

Sustainability Appraisal **Post Adoption Statement**

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1 Introduction

- 1.1 This document provides the [Post Adoption Statement of the Sustainability Appraisal](#) of Eastbourne Borough Council's [Employment Land Local Plan \(ELLP\)](#). The ELLP, adopted on 16 November 2016 replaces Policy D2: Economy from the Core Strategy (Local Plan), adopted February 2013, and provides the detailed planning guidance for development of employment land for the period up to 2027.
- 1.2 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.
- 1.3 When conducting an SA of DPDs an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12 (The SEA Regulations).
- 1.4 Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the '[National Planning Policy Framework \(NPPF\) 2012](#)' and '[National Planning Practice Guidance \(NPPG\)](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

2 The Post Adoption Statement

- 2.1 This Post Adoption Statement has been prepared in accordance with the paragraph 16 (3) and (4) of the SEA Regulations, which require a statement to be produced on adoption of a plan or programme. The Statement should include:
- How sustainability considerations have been integrated into the plan or programme
 - How the Sustainability Report (SA report) has been taken into account
 - Details of the consultation undertaken and how opinions expressed in response to the public consultation have been taken into account
 - The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with
 - The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

3.0 Background to the ELLP

- 3.1 Eastbourne Borough Council Employment Land Local Plan has been prepared to guide job growth and economic development in Eastbourne up to 2027 as well as identifying an appropriate supply of land for future employment development. The Employment Land Local Plan forms 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.

4.0 The Sustainability Appraisal (SA) Process

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

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

5 Integration of Sustainability within the Plan

Scoping Report, 2013

- 5.1 An initial Scoping Report was prepared for the Core Strategy, which was published in 2005 for consultation and set out the proposed methodology for the SA. The Core Strategy SA framework was used to inform the Scoping Report for the SA of the ELLP, issued in October 2013, as recommended by guidance. The SA framework includes the sustainability objectives and indicators, which have been used to test the ELLP at each stage in the plan's preparation. The Scoping report also set out the baseline information and sustainability issues affecting employment land within the Borough and reviewed the policies, programmes, strategies and initiatives, which could influence the preparation of the Plan. The full report can be accessed on the Council's website at <http://www.eastbourne.gov.uk/ellp>
- 5.2 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.
- 5.3 The Scoping Report was issued to the statutory consultees, neighbouring local authorities and other key stakeholders for a period of five weeks to ensure that the proposed scope of work was appropriate, including:
- The Environment Agency
 - Natural England
 - English Heritage.

Initial SA Report, 2013

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

Proposed Submission SA Report, 2014

- 5.5 The Proposed Submission SA Report dated November 2014 was published for representations alongside the Proposed Submission Employment Land Local Plan December 2014. The 8 week representation period commenced on Friday 12 December 2014 and finished on Friday 6 February 2015. Responses were received from 12 consultees in relation to the ELLP including statutory consultees; the Environment Agency and Natural England. Only one response was received with specific reference to the SA from Teal Planning on behalf of Sovereign Harbour Ltd.

Revised Submission SA Report, 2015

- 5.6 The Revised Sustainability Appraisal of the Revised Proposed Submission Employment Land Local Plan (RELLP) or **Stages B and C** of the SA process was published in November 2015. The report assessed the options and policies considered in the development of the ELLP. The document provided a revised appraisal of the ELLP in order to address concerns raised through the consultation process regarding the selection of options and policies that were presented in the Proposed Submission ELLP and SA Report, November 2014.

Addendum to Submission SA Report, 2016

- 5.7 Following the Examination in Public of the ELLP, which was held between May and June 2016, the Council decided to make the following major modifications to the Preferred Option:
- A reduction in the allocation at Sovereign Harbour from **25,000 sqm Gross External Area (GEA)** (20,000 sqm Net Internal Area (NIA)) to **23,125 sqm GEA** (18,500 sqm NIA) in order to accommodate a new community centre on **Site 7a**
 - The provision of **1,875 sqm GEA** (1,500 sqm NIA) of office space within the existing **industrial estates** to replace the lost provision on Sovereign Harbour Site 7a
 - To retain the office allocation of **3,750 sqm GEA** (3,000 sqm NIA), provided solely on **Development Opportunity Site 2** with no mandatory requirement for office space on Development Opportunity Site 3.

The policy wording of all the proposed policies in the ELLP was modified and the policies were therefore subject to further appraisal to ensure that any likely significant impacts as a result of the changes were identified. Several minor modifications were also made to the ELLP as a result of the EiP but such modifications did not need further appraisal as any impacts were not likely to be significant. Amendments were also made to address issues raised in the representations that were received on the RSA 2015.

6 How the SA Report has been taken into account

- 6.1 A Sustainability Appraisal has been undertaken and an SA Report has been published at each key stage of the plan making process, in order to ensure that sustainability issues have been considered in the development of the plan. The following documents have been produced:
- Scoping Report, October 2013
 - Initial SA Report, November 2013
 - Proposed Submission SA Report, December 2014
 - Revised Submission SA Report, November 2015
 - Addendum to Submission SA Report, July 2016
- 6.2 The ELLP has been assessed against the SA framework to establish the likely significant effects, both positive and negative, of the options and policies. The SA framework sets out the Sustainability Objectives, Indicators and Targets, which are used to assess the likely impacts of the plan. The SA framework is based on the framework developed to assess the Core Strategy with the addition of objectives and indicators of relevance to the ELLP. The SA framework has been developed in consultation with the statutory consultees and other key local stakeholders.
- 6.3 The SA Framework for the Employment Land Local Plan was developed during [Stage A](#) of the SA process and was set out in the SA Scoping Report 2005 and 2013 and revised further in the RSA November 2015 to include an additional objective and indicators on infrastructure. The SA Framework consists of a series of sustainability objectives and sub-objectives supported by indicators, which form the assessment criteria.
- 6.4 The SA reports have set out the likely significant effects of the ELLP, including alternatives, and evaluated the likely effects of the plan. The assessments have been carried out in the form of a matrix and include the identification of potential mitigation measures. The assessment has included the prediction and evaluation of the likely significant effects including:
- short, medium and long term effects
 - temporary and permanent, direct and indirect effects
 - cumulative or synergistic effects
 - consideration of mitigation measures
 - proposals to monitor the effects of the plan
- 6.5 The results of the SA assessments and the consultation responses have been used to inform the development of the Plan at each stage. The ELLP seeks to guide job growth and economic development in Eastbourne up to 2027 by identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a place where people want to live and work. The Employment Land Local Plan aims to provide the right space in the right locations for inward investment but also provide the range of sites and premises required to ensure existing businesses are retained and can grow.
- 6.6 The Employment Land Local Plan vision and objectives seek to ensure that the requirement for employment land in Eastbourne over the plan period is delivered in sustainable locations. A number of different strategic options for the distribution of employment land within the town have been considered as part of the production of the Employment Land Local Plan.
- 6.7 The Plan has sought to allocate employment land in the most sustainable and effective way, through intensifying development in existing employment locations and directing development toward the Sustainable Centres at the Town Centre and Sovereign Harbour that have been identified in the Eastbourne Core Strategy Local Plan 2006-2027. This approach will allow all sites within the Borough to ‘work together’ to meet future requirements, providing a functioning supply of sites that are deliverable and provide sufficient choice to support indigenous businesses and inward investment.
- 6.8 All the development must also comply with the NPPF, the Core Strategy and Supplementary Planning Documents including the Town Centre Local Plan, Sovereign Harbour and Sustainable Building Design.

- 6.9 The RSA tested the plan objectives against the sustainability objectives to check their compatibility. The assessment showed that the ELLP objectives were largely compatible. Two areas of potential incompatibility were identified with regards to ELLP Objective 1 - Stimulate Economic Growth in relation to CS19 Climate Change and CS21 Waste.
- 6.10 The building of new homes and businesses is likely to have a negative impact on climate change and waste owing to the increase in CO₂ emissions and waste that will be produced. However, mitigation of potential negative impacts should be considered through the design and approach to development, which will be managed by development management policies, in the application of the planning policies.
- 6.11 Where uncertain relationships were found, the likely impact could be positive or negative depending on implementation. These impacts were shown to highlight any potential incompatibilities and for suitable mitigation measures to be identified during the SA process.

Cumulative Impacts of Policies

Positive impacts

- 6.12 21 Policies resulted in a likely positive cumulative impact, particularly the objectives concerning economic issues. The ELLP policies support job growth and economic prosperity in Eastbourne in order to make Eastbourne a place where people want to both live and work. The policies support the diversification of the market as well as the provision of education and training opportunities through Local Labour Agreements. The ELLP seeks to create a more balanced market, with a better mix of spaces within sustainable centres, which provide opportunities for businesses to grow or relocate, in order to address current demand and existing constraints.

Negative Impacts

- 6.13 5 Policies resulted in a likely negative cumulative impact, which mainly concerned environmental issues, including air quality, natural resources and climate change. The impacts are likely to occur both in construction and operation of the development, although the impacts during construction are likely to be of a short-term and temporary nature. Suitable mitigation measures will need to be identified through the development management process to mitigate any likely impacts and ensure that sustainable design and management measures are incorporated.

Uncertain Impacts

- 6.14 9 Policies resulted in an uncertain cumulative impact, again with regard to environmental issues. The uncertainty is largely because of different impacts in different areas of development as well as the possibility of impacts changing over time. For example, with regard to transport, whilst the impact is likely to be negative in the short term as a result of dependence on car travel, this impact could change in the long-term as public transport becomes a more viable option. Suitable mitigation measures will need to be identified to minimise any likely negative impacts. Any changes in the impacts will be reviewed as a part of the monitoring and changes to policies and baseline information will be made where necessary.

No significant impact

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

Proposed Mitigation Measures

- 6.16 The results of the SA of the Main Modifications showed that the ELLP performs well, with the majority of the impacts regarded as positive. Some uncertain and minor negative impacts were identified with regard to environmental issues, particularly in the short term as a result of construction. Suitable mitigation measures will need to be identified through the development management process. The proposed mitigation measures are set out below:

Accessibility and Transport

- 6.17 Creating better public transport connectivity within and beyond Eastbourne is a key factor in encouraging sustainable travel, especially for people travelling into Eastbourne from surrounding areas. It is recognised that in the short term development could have a minor negative impact upon the road network by increasing congestion in areas that are already congested and result in a loss of on-site car parking in the industrial estates. However, the increase in development in the industrial estates and at Sovereign Harbour should make public transport more viable in the longer term, reducing this impact. All development will also need to comply with Core Strategy [Policy D8: Sustainable Travel](#).
- 6.18 Transport Assessments will be needed to establish the likely impacts and key areas of concern in order to identify suitable mitigation measures. Travel Plans will also be required for development that is expected to create a significant number of additional trips in line with East Sussex County Council's 'Guidance on Travel Plans for New Developments' and Core Strategy Policy D8: Sustainable Travel.
- 6.19 At Sovereign Harbour, development will be required to provide additional car parking spaces in accordance with adopted parking standards, along with a holistic approach to transport planning. Transport modelling has been undertaken to assess the impacts of future development at Sovereign Harbour on the highway network. The analysis indicated that the impact of development at Sovereign Harbour on the highway network is slight when compared to the impact of all development proposals in the Core Strategy. There is no clear indication that further mitigation will be needed, specifically to accommodate the marginal impacts of the Sovereign Harbour developments. However, all development in Eastbourne including development at Sovereign Harbour, must contribute to the delivery of the whole transport interventions package.

Open Space and Biodiversity

- 6.20 All of the employment land that has been allocated is brownfield land, in order to minimise the impact of development upon open space and biodiversity, in particular Eastbourne Park, an area of biodiversity and landscape significance. In addition, development will need to comply with Core Strategy [Policy D9: Natural Environment](#), which requires development proposals to improve the quality and quantity of green spaces and address local deficiencies in accessible green space, where appropriate.
- 6.21 Furthermore, all developments over 500m² will be required to produce a Biodiversity Survey to ensure development does not impact on species of importance. The Survey must also include proposals to show how any impacts will be addressed by enhancement and mitigation measures.
- 6.22 There is an identified lack of usable open green space in the Sovereign Harbour neighbourhood. However, it is recognised that the beach frontage provides a significant area of accessible open space. [Policy C14 Sovereign Harbour Neighbourhood Policy](#) states that the amount of appropriately landscaped, usable open space should be increased through the development of the remaining sites. In addition, there is an opportunity to upgrade the shingle bank off Harbour Quay to form a more usable open space.

Climate Change and Natural Resources

- 6.23 The Eastbourne Landscape Character Assessment (2007) indicates that Eastbourne is likely to be disproportionately affected by climate change resulting in rises in river levels, frequent summer droughts and winter flooding, changes in habitats and species composition, habitat fragmentation and changes in soils, agricultural land use, recreation and tourism and cultural heritage. It is therefore imperative for schemes to consider the potential effects of climate change and other environmental damage from the outset.
- 6.24 The Core Strategy sets out a requirement for all non-residential development over 1000m² to meet the BREEAM 'Very Good' standard. BREEAM standards include measures for water efficiency, reducing waste, enhancing a site's ecology and reductions in CO₂ emissions.

- 6.25 The scale of development is likely to result in an increase in greenhouse gas emissions and non-renewable sources of energy. All development, however, will need to comply with the Core Strategy's [Policy D1: Sustainable Development](#), which should ensure that suitable mitigation is identified and applied. The scale of development at Sovereign Harbour should allow more scope for renewable forms of energy such as district networks to be applied.
- 6.26 The Eastbourne Environment Strategy 2010-2013 places considerable emphasis on reducing CO₂ emissions across the town and proposes a reduction in carbon emissions from household energy and businesses by 40% by 2020. The Council's Renewable Energy Potential Study also identifies the need for all new buildings in the town to reduce CO₂ emissions and advises that this can be achieved by incorporating renewable energy technologies into new and existing buildings. These technologies range from small scale such as solar technologies, to larger-scale renewable forms of energy. The Council's Energy Opportunities Plan identifies all potential opportunities for renewable energy technologies across the town.

Waste Management

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

Water Resources, Water Quality and Flood plain

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

Air Quality

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

7 Consultation Responses

- 7.1 A wide range of consultation measures informed the development of the ELLP, from the initial inception of the development of options to the specific policies. Consultation was undertaken on the following documents:
- Scoping Report for the Core Strategy, 2005
 - Scoping Report of ELLP, October 2013
 - Consultation Draft of the ELLP, November 2013
 - Initial Sustainability Appraisal, November 2013
 - Proposed Submission ELLP, November 2014
 - Proposed Submission SA Report, November 2014
 - Revised Proposed Submission SA Report, November 2015
 - Modifications to Submission ELLP, July 2016
 - Addendum to Submission SA Report, July 2016
- 7.2 Formal consultation was undertaken by EBC in line with regulatory and best practice guidance in relation to the plan making and associated Sustainability Appraisal process. The consultees included the Statutory Consultees: Natural England; The Environment Agency; and English Heritage, as well as key local stakeholders. Full details of the consultation measures undertaken, and responses received, are set out within the [Statement of Consultation and Representations, November 2014](#).
- 7.3 The representations made in relation to the [Scoping Report, 2013](#) can be found at [Appendix 2](#) of the Scoping Report. The responses to the [Proposed Submission SA](#) are summarised in [Section 3](#) of the RSA and provided in full at [Appendix A9](#). The responses to the RSA can be found at [Appendix 5](#) of the [Addendum SA report](#) and are summarised below. The SA reports took all the representations into account in the assessment, to make sure that the issues raised were properly addressed.

Summary of Representations

Scoping Report, 2013

- 7.4 Responses to the consultation were received from four of the consultees including; the statutory consultees shown above, Sovereign Harbour Ltd and Aldi stores Ltd. Key comments related to:
- The need for greater consideration of the impact on environmental factors and whether the sites provide opportunities for mitigation and enhancement
 - Minor changes to the objectives and indicators
 - Sustainable transport opportunities and accessibility of employment locations
 - The need to reference the Sovereign Harbour SPD, February 2013
 - The need to consider employment space densities, development viability and deliverability
 - The need to consider longevity of economic growth
 - Objection to the consultation being published before all of the evidence was available.

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

Initial SA Report, 2013

7.5 The responses raised the following key issues:

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

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

Proposed Submission SA, 2014

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

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

Further details are set out in [Section 3](#) of the [RSA report](#) and the full response can be found in [Appendix A9](#).

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

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

- 7.9 The review also recommended that the numerical scoring of the assessment be removed. Guidance on SA recommends the quantitative or qualitative prediction of effects. However, the guidance recognises that quantitative predictions are not always practicable and that broad brushed qualitative predictions expressed as very positive (++) to very negative (--) can be more effective. The introduction of numerical scoring into the matrix adds further confusion to the assessment given the number and range of different effects and varying levels of information available, which can be misleading.
- 7.10 It was therefore recommended that the SA be revisited to take into consideration the representations received in order to ensure a robust process. The numerical scoring system was removed as recommended and instead the assessment provides a commentary, which links to supporting evidence. The assessment of options and policies was also reviewed and a further assessment carried out, as set out in [Section 8](#) of the report and the [Appendices](#).

Revised Proposed Submission SA, 2015

- 7.11 Representations were received from Teal Planning on behalf of Sovereign Harbour Ltd. The representations raised the following concerns with regards to the RSA:
- Accuracy of the Council's evidence documents
 - That the Town Centre sites Development Opportunity Sites 2 and 3 could provide a greater quantum of office space than 3,000 sqm NIA
 - The quantum of development proposed at Sovereign Harbour was too high
 - Transport impacts and proposed mitigation
 - The suitability of the Options selected
 - Inaccuracy in the description of Option 3b as SHL's proposal
 - The accuracy of the RSA Results - a reassessment of the Options was provided by Teal Planning.
- 7.12 The full representations can be found in **Submission Document SD15**. [Appendix A5](#) of the [Addendum SA](#) sets out a summary of the representations and responses and proposed action to the comments made.

8 Reasons for Choosing the Adopted ELLP

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

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

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

Initial SA Report, 2013

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

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

1: Intensification of Existing Industrial Estates

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

2: Extensions to Industrial Estates

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

3: Redevelopment of sites outside Industrial Estates

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

4: Town Centre

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

5: Sovereign Harbour

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

6: Greenfield Development

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

- 8.3 As a result of consultation on the options, Sovereign Harbour Ltd (SHL) made a representation, which stated that the provision of 3,000sqm NIA of office space in the Town Centre was not objectively assessed and that the Town Centre had capacity for an increased amount of office space. As a consequence, an increased provision of office space in the Town Centre was an option that should be tested through the Sustainability Appraisal process. SHL also undertook a re-appraisal of the some of the options within their representation, including the additional option of increased office provision in the Town Centre.
- 8.4 Representations received also suggested that the intensification of existing industrial estates is likely to cause problems due to increased traffic in heavily used areas, loss of car parking and the loss of open spaces. Also, Sovereign Harbour is within tidal flood zone 3a, which means that it has a theoretical risk of flooding, although tidal defences protect the area.

Proposed Submission SA, 2014

- 8.5 Following the consultation on the Initial SA and ELLP it was decided to include an additional option: [4A – Town Centre \(Increased Provision of Office Space\)](#) to be tested alongside the other 6 Strategic Options already identified. The issues identified above as a result of the consultation on the Initial SA were also taken into account in the appraisal of the options. The points raised within SHL's separate appraisal were also considered in the re-appraisal of the options in the SA Report, although not all points raised were accepted.
- 8.6 In response to the consultation, SHL made a further representation criticising the approach to the assessment of options and justification for the decisions made. In particular SHL considered that the most sustainable, deliverable option had not been selected. The full response can be found in [Appendix A9](#).

Revised Proposed Submission SA, 2015

- 8.7 The review of the sustainability appraisals and supporting documents found there were some defects in the SA process, which needed to be corrected if the evidence base for the ELLP was to be considered suitably robust when subjected to Examination in Public (EiP).
- 8.8 In particular, the review found the assessment of options should be revisited in respect of the representations received, with specific reference to the quantum of office space that should be provided in the Town Centre and at Sovereign Harbour. It was also recognised that the results of the assessment could be strengthened, by providing greater links to the supporting evidence. The revised SA would also enable greater clarity to be provided on the reasons for the selection and rejection of alternatives.

Revision of Options

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

- 2: Extensions to Industrial Estates
- 3: Redevelopment of sites outside Industrial Estates
- 6: Greenfield Development

8.10 Following discussion with the Council it was decided that given the previous results of the SAs and taking into consideration the conflict with Core Strategy policy the inclusion of Options 3 and 6 could not be supported. However, it was decided that Option 2 should be retained in order to address developer interest in land adjacent to industrial estates and to verify the sustainability impacts of such proposals.

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

8.12 The revised options selected were therefore as follows:

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

Selection and Rejection of ELLP Options

Option 1

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

This option was therefore rejected.

Option 2a and 2b

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

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

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

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

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

Option 3a, 3b and 3c

- 8.17 Again none of the options can meet the employment land requirements on their own, so the best option will need to be combined with the best performing of **Option 2**. In addition, it was considered that options should include a different quantum of office space in both the town centre and at Sovereign Harbour in order to address the concerns raised in SHL's representations.

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

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

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

8.21 **Option 3c** provides a better balance of uses within the Borough offering greater choice and flexibility to the market. The increase in the provision of town centre floorspace reduces the viability of this option, retaining an over reliance on town centre stock and smaller floorplates, which conflicts with demand.

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

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

Preferred Option (RSA 2015)

8.24 The Preferred Option was a result of the best performing options that were assessed, which included:

Option 2A Intensification of Industrial Estates

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

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

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

The full results can be found in [Appendix A5](#) of the RSA 2015.

Addendum to the Submission SA, 2016

8.26 Following the Examination in Public of the ELLP, which was held between May and June 2016, the Council decided to make the following major modifications to the Preferred Option:

- A reduction in the allocation at Sovereign Harbour from **25,000 sqm Gross External Area (GEA)** (20,000 sqm Net Internal Area (NIA) to **23,125 sqm GEA** (18,500 sqm NIA) in order to accommodate a new community centre on **Site 7a**
- The provision of **1,875 sqm GEA** (1,500 sqm NIA) of office space within the existing **industrial estates** to replace the lost provision on Sovereign Harbour Site 7a
- To retain the office allocation of **3,750 sqm GEA** (3,000 sqm NIA), provided solely on **Development Opportunity Site 2** with no mandatory requirement for office space on Development Opportunity Site 3.

- 8.27 The policy wording of all the proposed policies in the ELLP was also modified and the policies were therefore subject to further appraisal to ensure that any likely significant impacts as a result of the changes were identified. Several minor modifications were also made to the ELLP as a result of the EiP but such modifications did not need further appraisal as any impacts were not considered likely to be significant.
- 8.28 The Revised Preferred Option was as follows:
- 76% Office Town Centre (3,750 sqm GEA): 23% Office Sovereign Harbour (23,125 sqm GEA) + 1% Office within existing Industrial estates (1,875 sqm GEA) + Intensification of Industrial Estates (25,000 sqm GEA)**
- 8.29 The Revised Preferred Option tested the same ratios of employment land as the Preferred Option with a split of 76:24 between the Town Centre and Out of Town provision including 3,750 sqm GEA of space provided in the Town Centre; 23,125 sqm GEA of office space provided at Sovereign Harbour; 1,875 sqm GEA of B1 within the existing Industrial estates; and 25,000 sqm provided through the intensification of industrial estates.
- 8.30 GVA's Employment Land Review (ELR 2012) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and did not fully reflect or respond to market signals; the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual.
- 8.31 Cushman & Wakefield's Viability Report 2016, examined the potential to deliver more office space within the Town Centre with cross subsidy but concluded that the maximum achievable was 3,750 sqm GEA (3,000 sqm NIA), as previously proposed.
- 8.32 The quantum of office space that can be provided at SH was reduced from 25,000 sqm GEA to 23,125 sqm GEA (18,500sqm NIA) as a result of the new community centre. The provision of 1,875 sqm GEA (1,500 sqm NIA) was added within the existing Industrial Estates to address the reduction in provision at SH. The provision of 1,875 sqm of space was not considered to result in any significant change to the impacts.
- 8.33 The ELR showed the need to protect existing industrial land use for B class uses, with the retention and improvement of existing industrial estates and sites considered vital to accommodate future employment growth. Capacity is now at a critical point and future losses could significantly harm the Borough's future potential. By limiting the amount of new development within the Town Centre and providing 23,125 sqm GEA at Sovereign Harbour, sites within the TC can be retained for residential purposes in order to meet the established housing need of 450 homes across the five Development Opportunity Sites, identified in the Town Centre Local Plan. Industrial land is unlikely to be used for housing, enabling other sites to be used for residential development.
- 8.34 The Revised Preferred Option provides a greater balance of uses within the Borough offering greater choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013, although the impact is unlikely to be realised in the short term. SH will also benefit from the catalytic impact of the Innovation Park, which will help establish the area as an economic hub, allowing a larger cluster to be developed around this first phase. In turn, more diverse employment opportunities should be enabled which should result in a positive impact upon economic growth in the medium to long term. In addition, the viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole, particularly in the medium to long term. The new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining.

- 8.35 The retention and improvement of existing industrial sites should have a positive impact on future economic growth and prevent further losses from the industrial sector. Intensification may offer the opportunity for smaller units, suitable for start-up businesses. Such benefits should be achievable in the short term as well as medium to long term, which will have a greatly needed positive impact on the market. The additional provision of 1,875 sqm of office space within the industrial areas should also add to the positive impacts.
- 8.36 Development within the town centre is well served by public transport. Development at SH and the industrial estates is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development could make the viability of improved public transport services more likely in the long term.
- 8.37 The development is likely to result in an increase in the use of natural resources. However, the reduction in office space within the town centre provides the opportunity for new, more energy efficient accommodation to be provided, particularly in the medium to long term. A larger quantum of development at SH could also increase the potential for renewable forms of energy to be incorporated.
- 8.38 Whilst the town centre is not located adjacent to any sensitive sites of biodiversity, SH includes shingle habitat. Suitable mitigation measures have been identified to address the effects upon biodiversity as part of the masterplan and outline planning applications. The impact has therefore been revised since the preferred option from minor negative to uncertain to reflect the proposed mitigation measures.
- 8.39 The increase in development is likely to cause an increase in the levels of pollutants, greenhouse gas emissions and the amount of waste produced in both construction and operation as demonstrated by the minor negative impacts. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency. Impacts during construction will be of a temporary nature.
- 8.40 In conclusion the results for the Revised Preferred Option are very similar to the Preferred Option previously assessed, as the major modifications are unlikely to give rise to significant changes in the impacts. The appraisal therefore showed that the overall outcome is likely to be positive, although several impacts are unlikely to be realised until the medium to long term.

The full results of the Revised Preferred Option can be found in [Appendix A1](#) of the [Addendum SA Report](#).

9 Monitoring

- 9.1 The Plans, Programmes and Policies as well as the Baseline Data will need to be reviewed on a regular basis to identify any new data that may come forward that could have implications for the proposed development. Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work that will be undertaken as part of the planning applications for development. Specific attention should be given to the uncertain impacts identified when reviewing proposals.
- 9.2 Details of the specific mitigation measures will also need to be provided in more detail at the planning application stage to ensure that any adverse impacts are suitably addressed. There are also risks largely outside the Borough's control, which could have an impact on the development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change and BREXIT. Consideration of these issues should be included within the monitoring and implementation plan.
- 9.3 The Council will use the ELLP when determining planning applications in relation to the employment land policies. The ELLP will be used alongside the Core Strategy and Supplementary Planning Documents, in particular the Town Centre Local Plan, Sovereign Harbour and Sustainable Design SPDs.
- 9.4 In December each year, Eastbourne Borough Council publishes the Local Monitoring Report (LMR) covering the previous monitoring year from March to April. The LMR is the main mechanism for assessing the performance of the planning policies adopted by Eastbourne Borough Council. The requirements for the LMR are set out in Regulation 34 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The monitoring report sets out how the Council's planning policies have been implemented and whether the planning policies are addressing the required issues.
- 9.5 The ELLP should be monitored regularly to check that the policies are achieving the desired results and to accommodate any changes in circumstances. The indicators set out in the Sustainability Appraisal Framework should be incorporated into the Local Monitoring Report (LMR). The LMR will monitor the type of development occurring in the borough and the impact that the Council's planning policies are having upon sustainable development. If the LMR identifies any changes that should be made to the policies, such changes will be reviewed and a further SA undertaken, if it is considered necessary.