

COMMITTEE	CABINET
DATE	10 December 2014
SUBJECT	Employment Land Local Plan
REPORT OF	Senior Head of Development

Ward(s)	All
Purpose	For Members to approve the Proposed Submission Employment Land Local Plan for publication for an 8 week period to receive representations on issues of soundness, in preparation for formal submission to the Secretary of State.
Contact	Matt Hitchen, Specialist Advisor (Planning) 1 Grove Road, Eastbourne Tel no: (01323) 415253 E-mail: matt.hitchen@eastbourne.gov.uk
Recommendations	<ol style="list-style-type: none">1. That Cabinet approve the Proposed Submission Employment Land Local Plan for publication for an eight week period to receive representations on issues of soundness.2. To delegate authority to the Senior Head of Development 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 Development in consultation with the Local Plan Steering Group, authority to submit the Employment Land Local Plan to the Secretary of State for public examination.

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 specifically relates to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes.
- 1.3 As Members will recall, a Proposed Draft ELLP was presented to Cabinet on 14 December 2013 for approval and authority to consult. It was subsequently published for a 12 week public consultation with the community and stakeholders between 20 December 2013 and 14 March 2014. The representations received during the consultation have been taken into account in revising the ELLP.
- 1.4 In order to progress the ELLP toward adoption, a Proposed Submission version now needs to be published to allow for representations to be made on issues of soundness.

2.0 Employment Land Local Plan

- 2.1 The evidence supporting the ELLP shows that there is a requirement to provide 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 In order to deliver the employment floorspace requirement, the ELLP proposes the intensification of land within the existing Industrial Estates to provide 20,000sqm of industrial and warehouse space, and the development of new office space in the Town Centre (3,000sqm) and Sovereign Harbour (20,000sqm).

3.0 Representations on Proposed Draft ELLP

- 3.1 A total of 30 representations were received from 10 organisations during the consultation on the Proposed Draft ELLP.
- 3.2 There were five main issues raised through consultation:
 - The amount of office space allocated in Town Centre

- The viability of employment development at Sovereign Harbour
- The density assumptions used to calculate how much floorspace will be required
- Protection of existing employment sites and restrictions on non-employment development within Industrial Estates
- The non-allocation of land north west of Hammonds Drive off Lottbridge Drove for employment development

3.3 Additional evidence has been prepared in order to take account of these representations and provide further information as to whether or not changes are required to the ELLP. This additional evidence has backed up the original position, and there will be no fundamental changes to the ELLP as a result of these representations.

3.4 A summary of representations and the full responses to those representations is provided in Appendix 1.

4.0 Amendments made to the ELLP

4.1 As the evidence supports the original position, there are few recommended changes to the ELLP. There are some minor amendments to various parts of the ELLP for clarification purposes.

4.2 A schedule of changes made to the Employment Land Local Plan is provided in Appendix 2.

5.0 Consultation

5.1 The Proposed Submission ELLP and its associated documentation was presented and approved by the Local Plan Steering Group on 23 September 2014.

5.2 The Proposed Submission ELLP will, if approved by Cabinet, be subject to an 8 week representation period between 12 December 2014 and 6 February 2015 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.

5.3 Public consultation will take place via the usual methods and will be in compliance with the Statement of Community Involvement. Representations can be made electronically via the Council's on-line consultation portal. A Statement of Representations Procedure, which is

required by Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012, is provided as a background paper.

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 the need for further changes, and that the Senior Head of Development is given delegated authority to approve the submission of the ELLP to the Secretary of State ahead of public examination by a Planning Inspector. It is anticipated that this will take place around May/June 2015. If found sound at examination, the ELLP can be formally adopted by the Council.

7.0 Resource Implications

7.1 Legal Implications

- 7.1.1 The Proposed Submission ELLP has been prepared in order to meet Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

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 publicity for 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 Customer First team will manage the consultation arrangements for the ELLP, and the collection and processing of representations received.

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 As a result of representations received during the consultation on the

Proposed Draft Employment Land Local Plan, some minor amendments have been made.

- 8.2 In order to progress the Employment Land Local Plan towards adoption, Cabinet are requested to approve the Proposed Submission ELLP for publication to receive representations on issues of soundness between 12 December 2014 and 6 February 2015.
- 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:

- Proposed Submission version of Employment Land Local Plan (October 2014)
- Employment Land Local Plan Proposed Submission Sustainability Appraisal Report (November 2014)
- Schedule of Changes to the Employment Land Local Plan (Proposed Submission) (October 2014)
- Representation Statement (September 2014)
- Statement of Representations Procedure (September 2014)
- Employment Land Local Plan – Changes to Policies Map (September 2014)

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

APPENDIX 1

Responses to Representations

The table below provides a response to the representations receive during the public consultation on the Proposed Draft Employment Land Local Plan between 14 December 2013 and 14 March 2014, and identifies changes that should be made to the Proposed Submission version of the Employment Land Local Plan as a result.

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
PD-ELLP/02	Marine Management Organisation (Angela Atkinson)	General	No comments	No comment	No change to ELLP
PD-ELLP/03	Richard Maile	Employment Land Strategy and Distribution Scenario 1	<p>All of the industrial sites have the same flood risk from tidal flooding as the whole of Eastbourne. Therefore, there is no advantage in terms of flood risk.</p> <p>The major disadvantage is the uncertainty arising from what is basically a windfall site scenario. This is totally contrary to Government policy that seeks certainty in the planning system, particularly in terms of the provision of sites for employment.</p> <p>The figure of 20,000m² based upon the intensification of existing sites is totally unrealistic. Furthermore, it represents almost half of the total allocation of 43,000m².</p> <p>The disadvantages in Table 3 fail to highlight the enormous problems that are likely to be caused by increased traffic in heavily used areas, loss of car parking and other open spaces and, in particular, the fact that such intensification may well rely upon existing businesses having to move out to facilitate redevelopment.</p>	<p>The industrial estates are in tidal flood zone 3a, so reference will be included as a disadvantage. However, they are sites that have already been developed, and flooding infrastructure is already in place, which would still need to be provided on greenfield sites.</p> <p>It is considered that the Industrial Estates can accommodate 20,000sqm through the redevelopment and intensification of existing sites. Evidence of windfall delivery over recent years shows that the</p>	<p>No change to ELLP.</p> <p>Include reference to 'flooding' in disadvantages in the Employment Land Strategy and Distributions Options Report</p>

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				<p>requirement can be delivered within the Industrial Estates. In addition, the Inspector at the Core Strategy examination accepted that a higher amount of floorspace than proposed in the ELLP could be provided within the industrial estates through intensification.</p> <p>The requirement includes an allowance for churn, to facilitate existing businesses moving out to allow redevelopment.</p>	
		Scenario 2	<p><u>Scenario 2: Extensions to Industrial Estates</u></p> <p>This scenario has been rejected as a preferred option. However, it is still an option and I would ask the appointed Inspector to consider it as such.</p> <p>A number of individual sites are involved, certain of which may have some of the disadvantages set out in Table 3. It is necessary to incorporate a policy within the Employment Land Local Plan to allow for the possibility of some extensions to industrial estates where these would produce benefits such as improved access, relationship with existing adjacent employment areas, enhanced visual and environmental benefits and the possibility of immediate development.</p> <p>In particular, I have had numerous approaches from developers; a fact that will be borne out by my agents,</p>	<p>The site in question was assessed during the examination on the Core Strategy as an omission site. In her report, the Inspector was satisfied that none of the omission sites were suitable for housing or employment development.</p> <p>The site is a greenfield site within the boundary of Eastbourne Park, and any development within this area would be contrary to Core Strategy</p>	No change to ELLP

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			<p>Messrs Ross & Co, together also with Sussex Police Authority who wishes to expand onto the site, their Custody Suite being located next door.</p> <p>Development of this site could also bring with it highway benefits in providing part of the access for the St Anthony's Link and environmental benefits in terms of bunding and landscaping to enhance the visual entry southeast along Lottbridge Drove, which is the main A22.</p> <p>The provision of the St Anthony's Link could also bring with it benefits in terms of the viability in the longer term of the sites at Sovereign Harbour.</p> <p>Although nominally part of Eastbourne Park, this land has for some 40 years been allocated as the Southbourne Link into town. Accordingly, it has never during that time been available as part of the open areas of the Park.</p>	<p>Policy D11: Eastbourne Park. Being in Eastbourne Park, the site has considerable biodiversity and the development of this site could have significant environmental impacts.</p> <p>It is considered that the requirement for industrial and warehouse development can be met through redevelopment and intensification within the existing industrial estates, and therefore there is no need to allocate additional greenfield sites for development, especially considering that development of this site would be contrary to existing policy in the Core Strategy.</p>	
		Scenario 3	<p><u>Scenario 3: Redevelopment of Sites Outside Industrial Estates</u></p> <p>I agree that redevelopment of sites outside industrial estates located in other areas of the town could bring about the disadvantages set out in the document. Furthermore, such redevelopment would possibly only be suitable for B1 uses. It is also a fact that many of the smaller industrial estates have in recent years been</p>	Comments noted.	No change to ELLP

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			lost to employment in terms of their redevelopment for residential purposes or for A1 retail.		
		Scenario 4	<p><u>Scenario 4: Town Centre</u></p> <p>This allocation represents only 3,000m2. Furthermore, it is not suitable for other non-office B class uses. Therefore it is of a very restricted application, again contrary to the need set out in the NPPF for a variety of allocations.</p>	There is a requirement for office space as part of the overall requirement for employment land. The Town Centre is an option as a location for employment development in the form of offices, and is part of the preferred option which does provide a variety of allocations for employment development.	No change to ELLP
		Scenario 5	<p><u>Scenario 5: Sovereign Harbour</u></p> <p>These sites are liable to the same flooding constraints as the land at Lottbridge Drove, a factor not mentioned in the disadvantages.</p> <p>Furthermore, this site, amounting again to almost half the allocation, has been on the market for over 20 years I understand with no takers. It is in a very peripheral location. Access to it is likely to increase the existing congestion in Lottbridge Drove and it cannot sensibly be considered as a short term provider of employment opportunities given the need to provide the St Anthony's Link, which I note is shown as a low priority. Furthermore, in terms of sustainability it is almost certainly subject to access by private car given its isolated location.</p> <p>My understanding is that there have been recent planning applications submitted, which if approved may</p>	<p>Sovereign Harbour is within tidal flood zone 3a, so reference will be included as a disadvantage.</p> <p>There have been recent applications approved for the development of employment uses on the Sovereign Harbour sites, including the development of an Innovation Mall, which is currently under construction. This would not compromise the ability of the sites at Sovereign Harbour to meet the requirement for</p>	<p>No change to ELLP.</p> <p>Include reference to 'flooding' in disadvantages in the Employment Land Strategy and Distributions Options Report</p>

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			well render this particular allocation obsolete in terms of the overall floor area of 20,000m2. I would also mention that a number of companies interested in developing on my site in Lottbridge Drove have totally rejected going to Sovereign Harbour given its isolation and lack of other business uses.	20,000sqm of employment floorspace. Therefore this option should continue to form part of the preferred option for location of employment development in the town.	
		Scenario 6	<u>Scenario 6: Greenfield Development</u> I agree that the development of previously undeveloped greenfield land located away from the existing industrial estates is not a good option and should only follow if all else fails. However, my comments in respect of Scenario 6 should not be seen as precluding development of the site adjacent to Hammonds Drive, which falls to be considered under Scenario 2.	Comments noted.	No change to ELLP
PD-ELLP/04	Gardners Books Ltd (Andrew Little)	Employment Land Strategy and Distribution	Support for the Preferred Option for distribution of employment land. Against any development of Eastbourne Park (Scenario 6) as building on this land would be detrimental to the character of the town and it contributes to making Eastbourne a desirable and unique location to live. Need to cater for larger office/industrial units as there is a shortage of this type of accommodation. Disappointed that industrial land had previously been released for retail development.	Comments noted. Scenario 6 has not been taken forward and there will not be any development proposals in Eastbourne Park as part of the Employment Land Local Plan. It is understood that there is a shortage of larger accommodation, and it is anticipated that this can be provided as part of the development	No change to ELLP

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				<p>of the Sovereign Harbour sites. In addition, the protection of sites in industrial estates will encourage redevelopment to provide better quality industrial floorspace.</p> <p>The loss of industrial floorspace to other uses including retail is an identified issue. The Employment Land Local Plan includes policies for the protection and safeguarding of existing employment space within the Industrial Estates.</p>	
PD-ELLP/05	Highways Agency (Keith Jacobs)	General	<p>The cumulative effect of development in the borough could have an impact on the A259 to the east, A27 to the north and more specifically the Cophall roundabout and A27/A2270 junction. It is important that, wherever possible, policies which encourage sustainable development will help reduce the likely impact on the SRN.</p> <p>No comment other than that described above and as stated in our consultation responses to the Core Strategy.</p>	<p>Comments noted.</p> <p>The Employment Land Local Plan proposes a lower quantum of development that previously proposed in the Core Strategy, and therefore it is not expected that there will be additional adverse impact on the Strategic Road Network.</p>	No change to ELLP
PD-ELLP/06	Sussex Police (Samantha Prior)	Employment Land Strategy and	Support for Scenario 1 as this option makes best use of existing Brownfield land, and includes the area of Hammonds Drive in which Sussex Police have a	Support noted.	No change to ELLP

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		Distribution	particular interest due to the existing premises operated and land owned.		
		Policy EL2	<p>Inclusion of Sussex Police site in proposed Policy EL2 is welcomed.</p> <p>Concern that Policy EL2 only allows for the intensification, redevelopment or new build for Class B Use only (or appropriate uses that cannot be located elsewhere due to their un-neighbourliness), as Sussex Police operations fall within Class C2A and Policy EL2 may prohibit future police developments. Although there are no plans to increase this facility on site, some flexibility may be required over the thirteen year plan period.</p> <p>The ELR identifies that one of the weaknesses of Hammonds Drive is access. Policy EL2 does not take the opportunity available for improving the approach, parking demarcation and public realm within the Estate.</p>	<p>It is necessary to protect the Industrial Estates from other uses in order to protect their integrity and so that they remain locations where there is an expectation that businesses would be located. However, Policy EL2 does allow appropriate uses that cannot be located elsewhere due to its un-neighbourliness and it is considered that a Police Custody Centre would be such a use due to the fact that it is used 24 hours a day, which could cause disturbance in a residential area.</p> <p>The Core Strategy Neighbourhood Policy C13 addresses the issue of public realm in the Industrial Estates by 'promoting the upgrading public realm in the Industrial Estates to make it more attractive for potential and existing businesses'. It is not</p>	No change to ELLP

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				considered necessary for this to be repeated in the ELLP.	
PD-ELLP/08	Natural England (John Lister)	General	The designated Industrial Sites shown in Figure 1 - lie to the north and south of part of Eastbourne Park. This is Coastal & Floodplain Grazing Marsh and a significant part of this area is supported by Environmental Stewardship funded through NE. The Park is a key component in the habitat network and an amenity for the town. The Plan (as a whole) should ensure that intensification of the Industrial Sites does not have a detrimental impact this important asset.	Comment noted. The Core Strategy contains policies for the protection of Eastbourne Park, and the Employment Land Local Plan does not identify development in Eastbourne Park on this basis. It is not expected that intensification of the industrial estates will have an adverse impact on Eastbourne Park, as development would not be accepted outside of the industrial estate boundary.	No change to ELLP
PD-ELLP/09	East Sussex County Council (Ellen Reith)	Introduction - Relationship with other plans and strategies	There is no reference to the EU Structural Investment Fund or the draft SELEP Strategic Economic Plan, although it is likely that Eastbourne would seek some of the funding for activities identified through these routes. Identifying the link in this strategy would also strengthen the case when making project applications.	Reference to the EU Structural Investment Fund and the SELEP Strategic Economic Plan will be made.	Add two new paras after para 1.14 to read: <i>The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government's Local Growth Fund is</i>

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					<p><i>supported by businesses, local authority and education leaders across the area. To date, funding has been awarded for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the 'Hailsham, Polegate and Eastbourne Sustainable Corridor' and an Eastbourne and South Wealden walking and cycling package.</i></p> <p><i>EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support, innovation, export and new technologies.</i></p>

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PD-ELLP/10	East Sussex County Council (Ellen Reith)	2.3	Where claims are made e.g. There is a strong concentration of employment within key parts of the 'media' sector, there should be a footnote reference to the source of the data. The document includes a number of claims about clusters and sectors in the county, but there are often few data references to back them up. It would be very helpful for cross-referral and also to identify sources of data.	The data is sourced from the Employment Land Review (GVA, 2013), and this will be referenced in the footnotes.	Include footnote references to data sources.
		2.14	Is there evidence of the need for additional business space of this type? If this type of investment is to be made, there should be some reference to how the need has been identified, or there is a risk of new-build standing empty.	The Employment Land Review (GVA, 2013) identifies that the lack of 'mixed' units is one of the weaknesses of the employment land supply in Eastbourne. It goes on to state that this stock is likely to be in demand by businesses in advanced manufacturing, media/creative and technology based sectors. The recent application for an Innovation Centre, which is currently under construction, is just this type of flexible, mixed accommodation and provides an indication that there could be further demand for this type of space in the future.	No change to ELLP

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PD- ELLP/11	East Sussex County Council (Ellen Reith)	2.21	This should specify what specialisms and clusters are to be encouraged to grow and to build their supply chains. This will help a wider audience identify opportunities and can give a focus to others working on this agenda elsewhere.	The Employment Land Review (GVA, 2013) identifies strength in a number of manufacturing activities, particularly relate to mechanical products, and in parts of the 'media' sector in terms of film and TV production and production of recorded media.	Amend the final sentence of para 2.21 to state: <i>Also, by encouraging existing key businesses and their supply chains, there is an opportunity to grow existing specialisms and 'clusters'. This might include manufacturing activities, particularly related to mechanical products, and parts of the 'media' sector, such as film and TV production and production of recorded media, which are sectors that have been identified as being particularly strong in Eastbourne.</i>
		2.22	It is very unhelpful to put the statement ' ... Should no longer rely on attracting significant inward investment.' It sends the signal that Eastbourne is closing the door to inward investment, or at best will put little effort into it if an opportunity arises, focusing instead on home-grown business. It is also at odds with the fact that Eastbourne contributes to the funding for Locate East Sussex. Even if recently there has not been inward investment it does not automatically mean it will remain that way. As the economy edges out of recession, there should be more growth and opportunities for business mobility, so Eastbourne should be prepared for this and invite it in.	It was not the intention for the ELLP to close the door on inward investment, but to recognise that future demand is more likely to be driven from local business requirements. Increasing economic growth will require focusing on the strengths of existing businesses and attracting like-minded	Amend para 2.22 to read: <i>The nature of economic growth has changed over recent years and Eastbourne has seen lower levels of inward investment, mainly due to the age and quality of existing stock, and has instead been more reliant on local investment from indigenous businesses.</i>

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				<p>new activities to the area. This will need to be done through the provision of new, higher quality floorspace, which will be key to providing choice and attracting inward investment.</p> <p>Para 2.22 will be amended to reflect this.</p>	<p><i>Future demand and growth in the market is still likely to be driven from local investment, either through expansion, changing space requirements or new business start ups. However, as the economy grows, it is important to encourage inward investment by making provision for attracting like-minded new activities to the area.</i></p> <p><i>The Employment Land Local Plan needs to ensure it provides 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. This will also include the provision of a range of sites, including new, high quality floorspace alongside sites and premises to help increase the business start-up and survival rate and ensure indigenous businesses are</i></p>

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					<i>retained and can grow.</i>
PD-ELLP/12	East Sussex County Council (Ellen Reith)	Key Issues	The improvements underway, both commercially and through the East Sussex investments in super-fast broadband should be included. Increasingly, premises with super-fast broadband connectivity are a requirement by businesses, (even if 'not mandatory for the delivery of employment land' - 5.4) aiming to grow and expand their markets, and should be highlighted here as well as later in the document.	Agreed. Broadband connectivity could influence demand for employment land and will be referenced as a demand issue.	Add additional sentence to end of para 2.20: <i>In addition, premises with super-fast broadband connectivity are a requirement for businesses aiming to grow and expand their markets, and improvements in broadband connectivity may influence the requirement for additional employment land in the area.</i>
PD-ELLP/13	East Sussex County Council (Ellen Reith)	2.30	The Employment Land Review should be footnoted with a link to ensure ease of access.	Comments noted.	Include link to ELR within footnote
		2.32	It would be helpful to give examples of the densities mentioned in the text - not all of the audience will be clear what these densities look like in practice, so a recognisable example for each one cited would aid understanding.	The density assumptions are derived from the HCA Density Guide Second Edition 2010. This is national good practice guidance. In addition, it would be very difficult to find examples that everyone would be familiar with.	No change to ELLP
PD-ELLP/14	East Sussex County Council	Vision and Objectives	'Eastbourne will be making a strong contribution to the economy of Eastbourne and South Wealden' is confusing - it is making a contribution to itself. It is	Agreed. The Vision could be re-worded to be less	Amend the Vision to read: <i>"By 2027, Eastbourne will</i>

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	(Ellen Reith)		suggested that this is changes to 'The Eastbourne economy will be stronger and more sustainable. It will also contribute to the wider economy in South Wealden by	confusing.	<i>be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work"</i>
PD-ELLP/15	East Sussex County Council (Ellen Reith)	Vision and Objectives	<p>ELLP1 seems at odds with the comment about inward investment in paragraph 2.22. It is also unclear how attracting increased investment and new and innovative businesses encourages economic competitiveness. Generally, that would be more a result of efficiencies and comparative advantage.</p> <p>ELLP2 says largely the same as ELLP3. The title suggests start-up support, whereas the paragraph refers to both start-up and established businesses. It is suggested that the objective just says something about providing flexible employment spaces that meet the needs of and are attractive to small and start-up businesses.</p> <p>ELLP4 maybe be a bit more positive about what the new premises will enable, such as staying in the town and flourishing.</p>	<p>As described in the response to PD-ELLP/11, economic growth will rely on indigenous businesses as well as inward investment.</p> <p>Inward investment through attracting like-minded business activities will encourage the economic competitiveness of the local economy.</p> <p>Whilst there is an element of similarity between ELLP2 and ELLP3, the objectives are different. In order to reduce similarities, ELLP2 will be amended to removed</p>	<p>ELLP2 delete: 'To diversity the local economy...'</p> <p>Amend ELLP4 to read: 'ELLP4 - Support Existing Businesses - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.</p>

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				reference to diversity. ELLP4 will be amended to refer to staying in the town and flourishing.	
PD-ELLP/16	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with assessment of the scenarios for the strategy and distribution.	Comments noted.	No change to ELLP
PD-ELLP/17	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with the preferred option.	Comments noted.	No change to ELLP
PD-ELLP/18	East Sussex County Council (Ellen Reith)	Page 19	The narrative on this page repeats what was set out clearly in the tables and does not add anything qualitative, so could be taken out to make the document more succinct.	The section on 'Options considered for employment land strategy and distribution' was only intended to aid understanding in the Proposed Draft version and will not be included in the Proposed Submission version.	No change to ELLP
		3.7	Clarify why occupiers are seeking to vacate: is it to relocate within the area, fold, or leave the area altogether?	There are a number of instances where the current premises do not meet the needs of the business. However, there is no indication as to where they will move to. It is important for the ELLP to recognise that	No change to ELLP

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				there will be movement within industrial estates.	
PD-ELLP/19	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with the proposed approach to the distribution of employment land.	Comments noted.	No change to ELLP
PD-ELLP/20	East Sussex County Council (Ellen Reith)	Policy EL1, bullet point 4	It would be helpful to specify specialisms.	Para 2.21 has been amended to refer to specific specialisms. It is not considered appropriate to include this reference in the policy, however the supporting text will be amended to specify the specialisms.	No change to ELLP
		3.11	Examples of similar successful schemes elsewhere in East Sussex should be given.	Agreed. Examples of other successful developments in East Sussex will be referenced.	Add sentence at end of para 3.11 to read: <i>Examples of this type of development in other parts of East Sussex include the Priory Quarter and North Queensway Innovation Park in Hastings, and the Basepoint Enterprise Centre in Newhaven.</i>
		3.12	Specify which sectors key businesses are in.	Instead of referring to specific specialisms in the Policy, it is more appropriate to do this in the support text, and para	Amend 3.12 to read: <i>Eastbourne should further the development of 'clusters', including but</i>

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				3.12 will be amended to make this reference.	<i>not limited to mechanical manufacturing and film and TV production, by using existing key businesses and their supply chains as an opportunity to grow existing specialisms through promotion and provision of appropriate space. The role of these clusters should be enhanced in the Borough both as a 'selling point' to attract occupiers and through the development of links to suppliers locally.</i>
		3.15	Where it says 'Working with and enhancing', it should identify clearly what this means. Is it Eastbourne Borough Council or others as well?	Eastbourne Borough Council will work with education providers in order to enhance skills provision. Para 3.15 will be re-worded to make it clearer.	Amend final sentence of para 3.15 to read: <i>Eastbourne Borough Council will work with the existing education and skills institutions to enhance provision, in order to address skill shortages, increase the working age population and improve the 'economic catchment' of the Borough.</i>
PD-	East Sussex County Council	4.7	Are any bespoke builds intended here to help existing	The ELLP does not specify the type of	No change to ELLP

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ELLP/21	(Ellen Reith)		businesses grow with minimum relocation?	redevelopment that should take place in the industrial estates, but it is envisaged that it will be a mix of bespoke and speculative developments.	
PD-ELLP/22	East Sussex County Council (Ellen Reith)	4.20	Clarify what sort of 'support will be given'. Does it mean planning permission, lobbying or funding, or something else?	'Support' refers to planning permission. The sentence will be re-worded for clarification.	Amend final sentence of 4.20 to read: <i>Therefore, proposals for the refurbishment of existing office stock within the Town Centre will be supported, to meet modern occupier demands where they come forward.</i>
PD-ELLP/23	East Sussex County Council (Ellen Reith)	Monitoring Framework	Information should be gathered not only on floor space completed, but also how much of it is occupied after 1 year, 3 years, 5 years, and how much remains vacant, to evaluate the success and value for money of the investments.	Whilst it is agreed that this information would help to evaluate success of development schemes, the occupation of the business units are not in the control of the planning system, and therefore it would not help with monitoring the effectiveness of the Employment Land Local Plan. In addition, Eastbourne Borough Council does not	No change to ELLP

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				have the resources to monitor of occupation as part of the monitoring of the Employment Land Local Plan.	
PD-ELLP/24	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)	Evidence (<i>Employment Land Review</i>)	<p>The ELR presents much of the technical assessment data in summary form only. It would benefit from the addition of primary and analytical data tables within an appendix to trace the steps taken through to the recommended level of floorspace to be provided.</p> <p>Some inconsistencies appear within some of the ELR's summary tables and text (e.g. ELR Tables 3 and 4). The document should be reviewed to ensure these are corrected.</p>	The Employment Land Review (ELR) will be reviewed and amended to ensure consistency between data tables and commentary text. Where relevant we will provide supporting data tables in an appendix to the main report.	<p>No change to ELLP</p> <p>The ELR will be reviewed and amended to include technical data and ensure consistency between text and tables.</p>
			<p>Reference is made within various of the ELLP documents to the proposed Innovation Mall at Sovereign Harbour providing 3,000sq.m. of B1 space. The detailed planning application for the Mall is for 2,300sq.m. accommodating c.300 jobs. This equates to a density of c.8sq.m. per job, which accords with HCA published guidance on floorspace to job densities for serviced space. The ELR's application of 12sq.m. per office job across town centre and business park sites represents an over-specification of any such allocated space at Sovereign Harbour, as already demonstrated by the Mall. This should be reduced to 8-10sq.m. for assessment purposes.</p>	The density of 12 sqm is in line with the nationally recognised HCA's Density Guide Second Edition (2010). The average office density across the South East region is 12.7 sqm per office job. Only within Central London are densities of 8-10 sqm per office job regularly achieved. Average densities for the sectors most relevant to Eastbourne indicate that 12 sqm is appropriate, and therefore 12 sqm per office job will continue to	No change to ELLP

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				be used as occupier density.	
			<p>The ELR refers to the TCLP envisaging that 3,000sq.m. of new office space will be allocated to Eastbourne town centre (ELR para 4.88). The TCLP does not envisage this. The requirement for the early review of the CSLP and the examination of the TCLP both emphasised the purpose of the ELLP is to independently determine the level of new floorspace requirements and how these can be most appropriately met across the town.</p> <p>The linked SA/SEA (para 6.10) repeats this error and has not considered all reasonable alternative spatial options for the distribution of new employment space. It demonstrates the consideration of just one strategic option for office space within the town centre: this being the continued allocation of just 3,000sq.m. A higher allocation within the town centre is a reasonable, market-led and NPPF policy compliant alternative.</p> <p>The allocation of just 3,000sqm. to the town centre will not replace the ELR's assessed windfall loss of 4,000sq.m. of office space to other uses, which will predominately take place within the town centre. The proposed allocation of new office space to the town centre thereby represents a planned for net loss of office space within the centre when both forecast losses and allocated new space are accounted for.</p> <p>Capacity exists for the office allocation within the town centre to be significantly increased without compromising other spatial objectives, including the provision of new housing. This includes within the two sites that are specifically identified in the ELLP to accommodate the 3,000sq.m. of allocated space. Whilst</p>	<p>90% of the office stock in Eastbourne is located in the Town Centre. Office occupiers have different requirements, and currently Eastbourne does not provide sufficient choice with the majority of office space provided in the town centre. A more balanced provision of town centre and out of town locations is required to secure economic growth.</p> <p>It is considered that the provision of 3,000 sqm of new office space in the town centre will allow the replacement of some of the old stock that no longer meets the needs of occupiers, whilst also allowing the rebalancing of the portfolio.</p> <p>It is not agreed that there is capacity in the Town Centre for significantly increased office provision without compromising other objectives for the</p>	<p>No change to the ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>the EBC documents do not appraise the total upper floorspace capacity of these sites, it is nonetheless acknowledged through ELLP Policy EL3 that they can individually as well as together accommodate more than 3,000sq.m. of office accommodation.</p> <p>The ELLP acknowledges the strength and strategic benefits of the Eastbourne/Polegate/Hailsham corridor but does not propose any further formal allocation of office space within the Eastbourne area of the corridor beyond just 3,000sq.m. in the town centre. The corridor is a key establish commercial hub and in connectivity terms benefits from existing infrastructure including rail connections. Potential exists to capitalise on this further including for office space. This must be recognised in policy.</p> <p>The assessed requirement of just under 21,000sq.m. of Class B1a/b space must be rebalanced to require the majority of this to be provided within the town centre alongside (1) opportunities for additional provision within the town's other centre and along the strategic corridor to Polegate, and (2) the possibility of grant supported space at the Harbour.</p> <p>This distribution will ensure office accommodation is replaced and enhanced within the town centre and will follow the logical pattern of established growth and connectivity within Eastbourne and adjoining Wealden.</p> <p>The SA/SEA's appraisal of the Council's preferred spatial options exaggerates the sustainability benefits of the ELLP's proposed balance of office space allocations. The reassessment of these and of the alternative option to allocate a higher amount of space to the town centre, accounting for potential subsidised new space at the Harbour, demonstrates this to be by</p>	<p>Town Centre. The Town Centre Local Plan identifies five development sites, two of which already have permission. The remaining three sites will be required to deliver the office space requirement, 450 residential units, along with additional retail and community uses. It is not considered that an increased provision of office space could be appropriated provided alongside the other requirements on these sites.</p> <p>However, an increase level of provision of office space in the Town Centre will be tested as part of the Sustainability Appraisal.</p> <p>It is not considered appropriate that the majority of the office space requirement should be provided in the town centre.</p>	

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			<p>far the more beneficial option. This is in overall delivery and sustainability terms and in terms of being able to achieve the objectives and vision of the ELLP overall. This alternative option is also SEA regulation and NPPF compliant.</p>		
			<p>The ELR acknowledges the longstanding viability constraints for Class B1 space at the Harbour. It however goes on to recommend that no less than 96% of the town's total assessed office floorspace requirement (20,766sq.m) and 100% of the assessed net new floorspace requirement (15,977sq.m.) should be allocated here. This does not represent an appropriate balance in the distribution of new and replacement office space and will not achieve the vision or the core objectives of the NPPF, CSLP or of the ELLP.</p> <p>Critically, the ELR/ELLP's proposed allocation at the Harbour is also unviable in commercial terms. The ELR acknowledges the need for grant funding support to overcome viability constraints for high quality office development at the Harbour. The Site 6 B1 proposals that are progressing through planning at the time of writing are only proposed with the support of grant aid. That support will not apply to all of the proposed employment land. Acknowledged longstanding viability constraints that have sterilised the employment sites at the Harbour will therefore not only remain on Sites 4 and 7 but will be exacerbated further by the presence of adjoining subsidised provision, against which Sites 4 and 7 will be unable to compete in financial terms. A continuing policy allocation for further substantial open market B1 space at the Harbour will, in short, be undeliverable.</p>	<p>It is established practice for public funded employment space to 'lead' or support new commercial districts as it allows for future delivery on 'market terms', provides proof that there is a market for such development and helps establish new sectors.</p> <p>The Innovation Mall can play an important role in demonstrating the potential of Sovereign Harbour as a new economic hub. The provision of publicly subsidised space has been a key tool in a number of locations to support wider, private sector, employment development. Examples of this are locations such as Silverstone and the Medway Innovation Centre. It is not considered that the</p>	<p>No change to ELLP</p>

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				subsidised provision on Site 6 will have any negative impact of the viability of the remaining sites.	
PD-ELLP/25	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)	Demand Issues	<p><i>Requirement for additional employment land:</i> the summary explanation on this matter is supported, in particular the need to provide for an appropriate and realistic employment land requirement, differentiated by B Use Classes.</p> <p>The assessment of floorspace and resulting land requirements, must accordingly take into account the nature of Eastbourne's employment market, including its small scale and local origin of demand for space.</p> <p>Having reviewed the new ELR, however, we do not consider the resulting recommended requirements for the level and distribution of new office space have been fully substantiated.</p>	The ELR provides a full justification for the employment land requirements, including the forecast for the number of jobs that need to be provided by use class, and appropriate densities to turn the job requirements into floorspace requirements.	No change to ELLP
			<p><i>Need for sustainable job creation and diversification:</i> The need to diversify local employment and to ensure that new local job creation is sustainable is supported.</p> <p>The definition of sustainable employment must be clearly defined if this is to appropriately and objectively inform employment land allocation options and choices. We consider the definition in relation to Class B1a/b space should be new employment that:</p> <ul style="list-style-type: none"> • becomes established and continues to provide job opportunities for local people over the long term; and • is located where it is most accessible by the greatest number of people without their need to 	<p>The ELLP does not reference the term 'sustainable employment' and therefore there is no need to provide a definition for it.</p> <p>Within the Initial Sustainability Appraisal Report, Sustainability Objective EL-SA13 relates to providing employment opportunities that are in accessible locations for local people and commuters, Sustainability</p>	No change to ELLP

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			<p>travel by private car.</p> <p>This second requirement underpins significant elements of nationally accepted strategic and sustainable planning objectives but does not sufficiently underpin the draft ELLP and its linked SA/SEA. This follows from weaknesses within the ELLP and its supporting documents in the weighing up of the respective location benefits of the town centre and Sovereign Harbour.</p> <p>The Response Statement includes a reassessment of the ELLP's proposed distribution of new office space based upon the SA/SEA assessment criteria.</p> <p>An alternative allocation option, with more office space directed to the town centre, has also been appraised and is shown to score more highly in sustainability terms.</p>	<p>Objective CS7 mentions accessibility by sustainable modes of transport, and Sustainability Objective CS20 references reducing the need to travel by car.</p> <p>It is considered that this adequate deals with the assessment of sustainability in terms of accessibility.</p>	
			<p><i>Development that provides for start-up businesses:</i> This is also supported. The proposed Innovation Mall at Sovereign Harbour will help to meet this objective.</p> <p>The Innovation Mall will however provide 2,300sq.m. of space not 3,000sq.m. as referenced in the ELLP (para 4.36). The planning application for the Mall has also specified that it envisages it will accommodate 300 jobs. This equates to a floorspace to job density of 7.7sq.m.; a density that is in line with the HCA's 2010 guidance on serviced office space, but significantly lower than the 12sq.m. used within the ELLP's accompanying ELR to appraise floorspace requirements.</p> <p>As outlined within the Response Statement, the ELR's applied job density results in an over-allocation of office space. A density of 8 to 10sq.m. per job is appropriate</p>	<p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm NIA</p> <p>The density of 12 sqm is in line with the nationally recognised HCA's Density Guide Second Edition (2010). The average office density across the South East region is 12.7 sqm per office job. Only within Central London are densities of 8-10 sqm per office job regularly</p>	<p>No change to ELLP</p> <p>Reference to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm NIA.</p>

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			for such space at the Harbour.	achieved. Average densities for the sectors most relevant to Eastbourne indicate that 12 sqm is appropriate, and therefore 12 sqm per office job will continue to be used as occupier density.	
		Supply Issues	<p><i>Suitability of Current Commercial Premises:</i> The draft ELLP on this matter refers only to examples of the town's Industrial Estates as providing opportunities to be upgraded or replaced to provide more appropriate modern accommodation.</p> <p>The town's existing office stock presents the same challenges but also opportunities. This must also be acknowledged and addressed more positively by the ELLP if the necessary links are to be made between:</p> <p>(1) the nature of the town's office market; and</p> <p>(2) a need to ensure employers have an on-going and increased opportunity to locate in the town centre as Eastbourne's established and most sustainable office location.</p>	The 'Suitability of Current Commercial Premises' will be amended to include reference to office stock. The ELR identifies that much of the office stock is no longer fit for purpose and does not provide an attractive offer to new occupiers. This is evidenced by the persistent high vacancy rates in a number of buildings and increasing demand for conversion to other uses.	Add additional text at end of para 2.23: Similarly, a significant amount of the office stock, especially in the town centre, is dated and does not tend to meet the needs of modern office occupiers. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to allow modern servicing and infrastructure to be incorporated.
			<p><i>Loss of Employment Land to Other Uses:</i> The acknowledgement of this issue is supported. At present however the ELLP appears to too readily accept the loss of employment space within the town centre because higher value use options may be available. Planning policy allocations and linked planning controls must seek to maintain existing employment based</p>	It is appropriate to consider the loss of employment land to other uses, especially in the town centre, because of permitted development rights that allow	No change to ELLP

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			<p>accommodation where it is already appropriately located to help meet space requirements.</p> <p>This requires a more positive policy response towards the retention and provision of office space, across a greater number of sites and to a higher level of floorspace capacity within the town centre than is currently proposed within the draft ELLP.</p>	<p>conversion of office space to residential (subject to prior approval), and para 51 of the NPPF, which sets the principle of allowing change of use from B space to residential use. The most appropriate employment space for conversion to residential is located within the town centre. Policy EL2 has been included in the ELLP to maintain existing employment based accommodation in the most appropriate locations.</p>	
			<p><i>Identification of Sites:</i> The ELLP's stated need to ensure that additional employment development is provided in the most appropriate and sustainable locations is supported.</p> <p>The draft ELLP however is too negative in its assessment of development constraints and its options for new office space within the town centre and too readily dismisses this option in favour of other potentially higher value uses.</p> <p>The need to ensure an appropriate supply of office space within the town centre must take greater precedence than is currently expressed within the draft ELLP.</p> <p>The ELLP additionally assumes in space allocation terms</p>	<p>Support for the identification of sites is noted.</p> <p>It is not considered that the draft ELLP is too negative in the assessment of the town centre, and it does take into account occupier needs for a more balance provision of office stock.</p> <p>However, an increase level of provision of office space in the Town Centre</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>that no new office space will be provided within the town's existing employment estates. New office accommodation has been provided in these locations and opportunities to provide further such accommodation should not be dismissed.</p>	<p>will be tested as part of the Sustainability Appraisal.</p>	
			<p><i>Requirements for Office Space in the Town Centre:</i> The ELLP refers to both the EBC TCLP (2013) and the SA/SEA as stating that the ELLP is to determine the appropriate amount of office space to be provided in the town centre. The ELLP's summary of this issue also states that a balance must be struck which must take into account the maintenance of the town centre as an office location as well as the broadening of choice within the town's overall office stock.</p> <p>At para 4.88 of the supporting ELR however GVA states: Across a range of Development Opportunity Sites, Transition Areas and Potential Areas of Change B1a floorspace is deemed an acceptable use.</p> <p>It is within these areas that the TCLP envisages the delivery of 3,000sq.m. of new floorspace within come forward.</p> <p>The TCLP does not envisage this; the TCLP requires the ELLP, supported by a sound evidence base (i.e. the new ELR), to establish an appropriate allocation of net additional new space for the town centre. At no point does the ELR explain how the allocation of this amount of space has been re-arrived at or why it is limited to just 3,000sq.m.</p> <p>At page 8 within the Executive Summary of the ELR, GVA states: To avoid any adverse impact on the town centre we would continue to support the 3,000sq.m. allocation within the Core Strategy with a primary focus</p>	<p>The NPPF sets the direction for LPAs to identify strategic sites (or set criteria to identify them) for local and inward investment to meet "anticipated needs over the plan period". In line with paras 7 and 17 the distribution of development land for business should have the right types of land available in the right places at the right time to meet occupier requirements, it should also respond to market signals.</p> <p>The review of Development Opportunity Sites within the ELR identifies the 'hierarchy' of potential sites in the town centre for office use based on a market orientated view of their attractiveness. None of the sites are ruled out,</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>for delivery on the sites Development Opportunity Site 2 and Development Opportunity Site 3.</p> <p>Whilst the ELR at its Table 15 (pages 49 to 52) appraises the TCLP Development Opportunity Sites (DOS) and town centre Transition Areas for their suitability for new office accommodation, as explained within the Response Statement, elements of this assessment are flawed and the link between the capacity of these sites and the allocation of 3,000sqm is again not explained.</p> <p>An allocation of 3,000sq.m. equates to just one building within one block of DOS Three.</p> <p>The ELLP at para 4.26 also acknowledges that DOSs Two and Three have capacity to accommodate more than 3,000sq.m. both individually as well as together, It states that: If one site comes forward without sufficient provision of office space, the balance should be provided on the other.</p> <p>Following from this, the ELR fails to appropriately appraise the overall market risks and threats that arise from proposing such a limited amount of office space within the town centre and does not fully consider the sustainability issues arising from the balance of allocations proposed within the centre and at Sovereign Harbour.</p> <p>As outlined within the accompanying Response Statement, the SA/SEA's appraisal of the ELLP's single option for the town centre of 3,000sq.m. of B1 space is flawed. The Statement accordingly reappraises the distribution of space options:</p> <ul style="list-style-type: none"> • first based upon what we consider a more appropriate scoring of EBC's proposed option 	<p>but it suggest those that are likely to be most appropriate and attractive to the market. In line with the direction of the NPPF, office proposals, should they come forward on any site, will be assessed in the usual development control manner for acceptable town centre uses. The identification of the DOS 2 and 3 is intended to provide a strategic direction for promotion of town centre opportunities. The availability of other development sites does not evidence a reduction in the need for other types of site across the Borough to meet local economic needs.</p> <p>The majority of the office stock in Eastbourne is located in the Town Centre. This does not meet occupier needs, and therefore it is necessary to rebalance the portfolio is include provision in out of town locations. Provision in the town centre will be high quality</p>	

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			<p>against the ELLP’s sustainability objectives; and</p> <ul style="list-style-type: none"> second based upon an alternative option which demonstrates that a higher office allocation for the town centre presents a more favourable approach in sustainable planning terms, one that is deliverable in space capacity terms within the town centre and that will not prejudice other strategic development objectives for the centre. 	<p>replacement for some of the older provision that does not meet occupier needs.</p> <p>As previously mentioned, increased provision of office space may compromise the ability of the town centre to meet other objectives, particularly those related to housing delivery.</p> <p>An increase level of provision of office space in the Town Centre will be tested as part of the Sustainability Appraisal.</p>	
			<p><i>Suitability and Viability of Land at Sovereign Harbour:</i> The draft ELLP’s summary of this issue correctly outlines (1) the long standing Council priority for employment development to be delivered at the Harbour, (2) that this has not occurred (3) that the ELLP is to consider the suitability and viability of land here for office development.</p> <p>The ELR identifies an overall B1a requirement for the town of 20,766 sq.m. allowing for losses and churn within the town’s office stock. This is translated into a proposed allocation of 20,000sq.m. at the Harbour: i.e. effectively the total amount of office space assessed to be required within the town overall through to 2027.</p> <p>EBC’s proposed allocation takes into account the Innovation Mall which has been applied for, albeit this</p>	<p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm</p> <p>The allocation of 20,000 sqm of office space at Sovereign Harbour is an attempt to rebalance the office stock portfolio in order to provide occupier choice and support economic growth. Currently, 90% of office stock is located in the town centre and this does</p>	<p>No change to ELLP</p> <p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm</p>

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			<p>will total just 2,300sq.m. not 3,000sq.m. as referenced within the ELR (para 4.75).</p> <p>Based upon EBC's proposed allocation of 20,000.sq.m, once the Innovation Mall is delivered this will leave a remaining allocation of 17,700sq.m. to still be delivered at the Harbour.</p> <p>This allocation may represent a reduction of 10,000sq.m. on the CSLP allocation for the Harbour (i.e. 30,000sq.m. of B1 space), but again this amount is not substantiated in terms of how this meets with market demand, market trends and strategic planning and sustainability objectives.</p> <p>The ELR at its para 4.79 to 4.82 itself outlines the significant viability constraints at the Harbour. At its paras 4.84 and 4.85 the ELR states that: However the availability of public sector funding via the Growing Places Fund is likely to help overcome some of these challenges. It will help to establish Sovereign Harbour as an employment location and by providing on site servicing reduces some of the prohibitive barriers to entry. Both will help to attract future demand as the economy recovers and potentially enable that demand to be realised.</p> <p>If these barriers can be overcome with public sector support then the vacant land at Sovereign Harbour could have an important role to play in accommodating future economic growth by providing a new, high quality location that is considerably different to current employment areas and the town centre and provides additional capacity for growth.</p> <p>Receipt of a public subsidy may unlock some of the infrastructure servicing constraints on part of the land at the Harbour and may provide accommodation that</p>	<p>not offer the choice that the market requires. Providing a balanced portfolio of office provision will help meet market demand and provides sustainability benefits in relation to economic growth.</p> <p>It is established practice for public funded employment space to 'lead' or support new commercial districts as it allows for future delivery on 'market terms', provides proof that there is a market for such development and helps establish new sectors.</p> <p>The Innovation Mall can play an important role in demonstrating the potential of Sovereign Harbour as a new economic hub. The provision of publicly subsidised space has been a key tool in a number of locations to support wider, private sector, employment development. Examples of this are locations such</p>	

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			<p>can in turn be offered at subsidised (lower) rentals in support of small / start-up businesses. This subsidy will bring occupancy costs of new high quality space at the Harbour more in line with town centre costs and as such the Harbour will be more likely to attract occupiers.</p> <p>This benefit however only addresses (part of) Site 6 and in time occupancy charges for the subsidised space will no doubt have to increase to reflect open market values.</p> <p>The fact that Site 6 will benefit from being heavily subsidised even in the short to medium term will however significantly impact on the ability to deliver equivalent space on neighbouring non-subsidised sites.</p> <p>The development costs of Sites 4 and 7 will be unchanged and will reflect the longstanding viability constraints of these sites in terms of their additional servicing costs. The open market rent or sale prices that will be required to recover those costs and provide a development profit unaided by grant support will be at a further significant premium compared with the supported space on Site 6.</p> <p>The development of Sites 4 and 7 for offices will thereby not only be unviable based on general development cost considerations but will have the additional constraint of having to compete against the advantages of the subsidised accommodation on Site 6.</p> <p>By acknowledging the viability issues at the Harbour and the need for grant subsidy to deliver new space here, demonstrates awareness of the reasons why the Harbour has not delivered office space to date. The failure of the ELR and the ELLP to acknowledge the implications of this as a constraint to the delivery of</p>	<p>as Silverstone and the Medway Innovation Centre.</p> <p>It is not considered that the subsidised provision on Site 6 will have any negative impact of the viability of the remaining sites.</p>	

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			<p>additional unsubsidised space however is a major flaw.</p> <p>By going on to recommend that the most substantial share of the town's allocated office space should be directed to the Harbour in spite of these viability issues is flawed and is unsound.</p>		
			<p><i>Eastbourne and South Wealden area:</i> The ELLP's summary of this matter refers to the relationship between these two neighbouring areas and in particular between Eastbourne, Polegate and Hailsham. It also refers to the 2008 masterplan that was produced for this area.</p> <p>The representations submitted on behalf of SHL at that time also emphasised the primary focus for growth between the two authorities was along the north-south corridor and at the core hub at Polegate / Stone Cross.</p> <p>The ELLP stakeholder event held in June 2013 focused quite significantly on the strength of this north-south corridor and on the opportunities to build further upon it. Sovereign Harbour remains very much peripheral to this area.</p> <p>There is scope to develop further employment space within and along the corridor without the need to rely upon new space at Sovereign Harbour. The ELR / ELLP ignores this, representing a further flaw in the range of alternative allocation options that should be considered.</p>	<p>In order to ensure economic growth in the area, a balanced provision of office space should be provided. This means provision in town centre and out of centre locations. Sovereign Harbour is not considered to be peripheral to the Eastbourne and South Wealden area as a whole as it can provide something that is not present in the rest of the area.</p>	<p>No change to ELLP</p>
PD-ELLP/26	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited</p>		<p>The vision, and the emphasis placed within it on sustainability measures and objectives, are supported.</p> <p>The setting out of the alternative options for the distribution of new office space and the scoring of these options within the ELLP's accompanying documents however are not sufficiently appraised to ensure that</p>	<p>An increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
	(Mark Orriss)		<p>the ELLP's vision will be achieved to its fullest possible extent.</p> <p>This includes a failure to identify and appraise all reasonable alternative office space allocation options.</p>		
PD-ELLP/27	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>		<p>The draft ELLP identifies the Key Spatial Objectives (KSO) of the CSLP that are considered to be of most relevance to the ELLP and which set a template for the appraisal of options for growth within and across the town.</p> <p>Whilst KSO3 focuses upon the shopping and leisure role of Eastbourne town centre, this does link to wider considerations of how to help sustain the centre as a vibrant, high quality destination.</p> <p>EBC's policy approach for the town centre recognises the benefit of supporting new residential development within the centre, which will contribute to meeting housing requirements and provide additional footfall and patronage for service providers within the centre.</p> <p>The vitality and sustainability of service provision however is also dependent upon a wider commercial and employment base that provides important weekday and evening footfall.</p> <p>The ELLP's proposed allocation of just 3,000sq.m. of new office space to be provided within the centre fails to make this important link and will represent a net loss in the town centre's office stock, once forecast net losses are also taken into account. This undermines the ELLP's ability to meet CSLP KSO3 and the vision set out for the ELLP itself.</p> <p>CSLP KS08 and KS010 emphasise the need for development to be appropriately located to help reduce</p>	<p>90% of Eastbourne's office stock is already located in the town centre. The proposed approach would result in an increased provision of higher quality office provision as the losses of stock are likely to be poor quality and condition that does not meet occupier needs. A balanced provision of office space across the town, including the replacement of old stock in the town centre with new high quality provision, will help meet the Spatial Objectives.</p> <p>The proposal to rebalance the office provision in the town will still result in the majority of the office space being located in the town centre. This means that the majority will still be appropriately located to help reduce car-based travel, but will also</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>car-based travel and to ensure that development is of an appropriate scale to achieve sustainability of each of the town's neighbourhoods in terms of their infrastructure capacity and opportunities to meet identified requirements. These considerations are also relevant to the achievement of the ELLP's overall vision and to the sustainability appraisal of development options.</p> <p>Leading from the consideration of the CSLP objectives, the five objectives identified for the ELLP itself are supported.</p> <p>The definition and explanation of ELLP5 (To promote sustainable employment locations) however should be expanded to capture the wider understanding of what contributes to sustainable employment locations; namely locations that are sustainable in transport terms and where businesses are supported and sustainable through established business linkages: i.e. the considerations addressed through CSLP KSO 3, 8 and 10 as outlined above.</p>	<p>provide choice for occupiers who would prefer an out of centre location.</p> <p>It is not considered necessary to expand the definition of Objective ELLP5 as these are explained elsewhere, including through the Sustainability Appraisal.</p>	
PD-ELLP/28	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>	Scenario 1: Industrial Estates	<ul style="list-style-type: none"> Disadvantages. Included is a consideration that the existing estates are Unsuitable for high quality office development. Some such space has been provided on existing estates and additional new provision should not automatically be ruled out. Advantages. The ELLP's summary conclusion states that the existing estates are suitable for B1 space. This includes potential office space. The ELLP however again makes no account for this in its proposed allocation of new space. 	It is unlikely that high quality office development will locate within industrial estates because the industrial environment is unlikely to meet their requirements. However, Policy EL2 does not prevent the development of office space within the Industrial Estates.	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
		Scenario 4: Town Centre	<ul style="list-style-type: none"> • The town centre is appraised as being unsuitable for other non office B uses. Some sites, for instance TCLP DOSs Two and Three could be appropriate for Class B1b use, in view of their size, their setting and fact that they are assessed as appropriate for mixed use schemes. Class B1b by definition is appropriate as a neighbour to residential uses and can occupy space of a very similar specification to B1a space. • Other forms of development [within the town centre] may be more viable. This can be applied to all sites across the town. It should therefore be struck through as a disadvantage to be taken into account only in relation to the town centre. • the allocation of employment space will have an adverse impact on the delivery of housing. The CSLP has appraised the delivery of housing sites within the town centre and has identified employment opportunity sites and transition areas. The ELLP must strike the right balance between commercial, residential and other uses that can and should be directed to the centre. The ELLP however places too significant emphasis on new residential space at the cost of office development. As such, the ELLP's assessment of the DOSs has underestimated the potential of these sites to accommodate sizeable new office spaces without undermining the delivery of new homes. The two aims are not mutually exclusive. • Land within the town centre has not been assembled. This goes against the evidence put forward in support of the TCLP which sets out a delivery programme for each of the DOSs and a 	<p>Office provision includes class B1a and B1b uses, and therefore it is considered that B1b uses would be appropriate in the town centre.</p> <p>It is accepted that other forms of development being more viable is an issue across the whole town, and therefore it will be removed as a disadvantage for the town centre.</p> <p>It is considered that the provision of office space may impact on housing delivery. There are three remaining development sites identified in the TCLP, and these will be required to accommodate the office provision and 450 residential units, as well as retail and community uses. A significant increase in office provision will affect the capacity of the remaining sites to deliver the housing requirement. This, coupled with the fact that the majority of office space is already located in</p>	<p>No change to ELLP</p> <p>Amendments to be made to the Employment Land Strategy and Distributions Options Report</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>policy framework for reviewing additional site options should further opportunities be required to meet development needs. Part of the role of planning is to facilitate land assembly and this should not be so readily dismissed as an option for town centre sites where the economic linkage benefits from new investment are the strongest.</p>	<p>the town centre, means that there is no reason to increase the amount of office provision at the expense of residential development.</p> <p>There are limited opportunities in the Town Centre to deliver office space. The ELR identifies that Development Opportunity Sites 2 and 3 would be the most attractive sites for office development. There are issues associated with bringing these sites forward as both sites are in multiple ownership. This is a disadvantage when compared to other locations that are currently in single ownership.</p>	
		Scenario 5: Sovereign Harbour	<p>Advantages</p> <ul style="list-style-type: none"> Fewer design and layout constraints: the sites at Sovereign Harbour are subject to prescriptive design parameters set out within the Harbour SPD which include building heights and in the case of Site 4 building footprint. Development here will also need to be supported by appropriate on-site car parking which will take up development capacity. In contrast, the larger town centre sites may be less 	<p>Sites 6 and 7 are currently vacant sites with limited design constraints and are essentially a blank canvas. The Sovereign Harbour SPD provides guidelines for design but not to the extent that they would constraint development.</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>restricted in particular where reliance on public transport and public car parks can be significant benefits and greater flexibility may be applied to building heights, working with changes in site levels and existing neighbouring tall buildings.</p> <ul style="list-style-type: none"> • Increases distribution of employment opportunities and employment within a Sustainable Centre. These are agreed but this does not justify such a significant proposed quantum of new office floorspace being allocated here, relative to the town centre. • High Quality Environment. This equally applies to the town centre which provides more significant linked service benefits and attractions, in contrast with a business park setting. • Could attract a mixture of business sizes. This again equally applies to (1) the town centre in view of the mix and size of development sites available and (2) to potential development opportunities within the existing employment estates across the town which have demonstrated the ability to accommodate new campus developments. • Sites ready to develop. The sites may be less constrained in terms of their being undeveloped with clear access arrangements compared with some town centre sites. They however do require servicing upgrades and are required to deliver a high quality environment and stock of accommodation which, given the scale and nature of the Eastbourne market have resulted in no viable open market office development being secured. The sites may be ready to develop but this does not mean they are deliverable in market terms for a 	<p>In addition, the SPD was subject to public consultation and SHL made extensive representations. It is considered that the Sovereign Harbour sites have fewer design and layout constraints than other locations.</p> <p>The provision of employment space within a Sustainable Centre is an advantage.</p> <p>Sovereign Harbour provides an attractive offer that is different to the town centre that will appeal to occupiers with different needs.</p> <p>Sovereign Harbour has greater potential to attract a mixture of business sizes due to fewer constraints on design and layout. This means that there are less constraints on the types of employment space that can be provided. This does not apply equally to the town centre or other industrial locations as there are more</p>	

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			<p>large amount of space.</p> <p>Disadvantages</p> <ul style="list-style-type: none"> Potential noise issues on residential amenity. Class B1 use is by definition compatible with residential development. Class B1c may raise more issues, however this is envisaged only to potentially comprise a small amount of space on Site 6 at the Harbour. This lack of constraint however again does not deem the Harbour appropriate for a significant B1a/B1b allocation; other wider considerations of economic and environmental based sustainability must be taken into account. 	<p>constraints on design and layout in these locations.</p> <p>It is likely that any development site will require servicing upgrades. It is not considered that this has any effect on the advantage of the sites at Sovereign Harbour being ready to develop. It is considered that the Innovation Mail currently being built on Site 6 will be a catalyst for further provision of B space in the location.</p> <p>As Sovereign Harbour contains a significant amount of residential development, there is potential that any type of employment development may cause some form of noise disturbance. It is recognised that B1 uses are compatible with residential uses. However, it is appropriate to identify this as a potential disadvantage.</p>	
PD-ELLP/29	Teal Planning Ltd (Marie Nagy)		Yes. The Draft ELLP and its supporting documents fail to consider all reasonable alternatives and as such are	An increased amount of office provision in the	No change to ELLP Increased office provision

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	On behalf of Sovereign Harbour Limited (Mark Orriss)		not SEA compliant. The accompanying Response Statement reappraises the ELLP's proposed distribution of new office space taking more fully into account sustainable location and accessibility issues. It also appraises the option of providing a higher allocation of office space in the town centre, alongside a lower amount of subsidised space at the Harbour. This shows a still higher sustainability score for both locations compared with EBC's preferred option.	Town Centre will be tested through the Sustainability Appraisal.	to be tested as part of the Sustainability Appraisal
PD- ELLP/30	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)		No. The broad preferred locations comprising: intensification of existing estates (Scenario 1), the town centre (Scenario 3) and Sovereign Harbour (Scenario 4) are supported in principle. The specification of Scenarios 3 and 4 however are not supported and are not NPPF compliant. They must be redefined based upon a greater priority weighting of new office floorspace to the town centre.	As previously mentioned, the evidence suggest that a more balanced portfolio of office space in Eastbourne is required, which means directly some away from the town centre. However, an increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.	No change to ELLP Increased office provision to be tested as part of the Sustainability Appraisal
PD- ELLP/31	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)		No. EBC's preferred option is based upon an unsubstantiated weighting of new Class B1 space at Sovereign Harbour which does not best meet sound or sustainable strategic planning objectives for Eastbourne town overall and raises issues of viability and deliverability in respect of the amount of space that is proposed to be allocated at the Harbour.	As previously described, the majority of office provision in Eastbourne is located in the town centre, and provision in other locations is required in order to rebalance the portfolio and provide occupier choice to	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			The distribution of Class B1 space must be rebalanced. The ELLP must also recognise the potential for further office campus development within the town's other existing employment areas.	encourage economic growth. Whilst there may be some office development on industrial estates, it is unlikely to be campus developments.	
PD-ELLP/32	Southern Water (Sarah Harrison)	Policy EL2	Southern Water sewerage infrastructure crosses the designated Industrial Estates. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. Proposed additional text to be included in Policy EL2: <i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i>	It is not considered that this is an issue that needs to be referenced in a strategic planning document. This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It could be addressed as part of an informative as part of any planning application.	No change to ELLP
PD-ELLP/33	Southern Water (Sarah Harrison)	Policy EL3	Southern Water sewerage infrastructure crosses Development Opportunity Site 2: Land adjoining the Railway Station and the Enterprise Centre and Development Opportunity Site 3: Land between Upperton Road and Southfields Road. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. Proposed additional text to be included in Policy EL3:	It is not considered that this is an issue that needs to be referenced in a strategic planning document. This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It could be	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i>	addressed as part of an informative as part of any planning application.	
PD-ELLP/34	Southern Water (Sarah Harrison)	Policy EL4	<p>Southern Water sewerage infrastructure crosses Site 4 Land of Harbour Quay and Site 7 Land fronting Pevensey Bay Road and Pacific Drive. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing.</p> <p>Proposed additional text to be included in Policy EL4:</p> <p><i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i></p>	<p>It is not considered that this is an issue that needs to be referenced in a strategic planning document.</p> <p>This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It addressed as part of an informative as part of any planning application.</p>	No change to ELLP
PD-ELLP/35	Planning Potential (Leigh Thomas)	<i>Evidence supporting the ELLP</i>	<p>The ELR forms part of the evidence base to inform the emerging ELLP. Specifically in respect of the Cosmetica site, the ELR suggests that the site " ...could be redeveloped to provide more modern floorspace"</p> <p>The ELR does not include specific reference to the NPPF tests and requirements in respect of employment sites allocations, including para. 21 referred to above.</p> <p>The ELR was not subject of consultation with either third parties or landowners during its preparation and certainly we can confirm that at no time were ARca contacted in respect of the former Cosmetica site. This is perhaps unfortunate and again is surprising given their previous discussions with the Council, the local prominence of this site and the genuine difficulties that had been expressed in respect of trying to secure a B</p>	<p>The ELR will be reviewed and amended to include reference to the NPPF.</p> <p>The ELR was prepared in consultation with land owners and promoters where these were identified both via workshop and one to one meetings. This approach was in line with guidance at the time of ELR preparation. The ELR will be revised to highlight the consultation approach.</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>Use Class at the site, including having applied for planning permission for smaller units by the previous owner to ARCa.</p> <p>The fact that the previous owner TAM had gone as far as trying to secure a more attractive planning position for B Use demonstrates the attempts made to move forward. That this has not happened is further evidence of the genuine difficulties experienced to date that have been overlooked in the conclusions reached by the ELR.</p>		
		Vision and Objectives	<p>Given both our experience, knowledge and concerns expressed above, we are equally concerned with the weight to be attached to the PDELLP, particularly in respect of the former Cosmetica site.</p> <p>In this context we again reiterate our concerns that to continue to protect sites such as the former Cosmetica for B Use Classes, where there is clear evidence that, "...there is no reasonable prospect of a site being used for that purpose" is contrary to the requirements of the NPPF para. 21. It is our clear position that this genuine issue, as recognised in national policy must be taken into account in the emerging ELLP.</p>	<p>NPPF para 21 sets the direction for Local Planning Authorities to identify strategic sites (or set criteria to identify them) for local and inward investment to meet "anticipated needs over the plan period".</p> <p>Therefore, Employment land designations must be considered in the context of demand over the plan period, rather than reflecting short-term market fluctuations.</p> <p>Given the constrained nature of the town, lack of land availability and the relatively high requirement for residential development, it is important to protect sites already providing an</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>employment use within a predominantly industrial location. Although the site may have been vacant over recent years, the demand for employment land over the plan period will increase.</p> <p>Although certain buildings will not meet future needs, this does not mean that land itself is redundant over the life of the plan.</p> <p>The loss of identified employment land will constrain future economic growth and compromises the ability of the town to meet future employment needs.</p>	

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
		Policy EL2	<p>Object to the former Cosmetica site be subject to the same policy protection as the remainder of Brampton Road Industrial Estate. The site has been vacant for over 4 years and remains so despite marketing and attempts through a planning application to make it more attractive for B Use Classes. There is no justification for it to remain protected for such uses and to do so will simply lead to the site continuing to be vacant and would be contrary to both evidence and the NPPF.</p> <p>Policy EL2 is considered to be overly restrictive and does not allow for redevelopment, especially in instances where it is demonstrated that there is no reasonable prospect of continued B use class.</p> <p>Policy EL2 creates ambiguity suggesting that non-B uses would only be acceptable in respect of change of use rather than redevelopment. This is unreasonable and does not account for instances where a premises is no longer fit for purpose. As such, it is suggested that the final paragraph is amended to read:</p> <p><i>"Within designated Industrial Estates, change of use or redevelopment of units in class B use to other employment generating non-B uses may be acceptable subject to genuine redundancy of the unit being demonstrated"</i></p> <p>Further, it is noted that in order to demonstrate genuine redundancy, applications would be tested against saved policy BI1 of the Eastbourne Borough Local Plan 2001 - 2011. This policy is now considerably out-of-date, and has been superseded by the NPPF. As such, it is respectfully submitted that a more up-to-date test, that has been subject of public consultation and is shown to be in accordance with the NPPF is</p>	<p>The Cosmetica site is part of the Brampton Road Industrial Estate. It is accessed via the main estate road and it is surrounded by similar uses.</p> <p>Being within the Brampton Road Industrial Estate, it is considered appropriate that it is given the same policy protection as the rest of the Industrial Estate.</p> <p>It is not considered that Policy EL2 is overly restrictive. Policy EL2 aims to ensure that the redevelopment of sites within Industrial Estate must be within class B use.</p> <p>However, it is considered that Policy EL2 could be expanded to include reference to allowing redevelopment in instances where it can be demonstrated that the loss of the site would not impact upon the long term supply of employment land and the</p>	<p>Delete the final two paras of Policy EL2 and replace with:</p> <p>Proposals for redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> • The purposed alternative use is an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or • The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and • The site does not meet the current or long term needs of modern business, and could not be upgraded

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			<p>necessary.</p>	<p>site cannot be upgraded to meet current or long term needs.</p> <p>The ELLP recognises that a number of units are part of a sub-divided larger unit, and there may be situations where there is no 'B use' demand for an older unit that is part of a larger building, although the other units may still be occupied. In these situations, it would not be beneficial for that unit to sit empty until the whole site is available for redevelopment, and therefore, subject to it being demonstrated that the unit will not be used for B use again, these units should be allowed to change use to remain in occupation until full redevelopment can take place.</p> <p>The NPPF is clear that just because a policy was adopted prior to the publication of the NPPF, it does not automatically mean that the policy is out of date. Although it is</p>	<p>to do so.</p> <p>Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated to the satisfaction of the Council that that there is no reasonable prospect of the site continuing to be used for class B use.</p>

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				<p>not considered that Borough Plan Policy BI1 and the related Supplementary Planning Guidance are out of date, in order to be consistent with the NPPF, reference to genuine redundancy will be replaced with 'no reasonable prospect'.</p>	

APPENDIX 2

Schedule of Changes

The table below provides a schedule of the changes that should be made to the Employment Land Local Plan in order to progress to Proposed Submission. The majority of the changes are proposed as a response to the representations received during the public consultation on the Proposed Draft Employment Land Local Plan between 14 December 2013 and 14 March 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
PS-C1	n/a	Introduction - What is the Employment Land Local Plan	Delete final sentence of para 1.2	To provide consistency for Proposed Submission Version
PS-C2	n/a	Introduction - What is the Employment Land Local Plan	Add additional para after 1.3 to read: It should be noted that although the National Planning Policy Framework (NPPF) defines economic development as being development within the B Use Classes, public and community uses and main town centre uses, employment land in the context of the Employment Land Local Plan only relates to development of Class B Uses. Other uses are dealt with through the Eastbourne Core Strategy Local Plan 2006-2027 (adopted 2013).	To provide clarification on what is meant by 'employment land'.
PS-C3	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Replace para 1.4: The Proposed Submission Employment Land Local Plan has been published for an eight 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 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 Proposed Submission Version

Ref	Rep ID	Section	Modification	Reason
PS-C4	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Delete para 1.5	To provide consistency for Proposed Submission Version
PS-C5	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Replace para 1.6: The Proposed Submission Employment Land Local Plan takes into account representations that were received through pre-production stakeholder engagement, and via consultation on the Proposed Draft Employment Land Local Plan that took place between December 2013 and March 2014.	To provide consistency for Proposed Submission Version
PS-C6	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Add additional bullets: <ul style="list-style-type: none"> Supplementary Employment Land Evidence (GVA, 2014) Employment Land Review Viability Briefing Note (GVA, 2014) 	To provide consistency for Proposed Submission Version
PS-C7	PD-ELLP/09	Introduction – Relationship with Other Plans and Strategies	Add two new paras after para 1.14 to read: <i>The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government’s Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been award for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the ‘Hailsham, Polegate and Eastbourne Sustainable Corridor’ and an Eastbourne and South Wealden walking and cycling package.</i> <i>EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support, innovation, export and new</i>	To add reference and a link to the South East Local Enterprise Partnership, the Strategic Economic Plan, and the EU Structural Investment Funds.

Ref	Rep ID	Section	Modification	Reason								
			<i>technologies.</i>									
PS-C8	n/a	Introduction - Stages in the Production of the Plan	Replace para 1.15 with: The timetable for the preparation of the Employment Land Local Plan is outlined in Table 1.	To provide consistency for Proposed Submission Version								
PS-C9	n/a	Introduction - Stages in the Production of the Plan	Delete para 1.16	To provide consistency for Proposed Submission Version								
PS-C10	n/a	Introduction - Stages in the Production of the Plan	In Table 1, replace: <table border="1" data-bbox="913 596 1675 967"> <tr> <td>Publication of Proposed Submission Version for representation period</td> <td>December 2014 – January 2015</td> </tr> <tr> <td>Submission to Secretary of State</td> <td>February 2015</td> </tr> <tr> <td>Examination in Public</td> <td>June 2015</td> </tr> <tr> <td>Adoption</td> <td>October 2015</td> </tr> </table>	Publication of Proposed Submission Version for representation period	December 2014 – January 2015	Submission to Secretary of State	February 2015	Examination in Public	June 2015	Adoption	October 2015	To provide consistency for Proposed Submission Version
Publication of Proposed Submission Version for representation period	December 2014 – January 2015											
Submission to Secretary of State	February 2015											
Examination in Public	June 2015											
Adoption	October 2015											
PS-C11	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	Replace Para 1.17 with: The eight week representation period on the Proposed Submission Employment Land Local Plan commenced on 12 December 2014 and finishes on 6 February 2015. The Proposed Submission Employment Land Local Plan is accompanied by a Sustainability Appraisal Report, which is also available for comment.	To provide consistency for Proposed Submission Version								
PS-C12	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	In Para 1.18, replace reference to Proposed Draft to Proposed Submission	To provide consistency for Proposed Submission Version								

Ref	Rep ID	Section	Modification	Reason
PS-C13	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	In Para 1.18, replace Friday 14 March 2014 with Friday 6 February 2015	To provide consistency for Proposed Submission Version
PS-C14	PD-ELLP/10	Context – Existing Situation	In Para 2.3, include footnote references to data sources.	For clarification purposes
PS-C15	n/a	Context – Recent Developments and Future Projects	Amend par 2.18 to read: <i>In addition, the Council is intending to prepare a draft Economic Development and Tourism Strategy by the end of 2015 to help direct the current economy and build on this to determine a vision and destination for Eastbourne’s economic future.</i>	To update the schedule for the Economic Development and Tourism Strategy
PS-C16	PD-ELLP/12	Context – Key Issues	Add additional sentence to end of para 2.20: <i>In addition, premises with super-fast broadband connectivity are a requirement for businesses aiming to grow and expand their markets, and improvements in broadband connectivity may influence the requirement for additional employment land in the area.</i>	To provide reference to broadband as an issue for employment space in Eastbourne
PS-C17	PD-ELLP/11	Context – Key Issues	Amend the final sentence of para 2.21 to state: <i>Also, by encouraging existing key businesses and their supply chains, there is an opportunity to grow existing specialisms and ‘clusters’. This might include manufacturing activities, particularly related to mechanical products, and parts of the ‘media’ sector, such as film and TV production and production of recorded media, which are sectors that have been identified as being particularly strong in Eastbourne.</i>	To provide examples to aid understanding
PS-C18	PD-ELLP/11	Context – Key Issues	Amend para 2.22 to read: <i>The nature of economic growth has changed over recent years and Eastbourne has seen lower levels of inward investment, mainly due to the age and quality of existing stock, and has</i>	In order to clarify that Eastbourne is not ‘closing the door’ on inward investment, but to recognise that future

Ref	Rep ID	Section	Modification	Reason
			<p><i>instead been more reliant on local investment from indigenous businesses.</i></p> <p><i>Future demand and growth in the market is still likely to be driven from local investment, either through expansion, changing space requirements or new business start-ups. However, as the economy grows, it is important to encourage inward investment by making provision for attracting like-minded new activities to the area. The Employment Land Local Plan needs to ensure it provides 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. This will also include the provision of a range of sites, including new, high quality floorspace alongside sites and premises to help increase the business start-up and survival rate and ensure indigenous businesses are retained and can grow.</i></p>	demand is likely to be driven by local business
PS-C19	PD-ELLP/25	Context – Key Issues	<p>Add additional text at end of para 2.23:</p> <p><i>Similarly, a significant amount of the office stock, especially in the town centre, is dated and does not tend to meet the needs of modern office occupiers. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to allow modern servicing and infrastructure to be incorporated.</i></p>	
PS-C20	n/a	Context – Key Issues	At para 2.29, Delete Question 1 box	No requirement for this question as part of the Proposed Submission version
PS-C21	PD-ELLP/13	Context – Employment Land Requirements	At para 2.30, include link to ELR within footnote	For clarification purposes
PS-C22	n/a	Context – Employment Land Requirements	At para 2.32, amend bullet points to read:	To clarify that the requirement for office space

Ref	Rep ID	Section	Modification	Reason
			<ul style="list-style-type: none"> Office (B1a/B1b) – 12 sqm per employee (NIA) Industrial (B1c/B2) – 36 sqm per employee (GEA) Warehouse (B8) – 70 sqm per employee (GEA) 	is based on net internal area, whilst the requirement for industrial and warehouse space is based on gross external area.
PS-C23	PD-ELLP/14	Context – Vision and Objectives	<p>Amend the Vision to read:</p> <p><i>"By 2027, Eastbourne will be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work"</i></p>	For clarification purposes
PS-C24	PD-ELLP/15	Context – Vision and Objectives	<p>ELLP2 delete:</p> <p><i>'diversify the local economy and...'</i></p>	To emphasise the difference between ELLP2 and ELLP4
PS-C25	PD-ELLP/15	Context – Vision and Objectives	<p>Amend ELLP4 to read:</p> <p><i>'ELLP4 - Support Existing Businesses - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish.'</i></p>	To emphasise the difference between ELLP2 and ELLP4
PS-C26	n/a	Context – Vision and Objectives	At para 2.42, delete Question 2 and Question 3 box	No requirement for this question as part of the Proposed Submission version
PS-C27	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.1, delete 'Options considered for employment land strategy and distribution' box	No requirement for this question as part of the Proposed Submission version
PS-C28	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.1, delete Question 4, Question 5 and Question 6 box	No requirement for this question as part of the Proposed Submission version

Ref	Rep ID	Section	Modification	Reason
PS-C29	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.7, delete Question 7 box	No requirement for this question as part of the Proposed Submission version
PS-C30	PD-ELLP/20	Strategy – Economy and Employment Land	Add sentence at end of para 3.11 to read: <i>Examples of this type of development in other parts of East Sussex include the Priory Quarter and North Queensway Innovation Park in Hastings, and the Basepoint Enterprise Centre in Newhaven.</i>	To provide examples to aid understanding
PS-C31	PD-ELLP/20	Strategy – Economy and Employment Land	Amend 3.12 to read: <i>Eastbourne should further the development of 'clusters', including but not limited to mechanical manufacturing and film and TV production, by using existing key businesses and their supply chains as an opportunity to grow existing specialisms through promotion and provision of appropriate space. The role of these clusters should be enhanced in the Borough both as a 'selling point' to attract occupiers and through the development of links to suppliers locally.</i>	To provide examples to aid understanding
PS-C32	PD-ELLP/20	Strategy – Economy and Employment Land	Amend final sentence of para 3.15 to read: <i>Eastbourne Borough Council will work with the existing education and skills institutions to enhance provision, in order to address skill shortages, increase the working age population and improve the 'economic catchment' of the Borough.</i>	For clarification purposes
PS-C33	PD-ELLP/35	Policies – Policy EL2: Industrial Estates	Delete the final two paras of Policy EL2 and replace with: <i>Proposals for redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</i> <ul style="list-style-type: none"> <i>The purposed alternative use is an appropriate use to the</i> 	To expand Policy EL2 to include reference to allowing redevelopment in instances where it can be demonstrated that the loss of the site would not impact upon the long term supply of employment

Ref	Rep ID	Section	Modification	Reason
			<p><i>industrial estate that cannot be located elsewhere due to its un-neighbourliness; or</i></p> <ul style="list-style-type: none"> <i>The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and</i> <i>The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.</i> <p><i>Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated to the satisfaction of the Council that that there is no reasonable prospect of the site continuing to be used for class B use.</i></p>	<p>land and the site cannot be upgraded to meet current or long term needs.</p> <p>To provide consistency with the NPPF</p>
PS-C34	n/a	Policies – Industrial Estates	<p>Replace the final sentence of para 4.14 with:</p> <p>... subject to it being demonstrated to the satisfaction of the Council that there is no reasonable prospect of the premises continuing to be used for class B use.</p>	To provide consistency with Policy EL2
PS-C35	PD-ELLP/22	Policies – Town Centre	<p>Amend final sentence of 4.20 to read:</p> <p><i>Therefore, proposals for the refurbishment of existing office stock within the Town Centre will be supported, to meet modern occupier demands where they come forward.</i></p>	For clarification purposes
PS-C36	n/a	Policies – Sovereign Harbour	In para 4.36, change reference to 3,000sqm to 2,300 sqm NIA	To provide floorspace in NIA
PS-C37	n/a	Appendix 1: Glossary	Delete Development Management Local Plan and description	The Development Management Local Plan is no longer being taken forward
PS-C38	n/a	Appendix 1: Glossary	<p>Add:</p> <p>Gross External Area (GEA) - The total floor area contained within</p>	Provide explanation for GEA, which is referenced in the

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			the building measured to the external face of the external walls	document
PS-C39	n/a	Appendix 1: Glossary	Add: Gross Internal Area (GIA) - The floor area contained within the building measured to the internal face of the external walls	Provide explanation for GIA, which is referenced in the document
PS-C40	n/a	Appendix 1: Glossary	Add: Net Internal Area (NIA) - The usable floor area, which is the Gross Internal Area (GIA) less the floor areas taken up by lobbies, enclosed machinery rooms on the roof, stairs and escalators, mechanical and electrical services, lifts, columns, toilet areas, ducts, and risers.	Provide explanation for NIA, which is referenced in the document
PS-C41	n/a	Appendix 2: Designated Industrial Estates	Replace plan of Highfield (South) Industrial Estate with updated version	To extend the boundary in recognition of the fact that the extension to the Gardners Books development is outside of the previous boundary
PS-C42	n/a	Appendix 2: Designated Industrial Estates	Replace plan of Highfield (North) Industrial Estate and Highfield Park with updated version	To reflect changes in the basemap that now show the Morrisons development