

Non-Technical Summary

Proposed Submission Version of the Eastbourne Town Centre Area Action Plan, Sustainability Appraisal / Strategic Environmental Assessment

Introduction and Invitation to Comment

This Sustainability Appraisal / Strategic Environmental Assessment (SA/SEA) report prepared by Waterman Energy, Environment and Design presents the sustainability implications of the Proposed Submission Version of the Eastbourne Town Centre Area Action Plan Document (AAP). The Proposed Submission Version of the Town Centre AAP was prepared by David Lock Associates on behalf of Eastbourne Borough Council (EBC). The SA/SEA aims to ensure that sustainability considerations (that is the social, environmental and economic effects) are taken into account during the preparation of the AAP. This Proposed Submission Version of the Town Centre AAP SA/SEA Report has been published for consultation alongside the Proposed Submission Version of the Town Centre AAP, and follows on from the SA/SEA Scoping Report (May 2010), and the Initial SA/SEA Report of the Issues and Options AAP (June 2010).

Your views are invited on the SA/SEA Report for the Proposed Submission Version of the Eastbourne Town Centre AAP. If you would like to make any comments, please forward your written responses marked 'Sustainability Appraisal of the Eastbourne Town Centre Area Action Plan' to:

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1 Grove Road
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Alternatively, responses may be emailed to: Lisa.Rawlinson@eastbourne.gov.uk and should be clearly marked 'Sustainability Appraisal of the Eastbourne Town Centre Area Action Plan'.

All responses should be received no later than **22nd September 2011.**

Background and Methodology

The Eastbourne Town Centre AAP, when adopted, will form part of the suite of development documents referred to as the Local Development Framework. The Local Development Framework will replace the Borough Plan for Eastbourne (prepared for the period 2001-2011). The AAP, once adopted, will set out the planning strategy for managing future development in Eastbourne Town Centre until 2027. It will set out policies that future planning applications to regenerate the Town Centre, would need to comply with.

An SA/SEA of the emerging AAP has been undertaken in accordance with the following legislation:

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

The SA/SEA has followed Government guidance set out within the 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' published in November 2005.

This SA/SEA Report follows a 'scoping stage' and the Initial Sustainability Appraisal of the Issues and Options AAP. The 'scoping stage' involved a review of key planning policy and available information for Eastbourne Town Centre to identify the key social, economic and environmental issues within the Town Centre. Taking these issues into consideration, a number of sustainability objectives were identified which could be used to appraise the emerging AAP, 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 10th May 2010 for consultation with statutory consultees. Comments were received from Natural England, Environment Agency, the Government Office for the South East and East Sussex County Council. As a result some minor amendments were made to the sustainability framework.

The AAP Issues and Options Report (June 2010) prepared by David Lock Associates identified a series of issues relevant to the Town Centre. Based on these issues, a 'Vision' for the future of Eastbourne Town Centre has been identified, and broad AAP Objectives have been developed to achieve this vision. The Vision and broad AAP Objectives were assessed against the sustainability objectives during the initial preparation of the AAP to identify any conflicts. Based on this assessment, the Vision and Objectives were refined and were developed into a series of policies within the AAP Proposed Submission Version. The key issues and options within the AAP Issues and Options Report were also tested against the sustainability objectives. The findings were used to refine the options and inform the next stage of preparing the planning policy.

On the basis of the issues identified within the Issues and Options AAP Report and public consultation, two spatial policies, 24 Town Centre Policies and proposals for five Site Specific Development Opportunities have been developed for the Proposed Submission Version AAP. An assessment of the sustainability effects of these policies and development opportunities has been undertaken, as reported within this SA/SEA Report.

The Proposed Submission Version 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. The Report presents on outline proposals for monitoring related to sustainability effects.

Comments received on the Proposed Submission Version AAP and SA/SEA will be considered prior to the submission of the AAP for independent examination by a Planning Inspector. Following adoption of the AAP, a Post-Adoption SEA Statement will be prepared to summarise the process, how the SA/SEA has influenced preparation of the AAP and the results of consultation on the SA/SEA reports.

Context of the AAP, Sustainability Issues and Objectives

Following the preparation of the Issues and Options AAP Report and subsequent consultation, the boundary of the AAP was extended to include three additional areas. This extension of the AAP boundary will allow for additional development opportunities to support the policies of the AAP and the overall regeneration of the Town Centre.

Generally the AAP boundary extends from the seafront in the south to the railway station in the north and includes the Arndale Centre and other shopping areas, the Enterprise Centre and other areas of commercial buildings. There are currently a number of commercial, residential and community land uses within the boundary of the AAP.

The review of the existing conditions in Eastbourne Town Centre has identified a number of sustainability issues, these are as follows:

Social

- ▮ There is currently a lack of affordable housing, care housing units and sheltered housing in Eastbourne. In addition, there are a high proportion of 'Houses in Multiple Occupation'. The AAP should address the need for appropriate and affordable housing to meet the needs of the community. An increase of housing in the Town Centre would also improve accessibility and inclusivity as well as reducing the need to travel;
- ▮ A high proportion of the population suffer from a limiting long-term illness or disability, coinciding with the high number of retired residents within the Borough. Any new development should ensure that associated health facilities are provided;
- ▮ The Town Centre AAP includes portions of the Upperton, Meads and Devonshire Wards (refer to Figure 4). Devonshire Ward contains the most deprived areas within Eastbourne and the ward is within the top 10% of deprived wards in England. Future redevelopment in the Town Centre will need to address this;
- ▮ The area to the north of Terminus Road and around the railway station would benefit from enhanced public realm and improved permeability for pedestrians and cyclists. Consideration should be given to linking to National Cycle Route 21, and Regional Cycle Route 89;
- ▮ Whilst crime has reduced recently in Eastbourne, the AAP should ensure that crime prevention is considered during the design of new development within the Town Centre; and
- ▮ The AAP should seek to improve pedestrian and cycle routes and in particular the link between the station and the seafront. New developments should contribute towards improvements in the streetscape. Streetscape design should aim to encourage walking and cycling thereby helping to improve to accessibly and inclusivity.

Economic

- ▮ The existing retail facilities comprise predominantly small unit sizes and there are a limited number of medium and large high street shops in Eastbourne. The AAP should ensure that existing independent shops are protected, whilst also providing units to attract 'high street' names in order to ensure the Town Centre can compete with Tunbridge Wells, Brighton and out of town shopping centres such as Bluewater and Lakeside;
- ▮ Eastbourne has a poor record of attracting inward investment, and the AAP should seek to address this issue;
- ▮ The AAP should support and encourage investment in the retail led regeneration of the Town Centre whilst protecting the existing retail offer to ensure it delivers maximum economic benefits;
- ▮ The AAP should seek to enhance the tourism and leisure offer available within the Town Centre, and improve links to the cultural quarter;
- ▮ The economy is currently focused on tourism and retail trade as well as health and social work and the AAP should seek to attract a wider range of investment and employment opportunities; and
- ▮ A high proportion of residents within Eastbourne are economically inactive. Additionally, the existing workforce is low skilled and low paid. The AAP should seek to provide employment appropriate to a range of skill levels and help to improve skills levels in the area.

Environmental

- ▮ The Town Centre is partially located in an area at high risk of flooding and therefore the AAP will need to ensure that future development in the area is protected and flood risk to existing development is minimised. New development should utilise Sustainable Drainage Systems (SuDS) where possible;
- ▮ As illustrated by Figure 3, the Town Centre is partially located in the Town Centre and Seafront Conservation Area which contains a number of listed buildings. Furthermore, the extended AAP boundary includes the Martello Tower Scheduled Monument. The AAP will need to ensure new development incorporates high quality design and materials so as to protect the historic assets, including the Martello Tower, ensuring that the setting of conservation areas, archaeological sensitive areas and listed buildings (including locally listed buildings) are protected and where possible enhanced;
- ▮ The Town Centre currently provides limited open space and therefore the AAP should consider the provision of additional open space (such as usable roof space) and improve accessibility to the seafront;
- ▮ The AAP area is not currently in an Air Quality Management Area, and no exceedances of National Air Quality Objectives have been identified for the Borough. Nevertheless, the AAP should seek to reduce the need to travel and ensure that development does not increase traffic congestion and thus air pollution at busy junctions;
- ▮ The AAP should ensure any new development is designed to provide appropriate waste facilities and storage to maximise composting and recycling of waste;

- The AAP should seek to protect and enhance biodiversity through protection of existing features including street trees as well as encouraging habitat creation and new tree planting as part of new development or improvements in public realm;
- The AAP should seek to reduce carbon dioxide emissions, in particular from carbon dioxide generated from buildings within the Town Centre and from transportation;
- The AAP should seek to limit exposure of sensitive land uses, including residential dwellings, to noise pollution; and
- The AAP should seek to remediate areas of known contamination.

Sustainability Objectives

Based on the identified key sustainability issues, a number of sustainability objectives have been developed to assess the AAP Proposed Submission Version, as set out in Table a.

Table a. Sustainability Objectives

1. **Social progress which recognises the needs of everyone**
 - 1a. To provide the opportunity for everyone to live in a decent sustainably constructed and affordable home.
 - 1b. To improve the health and wellbeing of the population and reduce inequalities in health.
 - 1c. 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.
 - 1d. To raise educational achievement.
 - 1e. To reduce crime and the fear of crime.
 - 1f. Create and sustain vibrant communities which recognise the needs and contributions of all individuals.
 - 1g. Improve accessibility to jobs, health, education, shopping, leisure, cultural and community facilities to everyone.
2. **Maintenance of high and stable levels of economic growth**
 - 2a. Develop and ensure a broad economic base.
 - 2b. To support continued economic growth and competitiveness.
 - 2c. To develop a dynamic, diverse and knowledge based economy and continue to support existing economic base including independent shops and the cultural quarter.
 - 2d. To develop and maintain a skilled and adaptable workforce.
3. **Effective protection of the environment**
 - 3a. Conserve and enhance the Borough's biodiversity.
 - 3b. Protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, seafont and historic environment.

- 3c. To improve efficiency in land use through the reuse of previously developed land and existing buildings, and encourage urban renaissance.
- 3d. Reduce air pollution and ensure air quality continues to improve.
- 3e. Maintain and improve the water quality of freshwater bodies, waterways and the marine environment.
- 3f. Reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment.
- 3g. Address the causes and effects of climate change.
- 3h. Reduce road congestion and pollution levels by improving travel choice, reducing the need to travel by car, and shortening the length and duration of journeys.

4. Prudent use of natural resources

- 4a. Reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting.
- 4b. Reduce the use of natural resources through minimising energy usage and maximising the use of energy from renewable sources.

Assessing the AAP Proposed Submission Version Spatial Policies

The AAP Proposed Submission Version Spatial Policies were assessed against the sustainability objectives to identify any negative effects and where positive contributions could be enhanced. The AAP Proposed Submission Version Spatial Policies are generally beneficial when appraised against the sustainability framework and no negative effects were identified. The AAP Proposed Submission Version Spatial Policies identify that a mix of different uses within the Town Centre would complement one another, and thereby improve and strengthen the economy within the Town Centre. The AAP Proposed Submission Version policies are primarily focussed on maximising the economic potential of the Town Centre, and the majority of the resultant positive effects were shown against the economic sustainability objectives, i.e. maintenance of high and stable levels of economic growth.

Additionally, the AAP Proposed Submission Version Spatial Policies would help to reduce crime and the fear of crime as a consequence of the proposals to improve public realm within the Town Centre. Additionally the proposed mix of land uses which would create activity throughout the day and night providing 'informal policing' which would further help to reduce crime. However, it is also recommended that design measures within new developments and the public realm follow Secure by Design principles, in order to further reduce crime and the fear of crime. Through improved pedestrian and cycle routes, the AAP Proposed Submission Version policies would also have a beneficial effect in terms of the accessibility to services and facilities such as health care and jobs to residents and users of the Town Centre.

Generally, the AAP Proposed Submission Version policies have a negligible or beneficial effect in terms of environmental or natural resources objectives. However, one uncertain effect was identified in relation to the conservation and enhancement of biodiversity. Whilst an enhancement to public realm and open space is proposed by the AAP Proposed Submission Version policies, the contribution these proposals would make to conserving and enhancing the Town Centre and the Borough's biodiversity is unknown. It is acknowledged that the Town Centre is an urban location and opportunities for biodiversity enhancement are therefore limited, however where possible the policies within the AAP Proposed Submission Version promote the inclusion of public realm design objectives to maximise beneficial biodiversity effects.

Assessing the AAP Town Centre Policies

The 24 Town Centre policies are grouped into four policies themes as follows:

- ▮ **Theme 1:** Supporting a mix of uses which includes retail development, living and working in the Town Centre, and enjoying the Town Centre.
- ▮ **Theme 2:** Town centre identity which sets out policies for achieving appropriate high quality development standards for buildings in the Town Centre.
- ▮ **Theme 3:** Town centre public realm which considers design quality and public realm priorities.
- ▮ **Theme 4:** Accessing the Town Centre which sets out policies concerning arriving at and moving around the Town Centre.

The AAP Proposed Submission Version Town Centre Policies were assessed against the sustainability objectives to identify any negative effects and where positive contributions could be



enhanced. Broadly, these policies have beneficial effects in terms of the sustainability objectives. This is particularly apparent with regard to environmental improvements, as a result of the proposed improvements to the public realm.

Theme 1 policies support a mix of uses and contribute beneficially to the economic sustainability objectives. The mix of uses would complement one another as well as the existing uses which would lead to maintaining high levels of economic growth. However, these policies also identify that the core retail area would benefit from being maintained, as would the number of independent retail units within the Town Centre. Furthermore, the provision of residential land uses in the Town Centre would ensure that opportunities are made for everyone to live in a decent sustainably constructed and affordable home, and support existing and future services and facilities such as education, health care and retail services.

Theme 2 policies predominantly concentrate on the preservation of the Town Centre's identity and character, particularly with regard to public realm improvements including parks, gardens, the countryside, seafront and historic environments. As such, the effects on the majority of sustainability objectives relating to effective protection of the environment are beneficial. These beneficial effects would be improved through specifying improvements related to walking and cycling.

Theme 3 policies would have beneficial sustainability effects as they require high standards of design and proposes a number of public realm improvements. These public realm improvements would include maintaining the character and identity of the street, squares and spaces, improving pedestrian movements and maximising the economic potential of the public realm by animating it and enriching it with public art and art from local artists. In addition, a number of key priority areas are identified in the AAP Proposed Submission Version for public realm improvements.

Theme 4 policies aim to improve the accessibility of getting into and moving around the Town Centre. This is to be achieved by enhancing public transport, parking, streets and public realm within the Town Centre, particularly pedestrian environments. These have a beneficial effect across a number of the sustainability objectives.

Assessing the AAP Site Specific Proposals

The Proposed Submission Version AAP identifies five Development Opportunity Sites within the AAP together with two Transition Areas and two Potential Areas of Change. For these areas Site Specific Proposals and policies have been prepared as part of the AAP. These Site Specific Proposals have been assessed against the sustainability objectives and predominantly beneficial effects have been identified. However, Development Opportunity Site One and Development Opportunity Site Four, are located within an area of high flood risk. To reduce and offset any adverse flood effects, redevelopment proposals should position less vulnerable land uses at ground level (i.e. non-residential land uses), incorporate sustainable drainage measures and adopt flood resilient design standards.

Whilst these are Site Specific Development Opportunities, these, together with the entirety of the AAP are focussed on the Town Centre. Consequently, the AAP encourages development on previously developed land and brownfield sites within the Town Centre, and as such the AAP should reduce development on the urban fringe, minimising unnecessary urban sprawl.

Summary and Next Stage of the Planning Process

The SA/SEA process has helped to inform preparation of the Eastbourne Town Centre AAP Proposed Submission Version. The process has identified that broadly the AAP policies are in line with sustainability objectives.

The sustainability effects of the AAP will be monitored by a number of indicators as part of EBC's Local Monitoring Report. The SA/SEA did not identify any additional monitoring requirements to specifically monitor the identified sustainability effects.

Once the Proposed Submission Version has been published for the community and stakeholders to make any final representations, David Lock Associates and EBC will refine the AAP and prepare the Submission Version AAP Report for the inspection by the Planning Inspectorate. Once the AAP is adopted a Post-Adoption SA/SEA Statement will be prepared to summarise the SA/SEA process and the representations received..