

COMMITTEE: PLANNING
DATE: 24 November 2015
SUBJECT: Employment Land Local Plan
REPORT OF: Senior Head of Regeneration, Planning and Assets

Ward(s): All

Purpose: To seek Members' views on the report before being considered by Cabinet on 9 December 2015

Contact: Matt Hitchen, Senior Strategy & Commissioning Officer
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Recommendations: Members are asked for their views on the attached report which will be reported to Cabinet at the meeting on 9 December 2015

1.0 Introduction

- 1.1 This is a covering report to introduce the Cabinet report attached. The Cabinet Report is self explanatory and includes a discussion under the usual implication headings so will not be repeated here.
 - 1.2 The Cabinet Report recommends that the Revised Proposed Submission version of Employment Land Local Plan be published for a six week period between 11 December 2015 and 22 January 2016 to allow stakeholders to make representations on issues on 'soundness' before it is submitted to the Secretary of Statement for public examination.
 - 1.3 Planning Committee Members are asked to consider the attached report and any comments will be considered and reported orally to Cabinet when they meet on 9 December.
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Background Papers:

The Background Papers used in compiling this report were:

- Cabinet Report – 9 December 2015

To inspect or obtain copies of the background paper, please refer to the contact officer listed above.

COMMITTEE	CABINET
DATE	9 December 2015
SUBJECT	Employment Land Local Plan
REPORT OF	Senior Head of Regeneration, Planning and Assets

Ward(s) All

Purpose For Members to approve the Revised Proposed Submission Employment Land Local Plan for publication for a 6 week period to receive representations on issues of soundness, in preparation for formal submission to the Secretary of State.

Contact Matt Hitchen, Senior Strategy & Commissioning Officer
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Recommendations

1. That Cabinet approve the Revised Proposed Submission Employment Land Local Plan for publication for a six week period to receive representations on issues of soundness.
2. To delegate authority to the Senior Head of Regeneration, Planning and Assets in consultation with the Lead Cabinet Member to make minor amendments before the commencement of the representation period.
3. That following the end of the representation period, to delegate to the Senior Head of Regeneration, Planning and Assets in consultation with the Local Plan Steering Group, authority to submit the Employment Land Local Plan to the Secretary of State for public examination.
4. To delegate authority to the Senior Head of Regeneration, Planning and Assets in consultation with the Lead Cabinet Member to authorise public consultation on proposed modifications as a result of the Examination, if necessary.

1.0 Introduction

1.1 In May 2012, the Eastbourne Core Strategy Local Plan was subject to Public Examination by a Planning Inspector. The Inspector expressed concerns over

the evidence that supported Core Strategy Policy D2: Economy, particularly relating to the employment land supply. In order to address this issue without delaying the adoption of the Core Strategy, the Inspector recommended that Core Strategy Policy D2: Economy be the subject of an early review, leading to its replacement with an additional Local Plan to deal specifically with the employment land supply.

- 1.2 In order to meet this requirement, an Employment Land Local Plan (ELLP) is being produced. The ELLP will guide job growth and economic development in Eastbourne up to 2027 by identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a town where people want to live and work. It relates to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes.
- 1.3 A Proposed Submission ELLP was presented to Cabinet on 10 December 2014 for approval and authority to publish to receive representations on issues of soundness. It was subsequently published for an 8 week period between 12 December 2014 and 6 February 2015. The representations received during the consultation have been taken into account in revising the ELLP.
- 1.4 Representations received on the Proposed Submission ELLP resulted in some changes being made on the ELLP and the supporting documents, and as a result a Revised Proposed Submission ELLP now needs to be published to allow for representations to be made on issues of soundness before it can be submitted for examination.

2.0 Employment Land Local Plan

- 2.1 The Employment Land Local Plan contains policies to meet the identified need for 43,000 sqm of employment (Class B) floorspace between 2012 and 2027. This would result in the creation of 1,263 new jobs.
- 2.2 The ELLP seeks to allocate land for employment use in the most sustainable and effective way, through intensifying development in existing employment locations and directing development towards the 'Sustainable Centres' at the Town Centre and Sovereign Harbour that have been identified in the Core Strategy 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.
- 2.3 Therefore the strategy contained within the ELLP to deliver the employment floorspace requirement proposes:
 - 20,000 sqm of industrial and warehouse floorspace through the intensification of the existing Industrial Estates;
 - 3,000 sqm of office floorspace in the Town Centre; and

- 20,000 sqm of office and light industry floorspace at Sovereign Harbour.

3.0 Representations on Proposed Submission ELLP

- 3.1 A total of 19 representations were received on the Proposed Submission ELLP when it was published in December 2014, including significant representations from Sovereign Harbour Limited (SHL) that raised a number of issues.
- 3.2 A review of the issues raised was undertaken, and as a result it was considered that the overall strategy for the provision of employment space, particularly in relation to the amount of office space at Sovereign Harbour, should be re-assessed through the Sustainability Appraisal process.
- 3.3 The outcomes of the revised Sustainability Appraisal showed that the proposed strategy is the most sustainable option, and that there is no overwhelming justification to reduce the amount of office space at Sovereign Harbour. Options for a lower provision of office space at Sovereign Harbour were rejected because they failed to meet market demand and were considered to be less deliverable and sustainable solutions.

4.0 Revised Proposed Submission ELLP

- 4.1 As a revised Sustainability Appraisal has been prepared and some minor changes to the ELLP have been proposed, it is necessary to publish a revised version of the Proposed Submission ELLP once again for a period to receive representations on issues of soundness.
- 4.2 As the evidence and the outcomes of the revised Sustainability Appraisal supports the original position, it is not proposed to make any significant changes to the ELLP before it is re-published. However, some minor amendments have been made to various parts of the ELLP for clarification purposes.
- 4.3 A schedule of changes made to the Employment Land Local Plan is provided in Appendix 1.

5.0 Consultation

- 5.1 The Revised Proposed Submission ELLP was approved by the Local Plan Steering Group on 20 October 2015.
- 5.2 The Revised Proposed Submission ELLP will, if approved by Cabinet, be subject to a 6 week representation period between 11 December 2015 and 22 January 2016 to allow stakeholders to make representations on issues of soundness. Soundness is defined in the National Planning Policy Framework as being: positively prepared, justified, effective and consistent with national policy.

6.0 Next Steps

- 6.1 Following the representation period, it is recommended that the Local Plan Steering Group consider a summary of representations, and that the Senior Head of Regeneration, Planning & Assets is given delegated authority to approve the submission of the ELLP to the Secretary of State ahead of public examination by a Planning Inspector.
- 6.2 It is anticipated that Public Examination will take place around May/June 2016. The Inspector at the Examination may require that modifications be made to the ELLP in order for it to be found sound, and it is recommended that authority is delegated to the Senior Head of Regeneration, Planning and Assets, in consultation with the Lead Cabinet Member, to authorise public consultation on any proposed modifications. Once the ELLP has been found sound by the Planning Inspector, it can be formally adopted by the Council.

7.0 Implications

7.1 Legal Implications

- 7.1.1 The Revised Proposed Submission version of the ELLP has been prepared in order to meet Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012, and with regard to the requirements of the National Planning Policy Framework. The Council must also comply with Section 33A, of the Planning and Compulsory Purchase Act 2004 (as amended) which imposes a duty to co-operate with other local planning authorities on issues which are likely to have a significant effect on more than one planning area.

7.2 Financial Implications

- 7.2.1 There are no financial implications to the Council as a direct result of this report. The cost of the publication and examination the ELLP will be met from within the service budget, which has been subject to bids through the Service and Financial Planning process.

7.3 Human Resource Implications

- 7.3.1 Officers in the Regeneration & Planning Policy team will manage the consultation arrangements for the ELLP, the collection and processing of representations received, and defending the ELLP at Examination.

7.4 Equalities and Fairness Implications

- 7.4.1 An Equalities and Fairness Impact Assessment was undertaken during the scoping stage in the production of the ELLP, and the assessment demonstrates that the ELLP is unlikely to have any significant impacts on equalities and fairness.

8.0 Conclusion

- 8.1 Work undertaken since the Proposed Submission version has provided the evidence required to show that the correct process has been followed, and that the strategy is the most sustainable, which will provide a solid base to defend against any further objections.
- 8.2 In order to progress the ELLP towards adoption, Cabinet are requested to approve the Revised Proposed Submission ELLP for publication to receive representations on issues of soundness between 11 December 2015 and 22 January 2016.
- 8.3 Following the representation period, the Employment Land Local Plan will be submitted to the Secretary of State for public examination, following which the Council will be able to formally adopt the Employment Land Local Plan.

Background Papers:

- Revised Proposed Submission Employment Land Local Plan (November 2015)
- Employment Land Local Plan Revised Sustainability Appraisal Report (November 2015)
- Schedule of Changes to the Employment Land Local Plan (Revised Proposed Submission) (November 2015)
- Representation Statement (November 2015)
- Statement of Representations Procedure (November 2015)
- Employment Land Local Plan – Changes to Policies Map (November 2015)

To inspect or obtain copies of the background paper, please refer to the contact officer listed above.

APPENDIX 1

Schedule of Changes

The table below provides a schedule of the changes that should be made to the Employment Land Local Plan for the Revised Proposed Submission version. The majority of the changes are proposed as a response to the representations received on the Proposed Submission Employment Land Local Plan, which was published in December 2014, and these can be identified by the Rep ID. Other changes are proposed to add clarity or revise description of the procedure.

Ref	Rep ID	Section	Modification	Reason
RPS-C1	PS-ELLP/13	Introduction – What is the Employment Land Local Plan?	Amend para 1.3 to read: The Employment Land Local Plan identifies the future requirements for employment land in Eastbourne and how the future needs for employment are to be met.	To provide consistency for the Revised Proposed Submission version
RPS-C2	n/a	Introduction – Format of the Proposed Submission Employment Land Local Plan	Replace para 1.5 to read: The Revised Proposed Submission Employment Land Local Plan has been published for a six week period in order to receive representations on matters of soundness in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012. The Revised Proposed Submission version presents the proposed strategy and policies relating to the employment land supply over the Core Strategy plan period up to 2027.	To provide consistency for the Revised Proposed Submission version
RPS-C3	PS-ELLP/13	Introduction – Format of the Proposed Submission Employment Land Local Plan	Replace para 1.6 to read: The Revised Proposed Submission Employment Land Local Plan takes into account representations that were received through pre-production stakeholder engagement, via consultation on the Proposed Draft Employment Land	To provide consistency for the Revised Proposed Submission version

Ref	Rep ID	Section	Modification	Reason
			Local Plan that took place between December 2013 and March 2014, and representations received between December 2014 and February 2015 following the publication of the Proposed Submission version. The Revised Proposed Submission version has been published to allow further representations following the preparation of a revised Sustainability Appraisal.	
RPS-C4	PS-ELLP/13	Introduction – Format of the Proposed Submission Employment Land Local Plan	<p>Amend para 1.7 to read:</p> <p>The Revised Proposed Submission Employment Land Local Plan has also been informed by:</p> <ul style="list-style-type: none"> • Employment Land Review (GVA, 2013) • Employment Land Strategy and Distribution Options Report (EBC, 2013) • Supplementary Employment Land Evidence (GVA, 2014) • Employment Land Review Viability Briefing Note (GVA, 2014) • Revised Sustainability Appraisal (JAM Consult, 2015) • Eastbourne Office Deliverability Assessment to Support the Sustainability Appraisal (GVA, 2015) 	To update para on stages that have occurred since Proposed Submission version
RPS-C5	PS-ELLP/13	Introduction – Relationship with Other Plans and Strategies	<p>Add new para after para 1.9:</p> <p><u>Sovereign Harbour Supplementary Planning Document (SPD)</u></p> <p>1.10 The Sovereign Harbour SPD, which was adopted in 2013, has been prepared to provide more detail on the implementation of Core Strategy Policy C14: Sovereign Harbour Neighbourhood Policy. The SPD identifies the issues that need to be addressed through future</p>	To provide further context and background to the preparation of the Employment Land Local Plan

Ref	Rep ID	Section	Modification	Reason
			development in Sovereign Harbour. It identifies that the main uses of Sites 6 and 7 should be a Business/Office Park of a high quality design to provide a distinctive gateway into the town and Sovereign Harbour, and that office use could also be provided on Site 4.	
RPS-C6	PS-ELLP/13	Introduction – Relationship with Other Plans and Strategies	<p>Add new paras after new para 1.10: <u>Town Centre Local Plan</u></p> <p>1.11 The Town Centre Local Plan, adopted in 2013, set out a strategy and proposals for the regeneration of the Town Centre, in order to create a place that attracts more shoppers, workers, residents and visitors to increase investment in the town, which will bring wide-ranging benefits to Eastbourne.</p> <p>1.12 Alongside enhanced shopping and leisure facilities, the Town Centre Local Plan aims to deliver a minimum of 450 net residential units across five Development Opportunity Sites, along with a quantum of office development that will be determined through the Employment Land Local Plan.</p>	To provide further context and background to the preparation of the Employment Land Local Plan
RPS-C7	n/a	Introduction – Relationship with Other Plans and Strategies	<p>In para 1.14, amend first sentence to read: The Revised Proposed Submission Employment Land Local Plan has been prepared having regard to the National Planning Policy Framework (NPPF) and specifically the presumption in favour of sustainable development.</p>	To provide consistency for the Revised Proposed Submission version
RPS-C8	n/a	Introduction – Relationship with Other Plans and Strategies	<p>Amend para 1.15 to read: The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive</p>	To provide an update on the latest situation regarding SELEP and

Ref	Rep ID	Section	Modification	Reason										
			economic expansion over the next six years. The bid for the Government's Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been awarded for the development of Pacific House at Sovereign Harbour (via the Growing Places Fund), and funds have been committed from the Growth Deal to deliver site infrastructure on the Sovereign Harbour Innovation Park site and transport schemes for the 'Hailsham, Polegate and Eastbourne Sustainable Corridor', 'Town Centre access & improvements' and an 'Eastbourne and South Wealden walking and cycling package'.	funding that has been committed.										
RPS-C9	n/a	Introduction – Stages in the production of the Plan	<p>In Table 1 at para 1.17, replace:</p> <table border="1"> <tbody> <tr> <td>Publication of Proposed Submission Version for representation period</td> <td>December 2014 – February 2015</td> </tr> <tr> <td>Publication of Revised Proposed Submission Version for representation period</td> <td>December 2015 – January 2016</td> </tr> <tr> <td>Submission to Secretary of State</td> <td>February 2016</td> </tr> <tr> <td>Examination in Public</td> <td>June 2016</td> </tr> <tr> <td>Adoption</td> <td>October 2016</td> </tr> </tbody> </table>	Publication of Proposed Submission Version for representation period	December 2014 – February 2015	Publication of Revised Proposed Submission Version for representation period	December 2015 – January 2016	Submission to Secretary of State	February 2016	Examination in Public	June 2016	Adoption	October 2016	To provide consistency for the Revised Proposed Submission version
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Adoption	October 2016													
RPS-	n/a	Introduction – Stages in the	Amend para 1.18 to read:	To provide consistency for										

Ref	Rep ID	Section	Modification	Reason
C10		production of the Plan	The six week representation period on the Revised Proposed Submission Employment Land Local Plan commenced on 11 December 2015 and finishes on 22 January 2016. The Revised Proposed Submission Employment Land Local Plan is accompanied by a Revised Sustainability Appraisal Report, which is also available for comment.	the Revised Proposed Submission version
RPS-C11	n/a	Introduction – Stages in the production of the Plan	At para 1.19, amend final sentences to read: Regeneration and Planning Policy 1 Grove Road Eastbourne BN21 1TW All representations should be received by 5pm on Friday 22 January 2016.	To provide consistency for the Revised Proposed Submission version
RPS-C12	PS-ELLP/13	Context – Existing Situation	Replace para 2.8: Over the past 10 years, there has been an overall net increase in employment floorspace in Eastbourne of 4,569 sqm. A significant amount of this growth has been due to redevelopment of areas of the Courtlands Road and Brampton Road Industrial Estates to provide an increased amount of higher quality employment space. There has been an overall increase in the amount of class B8 (Storage and Distribution) uses, however there has been a net loss of all other employment use classes. There has been a significant loss in class B1a (Office) uses in the last two years, particularly to residential use due to the recent changes to Permitted Development rights.	To provide an update on employment development that has taken place since the Proposed Submission version.

Ref	Rep ID	Section	Modification	Reason
RPS-C13	n/a	Context – Recent developments and future projects	Amend para 2.16 to read: There are a number of significant economic development projects that are being undertaken in Eastbourne. Recently, the South East Local Enterprise Partnership (SELEP) via the Growing Places Fund allocated £6m towards the development of a state of the art business park (Sovereign Harbour Innovation Park) at Sovereign Harbour. The first building, known as Pacific House, was completed in summer 2015 and has the potential to provide up to 300 new jobs.	To update the Revised Proposed Submission version with the latest position regarding the Sovereign Harbour Innovation Park.
RPS-C14	n/a	Context – Recent developments and future projects	Delete para 2.18.	The Council is no longer progressing an Economic Development and Tourism Strategy.
RPS-C15	PS-ELLP/13	Context – Key Issues	Amend the second sentence of para 2.27 to read: This allocation for 30,000 sqm (GEA) of office space across two sites (known as Sites 6 and 7) was retained through the Eastbourne Borough Plan 2001-2011 (adopted 2003).	To provide clarity over the amount of floorspace
RPS-C16	PS-ELLP/13	Context – Vision and Objectives	Add additional bullet points to para 2.41: <ul style="list-style-type: none"> • Key Spatial Objective 3: Town Centre Regeneration – To strengthen Eastbourne’s Town Centre as a leading sub-regional shopping and leisure destination. • Key Spatial Objective 8: Sustainable Travel – To reduce the growth in car-based travel by reducing the need to travel and by promoting alternative travel 	To include other relevant Spatial Objectives from the Core Strategy

Ref	Rep ID	Section	Modification	Reason
			<p>choices including walking, cycling and public transport.</p> <ul style="list-style-type: none"> Key Spatial Objective 10: Sustainable Neighbourhoods – To ensure that the diverse needs of local communities are delivered, having regard to the sustainability and capacity of each neighbourhood, the infrastructure needed and the opportunities to meet requirements. 	
RPS-C17	PS-ELLP/13	Strategy – Employment Land Strategy and Distribution	<p>Amend para 3.2 to read:</p> <p>The options for employment land were considered through the Sustainability Appraisal, and this determined that the most sustainable and effective way of meeting the employment land requirement is 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.</p>	To provide an update and better explanation that the preferred option is the more sustainable option that was considered.
RPS-C18	n/a	Policy EL1 – Economy and Employment Land	<p>Add bullet point to Policy EL1 to read:</p> <ul style="list-style-type: none"> Seeking Local Labour Agreements on all development of 1,000sqm or more, including change of use, to secure local employment and training measures as part of development proposals 	To provide a policy hook to seek Local Labour Agreements on developments.
RPS-C19	PS-ELLP/13	Strategy – Economy and Employment Land	<p>Amend the bullet points at para 3.10 to read:</p> <ul style="list-style-type: none"> Intensification of Industrial Estates – 20,000 sqm GEA of B1c/B2/B8 floorspace Town Centre – 3,000 sqm NIA of B1a floorspace 	To provide further clarity on the amount of floorspace to be provided.

Ref	Rep ID	Section	Modification	Reason
			<ul style="list-style-type: none"> Sovereign Harbour – 20,000 sqm NIA of B1 floorspace 	
RPS-C20	n/a	Strategy – Economy and Employment Land	<p>Replace para 3.14 with:</p> <p>The level of development required in Eastbourne will create a significant number of jobs and there is opportunity to create local employment at both construction and operational stages of this development. Eastbourne Borough Council will seek to secure Local Labour Agreements and associated contributions on developments of 1,000sqm or more (including change of use) in order to secure local employment and training measures as part of development proposals, with the objective of improving training and skills in the town for the future economic development of the Borough. This will be achieved through Section 106 Agreements related to specific development proposals, which will secure contributions from development that will support and benefit the local labour market and economy, enabling employment growth, raising skills and giving local people opportunities generated by new developments. A Local Labour Agreement Supplementary Planning Document (SPD) will be prepared to guide the implementation of this policy.</p>	To provide further information and justification on the part of the policy relating to Local Labour Agreements.
RPS-C21	PS-ELLP/13	Policies – Industrial Estates	In para 4.3, after 20,000 sqm, add: (GEA)	To provide further clarity on the amount of floorspace to be provided.
RPS-C22	PS-ELLP/13	Policy EL2: Industrial Estates	After 20,000sqm add: (GEA)	To provide further clarity on the amount of floorspace to be provided.

Ref	Rep ID	Section	Modification	Reason																
RPS-C23	n/a	Policies – Industrial Estates	<p>Replace para 4.6 with:</p> <p>Since 2012/2013, a total of 5,049 sqm of class B floorspace has been delivered within the town’s industrial estates (at 1 April 2015). This includes the redevelopment of an existing site that has been vacant for a considerable amount of time to provide new, high quality class B2 floorspace, and the intensification of an existing site to provide nine new class B1a and B8 units totalling 1,755 sqm. In addition, there is 3,722 sqm of employment floorspace within the Industrial Estates that has permission but development has yet to start. Table 3 shows the position at 1 April 2015 in terms of completed employment developments within the designated Industrial Estates.</p> <p>Table 3: Employment Land Delivery within Designated Industrial Estates</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Completed Floorspace (sqm)</th> </tr> </thead> <tbody> <tr> <td>2012/2013</td> <td>100</td> </tr> <tr> <td>2013/2014</td> <td>118</td> </tr> <tr> <td>2014/2015</td> <td>4,831</td> </tr> <tr> <td>Total</td> <td>5,049</td> </tr> <tr> <td>Target</td> <td>20,000</td> </tr> <tr> <td>Committed</td> <td>3,722</td> </tr> <tr> <td>Residual 2015-2027</td> <td>11,229</td> </tr> </tbody> </table>	Year	Completed Floorspace (sqm)	2012/2013	100	2013/2014	118	2014/2015	4,831	Total	5,049	Target	20,000	Committed	3,722	Residual 2015-2027	11,229	To provide an update on the current position in terms of the amount of employment floorspace that has already been developed within the Industrial Estates.
Year	Completed Floorspace (sqm)																			
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RPS-C24		Policies – Sovereign Harbour	<p>Replace Para 4.36 to read:</p> <p>Eastbourne Borough Council has been active in promoting the delivery of business space in Sovereign Harbour. In 2013, the Growing Places Fund confirmed the allocation of</p>	To update the Revised Proposed Submission version with the latest position regarding the																

Ref	Rep ID	Section	Modification	Reason
			£6 million to deliver a new "Innovation Mall" at Sovereign Harbour. Completed in 2015, Pacific House has provided 2,350 sqm NIA of serviced employment floorspace, and will help to establish Sovereign Harbour as a business location, which will help to attract future occupiers. The commitment from the Growing Place Fund highlights the potential for Sovereign Harbour to accommodate high quality employment space that is not available elsewhere in the area.	Sovereign Harbour Innovation Park.
RPS-C25	PS-ELLP/13	Figure 3	Update Figure 3 to include demarcation of Site 7a, and the full extent of Site 7.	To clarify the extent of Site 7a upon which the office development should be provided.
RPS-C26	n/a	Implementation and Monitoring – Infrastructure	Amend second sentence of para 5.5 to read: In April 2015, Eastbourne Borough Council adopted a CIL Charging Schedule, which sets out a table of charges that calculates how much development is required to pay.	To update the Revised Proposed Submission version with the latest position in terms of CIL
RPS-C27	PS-ELLP/13	Glossary	Add new terms and definitions into Glossary: Sovereign Harbour Supplementary Planning Document (SPD) - The Sovereign Harbour SPD provides additional detail on the implementation of Core Strategy Policy C14: Sovereign Harbour Neighbourhood Policy, to guide the development of the remaining sites. Sustainable Neighbourhood Assessment - An evidence study produced in 2011 that analyses the sustainability of each of the Borough's 14 neighbourhoods against locally relevant sustainability criteria.	To provide further clarification.

DRAFT