SEAFRONT LOCAL PLAN

Initial Sustainability Appraisal Report

Non-Technical Summary

Introduction

This Initial Sustainability Appraisal (SA) report presents the sustainability implications of the Seafront Local Plan Issues and Options Report. The SA/SEA aims to ensure that sustainability considerations (the environment, social and economic effects) are taken into account during the preparation of the Seafront Local Plan.

The Initial Sustainability Appraisal Report has been published for consultation alongside the Seafront Local Plan Issues and Options Report for a 12 week period between 17 July and 9 October 2015.

What difference has the process made?

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

The process has enabled the consideration of sustainability impacts of the options for the Seafront Local Plan. It has assisted in identifying the favoured options and the potential impacts of those options. It has also identified what mitigation may be required if certain options are taken forward.

How to Comment

The Seafront Local Plan Issues and Options Report and its Sustainability Appraisal Report are available from the Council’s website at www.eastbourne.gov.uk/seafrontlp. 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:

Regeneration and Planning Policy
Eastbourne Borough Council
1 Grove Road
Eastbourne
BN21 4TW

Following consultation, any comments or feedback will be used to inform the next stage in the production of the Seafront Local Plan.
Background and Methodology

The Seafront is a significant asset for Eastbourne, and therefore a Seafront Local Plan is being prepared to maximise its contribution to the tourism economy and to identify and manage the major pressures for change and development along the Eastbourne seafront. The Seafront Local Plan will develop a strategy for the seafront area of Eastbourne which will include proposals to preserve and enhance the conservation areas. It will guide the provision and protection of tourist accommodation, whilst recognising the importance of the seafront area to the local economy and the enjoyment of local residents and visitors. In particular the Seafront Local Plan will aim to stimulate economic regeneration and provide a seafront that can be a major asset for the town.

An SA/SEA of the Seafront Local Plan Issues and Options Report has been undertaken in accordance with the following legislation:

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


This Initial SA/SEA Report follows a ‘scoping stage’, which involved a review of key planning policy and available information to identify the key social, economic and environmental issues relating to the seafront. Taking these issues into consideration, a number of sustainability objectives were identified which could be used to appraise the emerging Seafront Local Plan, and the proposed scope of the SA/SEA was defined. The results of SA/SEA scoping stage was documented in the ‘Scoping Report’ issued on 10 April 2015 for consultation with statutory consultees. Comments were received from Natural England and Historic England. As a result some minor amendments were made to the sustainability framework.

The Initial SA/SEA Report documents the SA/SEA process to date and reports on the identified sustainability effects. The consultation process is outlined within the Report and a summary of the consultation responses received to date is also provided.

Comments received on the Seafront Local Plan Issues and Options Report and the Initial SA report will be considered prior to the publication of a draft Seafront Local Plan. Following this, the Seafront Local Plan will be subject to a representation period before being submitted for independent examination by a Planning Inspector. Following adoption of the Seafront Local Plan, a Post-Adoption SEA Statement will be prepared to summarise the process, how the SA/SEA has influenced preparation of the Seafront Local Plan and the results of consultation on the SA/SEA reports.
Context and Sustainability Issues

The key sustainability issues that need to be considered in the Seafront Local Plan and its Sustainability Appraisal have been identified through the PPPSI review and the analysis of the baseline data.

Economic Issues

- Eastbourne has around 4.8 million visitors per year, with 4.1 million day trippers and approximately 700,000 overnight visitors. As one of the main tourism focus for the town, and with 92% of first time visitors to Eastbourne visiting the beach, it is important that the Seafront Local Plan makes improvements to the seafront that will appeal to visitors and therefore increase the number of people visiting the town. This is particularly important in the 'shoulder months', and the low season more generally.

- Tourism is worth £355 million to the town and is a key driver for the local economy. This income includes over £160 million direct expenditure by overnight visitors, and around £110 million direct expenditure from day trippers. It is important to the local economy that visitors continue to spend their money in Eastbourne, and that the total expenditure continues increases over time. As overnight visitors individually spend significantly more on their trips, the Seafront Local Plan should particularly ensure that the seafront continues to encourage tourism and increases visitor spend.

- Eastbourne has around 3,351 visitor accommodation rooms in hotels, bed & breakfasts, guest houses and self-catering accommodation. The majority of the accommodation is within independent establishments. It is important that Eastbourne maintains an appropriate amount of tourist accommodation in order to cater for the number of visitors to the town. The Seafront Local Plan should help to encourage improvements in the quality of tourist accommodation in order to increase the number of people staying overnight.

- Tourism supports 19% of the total number of jobs in Eastbourne, and 10.4% of people are employed within ‘Accommodation and food’ related industries. Therefore it is important that the Seafront Local Plan continues to support the tourism sector in Eastbourne in order to provide sufficient number of visitors to support the number of jobs that are directly and indirectly funded through visitor’s expenditure.

- A significant number of tourist facilities are located within the seafront area. It is important that the Seafront Local Plan should ensure that a sufficient level and quality of tourist attraction is provided that will attract people to the seafront and to Eastbourne in general.

Social Issues

- The seafront has a massive social significance to local people, and many people are rightly proud of it. It holds a number of leisure and community facilities and amenities that are well used by local people. The Seafront Local Plan should improve the seafront for local people, particularly by addressing the issues that people dislike about the seafront, and improving on what they do like about the seafront. It should attempt to increase activity in areas that are currently underused. The Seafront Local Plan should ensure that facilities for the local community are provided and improved upon.
• Accessibility to and around the seafront can be challenging, particularly for disabled or elderly people. It is important that there is access for all to the seafront, and access should be improved through the Seafront Local Plan.

• A significant amount of people travel to the seafront by car. The Seafront Local Plan should look into reasonable opportunities to reduce reliance on private cars, and should encourage travel to the seafront via walking, cycling and public transport. It should also encourage appropriate amounts of car and cycle parking at new development.

• The seafront is used by a large number of local people for physical activity and recreation. It is important that adequate facilities are provided in order to encourage additional physical activity and recreation to help improve the health of the population.

• The appearance of the seafront is one of its main attractions. Therefore future development should provide high standards of design. The Seafront Local Plan should also support environmentally sustainable development which both limits short term impacts during construction and limits longer term impacts on a range of environmental receptors.

Environmental Issues

• A significant amount of Eastbourne, including the seafront area to the east of the Pier, is in zones of flood risk. The Seafront Local Plan should also ensure that new development is not located in areas of unacceptable flood risk, and that new development does not have an adverse effect on waterbodies or increase the risk of flooding elsewhere. It should also take account of surface water run-off into the sea.

• There may be opportunities to improve energy efficiency and renewable energy within the seafront area for the benefit of the local community. The Seafront Local Plan should take forward all reasonable opportunities to encourage development that is energy efficient, and aim to provide energy generation through renewable sources where appropriate.

• Eastbourne has approximately 5.8km of coastline, with a total volume of 2.12 million m³ of shingle on the beaches as sea defence. The Seafront Local Plan should take into account the potential impact of flooding from the sea and ensure that sea defences are not compromised in any way. It should not allow development that would prevent maintenance and improvements to the seawall, groynes or beach recharges.

• There are a number of identified biodiversity habitats and networks in Eastbourne, including in the seafront area. The Seafront 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 development properly assesses the impact of development on biodiversity, and consider whether the sites present opportunities for mitigation and enhancement.

• The landscape around the seafront is a defining feature and something that makes the seafront so special. It is important that the landscape and the seascape are protected from inappropriate development and that locations for development should have sufficient capacity in landscape terms for such development. The Seafront Local Plan should ensure that the large scale seascape and view are maintained and not impacted by development.

• The seafront has a number of Eastbourne’s most important heritage assets, such as the Martello Towers and the Redoubt, as well as a significant amount of the seafront being within Conservation Areas. The Seafront Local Plan should consider the impact on
cultural heritage assets when identifying sites for development. Archaeological assets, both potential and realised should be provided with full consideration through the Seafront Local Plan.

**Sustainability Objectives**

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

**Table A - Sustainability Objectives**

<table>
<thead>
<tr>
<th>Ref</th>
<th>Sustainability Objective</th>
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</thead>
<tbody>
<tr>
<td>SLP-SA1</td>
<td>To increase the length of the tourist season</td>
</tr>
<tr>
<td>SLP-SA2</td>
<td>To increase the number of visitors to the town, especially overnight stays</td>
</tr>
<tr>
<td>SLP-SA3</td>
<td>To increase the amount spent by visitors in the local economy</td>
</tr>
<tr>
<td>SLP-SA4</td>
<td>To ensure that Eastbourne continues to maintain an appropriate amount of visitor accommodation in locations where visitors would expect to find it</td>
</tr>
<tr>
<td>SLP-SA5</td>
<td>To enable increase in the quality of visitor accommodation by facilitating an increase in occupancy and room rates</td>
</tr>
<tr>
<td>SLP-SA6</td>
<td>To ensure that the tourism sector continues to provide jobs for local people</td>
</tr>
<tr>
<td>SLP-SA7</td>
<td>To increase the relevance of the seafront to local people</td>
</tr>
<tr>
<td>SLP-SA8</td>
<td>To ensure that the seafront is accessible for all.</td>
</tr>
<tr>
<td>SLP-SA9</td>
<td>To increase the number of people travelling to the seafront by non-car modes</td>
</tr>
<tr>
<td>SLP-SA10</td>
<td>To maintain the character of the seafront</td>
</tr>
<tr>
<td>SLP-SA11</td>
<td>To ensure that the coastal defences are not compromised, and that access for maintenance purposes is not prevented</td>
</tr>
<tr>
<td>SLP-SA12</td>
<td>To maintain and enhance the quality of the seascape</td>
</tr>
<tr>
<td>SLP-SA13</td>
<td>To ensure the continued protection of the seafront’s heritage assets</td>
</tr>
</tbody>
</table>

**Assessing the Plan Objectives**

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

**Table B - Plan Objectives**

<table>
<thead>
<tr>
<th>Ref</th>
<th>Plan Objective</th>
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<tbody>
<tr>
<td>SLP1</td>
<td>Conserve the unique natural and built environment that makes the Seafront so special</td>
</tr>
<tr>
<td>SLP2</td>
<td>Provide an appropriate amount of quality tourist accommodation that can meet the needs of tourists visiting the town</td>
</tr>
<tr>
<td>Ref</td>
<td>Plan Objective</td>
</tr>
<tr>
<td>-----</td>
<td>----------------</td>
</tr>
<tr>
<td>SLP3</td>
<td>Ensure that the seafront continues to protect the town against flooding and that protection measures are not compromised by future changes</td>
</tr>
<tr>
<td>SLP4</td>
<td>Provide a range of tourist facilities that continue to attract tourists and complement the special events that take place in the town</td>
</tr>
<tr>
<td>SLP5</td>
<td>Enhance the quality and appearance of the public realm to make the seafront even more attractive to residents and visitors</td>
</tr>
<tr>
<td>SLP6</td>
<td>Encourage sustainable travel to and from the seafront and to reduce the reliance and the negative effects the private car has on the seafront environment</td>
</tr>
<tr>
<td>SLP7</td>
<td>Provide an extensive range of community and leisure facilities that can be used by tourists and residents alike at any time of year</td>
</tr>
<tr>
<td>SLP8</td>
<td>Enhance the quality of the offer in terms of facilities and activities for children within the seafront area</td>
</tr>
</tbody>
</table>

The assessment of the Plan Objectives against the Sustainability Objectives shows that they would generally have positive effects, especially in relation to 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 Seafront Local Plan.

**Assessing the Options**

The options for the Seafront Local Plan are provided in two separate sections. The Seafront Local Plan divides the seafront into seven character areas where there are similarities in terms of landscape, land use and activities. The first section provides the options for each individual character area in terms of the amount of change that could take place. The second section identifies a series of policy themes, which apply across the whole seafront area.

**Character Areas**

For each character area, three options are identified: minimal change, medium change and significant change. These three options were assessed against the Sustainability Objectives to determine the sustainability effects of each option.

In Character Area 1: Holywell to Western Lawns, that minimal change could have an overall small positive impact, medium change could have an overall neutral impact, whilst significant change would have some positive impacts but more significant negative impacts.

In Character Area 2: Wish Tower and Devonshire Park minimal change and medium change could have an overall small positive impact, whilst significant change would have some negative impacts but more significant positive impacts.

In Character Area 3: Wish Tower to the Pier all three options could have an overall positive impact, but the higher amounts of change have more negative impacts associated with them.
In Character Area 4: The Pier to the Redoubt, that minimal change would have a similar benefit to medium change, although medium change would have more negative impacts, whilst significant change would have more positive and more negative impacts.

In Character Area 5: the Redoubt to the Sovereign Centre, most benefit can come from significant change in this area. Whilst minimal change has only 1 negative, it will not deliver positives, whilst medium change does deliver some positives.

In Character Area 6: Sovereign Park to Langney Point, minimal change would have some positive benefit and no negative benefits, medium change would have some positive and some negative, and significant change would have more positive but also more negative.

In Character Area 7: Sovereign Harbour, all three options could have some positive impacts, but the higher amounts of change have more negative impacts associated with them. The impacts here are less likely to involve tourism because the area is mainly used by local people and not visitors.

**Policy Themes**

The SA of the options for the retention of tourist accommodation indicates that two of the four options would be more sustainable than the two. **Option 1 – Continue existing policy** position has few positive effects but some negative effects, whilst **Option 2 – Remove Tourist Accommodation Area designation** would have more positive impacts, but significantly more negative impacts. **Option 3 – Reduce Tourist Accommodation Area designation and Option 4 – Designate Primary and Secondary Tourist Accommodation Areas** would have an overall positive impact.

In terms of new tourist accommodation, both options have similar overall positive impacts, although both positive and negative impacts are stronger for **Option 1 – Allocate sites for new tourist accommodation**, compared to **Option 2 – Criteria-based policies for new tourist accommodation**.

The SA for the options for new sports and recreation facilities showed that **Option 1 – No new sport/recreation facilities** had an overall negative effect, whilst **Option 2 – Create a single sport/recreation hub for all sports/recreation and Option 3 – Create ‘hubs’ for different types of sport/recreation** had an overall positive effect. **Option 4 – Distribute all sport/recreation facilities along Seafront** had some strong positive effect but also a number of negative impacts.

The SA for children’s play facilities indicated that **Option 1 – No new children’s play facilities** does not have an overall positive impact, whilst **Option 2 – Concentrate additional play areas in single location, Option 3 – Create a number of small play areas and Option 4 – Distribute play equipment along the length of the seafront** all have an overall positive impact although it is recognised that mitigation may be required for Options 3 and 4.

In terms of Linkages with the Town Centre, **Option 1 – Increased signposting / way finding, Option 2 – Investigate pedestrianisation of seafront end of Terminus Road and/ or Wilmington Square, Option 3 – Create landmark at end of Terminus Road and Option 4 – Consistency in public realm between Seafront and Town Centre/ Devonshire Park** all have overall positive impacts.
The SA for Linkages along the Seafront shows that Option 1 – Sculpture Trail / Arts Trail / Nature Trail, Option 2 – Additional ramps / disabled access and Option 3 – Additional lighting all have overall positive impacts, with only Option 2 have any potential negative impact on the character of the seafront.

The SA for the Gateway to the South Downs National Park shows that both Option 1 – Comprehensive redesign of the area at foot of Downs and Option 2 – Create improved access from Holywell end of seafront to Dukes Drive would have an overall positive sustainability benefit.

In terms of food and drink facilities, Option 3 – Provision of new cafés and Option 4 – Provision of new restaurants have the strong positive impacts, although they also have the most negative impacts. Option 1 – No new additional food and drink facilities and Option 2 – Provision of additional kiosks don’t have any particular sustainability benefit. However it is considered that the positive impacts of Options 2 and 3, particularly in terms of jobs and visitor spend, heavily outweigh the relatively minor negative impacts, which could be mitigated.

The SA for evening activity showed that neither Option 1 – Increase evening activities through provision of additional facilities nor Option 2 – Restrict evening activities have any overriding negative impacts, and it is likely that the negative impacts relating to increased evening activity could be mitigated.

The SA for the Working Seafront indicates that neither Option 1 – Concentrate working beaches into single area nor Option 2 – Allow distribution of working beaches has significant negative impacts associated with them.

In terms of renewable energy, Option 3 – Encourage larger scale renewable energy generation has very strong positive impacts, it does also have the most negative impacts. However, these could be mitigated. Option 2 – Encourage small-scale micro-generation is generally positive, whilst Option 1 – Do not allow renewable energy generation on the Seafront has some positives but strong negative impacts.

The SA for Location of Seafront Activities shows that Option 1 – Sectioning the seafront for different activities and Option 2 – Do not section seafront both have overall positive impacts and any negative impacts could be mitigated.

The SA for Beach Huts indicates that neither Option 1 – Restrict additional beach huts nor Option 2 – Allow additional beach huts has any significant negative impacts that cannot be mitigated, but Option 2 has stronger positive impacts.

In terms of water-based activities, Option 2 – Allow additional water based activities has significant positive implications, and the negative effects could be mitigated. Option 1 – Restrict additional water based activities would not bring about as much positive effects.

The SA for the Use of the Beach options shows that the positive impacts of Option 1 – Provide additional facilities to increase use of beaches far outweigh the negative impacts, and that these negative impacts can be mitigated. The slight positives for Option 2 – No new additional facilities to beaches are not significant enough for this option to be favoured.
In terms of options for the Landscape, **Option 1 – Restrict development in areas of highest landscape sensitivity** has strong positive impacts in relation to conserving landscape, but **Option 2 – Adopt a criteria-based policy that ensures conversation of landscape** has a wider range of positive effects. Neither option has any particularly significant negative impacts.

The SA for the options relating to Nature Designations shows that **Option 1 – Review and identify additional areas with nature conservation interest** has strong positive impacts in relation to conserving biodiversity, but **Option 2 – Allow minor changes to existing locally designated sites where replacement habitat is made** has a wider range of potentially positive effects. Neither option has any particularly significant negative impacts.

The SA for the Use of Historic Buildings options show that **Option 1 – Restrict the conversion of historic assets to new uses** has some strong positive impacts, but it also has some negative impacts associated with it. **Option 2 – Allowing conversion of historic buildings on a case-by-case basis** is mainly positive; whilst **Option 3 – Encourage the re-use of historic buildings** by allowing more flexible approach to uses has some strong positive effects but also a strong negative effect.

In terms of the options for contribution to the seafront, **Option 1 – Review and identify individual buildings that make a special contribution to the Seafront and provide policy for their protection** and **Option 2 – Review and identify areas of townscape that make a special contribution to the Seafront and provide policy for their protection** have very similar effects, and it is considered that they would give an overall positive impact. **Option 3 – Do not actively identify and protect any additional buildings or townscapes** would allow more flexibility to enhance the seafront offer, but the character of the seafront, particularly the townscape, is an important part of the seafront’s appeal.

The SA for the design of new facilities indicates that both **Option 1 – Ensure that the design of new developments is consistent with existing buildings** and **Option 2 – Allow new modern design that complements existing facilities** have overall positive benefits and there is little difference between them.

In terms of community facilities, both options have an overall positive impact, and there are no significant negative impacts. **Option 2 – Provide a new multi-use facility to allow community groups to combine** would be favoured over **Option 1 – Maintain separate community facilities** because of the opportunity to re-use the land for tourism related development; however there is little difference in terms of sustainability between the two.

The SA for Open Spaces shows that Both options have an overall positive impact, although the impacts of **Option 1 – Retain and protect existing open spaces** are purely related to environmental factors whilst **Option 2 – Allow loss of open spaces if replacement provision is made** has a broader range of impacts, particularly in terms of economic factors.

The SA for Tourist Attractions shows that **Option 1 – Concentrate mainly on provision of additional indoor tourist attractions**, **Option 2 – Concentrate mainly on provision of additional outdoor tourist attractions** and **Option 3 – Provide a mix of additional indoor and outdoor tourist attractions** all provide similar sustainability benefits and therefore no option is favoured over the others. However, mitigation may be required for Option 1 to ensure that no harm is done to landscape or biodiversity.
In terms of tourist demographics, the SA indicates that neither **Option 1 – Provide facilities mainly aimed at children and families** nor **Option 2 – Provide facilities mainly aimed at adults** has any negative sustainability effects.

The SA for the scale of attractions options shows that both **Option 1 – Develop a smaller number of larger multi-purpose facilities** and **Option 2 – Develop a larger number of smaller single purpose facilities** have an overall positive sustainability benefit, and the negative impacts could be mitigated.

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

The SA/SEA process has helped to inform preparation of the Seafront Local Plan Issues and Options Report. The process has identified that broadly the policies are in line with sustainability objectives.

However, there are some negative effects and these can be mitigated. The sustainability effects of the Seafront Local Plan will be monitored by a number of indicators as part of the Local Monitoring Report.

The next step is for the Seafront Local Plan Issues and Options Report and the Initial SA Report to be published for consultation with stakeholders and local residents. This consultation will commence on 17 July 2015 for a 12 week period until 9 October 2015.

Once the consultation is completed, representations received during the consultation period will be considered and a draft Seafront Local Plan will be prepared. Following consultation on a draft Seafront Local Plan, a Proposed Submission version will be published for representations ahead of submission for Public Examination. Once the Seafront Local Plan is adopted a Post-Adoption SA/SEA Statement will be prepared to summarise the SA/SEA process and the results of consultation.