of the positive impacts in relation to promoting economic growth, creating employment opportunities and the associated social impacts of employment such as reduced deprivation.

**ELLP1** relates to stimulating economic growth and therefore this objective has positive effects in relation to the economic growth objectives. It will also have positive effects on some social sustainability objectives relating to reducing deprivation. However there could be negative effects relating to biodiversity and landscape objectives, because economic growth will inevitably involve development. The ELLP should protect against adverse effects on biodiversity and landscape by ensuring development is appropriately located. There are also potential negative impacts relating to resource use and traffic. Overall, ELLP1 has 20 positive effects, 11 negative effects, 1 questionable effect and 5 no impact.

**ELLP2** relates to small and start-up businesses, and this is unlikely to have an effect on the majority of objectives. However there will be positive effects relating to economic growth and providing job opportunities. Overall, ELLP2 has 15 positive impacts, 4 negative impacts and 18 no impact.

**ELLP3** relates to diversifying the local economy, and there are no identified negative impacts relating to this objective. Again, the positive impacts relate to ensuring a broad low-impact economic base, and promoting an innovative economy. Overall, ELLP3 has 12 positive impacts and 25 no impact.
ELLP4 relates to supporting existing businesses and there are positive impacts in relation to supporting existing businesses to continue trading. The only negative impact relating to this objective is in relation to road congestion. Overall, ELLP4 has 10 positive impacts, 1 negative impact and 26 no impact.

ELLP5 relates to promoting employment development in sustainable locations, and has the most positive impacts of the five plan objectives. The positive impacts mainly relate to the economic objectives, particularly in relation to maximising the use of existing employment land and encouraging the overall number of businesses in the town. The fact that the plan objective mentions sustainable locations means that there are less negative impacts in relation to environmental issues. Overall, ELLP5 has 21 positive impacts, 3 negative impacts, 4 questionable impacts and 9 no impacts.

It is recommended that the Employment Land Local Plan takes account of the potential impacts of the plan objectives and ensures that mitigation measures are included in the Employment Land Local Plan to ensure that these negative effects are not realised.
Appendix 4 – Appraisal of Options

Need for a Local Plan (Do-nothing vs. Do-something)

Although the need to produce the Employment Land Local Plan is a requirement of the Inspector who examined the Core Strategy, it is useful to compare the ‘do-something’ scenario against the ‘do-nothing’ scenario. Table 12 appraises the need for a Local Plan based on these two scenarios.

The ‘do-nothing’ scenario would be based on continuing with ‘Business and Industry’ policies from the Eastbourne Borough Plan 2001-2011 (adopted 2003), as opposed to Core Strategy Policy D2: Economy, which will in actuality be replaced by the Employment Land Local Plan. The ‘do-something’ scenario is the preparation of an Employment Land Local Plan.

Table 12 - Appraisal of Need for a Local Plan

<table>
<thead>
<tr>
<th>Sustainability Appraisal</th>
<th>Do-Nothing</th>
<th>Do-Something</th>
<th>Commentary</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>O</td>
<td>O</td>
<td>Neither likely to have significant impact on provision of housing</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>O</td>
<td>O</td>
<td>Neither likely to have significant impact on health</td>
</tr>
<tr>
<td>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</td>
<td>O</td>
<td>✓</td>
<td>ELLP will help provide more job opportunities, potentially in Industrial Estates that are close to deprived areas.</td>
</tr>
<tr>
<td>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</td>
<td>O</td>
<td>✓</td>
<td>ELLP should help provide more opportunities for learning and apprenticeships</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have any affect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>O</td>
<td>✓</td>
<td>ELLP will help create more employment opportunities and spread them around the Borough.</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>O</td>
<td>✓</td>
<td>ELLP has potential for provision of job opportunities in locations accessible by sustainable modes of transport</td>
</tr>
<tr>
<td>CS8 To develop and ensure a broad, low-impact economic base and encourage</td>
<td>✓</td>
<td>✓</td>
<td>Both should develop the economic base, but the ELLP can better</td>
</tr>
<tr>
<td>Sustainability Appraisal</td>
<td>Do-Nothing</td>
<td>Do-Something</td>
<td>Commentary</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------------</td>
<td>------------</td>
<td>--------------</td>
<td>------------</td>
</tr>
<tr>
<td>entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth</td>
<td></td>
<td></td>
<td>promote entrepreneurship</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✔</td>
<td>✔</td>
<td>Both will help provide commercial infrastructure, although the ELLP can play a better role in masterplanning development</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>✔</td>
<td>✔</td>
<td>Both should develop the economic base, but the ELLP can provide the appropriate type and amount of development in appropriate locations</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>✔</td>
<td>✔</td>
<td>The ELLP will help provide more employment opportunities that are suited to the local workforce</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>✗</td>
<td>?</td>
<td>The Borough Plan relied on Greenfield allocations in Eastbourne Park. The impact of the ELLP depends on the identification of sites.</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
<td>?</td>
<td>Neither is likely to have a significant impact on accessibility to parks and gardens</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✗</td>
<td>✔</td>
<td>The Borough Plan relied on new Greenfield allocations in Eastbourne Park. The impact of the ELLP depends on the identification of sites, but has potential to re-use existing sites.</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>✗</td>
<td>?</td>
<td>The Borough Plan relied on Greenfield allocations in Eastbourne Park, which would impact on landscape. The impact of the ELLP depends on the identification of sites.</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗</td>
<td>✗</td>
<td>Neither is likely to make a significant contribution to reducing air pollution</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>✗</td>
<td>✗</td>
<td>Neither is likely to make a significant contribution to improving water quality</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>✗</td>
<td>✗</td>
<td>Neither is likely to make a significant contribution to reducing flood risk</td>
</tr>
<tr>
<td>Sustainability Appraisal</td>
<td>Do-Nothing</td>
<td>Do-Something</td>
<td>Commentary</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
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<td>-------------</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
<td>✗</td>
<td>Neither is likely to make a significant contribution to addressing causes of climate change</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
<td>?</td>
<td>The Borough Plan allocations were reliant on the Eastbourne Park road links, which would encourage car use. The impact of the ELLP depends on the identification of sites.</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>✗</td>
<td>✗</td>
<td>Neither is likely to make a significant contribution to reducing waste</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>✗</td>
<td>✗</td>
<td>Neither is likely to make a significant contribution to reducing use of non-renewables</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓</td>
<td>✓ ✓</td>
<td>The promotion of economic growth is an objective of the ELLP</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✗</td>
<td>✓</td>
<td>The Borough Plan relied on new Greenfield allocations in Eastbourne Park. The impact of the ELLP depends on the identification of sites, but has potential to re-use existing sites.</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✗</td>
<td>✓</td>
<td>The Borough Plan only makes realistic provision for office space, whilst the ELLP can make provision across all B uses</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✓</td>
<td>✓ ✓</td>
<td>Providing for start-up businesses is an objective of the ELLP</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>✓</td>
<td>✓ ✓</td>
<td>Providing for small and start-up businesses is an objective of the ELLP</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>✓</td>
<td>✓ ✓</td>
<td>Diversifying the economy is an objective of the ELLP</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>○</td>
<td>✓ ✓</td>
<td>Supporting existing businesses is an objective of the ELLP</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✗</td>
<td>?</td>
<td>The Borough Plan relied on Greenfield allocations in Eastbourne Park, which are removed from existing linkages. The impact of the ELLP depends on the identification of sites.</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>○</td>
<td>✓</td>
<td>ELLP should help provide more job opportunities and help reduce deprivation</td>
</tr>
</tbody>
</table>
**Commentary on need for a Plan**

The ‘Do Nothing’ option was assessed by testing the existing ‘Business and Industry’ policies within the Eastbourne Borough Plan 2001-2011 against the SA Objectives. The Borough Plan was adopted in September 2003, prior to the SEA Regulations, which came into force in 2004 and therefore whilst a sustainability appraisal was undertaken of the Borough Plan the methodology applied at that time differs from that used within this appraisal.

The appraisal found that the existing policy framework does include overarching policies that would meet some of the SA Objectives. However, one of the main sustainability issues from the ‘Do Nothing’ approach would be that the Borough Plan was reliant on Greenfield sites in Eastbourne Park for providing land for employment development, and access to these sites were dependent on the provision of new road links.

It is recognised that in the absence of the Employment Land Local Plan, some employment development could occur, however it is unlikely that it would be enough to meet requirements up to 2027 and would be piecemeal development that would mean that sustainable economic growth would not be realised. Also, opportunities for encouraging small and start-up businesses are unlikely to be as effective.

The need to produce the Employment Land Local Plan is a requirement of the Inspector who examined the Core Strategy. However, when considered against a ‘do nothing’, it is considered that an Employment Land Local Plan would provide the mechanism to ensure
that appropriate amounts of employment development comes forward in sustainable locations.

Appraisal of the Options

Scenario 1: Intensification of existing Industrial Estates

Scenario 1: Intensification of existing Industrial Estates involves the provision of additional employment floorspace through the redevelopment of vacant and underused sites within existing Industrial Estates to intensify use. There are seven Industrial Estates in Eastbourne, located in three broad areas (Hampden Park, Lottbridge Drove and Courtlands Road).

The advantages identified in relation to this option are:

- Re-use of previously developed land
- Infrastructure is already in place
- Encourages re-use of vacant sites
- Sites are suitable for B1, B2 and B8 uses
- Increases viability of public transport
- Increases perception as business location
- No biodiversity issues
- Flood mitigation measures already in place
- Suitable for smaller units

The disadvantages identified in relation to this option are:

- Unlikely to attract larger employers
- Does not distribute employment opportunities across town
- Likely to be unattractive location for high quality office development
- There will be less space for other uses, e.g. car parking, open spaces
- Increases traffic in heavy used and already congested areas

The intensification of existing Industrial Estates is likely to result in the creation of a number of smaller commercial units and spaces, rather than space that would attract larger businesses. There is evidence of this type of development occurring in the recent past.

It would have a positive effect in terms of re-use of land that is under-utilised or vacant, making the Industrial Estates more efficient and improving their image as business locations.

Although the requirement for employment space could not be met through this option alone, it could make a significant contribution towards the overall requirement across a range of class-B uses. It would make a positive contribution towards achieving the Employment Land Local Plan Objectives, particularly in terms of encouraging small and start-up businesses.

Table 13 appraises the sustainability of Scenario 1.

**Table 13 - Appraisal of Scenario 1**

- **✔✔ - Likely to have a strong positive effect (+2)**
- **〇 - Unlikely to have any effect (0)**
- **☆☆ - Likely to have a strong negative effect (-2)**
- **✔ - Likely to have a positive effect (+1)**
- **✗ - Likely to have a negative effect (-1)**
- **？ - Effect unclear/unknown (0)**
<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✓ Will help create economic growth, which supports housing. Sites on Industrial Estates are unlikely to be used for residential development</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>O Although job creation goes hand in hand with quality of life, minimal impact</td>
</tr>
<tr>
<td>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</td>
<td>O Will create jobs with smaller employers, but unlikely to have a significant effect on poverty and social exclusion</td>
</tr>
<tr>
<td>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</td>
<td>O Economic growth can support educational achievement by creating higher value jobs, but impact considered to be minimal</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>O Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>O Retains employment opportunities in existing locations rather than distributing employment opportunities across neighbourhoods.</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✓ Maximising employment in existing locations will make sustainable forms of transport, particularly public transport more viable. Existing centres should be more accessible as the infrastructure in already in place.</td>
</tr>
<tr>
<td>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</td>
<td>✓ Intensification is likely to create smaller units, which could be attractive for start-up businesses. This could encourage entrepreneurship and create more employment opportunities.</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✓ Infrastructure is already in place within existing Industrial Estates, so no requirement for new infrastructure to support development.</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>✓ Intensification will support economic growth and start up businesses, although they are unlikely to be knowledge-based</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>✓ Intensification will create more smaller units, which means more job creation.</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>✓ Intensification involves the re-use of previously developed land, so reducing the impact on biodiversity and landscape.</td>
</tr>
<tr>
<td>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</td>
<td>O Unlikely to have any impact on access to Eastbourne Park</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✓✓ Intensifying use with have a very positive effect on efficiency in land use</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>✓ Development will be within built up area and will not extend area of built form, so should therefore not adverse impact on landscapes.</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>○</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>○</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
</tr>
<tr>
<td>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</td>
<td>○</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>?</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>?</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✓ ✓</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start-ups and small businesses</td>
<td>✓ ✓</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>✓ ✓</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✓ ✓</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>✓</td>
</tr>
</tbody>
</table>
### Sustainability Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>EL-SA10</strong> To increase the average incomes of residents in the town</td>
<td>O</td>
</tr>
<tr>
<td></td>
<td>Intensification is likely to create smaller units for smaller employers, so not going to have massive effect on quality/pay of jobs</td>
</tr>
<tr>
<td><strong>EL-SA11</strong> To reduce levels of unemployment</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>More units, more jobs, less unemployment</td>
</tr>
<tr>
<td><strong>EL-SA12</strong> To ensure no adverse impact on the road network</td>
<td>✗</td>
</tr>
<tr>
<td></td>
<td>Will create more jobs in same location, which means more journeys to same locations, which may have adverse effect on road network</td>
</tr>
<tr>
<td><strong>EL-SA13</strong> To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Industrial Estates are already accessible for local people and commuters</td>
</tr>
<tr>
<td><strong>EL-SA14</strong> To reduce resource use from commercial &amp; industrial premises</td>
<td>?</td>
</tr>
<tr>
<td></td>
<td>Impact unknown</td>
</tr>
<tr>
<td><strong>EL-SA15</strong> To reduce the impact of noise from commercial premises on residential areas</td>
<td>✓</td>
</tr>
<tr>
<td></td>
<td>Increased employment use within existing Industrial Areas, including taking commercial uses away from residential areas, will minimise noise impact on residential areas.</td>
</tr>
</tbody>
</table>

### Scenario 2: Extensions to Industrial Estates

Scenario 2: Extensions to Industrial Estates involves the development of land on the edges of existing Industrial Estates for employment development. These sites are mainly Greenfield sites located within Eastbourne Park, and there are at least three sites within potential to provide an extension to an existing Industrial Estate.

The advantages identified in relation to this option are:

- Fewer design and layout constraints
- Sites are suitable for B1, B2 and B8 uses
- Increases viability of public transport
- Increases perception as business location

The disadvantages identified in relation to this option are:

- Greenfield land outside the built-up area boundary
- Does not distribute employment opportunities across town
- Flood risk mitigation costs
- Adverse impacts on biodiversity
- Contrary to Eastbourne Park policies in the Core Strategy
- Adverse impacts on landscape
- Increases traffic in heavy used and already congested areas

Any extension to the existing Industrial Estates are likely to be on Greenfield land within Eastbourne Park. The benefits of this option are that there are fewer design and layout constraints to employment development, which means that the sites can accommodate a range of different types and sizes of employment space. The entire employment floorspace requirement could be accommodated through this option, and these sites could accommodate a range of different class-B uses. The fact that they would form an extension to existing Industrial Estates means that this option would help improve the image of Industrial Estates as employment locations.
This option would make a contribution towards meeting the Employment Land Local Plan objectives, particularly relating to providing a range of different types and sizes of business unit, although there would be some conflicts in terms of environmental constraints. It could also increase traffic going through the Industrial Estates but it would also increase the viability of public transport.

The negatives of this option relate to the fact that the extensions would be on previously undeveloped land within Eastbourne Park. Any development within Eastbourne Park would be contrary to adopted policy in the Core Strategy.

This option would have an adverse effect on biodiversity within a significantly important area for biodiversity. Being undeveloped sites within Eastbourne Park, it is likely that there would be significant flood mitigation costs, and the potential for development of these sites to increase flood risk and have an adverse effect on water quality. In addition, as the development would be outside of the built-up area boundary, it is likely that there would be adverse landscape impacts.

Table 14 appraises the sustainability of Scenario 2.

### Table 14 - Appraisal of Scenario 2

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1</td>
<td>✔ ✔ - Likely to have a strong positive effect (+2)</td>
</tr>
<tr>
<td>CS2</td>
<td>○ - Unlikely to have any effect (0)</td>
</tr>
<tr>
<td>CS3</td>
<td>☒ ☒ - Likely to have a strong negative effect (-2)</td>
</tr>
<tr>
<td>CS4</td>
<td>✔ - Will help create economic growth, which supports housing. Sites on adjacent to Industrial Estates are unlikely to be used for residential development</td>
</tr>
<tr>
<td>CS5</td>
<td>○ - Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>CS6</td>
<td>○ - Retains employment opportunities in existing locations rather than distributing employment opportunities across neighbourhoods.</td>
</tr>
<tr>
<td>CS7</td>
<td>✔ ✔ - Extensions will create more units and wider range of types of units, and therefore</td>
</tr>
<tr>
<td>CS8</td>
<td>✔ ✔ - Extensions will create more units and wider range of types of units, and therefore</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>entrepreneurship to create diverse employment opportunities, particularly in the</td>
<td>increase job opportunities</td>
</tr>
<tr>
<td>tourism sector so that everyone can benefit from economic growth</td>
<td></td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure</td>
<td>✓</td>
</tr>
<tr>
<td>that will support continued economic growth and not just housing growth</td>
<td></td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in</td>
<td>✓ ✓</td>
</tr>
<tr>
<td>innovation with higher-value, lower-impact activities</td>
<td></td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment</td>
<td>✓</td>
</tr>
<tr>
<td>opportunities</td>
<td></td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure</td>
<td>xx</td>
</tr>
<tr>
<td>species sustainability</td>
<td></td>
</tr>
<tr>
<td>CS13 To protect, enhance, exploit the learning potential and make accessible for</td>
<td>○</td>
</tr>
<tr>
<td>enjoyment by sustainable modes of transport the Borough’s parks, gardens, countryside,</td>
<td></td>
</tr>
<tr>
<td>recreation areas and historic environment</td>
<td></td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land</td>
<td>xx</td>
</tr>
<tr>
<td>and existing buildings first, and encourage urban renaissance</td>
<td>Greenfield site</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>x</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>x</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater,</td>
<td>xx</td>
</tr>
<tr>
<td>waterways and the marine environment</td>
<td></td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the</td>
<td>xx</td>
</tr>
<tr>
<td>economy and the environment</td>
<td></td>
</tr>
<tr>
<td>CS19 To address the causes of climate change through reducing emissions of greenhouse</td>
<td>xx</td>
</tr>
<tr>
<td>gases and ensure Eastbourne is prepared for the impacts of climate change</td>
<td></td>
</tr>
<tr>
<td>CS20 To reduce road congestion and pollution levels by encouraging mixed-use</td>
<td>○</td>
</tr>
<tr>
<td>development, traffic calming measures, improving travel choice, reducing the need for</td>
<td></td>
</tr>
<tr>
<td>travel by car, and shortening the number, length and duration of journeys</td>
<td></td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste</td>
<td>?</td>
</tr>
<tr>
<td>hierarchy of minimisation, re-use, recycling and composting</td>
<td>Impact unknown</td>
</tr>
</tbody>
</table>
### Sustainability Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✔️ ✔️</td>
</tr>
<tr>
<td></td>
<td>Extensions will create more commercial units, and there will be fewer restrictions on type and size. This gives more potential for inward investment and attracting larger employers</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✗ ✗</td>
</tr>
<tr>
<td></td>
<td>Development not in existing employment land</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✔️ ✔️</td>
</tr>
<tr>
<td></td>
<td>Extensions will create more commercial units, and there will be fewer restrictions on type and size. This means units can be built to specifications.</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✔️</td>
</tr>
<tr>
<td></td>
<td>Creation of more units will help increase the number of businesses operating</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start-ups and small businesses</td>
<td>✔️</td>
</tr>
<tr>
<td></td>
<td>More units mean more opportunities for businesses, but these may not specifically suit smaller and start-up businesses.</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>✔️ ✔️</td>
</tr>
<tr>
<td></td>
<td>Will create an increased number and size of business units, which means more opportunities for employment</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>✔️ ✔️</td>
</tr>
<tr>
<td></td>
<td>Extensions will mean that existing businesses can develop land to meet their requirements</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✔️ ✔️</td>
</tr>
<tr>
<td></td>
<td>Providing new employment space adjacent to existing Industrial Estates will provide good opportunities to link with other existing businesses</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>✔️</td>
</tr>
<tr>
<td></td>
<td>Extensions might attract larger employers with higher value jobs, which may increase average income</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>✔️ ✔️</td>
</tr>
<tr>
<td></td>
<td>More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>✔️</td>
</tr>
<tr>
<td></td>
<td>Will create more jobs in same location, which means more journeys to same locations, which may have adverse effect on road network</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>✗</td>
</tr>
<tr>
<td></td>
<td>Industrial Estates are already accessible for local people and commuters</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>✔️</td>
</tr>
<tr>
<td></td>
<td>Increased employment use within existing Industrial Areas, including taking commercial uses away from residential areas, will minimise noise impact on residential areas.</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>✔️</td>
</tr>
</tbody>
</table>

#### Score

10

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

Scenario 3: Redevelopment of sites outside Industrial Estates involves redeveloping previously developed sites elsewhere in the town for employment use. Sites have been
identified through the Strategic Housing Land Availability Assessment as having potential for housing development, however they could be used for employment development instead.

The advantages identified in relation to this option are:

- Increases distribution of employment opportunities across town
- Development on previously developed land
- Increases opportunities for sustainable travel

The disadvantages identified in relation to this option are:

- Removes land that has potential for residential development
- Could create amenity issues with surrounding residential areas
- Isolated from other employment uses

The redevelopment of sites outside Industrial Estates is likely to have impacts on the delivery of housing development. This is because these sites have the potential to be developed for residential use and contribute to achieving housing targets set out in the Core Strategy.

This option would not meet the entire employment space requirement, although it could make a contribution towards it. However, it is likely that these sites could only accommodate B1 uses that are compatible with fact that the majority of these sites are in or adjacent to predominantly residential areas. It would also help distribute employment opportunities across the town, bring employment into communities, giving more opportunity to walk and cycle to work and making neighbourhoods more sustainable.

However, this option would mean that the employment development is isolated from other employment uses, and it could create amenity issues with surrounding residential areas.

Table 15 appraises the sustainability of Scenario 3.

**Table 15 - Appraisal of Scenario 3**

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✗✗ - Likely to have a strong negative effect (-2) Sites could be used for housing development so won’t provide opportunity for people to live in decent home</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>○ - Unlikely to have any effect (0) Although job creation goes hand in hand with quality of life, minimal impact</td>
</tr>
<tr>
<td>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</td>
<td>○ - Unlikely to have any effect (0) Will create jobs with smaller employers, but unlikely to have a significant effect on poverty and social exclusion</td>
</tr>
<tr>
<td>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</td>
<td>○ - Unlikely to have any effect (0) Economic growth can support educational achievement by creating higher value jobs, but impact considered to be minimal</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>○ - Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>✓ Redevelopment of other sites will distribute employment opportunities across town rather than just in few locations, helping to create more vibrant communities.</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✓ There will be more jobs located close to existing residential areas, making employment more accessible by walking and cycling.</td>
</tr>
<tr>
<td>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</td>
<td>✓ Redevelopment is likely to create smaller units, which could be attractive for start-up businesses. This could encourage entrepreneurship and create more employment opportunities.</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✓ Redevelopment gives the opportunity to masterplan and the sites should have a degree of existing infrastructure already in place</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>✓ New commercial development will support economic growth and start up businesses, although they are unlikely to be knowledge-based</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>○ It will create more opportunities but only in uses that are compatible with residential uses</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>○ Although redevelopment involves the re-use of previously developed land, it is unlikely to enhance biodiversity</td>
</tr>
<tr>
<td>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</td>
<td>○ Unlikely to have an impact on accessibility to parks, etc</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✓✓ Intensifying use with have a very positive effect on efficiency in land use</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>✓ Development will be within built up area and will not extend area of built form, so should therefore not adverse impact on landscapes.</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗ Any new development will create some form of air pollution, directly or indirectly</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>○ Intensification involves the re-use of previously developed land, but unlikely to improve water quality</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>○ Intensification involves the re-use of previously developed land, but unlikely to reduce risk of flooding</td>
</tr>
<tr>
<td>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</td>
<td>✗ Any new development will create some form of air emissions, directly or indirectly</td>
</tr>
<tr>
<td>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,</td>
<td>✗ Distribution of employment opportunities across town will result in increased number of car journeys to different areas.</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>----------------------------------------------------------------------------------------</td>
<td>---------------------------------------------------------------------------</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>hierarchy of minimisation, re-use, recycling and composting</td>
<td></td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>natural resources</td>
<td></td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>Redeployment will create jobs, but only in B1 uses that are compatible</td>
</tr>
<tr>
<td>with residential area, and therefore significance to economic growth will be limited.</td>
<td></td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>Does not involve the use of existing employment land</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>Redeployment will create jobs, but in limited sectors</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>Redeployment is likely to create smaller units, helping smaller and</td>
</tr>
<tr>
<td></td>
<td>start-up businesses, which will increase the number of businesses</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>Redeployment is likely to create smaller units which will help small</td>
</tr>
<tr>
<td></td>
<td>and start-up businesses</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>Will create an increased number and size of business units, which means</td>
</tr>
<tr>
<td></td>
<td>more opportunities for employment</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>Will support business looking to relocate to small but modern premises,</td>
</tr>
<tr>
<td></td>
<td>but not others looking to relocate to larger premises</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>Unlikely to be existing businesses in close proximity</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>Will create job opportunities, which will help reduce economic deprivation</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>Redevelopment is likely to create smaller units for smaller employers, so</td>
</tr>
<tr>
<td></td>
<td>not going to have massive effect on quality/pay of jobs</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>Will result in people travelling to different locations across town, which</td>
</tr>
<tr>
<td></td>
<td>increase number of journeys and effect on road network.</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for</td>
<td>Sites unlikely to be accessible as removed from other employment locations</td>
</tr>
<tr>
<td>local people and commuters</td>
<td></td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>Will create more commercial premises near residential areas, which will</td>
</tr>
<tr>
<td></td>
<td>mean more noise impacts</td>
</tr>
<tr>
<td>Score</td>
<td>7</td>
</tr>
</tbody>
</table>

**Scenario 4: Town Centre**
Scenario 4: Town Centre involves the redevelopment of sites identified in the Eastbourne Town Centre Local Plan for employment uses. The Town Centre has been identified as a Sustainable Centre, and is already a location where there are a significant number of businesses and other services provided.

The advantages identified in relation to this option are:

- Increases employment within Sustainable Centre
- Within Sustainable Neighbourhood
- Assists with Town Centre regeneration
- Accessible location with good public transport links
- Close to other employment uses
- Suitable for high quality office space
- Opportunities for businesses that would prefer to be located within the Town Centre

The disadvantages identified in relation to this option are:

- Not suitable for other non-office B uses
- Potential adverse impact on the delivery of housing
- Land in different ownerships

Development of employment space within the Town Centre is most likely to be in the form of office development. The Town Centre Local Plan makes allowance for office development on each of the five Development Opportunities sites. Office development would assist in the regeneration of the Town Centre by improving the vitality of the Town Centre through providing a mix of uses.

The Town Centre is identified in the Core Strategy as a Sustainable Centre and a Sustainable Neighbourhood. The Town Centre is a sustainable location for employment development due to high levels of accessibility through sustainable modes of transport, particularly public transport.

This option would only provide approximately 3,000 sqm of office space towards the requirement for additional employment floorspace. Office development would likely be high quality space, which would attract higher-value jobs. It would also provide opportunities for businesses that would prefer to be within the Town Centre rather than in out of centre locations. This would result in more office space being provided in out of town locations.

The main negative of this option is that it can only deliver office floorspace (class B1a/B1b). There would be no scope to provide other class-B uses. In addition, the sites used for office development may have alternatively been available for residential development within the Town Centre, where there is a high requirement for housing delivery.

Table 16 appraises the sustainability of Scenario 4.

<table>
<thead>
<tr>
<th>Effect</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓ ✓</td>
<td>Likely to have a strong positive effect (+2)</td>
</tr>
<tr>
<td>✓</td>
<td>Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>O</td>
<td>Unlikely to have any effect (0)</td>
</tr>
<tr>
<td>✗ ✗</td>
<td>Likely to have a strong negative effect (-2)</td>
</tr>
<tr>
<td>✗</td>
<td>Likely to have a negative effect (-1)</td>
</tr>
<tr>
<td>?</td>
<td>Effect unclear/unknown (0)</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>Will provide a balance between commercial development and provision of new homes, but may result in some commercial development on land that may be available for residential.</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>Although job creation goes hand in hand with quality of life, minimal impact</td>
</tr>
<tr>
<td>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</td>
<td>Employment development in the Town Centre will be limited to office uses, and therefore it isn’t going to help whole community</td>
</tr>
<tr>
<td>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</td>
<td>Economic growth can support educational achievement by creating higher value jobs, but impact considered to be minimal</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>Retains employment opportunities in existing locations rather than distributing employment opportunities across neighbourhoods.</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>A very sustainable location with good accessibility and linked trips. Close to health, education, shops, leisure uses etc. A small office allocation will have some but not maximum benefit to take full advantage of this.</td>
</tr>
<tr>
<td>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</td>
<td>Provides opportunities for businesses that need or want to be in the Town Centre, but also choice and more opportunities for occupiers who prefer out of town locations</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>Development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites.</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>Will create quality office accommodation to help businesses that are high-value, low-impact.</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>Will create more job opportunities, but only in jobs that are office-based</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>The Town Centre is not located close to biodiversity important areas. Involves the re-use of previously developed land, but unlikely to enhance biodiversity.</td>
</tr>
<tr>
<td>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</td>
<td>Unlikely to have any impact on accessibility to park and gardens etc</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>Located on previously development land, and will have a very positive effect on efficiency in land use</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>✔</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗ Requires more office space to be provided in out of town locations, meaning less opportunities for public transport</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>✔ Located on previously development land, but unlikely to improve water quality</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>✔ Located on previously development land, and mostly outside flood zones, but unlikely to reduce risk of flooding.</td>
</tr>
<tr>
<td>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</td>
<td>✗ Requires more office space to be provided in out of town locations, meaning less opportunities for public transport</td>
</tr>
<tr>
<td>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</td>
<td>✔ The Town Centre is a location that is well served by sustainable travel alternatives and measures to reduce car travel.</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✔ ✔ The creation of some high grade office development in the town centre with the remainder in other locations will help to rebalance the overall office stock in Eastbourne, providing more choice to attract inward investment and promote economic growth</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✔ Parts of the Town Centre are in employment use, but not necessarily the sites for development</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✔ ✔ Some office development in the town centre will support diversification of the local economy with more office space being provided in other locations, which will increase choice for office occupiers</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✔ ✔ A balance between replacing lost office space in the town centre and providing more opportunities and choice for occupiers who prefer out of town locations will help to increase the number of businesses operating</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start-ups and small businesses</td>
<td>✔ Will result in more business space being created, but not necessarily for business start-ups. It depends on how the space is provided.</td>
</tr>
</tbody>
</table>
**Sustainability Objective** | **Assessment**
--- | ---
EL-SA6 | To increase the number and range of employment opportunities in the town | ✓ ✓ A balance between replacing lost office space in the town centre and providing more choice for occupiers who prefer out of town locations will provide more opportunities for businesses and help to increase the number and range of employment opportunities
EL-SA7 | To support existing businesses to continue trading in Eastbourne | ✓ ✓ It will offer opportunities for businesses that want to be in town centre, but also offer more opportunities for existing businesses that prefer out of centre locations
EL-SA8 | To improve local business linkages | ✓ Providing some employment space within the Town Centre will provide good opportunities to link with other existing businesses
EL-SA9 | To reduce economic deprivation in the resident population | ✓ Will create job opportunities, which will help reduce economic deprivation
EL-SA10 | To increase the average incomes of residents in the town | ✓ ✓ Increased choice for office occupiers in terms of location, including opportunities for larger employers who prefer out of town locations
EL-SA11 | To reduce levels of unemployment | ✓ More units, more jobs, less unemployment
EL-SA12 | To ensure no adverse impact on the road network | ○ The Town Centre is a sustainable location with a range of travel alternatives, however more office space provided in out of town locations will have some impact on road network
EL-SA13 | To provide employment opportunities in locations that are accessible for local people and commuters | ✓ The Town Centre is already a location that is very accessible for local people and commuters, but impact is reduced by need to provide office space in out-of-town locations.
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 | ○ Offices unlikely to have a significant noise impact on residential uses

**Score** 25

**Scenario 4A: Town Centre (Increased provision of office space)**

In relation to Scenario 4, SHL's representation commented that the provision of 3,000sqm of office space in the Town Centre was not objectively assessed, and that the Town Centre has capacity for an increased amount of office space. Therefore, an increased provision of office space in the Town Centre is an option that should be tested in the Sustainability Appraisal. Therefore, **Scenario 4A – Town Centre (Increased Provision of Office Space)** will be tested alongside the other options.

In addition to the advantages and disadvantages outlined for Scenario 4 above, the following advantages and disadvantages apply to an increased amount of office space being provided in the Town Centre.

The advantages identified in relation to this option are:

- Improved accessibility by sustainable modes of transport
Further increases opportunities for business linkages

The disadvantages identified in relation to this option are:

- Reduces choice and opportunities for business with different locational requirements
- Less likely to attract new and different businesses into Eastbourne
- Will further reduce opportunities for other types of development, and would particularly compromise the ability to meet housing targets identified for the Town Centre

Increased provision of office space in the town centre will allow for an increase in the number of people travelling to work by public transport, due to the presence of the railway station and bus hub. It will also mean less people travelling to out of town locations where public transport is not available. In addition, increase office provision in the Town Centre is likely to further increase the opportunities for linkages between businesses given the high concentration of office space in the Town Centre.

However, the office market in Eastbourne is already highly concentrated within the Town Centre, which is markedly different from ‘market norms’ across the wider sub-region. Increase provision within the town centre will further reinforce this concentration and not provide choice within the market in order to capture economic interest and potential, as some office developers and occupiers will prefer out of town locations. If these locations are not available, they are more likely to move their activity to another location than to seek a town centre location. The lack of choice in terms of location means that Eastbourne is less likely to attract new and different businesses.

In addition, the Town Centre Local Plan identifies the need to provide 450 net residential units across the Development Opportunity Sites. The provision of an increase amount of office space on these sites would compromise the ability of the Town Centre to meet its housing requirements.

Table 17 appraises the sustainability of Scenario 4A.

### Table 17 - Appraisal of Scenario 4A

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✗ - Likely to have a strong negative effect (-2)</td>
<td>Increased office provision will result in commercial development taking place on land that may be available for residential development</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>O - Unlikely to have any effect (0)</td>
<td>Although job creation goes hand in hand with quality of life, minimal impact</td>
</tr>
<tr>
<td>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</td>
<td>✗ - Likely to have a negative effect (-1)</td>
<td>Employment development in the Town Centre will be limited to office uses, and therefore it isn't going to help whole community</td>
</tr>
<tr>
<td>CS4 To raise educational achievement levels across the Borough and develop opportunities</td>
<td>O - Effect unclear/unknown (0)</td>
<td>Economic growth can support educational achievement by creating higher value jobs,</td>
</tr>
</tbody>
</table>
## Sustainability Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>for everyone to acquire the skills needed to find and remain in work</td>
<td>but impact considered to be minimal</td>
</tr>
<tr>
<td>To reduce crime and the fear of crime</td>
<td>Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>Retains employment opportunities in existing locations rather than distributing employment opportunities across neighbourhoods.</td>
</tr>
<tr>
<td>To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>A very sustainable location with good accessibility and linked trips. Close to health, education, shops, leisure uses etc.</td>
</tr>
<tr>
<td>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</td>
<td>Provides more opportunities for businesses that need or want to be in the Town Centre, but reduces choice for occupiers who prefer out of town locations</td>
</tr>
<tr>
<td>To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>Development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites.</td>
</tr>
<tr>
<td>To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>Will create quality office accommodation to help businesses that are high-value, low-impact, but reduces opportunities for businesses who prefer out of town locations</td>
</tr>
<tr>
<td>To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>Will create more job opportunities, but only in jobs that are office-based</td>
</tr>
<tr>
<td>Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>The Town Centre is not located close to biodiversity important areas. Involves the re-use of previously developed land, but unlikely to enhance biodiversity.</td>
</tr>
<tr>
<td>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</td>
<td>Unlikely to have any impact on accessibility to park and gardens etc</td>
</tr>
<tr>
<td>To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>Located on previously development land, and will have a very positive effect on efficiency in land use</td>
</tr>
<tr>
<td>To maintain and enhance the quality of landscapes and townscapes</td>
<td>Town Centre is an already built up area and does not extend the area of built form, so there will be no adverse impact on landscapes. Parts of the Town Centre are in Conservation Areas, but the Town Centre Local Plan has policies on design.</td>
</tr>
<tr>
<td>To reduce air pollution and ensure air quality continues to improve</td>
<td>Any new development will create some form of air pollution, although more office space in the town centre will increase opportunities for public transport</td>
</tr>
<tr>
<td>To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>Located on previously development land, but unlikely to improve water quality</td>
</tr>
<tr>
<td>To reduce the risk of flooding and resulting detriment to public well-being, the economy</td>
<td>Located on previously development land, and mostly outside flood zones, but unlikely</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>and the environment</td>
<td>to reduce risk of flooding.</td>
</tr>
<tr>
<td>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</td>
<td></td>
</tr>
<tr>
<td>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</td>
<td>✓ ✓</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>○ Parts of the Town Centre are in employment use, but not necessarily the sites for development</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✗ Increase town centre provision will reduce opportunities for occupiers who prefer out of town locations, therefore reducing diversity in the local economy and not supporting business across a range of sectors</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>○ More office space in Town Centre may have some effect on the number of businesses, however it will not provide choice for businesses that prefer out of town locations and therefore will not attract new businesses with those requirements</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start-ups and small businesses</td>
<td>✓ Will result in more business space being created, but not necessarily for business start-ups. It depends on how the space is provided.</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>✓ An increased number and size of office spaces in the town centre will provide opportunities for employment, but is unlikely to provide choice for businesses that prefer out of town locations</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>✓ It will offer more opportunities for businesses that want to be in town centre, but is unlikely to provide choice for businesses that prefer out of town locations</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✓ ✓ As 90% of Eastbourne's office space is located within the town centre, providing more employment space within the Town Centre will provide good opportunities to link with other existing businesses</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>✓ Will create job opportunities, which will help reduce economic deprivation</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>✓ High quality office space will attract higher value jobs, which will increase average income.</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>✓ More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>✓ ✓ The Town Centre is a sustainable location with a range of travel alternatives therefore impact on road network should be minimised</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>✓ ✓ The Town Centre is already a location that is very accessible for local people and commuters</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>〇 Offices unlikely to have a significant noise impact on residential uses</td>
</tr>
</tbody>
</table>

**Score** 23

**Scenario 5: Sovereign Harbour**

Scenario 5: Sovereign Harbour involves the development of land at Sovereign Harbour that has historically been identified for employment use. The provision of employment space in Sovereign Harbour is a corporate priority, and this is an important element of enhancing Sovereign Harbour’s status as a Sustainable Centre.

The advantages identified in relation to this option are:

- Achievement of Corporate Plan priority
- Money already committed for development of Innovation Mall
- Fewer design and layout constraints
- Increases distribution of employment opportunities
- Increases employment within Sustainable Centre
- High quality environment
- Could attract a mixture of businesses sizes
- Sites ready to develop

The disadvantages identified in relation to this option are:

- Unsuitable for B2 and B8 uses
- Access predominantly by private car

Development of land at Sovereign Harbour for employment use would help achieve one of the Council’s corporate priorities. Sovereign Harbour has been identified in the Core Strategy as a Sustainable Centre, and employment space within this location would help distribute employment opportunities more widely across the town. The site could also provide a range of different sizes of business space due to fewer design and layout constraints, although it is recognised that the Sovereign Harbour SPD does set out some design parameters, such as building heights. Sovereign Harbour has the potential to provide high quality employment space in an attractive location due to its proximity to the Harbour.

These sites have been identified for employment development for a span of time with no development coming forward. However, there is now a commitment towards developing...
Employment land at this location following the grant of £6 million from the Growing Places Fund towards the development of an Innovation Mall.

Although the requirement for employment space could not be met through this option alone, it could make a significant contribution of 20,000 sqm towards the overall requirement, although this is likely to only be within B1 uses. It would make a positive contribution towards achieving the Employment Land Local Plan Objectives, particularly in terms of providing employment in a sustainable location and encouraging small and start-up businesses.

Table 18 appraises the sustainability of Scenario 5.

**Table 18 - Appraisal of Scenario 5**

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>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</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>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</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>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</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>- Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>✓ Will create more job opportunities, but only in uses that are compatible with residential area</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>✗ Will result in the loss of shingle habitat</td>
</tr>
<tr>
<td>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</td>
<td>Ø 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</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✓✓ The development is on previously developed land in a sustainable centre, and therefore has a very positive effect on efficiency in land use.</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>Ø 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.</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗ Any new development will create some form of air pollution, directly or indirectly</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>Ø Development would be on previously developed land, but proximity to harbour may mean potential impact on marine environment</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>✗ Location within Sovereign Harbour means that there may be a potential risk of flooding.</td>
</tr>
<tr>
<td>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</td>
<td>✗ Any new development will create some form of air emissions, directly or indirectly</td>
</tr>
<tr>
<td>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</td>
<td>✗ Access is likely to be via car through already congested locations.</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓✓ High quality development in this high quality location will provide choice for a range of different businesses and may attract large employers and inward investment</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✓ Development of this land has already identified for employment use</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✓✓ Potential to create a large number of new jobs across range of B1 sectors</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✓ More business space, especially if space available for small and start-up businesses,</td>
</tr>
</tbody>
</table>
### Sustainability Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>EL-SA5  To promote and encourage business start-ups and small businesses</td>
<td>✔ ✔</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>✔ ✔</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>✔ ✔</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>☐</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>✔</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>✔</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>✔</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>✗</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>✗</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>?</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>✗</td>
</tr>
</tbody>
</table>

**Score 15**

---

### Scenario 6: Greenfield Development

Scenario 6: Greenfield Development involves the development of Greenfield sites outside the built-up area boundary, but not adjacent to existing Industrial Estates. The majority of these sites would likely be in Eastbourne Park, and have previously been allocated for either housing or employment development in the Borough Plan.

The advantages identified in relation to this option are:

- Fewer design and layout constraints
- Distributes employment opportunities across town
- Could potentially accommodate all B uses
- Could attract larger employers

The disadvantages identified in relation to this option are:

- Greenfield land outside the built-up area boundary
- Infrastructure not in place
- Poor accessibility
- Isolated from other employment uses
• Adverse flood risk impacts and mitigation costs
• Adverse biodiversity impacts
• Contrary to Eastbourne Park policies in the Core Strategy
• Adverse landscape impacts

The majority of any Greenfield development is likely to be within Eastbourne Park. Any development within Eastbourne Park would be contrary to adopted policy in the Core Strategy.

This option would have an adverse effect on biodiversity within a significantly important area for biodiversity. As Greenfield sites within Eastbourne Park, they are likely to be in Tidal Flood Zone 3a, and it is likely that development of these sites would increase flood risk and adversely affect water quality. As the development would be outside of the built-up area boundary, it is likely that there would be adverse landscape impacts. In addition, these sites are likely to be isolated from other employment locations and there is unlikely to be existing infrastructure supporting development.

The entire employment floorspace requirement could be accommodated through this option, and these sites could accommodate a range of different class-B uses. The benefits of this option are that there are fewer design and layout constraints to employment development, which means that the sites can accommodate a range of different types and sizes of employment space.

Table 19 appraises the sustainability of Scenario 6.

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✅ - Likely to have a strong positive effect (+2)</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>○ - Unlikely to have any effect (0)</td>
</tr>
<tr>
<td>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</td>
<td>✅ - Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>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</td>
<td>✗ - Likely to have a negative effect (-1)</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>✗ - Likely to have a negative effect (-1)</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>✅ - Likely to have a positive effect (+1)</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to</td>
<td>✗ - Likely to have a negative effect (-1)</td>
</tr>
</tbody>
</table>

Table 19 - Appraisal of Scenario 6

- Effect unclear/unknown (0)

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✅ Economic growth on land that is not available for residential development will support housing growth</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>○ Although job creation goes hand in hand with quality of life, minimal impact</td>
</tr>
<tr>
<td>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</td>
<td>✅ There is more scope to deliver higher value employment space, which may help to reduce poverty.</td>
</tr>
<tr>
<td>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</td>
<td>○ Economic growth can support educational achievement by creating higher value jobs, but impact considered to be minimal</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>○ Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>✅ Redevelopment of other sites will distribute employment opportunities across town rather than just in few locations, helping to create more vibrant communities.</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to</td>
<td>✗ Majority of Greenfield sites are isolated from existing centres, and therefore accessibility to other uses is poor.</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>-------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>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</td>
<td>✔ Greenfield development will create an increased number and range units, and therefore more job opportunities</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✔ Greenfield sites give more opportunity for consideration of masterplanning and infrastructure issues as they are not constrained by previous development</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>✔ Greenfield development will create an increased number and range units, and therefore more job opportunities</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>✔ Greenfield development will create an increased number and range units, and therefore more job opportunities</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>XX Greenfield development will have a significant impact on Eastbourne Park, which is an areas of significant landscape and biodiversity importance.</td>
</tr>
<tr>
<td>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</td>
<td>XX Greenfield sites are generally quite isolated but are likely to be developed within Eastbourne Park, which will remove existing open space.</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>XX Greenfield site</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>XX Development will be outside built up area, and will therefore have a negative impact on Greenfield landscape</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗ Any new development will create some form of air pollution, directly or indirectly</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>XX Extensions will create additional impermeable area, which will result in more run-off and leaching into the water network in Eastbourne Park</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>XX Extensions will be on greenfield sites in tidal flood zone. It will create additional impermeable area, leading to more run-off, which will increase flood risk</td>
</tr>
<tr>
<td>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</td>
<td>XX Any new development will create some form of air emissions, directly or indirectly. Also, the removal of green areas does not prepare for impacts of climate change.</td>
</tr>
<tr>
<td>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</td>
<td>Any new development will create some form of air emissions, directly or indirectly. Also, the removal of green areas does not prepare for impacts of climate change.</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>☑ ☑ Greenfield sites give the opportunity to create more commercial units with less restrictions on type and size. This give more potential for inward investment and attracting larger employers</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>☒ ☒ Greenfield does not involve existing employment land</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>☑ ☑ Greenfield sites give the opportunity to create more commercial units with less restrictions on type and size. Less constraints means that employment space can be built to specifications</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>☑ Greenfield sites give the opportunity to create more commercial units with less restrictions on type and size. Less constraints means that employment space can be built to specifications</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>☑ ☑ More units will result in more opportunities, although units are less likely to be smaller units</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>☑ More units will result in more employment opportunities</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>☑ ☑ Greenfield development means that existing businesses have the potential to develop land to meet their requirements</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>☒ Unlikely to be existing businesses in close proximity</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>☑ Will create job opportunities, which will help reduce economic deprivation</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>☑ Employment space built to specifications might attract larger employers and higher value jobs, which will increase average income</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>☑ More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>☒ Access is likely to be via car, which will have adverse impact on road network</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>☒ Sites unlikely to be accessible as removed from other employment locations</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>? Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>? Employment development may or may not be close to existing residential areas</td>
</tr>
</tbody>
</table>

Score: -3
**Appendix 5 – Appraisal of Policies in the Proposed Submission ELLP**

**Policy EL1 – Economy and Employment Land**

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:

- Taking a positive approach that reflects a presumption in favour of sustainable economic development;
- 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;
- Promoting development which provides units for new start-up businesses and small enterprises;
- Encouraging key businesses and their supply chains to grow existing specialisms;
- Encouraging development which supports improvements in the local jobs market through creation of additional jobs and employment diversification; and
- Supporting the Education and Training sector of the Eastbourne economy through a flexible approach to expansion proposals.

**Table 20 - Appraisal of Policy EL1**

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have significant effect on provision of housing</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have significant effect on health issues</td>
</tr>
<tr>
<td>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</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>The provision of more employment opportunities, and encouraging development which supports improvements in the local jobs market will help to reduce poverty in the medium to long term</td>
</tr>
<tr>
<td>CS4 To raise educational achievement levels across</td>
<td>o</td>
<td>o</td>
<td>✓</td>
<td>Supporting education and training sector will help raise educational</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------------------</td>
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<td>-----------------------------------------------------------------------------</td>
</tr>
<tr>
<td>the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work</td>
<td></td>
<td></td>
<td></td>
<td>achievement in the long term</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have significant effect on crime rates</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Locating employment development in sustainable centres will help create sustainable communities</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Locating employment development in sustainable centres will improve accessibility and linked trips</td>
</tr>
<tr>
<td>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</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>The achievement of a sustainable economy is the main aim of Policy EL1.</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Policy EL1 strategically addresses employment development across the town</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>The policy promote sustainable economic growth and provides employment floorspace to meet the requirements</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>Policy EL1 identifies the requirement for employment land across Eastbourne is match workforce, and encourages development that supports local job growth</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Policy EL1 does not identify any Greenfield sites for development, but will not make a significant contribution to conserving and enhancing biodiversity</td>
</tr>
<tr>
<td>CS13 To protect, enhance, exploit the learning potential and make accessible for enjoyment by sustainable modes of transport the Borough’s</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have impact on accessibility to parks and gardens</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
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<td>------------</td>
</tr>
<tr>
<td>parks, gardens, countryside, recreation areas and historic environment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Policy EL1 does not identify any Greenfield sites for development, and promotes maximising the use of land in existing employment locations</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Policy EL1 does not identify any Greenfield sites for development and therefore is unlikely to have significant effect on landscapes and townscapes</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>More employment development may have the effect of increasing air pollution</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have significant effect on water quality</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have significant effect on flooding</td>
</tr>
<tr>
<td>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</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have significant impact on addressing the causes of climate change</td>
</tr>
<tr>
<td>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</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Directing employment development to sustainable centres may reduce need for travel by car in some locations, but increase it in other locations</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>More employment development may create more waste</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Unlikely to have significant impact on reducing non-renewable forms of energy</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
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<td>------------</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The achievement of a sustainable economy is the main aim of Policy EL1.</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Policy EL1 does not identify any Greenfield sites for development, and promotes maximising the use of land in existing employment locations</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Policy EL1 supports improvements in jobs market through creation of additional jobs and employment diversification</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Provision of new employment space will increase number of businesses</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>☐</td>
<td>✓</td>
<td>✓</td>
<td>Policy aims to promote development which provides units for small and start-up businesses</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>☐</td>
<td>✓</td>
<td>✓</td>
<td>Provision of new employment space will increase job opportunities</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Policy encourages key businesses and their supply chains</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>☐</td>
<td>✓</td>
<td>✓</td>
<td>Locating development in existing employment locations will help improve linkages between businesses</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
<td>Provision of new employment space will increase job opportunities and reduce deprivation</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
<td>Provision of new employment space will increase job opportunities and increase average incomes</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>☐</td>
<td>☐</td>
<td>✓</td>
<td>Provision of new employment space will increase job opportunities and reduce levels of unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
<td>New employment space may have adverse impact on road network</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>☐</td>
<td>✓</td>
<td>✓</td>
<td>Locating development in sustainable centres and existing employment locations will more employment opportunities are accessible</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
<td>New employment development will increase use of resources</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>Policy EL1 unlikely to have significant impact on noise</td>
</tr>
</tbody>
</table>

**Likelihood / Certainty:** High: Policy EL1 is the overall strategy for how and where employment land
should be delivered in Eastbourne, and the delivery of this policy will be key in achieving the vision for employment land. It is considered that the delivery of 43,000sqm of employment land in Eastbourne can be achieved, and that there is demand for development that provides new units, as evidenced by recent developments in the area. As such it is considered that there is a high level of certainty of achieving the sustainability framework objectives.

**Scale:** Local

**Permanence:** Permanent

**Cumulative / Indirect Effects:**

Policy EL1 aims to create job growth and economic prosperity in order to achieve a sustainable economy. If this is successful, there is the potential that there may be demand for more employment space than envisaged at this time.

**Monitoring:**

Policy EL1 will be monitored through a number of different indicators as it is a strategic policy that covers a number of different areas. The types of indicators that will be monitored to assess the beneficial sustainability effects relevant to this policy include:

- Monitoring economic activity and output
- Amount of employment development of previously developed land
- Amount of pollution and waste generated
- The amount of employment floorspace delivered and the location
- The number of business premises by sector and location
- The number of new businesses
- Method of travel to work
- Growth in traffic
- Resource consumption

**Mitigation and Recommendations:**

Water quality and flood risk can be mitigated through incorporating Sustainable Urban Drainage Systems (SUDS) into development and through the provision of flood storage compensation elsewhere in the town via Borough Plan Policy US4: Flood Protection and Surface Water Disposal.

Air pollution and emissions, plus reducing the use of non-renewable forms of energy, will be addressed through the requirement to meet BREEAM\(^4\) ‘very good’ standard, which requires new employment development to meet certain standards in relation to issues such as management, energy use, water use, material, waste, ecology and pollution. In addition, policy requirements for development to make provision for waste and recycling facilities will help reduce the impact of waste generation.

Issues relating to road congestion and the road network can be addressed through the use of travel plans, as well as proposals for a ‘bus gate’ at Sovereign Harbour.

\(^4\) BREEAM is an environmental assessment method and rating systems for buildings
Policy EL2 – Industrial Estates

Policy EL2: Industrial Estates

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:

- The proposed alternative use is an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or
- The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and
- The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.

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 there is no reasonable prospect of the site continuing to be used for class B use.

Table 21 - Appraisal of Policy EL2

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Sites on Industrial Estates are unlikely to be used for residential development</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant on health</td>
</tr>
<tr>
<td>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</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant on deprivation</td>
</tr>
<tr>
<td>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</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant on educational achievement</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
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<td>------------</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>Industrial estates generally considered to be slightly removed from communities</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Maximising employment in existing locations will make sustainable forms of transport, particularly public transport more viable.</td>
</tr>
<tr>
<td>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</td>
<td>〇</td>
<td>✓</td>
<td>✓</td>
<td>Intensification is likely to create smaller units, which could encourage entrepreneurship and create more employment opportunities.</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Infrastructure is already in place within existing Industrial Estates, so no requirement for new infrastructure to support development.</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>〇</td>
<td>〇</td>
<td>✓</td>
<td>Development on existing industrial estates will support economic growth but unlikely to be knowledge based</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>〇</td>
<td>✓</td>
<td>✓</td>
<td>Development on existing industrial estates will create more smaller units, which means more job creation.</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>Not Greenfield development so is unlikely to have direct impact on biodiversity, however existing Industrial Estates are in close proximity to Eastbourne Park so possible minor impact</td>
</tr>
<tr>
<td>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</td>
<td>〇</td>
<td>〇</td>
<td>〇</td>
<td>Unlikely to have any impact on access to parks and gardens</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Intensifying use with have a very positive effect on efficiency in land use</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
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<td>-----------</td>
<td>-------------</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td></td>
<td></td>
<td>✓</td>
<td>Development will be within built up area and will not extend area of built form, so should therefore not adverse impact on landscapes.</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>✗</td>
<td>✗</td>
<td>✗</td>
<td>Any new development will create some form of air pollution, directly or indirectly</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment</td>
<td></td>
<td></td>
<td></td>
<td>Development on existing industrial estates involves the re-use of previously developed land, but unlikely to improve water quality</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td></td>
<td></td>
<td></td>
<td>Development on existing industrial estates involves the re-use of previously developed land, but unlikely to reduce risk of flooding. Also, the majority of Industrial Estates are within Tidal Flood Zone 3a.</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
<td>✗</td>
<td>✗</td>
<td>Any new development will create some form of air emissions, directly or indirectly</td>
</tr>
<tr>
<td>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</td>
<td></td>
<td></td>
<td></td>
<td>Development on existing industrial estates means a higher concentration of development, which means there are more opportunities for reducing number of car trip. However, it also means creating more car trips in an area that may already be congested, rather than spreading impact across road network.</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>Development on existing industrial estates will create jobs, but not going to attract big inward investment and employers who will make a big impact</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Intensifying use with have a very positive effect on maximising use of existing employment land</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>Development on existing</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
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</tr>
<tr>
<td>EL-SA4 and support businesses across a range of sectors</td>
<td></td>
<td></td>
<td>✓</td>
<td>industrial estates will create jobs, but in limited sectors</td>
</tr>
<tr>
<td>To increase the overall number of business enterprises operating in the town</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>Development on existing industrial estates is likely to create smaller units, helping smaller and start-up businesses, which will increase the number of businesses operating.</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>Development on existing industrial estates will create more smaller business units which will help small and start-up businesses</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>Will create an increased number and size of business units, which means more opportunities for employment</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>Will support business looking to relocate to small but modern premises, but not others looking to relocate to larger premises</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Providing employment space within existing Industrial Estates will provide good opportunities to link with other existing businesses</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>O</td>
<td>O</td>
<td>✓</td>
<td>Will create job opportunities, which will help reduce economic deprivation</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Development on existing industrial estates is likely to create smaller units for smaller employers, so not going to have massive effect on quality/pay of jobs</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>Will create more jobs in same location, which means more journeys to same locations, which may have adverse effect on road network</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>O</td>
<td>✓</td>
<td>✓</td>
<td>Industrial Estates are already accessible for local people and commuters</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Increased employment use within existing Industrial Areas, including taking commercial uses away from residential areas, will minimise noise impact on residential areas.</td>
</tr>
</tbody>
</table>
**Likelihood / Certainty:** Medium: Policy EL2 facilities the provision of additional employment space through the redevelopment of existing sites. As such it is an important means of achieving the vision for employment land. The redevelopment of sites cannot be guaranteed, however a number of buildings will be coming to the end of their economic life over the plan period and it is expected that redevelopment will follow. The contribution towards the sustainability framework objectives is dependent upon land ownership and developer aspirations, as such only a Medium level of likelihood can be given. However, when sites do come forward, ensuring proposals are in accordance with ELLP, Core Strategy and Saved Borough Plan policy will give a high level of certainty to achieving the sustainability objectives.

**Scale:** Local

**Permanence:** Permanent

**Cumulative / Indirect Effects:**
Policy EL2 aims to provide 20,000sqm of class B space within the existing industrial estates, whilst protecting the integrity of the industrial estates and the perception of them as business locations by restricting development of non-B uses.

Protecting the perception as business locations will encourage businesses to locate there. An increased concentration of businesses within the industrial estates should may public transport, particularly bus services, more viable and therefore over time the number of people travelling to work by car could decrease. This may lead to easing of congestion and associated impacts on the surrounding area.

**Monitoring:**
Policy EL2 will be monitored through a number of different indicators that are specific to development on industrial estates. The types of indicators that will be monitored to assess the beneficial sustainability effects relevant to this policy include:

- Amount and % of new employment floorspace developed in Industrial Estates
- Number of people employed by sector and occupation
- Number of new and small businesses
- Resource consumption
- Air emissions
- Method of travel to work

**Mitigation and Recommendations:**
Water quality and flood risk can be mitigated through incorporating Sustainable Urban Drainage Systems (SUDS) into development and through the provision of flood storage compensation elsewhere in the town via Borough Plan Policy US4: Flood Protection and Surface Water Disposal.

Air pollution and emissions, plus reducing the use of non-renewable forms of energy, will be addressed through the requirement to meet BREEAM ‘very good’ standard, which requires new employment development to meet certain standards in relation to issues such as management, energy use, water use, material, waste, ecology and pollution. In addition, policy requirements for development to make provision for waste and recycling facilities will help reduce the impact of waste generation.

Issues relating to road congestion and the road network can be addressed through the use of travel plans.
**Policy EL3: Town Centre**

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.

**Table 22 - Appraisal of Policy EL3**

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✗</td>
<td>✗</td>
<td>✗</td>
<td>May mean commercial development on land that may be available for residential development</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have significant on health</td>
</tr>
<tr>
<td>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</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have significant on deprivation</td>
</tr>
<tr>
<td>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</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have significant on educational achievement</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Unlikely to have any effect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>O</td>
<td>O</td>
<td>O</td>
<td>Retains employment opportunities in existing locations rather than distributing employment opportunities across neighbourhoods.</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>A very sustainable location with good accessibility and linked trips. Close to health, education, shops, leisure uses etc.</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
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</tr>
<tr>
<td>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</td>
<td>☐</td>
<td>☑</td>
<td>☑</td>
<td>Provides more opportunities for businesses that need or want to be in the Town Centre</td>
</tr>
<tr>
<td>CS9 To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
<td>Development would form part of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites.</td>
</tr>
<tr>
<td>CS10 To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities</td>
<td>☐</td>
<td>☑</td>
<td>☑</td>
<td>Will create quality office accommodation to help businesses that are high-value, low-impact.</td>
</tr>
<tr>
<td>CS11 To develop and maintain a skilled and adaptable workforce to match local employment opportunities</td>
<td>☐</td>
<td>☑</td>
<td>☑</td>
<td>Will create more job opportunities, but only in jobs that are office-based</td>
</tr>
<tr>
<td>CS12 Conserve and enhance the Borough’s biodiversity and landscape, and ensure species sustainability</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>The Town Centre is not located close to biodiversity important areas. Involves the re-use of previously developed land, but unlikely to enhance biodiversity.</td>
</tr>
<tr>
<td>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</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>Unlikely to have any impact on accessibility to park and gardens</td>
</tr>
<tr>
<td>CS14 To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance</td>
<td>☑</td>
<td>☑</td>
<td>☑</td>
<td>Located on previously development land, and will have a very positive effect on efficiency in land use</td>
</tr>
<tr>
<td>CS15 To maintain and enhance the quality of landscapes and townscapes</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>Town Centre is an already built up area and does not extend the area of built form, so there will be no adverse impact on landscapes. Parts of the Town Centre are in Conservation Areas, but the Town Centre Local Plan has policies on design.</td>
</tr>
<tr>
<td>CS16 To reduce air pollution and ensure air quality continues to improve</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
<td>Any new development will create some form of air pollution, directly or indirectly</td>
</tr>
<tr>
<td>CS17 To maintain and improve the water quality of freshwater bodies, groundwater,</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>Located on previously development land, but unlikely to improve water quality</td>
</tr>
<tr>
<td>Sustainability Objective</td>
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<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
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<td>-----------</td>
<td>------------</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Located on previously development land, and mostly outside flood zones, but unlikely to reduce risk of flooding.</td>
</tr>
<tr>
<td>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</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>Any new development will create some form of air emissions, directly or indirectly</td>
</tr>
<tr>
<td>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</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The Town Centre is a location that is well served by sustainable travel alternatives and measures to reduce car travel.</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The creation of high grade office development will attract inward investment and promote economic growth</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>o</td>
<td>o</td>
<td>o</td>
<td>Parts of the Town Centre are in employment use, but not necessarily the sites for development</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>Town Centre office development will support diversification of the local economy but only in limited sectors</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>o</td>
<td>o</td>
<td>✓</td>
<td>More office space in Town Centre will have some effect on the number of businesses</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>Will result in more business space being created, but not necessarily for business start-ups. It depends on how the space is provided.</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>An increased number and size of office spaces will provide more opportunities for employment.</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in</td>
<td>o</td>
<td>✓</td>
<td>✓</td>
<td>It will offer more opportunities for businesses that want to be</td>
</tr>
</tbody>
</table>
### Sustainability Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
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<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✔️</td>
<td>✔️</td>
<td>✔️</td>
<td>Providing employment space within the Town Centre will provide good opportunities to link with other existing businesses</td>
</tr>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td>☐</td>
<td>☐</td>
<td>✔️</td>
<td>Will create job opportunities, which will help reduce economic deprivation</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td>☐</td>
<td>☐</td>
<td>✔️</td>
<td>High quality office space will attract higher value jobs, which will increase average income.</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td>☐</td>
<td>☐</td>
<td>✔️</td>
<td>More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td>✔️</td>
<td>✔️</td>
<td>✔️</td>
<td>The Town Centre is a sustainable location with a range of travel alternatives therefore impact on road network should be minimised</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td>✔️</td>
<td>✔️</td>
<td>✔️</td>
<td>The Town Centre is already a location that is very accessible for local people and commuters</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td>☒</td>
<td>☒</td>
<td>☒</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>Offices unlikely to have a significant noise impact on residential uses</td>
</tr>
</tbody>
</table>

### Likelihood / Certainty:
High: The Town Centre Local Plan allocates sites for mix of uses, and it has been identified that Development Opportunity Sites 2 and 3 would be the most attractive locations for new office development. Therefore there is a relatively high certainty that the development will take place and that the sustainability objectives will be achieved.

### Scale:
Local

### Permanence:
Permanent

### Cumulative / Indirect Effects:
Policy EL3 provides an amount of office space in the town centre to replace some of the space that it is anticipated will be lost over the plan period. This will provide choice for businesses who want to locate in Eastbourne in a town centre location.

Although there are opportunities for public transport, people will still travel to work by car, potentially having an indirect effect on pollution and congestion in the town centre.

A concentration of businesses at Sovereign Harbour should make public transport, particularly bus services, more viable and therefore over time the number of people travelling to work by car could decrease. This may lead to easing of congestion and associated impacts on the surrounding area.

### Monitoring:
Policy EL3 will be monitored through a number of different indicators that are specific to
development within the Town Centre. The types of indicators that will be monitored to assess the beneficial sustainability effects relevant to this policy include:

- Annual housing completions in the town centre
- Economic activity and output
- Amount and % of new employment floorspace developed in the town centre
- Number of people employed by sector and occupation
- Number of new and small businesses
- Resource consumption
- Air emissions
- Method of travel to work

**Mitigation and Recommendations:**

Water quality and flood risk can be mitigated through incorporating Sustainable Urban Drainage Systems (SUDS) into development and through the provision of flood storage compensation elsewhere in the town via Borough Plan Policy US4: Flood Protection and Surface Water Disposal.

Air pollution and emissions, plus reducing the use of non-renewable forms of energy, will be addressed through the requirement to meet BREEAM ‘very good‘ standard, which requires new employment development to meet certain standards in relation to issues such as management, energy use, water use, material, waste, ecology and pollution. In addition, policy requirements for development to make provision for waste and recycling facilities will help reduce the impact of waste generation.
Policy EL4: Sovereign Harbour

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.

Table 23 - Appraisal of Policy EL4

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CS1 To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>Employment development on land that is not available for residential development will support housing growth</td>
</tr>
<tr>
<td>CS2 To improve the health and well-being of the population and reduce inequalities in health</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant on health</td>
</tr>
<tr>
<td>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</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant on poverty</td>
</tr>
<tr>
<td>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</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant on educational achievement</td>
</tr>
<tr>
<td>CS5 To reduce crime and the fear of crime</td>
<td>○</td>
<td>○</td>
<td>○</td>
<td>Unlikely to have significant effect on crime</td>
</tr>
<tr>
<td>CS6 To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town</td>
<td>○</td>
<td>✔</td>
<td>✔</td>
<td>Will result in the creation of employment space in a ‘Sustainable Centre’, improving the sustainability of the Sovereign Harbour neighbourhood</td>
</tr>
<tr>
<td>CS7 To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone</td>
<td>✗</td>
<td>✗</td>
<td>○</td>
<td>It is located outside of existing employment areas, and access is likely to be car-based due to relatively poor public transport. However, this may lessen over time as public transport</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
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<tr>
<td>--------------------------</td>
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<td>-----------</td>
<td>------------</td>
</tr>
<tr>
<td>CS8</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>provision is provided</td>
</tr>
<tr>
<td>CS8</td>
<td></td>
<td></td>
<td></td>
<td>The sites can provide more opportunities for all types of B1 use, particularly high quality space as demonstrated by the application for an Innovation Mall.</td>
</tr>
<tr>
<td>CS9</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The Sovereign Harbour SPD masterplans all of the remaining development sites in Sovereign Harbour.</td>
</tr>
<tr>
<td>CS10</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>Development at Sovereign Harbour can create better linkage opportunities to knowledge based economy</td>
</tr>
<tr>
<td>CS11</td>
<td></td>
<td>✓</td>
<td>✓</td>
<td>Will create more job opportunities, but only in uses that are compatible with residential area</td>
</tr>
<tr>
<td>CS12</td>
<td></td>
<td></td>
<td></td>
<td>May result in the loss of shingle habitat and sites are adjacent to Pevensey Levels</td>
</tr>
<tr>
<td>CS13</td>
<td></td>
<td></td>
<td></td>
<td>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</td>
</tr>
<tr>
<td>CS14</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>The development is on previously developed land in a sustainable centre, and therefore has a very positive effect on efficiency in land use.</td>
</tr>
<tr>
<td>CS15</td>
<td></td>
<td></td>
<td></td>
<td>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.</td>
</tr>
<tr>
<td>CS16</td>
<td></td>
<td></td>
<td></td>
<td>Any new development will create some form of air pollution, directly or indirectly</td>
</tr>
<tr>
<td>CS17</td>
<td></td>
<td></td>
<td></td>
<td>Development would be on previously developed land, but proximity to harbour may mean potential impact on marine environment</td>
</tr>
<tr>
<td>Sustainability Objective</td>
<td>Short-term</td>
<td>Medium-term</td>
<td>Long-term</td>
<td>Assessment</td>
</tr>
<tr>
<td>--------------------------</td>
<td>------------</td>
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<td>-----------</td>
<td>------------</td>
</tr>
<tr>
<td>CS18 To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment</td>
<td>✗</td>
<td>✗</td>
<td>✗</td>
<td>Location within Sovereign Harbour means that there may be a potential risk of flooding.</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
<td>✗</td>
<td>✗</td>
<td>Any new development will create some form of air emissions, directly or indirectly</td>
</tr>
<tr>
<td>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</td>
<td>✗</td>
<td>✗</td>
<td>✗</td>
<td>Access is likely to be via car through already congested locations. However, this may lessen over time as public transport provision is provided</td>
</tr>
<tr>
<td>CS21 To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>CS22 Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources</td>
<td>?</td>
<td>?</td>
<td>?</td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA1 To promote sustainable economic growth</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>High quality development in this high quality location may attract large employers and inward investment</td>
</tr>
<tr>
<td>EL-SA2 To maximise use of existing employment land</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Development of this land has already identified for employment use</td>
</tr>
<tr>
<td>EL-SA3 To diversify the local economy and support businesses across a range of sectors</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Potential to create a large number of new jobs across range of B1 sectors</td>
</tr>
<tr>
<td>EL-SA4 To increase the overall number of business enterprises operating in the town</td>
<td>✗</td>
<td>✓</td>
<td>✓</td>
<td>More business space, especially if space available for small and start-up businesses, will increase number of businesses operating</td>
</tr>
<tr>
<td>EL-SA5 To promote and encourage business start ups and small businesses</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>More spaces of the type of the Innovation Mall will benefit small and start-up businesses</td>
</tr>
<tr>
<td>EL-SA6 To increase the number and range of employment opportunities in the town</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Will result in more business space and therefore more employment opportunities</td>
</tr>
<tr>
<td>EL-SA7 To support existing businesses to continue trading in Eastbourne</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>Existing businesses can relocate to Sovereign Harbour, creating churn and making other sites available for improvement and relocation</td>
</tr>
<tr>
<td>EL-SA8 To improve local business linkages</td>
<td>✗</td>
<td>✗</td>
<td>✓</td>
<td>There are few existing businesses within Sovereign</td>
</tr>
</tbody>
</table>
### Sustainability Objective

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Short-term</th>
<th>Medium-term</th>
<th>Long-term</th>
<th>Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>EL-SA9 To reduce economic deprivation in the resident population</td>
<td></td>
<td></td>
<td></td>
<td>Harbour, but will help create new business linkages</td>
</tr>
<tr>
<td>EL-SA10 To increase the average incomes of residents in the town</td>
<td></td>
<td></td>
<td></td>
<td>Will create job opportunities, which will help reduce economic deprivation</td>
</tr>
<tr>
<td>EL-SA11 To reduce levels of unemployment</td>
<td></td>
<td></td>
<td></td>
<td>More units, more jobs, less unemployment</td>
</tr>
<tr>
<td>EL-SA12 To ensure no adverse impact on the road network</td>
<td></td>
<td></td>
<td></td>
<td>Access is likely to be via car, which will have adverse impact on road network. However, this may lessen over time as public transport provision is provided</td>
</tr>
<tr>
<td>EL-SA13 To provide employment opportunities in locations that are accessible for local people and commuters</td>
<td></td>
<td></td>
<td></td>
<td>Sovereign Harbour not particularly accessible for local people and commuters. However, this may lessen over time as public transport provision is provided</td>
</tr>
<tr>
<td>EL-SA14 To reduce resource use from commercial &amp; industrial premises</td>
<td></td>
<td></td>
<td></td>
<td>Impact unknown</td>
</tr>
<tr>
<td>EL-SA15 To reduce the impact of noise from commercial premises on residential areas</td>
<td></td>
<td></td>
<td></td>
<td>It is close to existing residential areas, and therefore there may be some noise impact in the short term during construction. In the longer term impact will be less as B1 use is compatible with residential areas.</td>
</tr>
</tbody>
</table>

### Likelihood / Certainty:

Medium: Part of the land identified at Sovereign Harbour is in the ownership of Eastbourne Borough Council and East Sussex County Council and development of part of the site is already underway, and therefore it could be considered that there is a high level of certainty that the sustainability objectives can be achieved. However, it should be recognised that there may be short-term viability issues with the development, although it is considered that it will be viable over the plan period. As such, it is considered that there is an overall medium level of certainty.

### Scale:

Local

### Permanence:

Permanent

### Cumulative / Indirect Effects:

Policy EL3 aims to provide 20,000sqm of B1 space at Sovereign Harbour, which is a corporate priority for the Council. This will provide choice for businesses who want to locate in Eastbourne but prefer non-town centre locations.

A concentration of businesses at Sovereign Harbour should make public transport, particularly bus services, more viable and therefore over time the number of people travelling to work by car could decrease. This may lead to easing of congestion and associated impacts on the surrounding area.

### Monitoring:
Policy EL4 will be monitored through a number of different indicators that are specific to development on industrial estates. The types of indicators that will be monitored to assess the beneficial sustainability effects relevant to this policy include:

- Economic activity and output
- Amount of new development that is masterplanned
- Effect on Priority habitats
- Air emissions and pollution
- Water quality
- Number of people employed by sector and occupation
- Number of new and small businesses
- Method of journey to work
- Bus journeys per year
- Traffic growth

Mitigation and Recommendations:

Water quality and flood risk can be mitigated through incorporating Sustainable Urban Drainage Systems (SUDS) into development and through the provision of flood storage compensation elsewhere in the town via Borough Plan Policy US4: Flood Protection and Surface Water Disposal.

Air pollution and emissions, plus reducing the use of non-renewable forms of energy, will be addressed through the requirement to meet BREEAM ‘very good’ standard, which requires new employment development to meet certain standards in relation to issues such as management, energy use, water use, material, waste, ecology and pollution. In addition, policy requirements for development to make provision for waste and recycling facilities will help reduce the impact of waste generation. In addition, biodiversity assessments will help mitigate adverse impacts on biodiversity.

Issues relating to road congestion and the road network can be addressed through the use of travel plans, as well as proposals for a ‘bus gate’ at Sovereign Harbour.