

Local Employment and Training Supplementary Planning Document

STATEMENT OF CONSULTATION*July 2024***I. Introduction**

- 1.1 This consultation statement has been prepared in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012. It supports the Local Employment and Training Supplementary Planning Document (SPD), which is being published for representations under Regulation 13.
- 1.2 In preparing Supplementary Planning Documents (SPDs) local authorities are required to publish a Statement of Consultation setting out:
- Who was consulted during the preparation of the draft SPD;
 - How they were consulted;
 - The main issues raised in response to the consultation;
 - How those issues were addressed in the draft SPD.
- 1.3 The Local Employment and Training Supplementary Planning Document has been prepared by Eastbourne Borough Council. It has previously been subject to public participation and representation periods. This representation period relates to changes that are proposed to the SPD to update it, taking into account lessons learned during its implementation. Therefore, engagement and consultation previously undertaken on the SPD is considered relevant. The revised SPD was published for consultation between 7th May 2024 and 2nd July 2024.
- 1.4 The purpose of the Local Employment and Training SPD is to assist in securing local labour agreements as part of development proposals. The level of development required in Eastbourne will create a significant number of jobs and this SPD will play an important role in helping to secure local employment at both construction and operational stages of development.
- 1.5 The Local Employment and Training SPD has been prepared to provide detail to the Eastbourne Employment Land Local Plan Policy EL1 in order to provide a framework as to how local labour agreements (including employment and training measures) will be secured and how to maximise local employment opportunities at both the construction and first operational phase of the development.

2. Who was consulted?

- 2.1 Eastbourne Borough Council maintains a mailing list of all bodies, organisations and individuals that have previously asked to be kept informed about the preparation of planning policy documents. All stakeholders on the mailing list were notified by email of the consultation being undertaken.
- 2.2 The Employment and Training SPD replaced the ‘tried and tested’ Employment and Training Technical Guidance Note. The Technical Guidance Note was subject to a three-week targeted consultation with professional and technical organisations that involved 83 stakeholders, including local architects, planning agents, builders, development companies, education providers and business support organisations. A full list of stakeholders consulted during the targeted consultation is provided in Appendix 1.
- 2.3 In addition, for the Employment Land Local Plan, selected stakeholders who it was considered would have a specific interest were notified of the consultations. This included some stakeholders who were not on the mailing list but it was considered may have an interest in the production of the Plan.
- 2.4 The stakeholders who were notified on the Employment Land Local Plan included: all statutory consultees, large employers located on industrial estates, landowners and agents, enterprise-related agencies, the Chamber of Commerce, and the Federation of Small Businesses. In addition, all properties located on the town’s industrial estates were sent a letter informing them of the consultation.
- 2.5 A representation period for the Employment and Training SPD previously took place from 1 April to 24 June 2016. Stakeholders who were notified and invited to participate consisted of statutory consultees, architects and planning agents, Chamber of Commerce, Federation of Small Business, Sussex Downs College and local training and employment support providers and consultees on the consultation portal.

3. How were they consulted?

- 3.1 The basis for the Local Employment and Training SPD comes from the Employment Land Local Plan. The Employment Land Local Plan was subject to four separate rounds of consultation with the local community and other stakeholders.
- 3.2 All consultees on the Eastbourne Local Plan mailing list, including statutory consultees, were invited to make comments and representations on the Employment Land Local Plan during:
- Pre-production Engagement Questionnaire – June-August 2013
 - Proposed Draft Employment Land Local Plan – December 2013 – March 2014
 - Proposed Submission Employment Land Local Plan – December 2014 – February 2015
 - Revised Proposed Submission Employment Land Local Plan – December 2015 – January 2016

- 3.3 The Local Employment and Training SPD had been informed by:
- Desktop and verbal research undertaken on other local authority approaches
 - Dialogue with CITB – Construction Skills, the Construction Training Industry Board, who provided key guidance
 - A successful pilot on the Morrison’s supermarket. On average 67% of employees on the construction site and 23% of businesses contracted were local; and of the starting workforce 83% were local of which 45% were previously not in employment
 - External lawyers to the Council providing legal advice on the Section 106 Agreement for the Arndale Centre Extension
 - A three-week targeted consultation of professional and technical organisations and partners that have shown interest in Planning Policy.
- 3.4 A Local Employment and Training Technical Guidance Note was produced in February 2013 and subject to targeted consultation with key stakeholders including planning agents, developers, consultants and those with an interest in development matters between 20 February and 13 March 2013.
- 3.5 Throughout the preparation of the SPD, internal discussions and meetings had taken place. There have been regular meetings with Jobcentre Plus and East Sussex College and local employment support partners.
- 3.6 Frequent meetings also took place between key officers and councillors on the Local Plan Steering Group.
- 3.7 Eastbourne Borough Council’s Cabinet approved the draft Local Employment and Training SPD for the purposes of public consultation on 23 March 2016. It was presented to the Council’s Planning Committee for its consideration on Tuesday 22 March 2016.
- 3.8 The document was published for a representation period prior to its adoption in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 3.9 The consultation took place over a 12-week consultation commencing on Friday 1 April until Friday 24 June 2016. The SPD documents published at that point comprised the following:
- Draft Local Employment and Training SPD
 - Statement of Consultation
 - Guidance Notes for Making a Representation
 - Statement of Representations Procedure
 - Response Form

- 3.10 Specific and general consultation bodies, other organisations, residents and businesses and stakeholders that were on the Local Plan Mailing List were informed of and invited to participate in the consultation by email. In total 512 consultees were invited to participate the consultation. Thirty-five consultees joined the consultation.
- 3.11 Notice of the consultation and locations where the documentation was available were published in an advertisement that appeared in the local newspaper the Eastbourne Herald on Friday 1 April 2016. Details regarding the consultation and participation were also published on the Council's consultation portal, April's issue of the Council's e-Business Newsletter and in the Eastbourne Independent newspaper on Friday 1 April 2016.

4. Summary of the Main Issues and how they were addressed

Employment Land Local Plan

- 4.1 There were no consultation responses received on the various versions of the Employment Land Local Plan that related to the part of Policy EL1 that references Local Labour and relates to the Local Employment and Training SPD.

Pre-production Engagement/Technical Guidance Note

- 4.2 A total of 29 responses were received on the Technical Guidance Note consultation from 4 organisations:
- Performance Retail Limited Partnership
 - Eastbourne Chamber of Commerce Ltd
 - Teal Planning on behalf of Sovereign Harbour Ltd
 - Eastbourne Homes
- 4.3 A table containing the response received is provided in Appendix 2, and the main issues are summarised below.

Performance Retail Limited Partnership (PRLP)

- 4.4 PRLP raised concerns that significant requirements relating to the percentage of contracts that should be given to local businesses may affect the viability of development schemes. In addition, there is concern that reference to 'local people' could have the effect of precluding future tenants from occupying certain commercial units. As a result of this, the SPD will not provide specific targets for the percentage of contracts that should be given to local businesses.
- 4.5 PRLP recommended a more flexible wording to outline the requirement of Employment and Training Plans to ensure that it is not too onerous on any developer dealing with multiple tenant occupancy. However this misunderstands that bespoke support that can

be provided to each tenant. Each tenant will be looking to train and recruit. EBC would work with each to put together an Employment Training Plan to provide a flexible approach to meet the needs of the employer. EBC will assist them with their employment and training needs.

- 4.6 PRLP requested the removal of the target for guaranteed job interviews for local unemployed residents who have undertaken specific pre-employment training. However, it is considered that unemployment is a local priority and this obligation should be retained. The target that will be negotiated on a case by case basis with each tenant, including in a multiple tenant occupancy schemes. It's unlikely to occur in the construction phase as workforce in place. The SPD will make it clear that each tenant in a multi-occupancy scheme will have their own targets and Employment Training Plan for the starting workforce.

Eastbourne Chamber of Commerce Ltd

- 4.7 The Chamber of Commerce are concerned that the local employment and training requirements will favour multi-national and national contractors who have better resources and will further deter local indigenous contractors from tendering even if they are afforded the opportunity. The Council does not want to add extra burdens on contractors. It should be noted that Eastbourne Borough Council cannot influence the way national companies enter into framework agreements. However the SPD seeks to influence national companies when they develop in Eastbourne so capturing the opportunity for local employment. In addition, the monitoring role at EBC will assist with paperwork required for monitoring purposes to help those local companies with less resources.
- 4.8 The Chamber of Commerce feel that the financial contribution is just another tax of business. However, the financial contribution to be paid by the developer/owner only. The cost is nominal and covers the salary of a monitoring position for one day a week for the during of the construction phase and an additional 4 weeks if there is an end use of the site.
- 4.9 The Chamber of Commerce question where the trainees provided will work when their project is finished. They are also concerned that there are no local facilities or courses available within a 50 mile radius that provides the classroom training or support for any construction management course. The Council are committed to working with partners, including Sussex Downs College, to ensure that relevant and appropriate courses are available to assist with training. It is considered that apprentices will remain with employer during the term of their apprenticeship. The SPD does not dictate which firms will employ apprentices so could potentially be local firms. The Training and Apprenticeships in Construction (TrAC) initiative is an option which will involve local people. The work experience placements are also aimed at local people. The construction phase is potentially only one side of the process. The SPD also impacts on the end use of a development by assisting the operator with the employment and training of their starting workforce.

Teal Planning on behalf of Sovereign Harbour Limited (SHL)

- 4.10 Sovereign Harbour Limited (SHL) are concerned that the need additional financial cost on development has not been substantiated and is not supported by the evidence, and that it is overly bureaucratic, placing unnecessary administrative burdens on developers, contractors and operators that could act as a potential disincentive to investment in the town. However, EBC consider that this should be an incentive to investors as EBC and partners want to help developers, contractors and operators with their employment and training needs. The monitoring role is for one day per week during the course of the development and is not intended to be invasive but of assistance. The financial contribution is not only for the monitoring of the S106 Agreement but also the coordination of personalised Employment Training Plan's for developers and operators who will have access to local employment and training support of which most will be free. EBC will have additional hidden costs to absorb. EBC's approach has purposefully been developed to be flexible and unique to Eastbourne's economy.
- 4.11 SHL are concerned that more complex multi-site or multi-phase developments and the cost and administrative implications of the proposals on such schemes are not acknowledged. In response, multi-site and multi-phase developments will be acknowledged, and the fact that each site or multi-site will be negotiated on a case by case basis with flexibility will be referenced.
- 4.12 SHL feel that the targets are too prescriptive and there is no guarantee that appropriate candidates will be identified and retained. It is confirmed that targets have been taken from the industry approved CITB Client Based Approach, and that targets for operational phase to be negotiated to be flexible to unique needs.
- 4.13 SHL also note that larger established firms often operate their own employment and internal training programmes and systems, potentially linked with the NVQ or other national training programmes. Where such existing processes exist, firms should be exempted from being required to consider additional training measures. It is confirmed that the pro-forma provides the opportunity for developers and operators to outline their own procedures and how they meet relevant targets. The pro-forma will be discussed between the developer, operator/s and EBC to create an appropriate and bespoke Employment Training Plan.

Eastbourne Homes

- 4.14 Eastbourne Homes felt that there is a need to make the connection between education and sustainable jobs in construction. EBC will continue to discuss provision of construction training and a model to link training to local employment with Eastbourne Homes and Sussex Downs College.
- 4.15 Eastbourne Homes felt that targets for Construction Skills Certificate Scheme (CSCS) cards should be included. However EBC purposefully wants a simple and flexible approach but recognise the importance of CSCS cards. This will be added to the SPD

as an additional requirement and to be discussed on a case by case basis as part of individual package.

- 4.16 Eastbourne Homes commented that the document should be named Local Employment and Training as opposed to 'Local Training'. This was agreed and the name has been changed.

Local Employment and Training SPD – Representation Period 2016

- 4.17 Representations received during the representation period and the issues raised were taken into account when finalising the SPD.
- 4.18 A total of ten representations were received from six organisations and individuals. A table containing the responses to the representations received on the Local Employment and Training SPD is provided in Appendix 3 and a Schedule of Changes made as a result of these representations is contained in Appendix 4.
- 4.19 The representations made are summarised below.

Highways England

- 4.20 Highways England confirmed they were not concerned with proposals that do not have the potential to impact the safe efficient operation of the strategic road network. In light of this, no amendments were made to the SPD.

Historic England

- 4.21 Historic England responded advising they had no comment to on the content of the SPD as it dealt with matters beyond their remit, therefore, no amendment was made to the SPD.

Members of the Public

- 4.22 A consultation response recommended that the Council involve local schools in the establishment of a local skills agency to encourage employers to engage with school leavers who are seeking guidance on career options.
- 4.23 This area is being addressed by East Sussex County Council (ESCC), who have established a Construction Ambassador Programme developed by the Construction Industry Training Board (CITB) where representatives from industry are trained to deliver careers sessions in schools.
- 4.24 It was also highlighted that further education should be directly related to employment skills, emphasising the benefits of on the job training and apprenticeships. Further noted that provision should be extended to those aged 25+ years.

- 4.25 The SPD requires that Employment and Training Plans are negotiated at the construction and operation stages of development. These are monitored regularly and opportunities for local people of all ages to undertake work experience and/or apprenticeships are explored and encouraged. Both of these options enable on the job learning. Main contractors are also invited to participate in careers talks and offer site visits.
- 4.26 A consultation response questioned the use of the terminology 'encouraging' and questioned how this would be defined and measured. It also requested consideration of the inclusion of 'Traineeships', and adjustment of residential apprenticeship targets.
- 4.27 As the terminology has been extracted from an adopted policy document, it would be inappropriate to amend in the SPD. The SPD has been amended to encourage Traineeships as a preliminary stage to an apprenticeship or to enable practical work experience. The benchmarks have not been amended to incorporate Traineeships as these will be captured in either work experience or Apprenticeship targets. The residential apprenticeship targets follow CITB benchmarks recognised in the construction industry, therefore, it would be inappropriate to amend.
- 4.28 The consultation response also suggested that feedback on work experience and apprenticeships be sought. In response, the data collection form in Appendix 5 of the SPD has been amended to incorporate work experience and apprenticeship feedback.
- 4.29 A consultation response highlighted excessive use of the phrase 'to use reasonable endeavours' which is hard to define and enforce. It was requested that more precise text be included that was clear, certain and enforceable, otherwise SPD likely to fall into disrepute and loopholes exploited.
- 4.30 In response, the use of the phrase 'to use reasonable endeavours' in the SPD has been reviewed with the Council Lawyer and its use has been minimised where appropriate.
- 4.31 A consultation response made observations concerning thresholds for residential development and associated compliance with National Planning Policy Framework (NPPF).
- 4.32 During the negotiation of a Local Labour Agreement with this Consultee, the thresholds for development were challenged. In response to this challenge the thresholds were reviewed and amendments were made prior to the Local Employment and Training SPD consultation.
- 4.33 The consultee also questioned the process for approving and adopting the SPD and involving the Planning Inspector, particularly with regard to NPPF compliance.
- 4.34 A review of the relevant sections of the CIL Regulations (2010 as amended) was undertaken prior to the consultation; the Local Employment and Training SPD complies with the legal tests and the NPPF.

5. Conclusion

- 5.1 This Statement of Consultation has been prepared in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 to identify who was consulted during the preparation of the SPD, how they were consulted, the main issues raised in response to the consultation, and how those issues were addressed.
- 5.2 There is a long history of public participation in the Local Employment and Training SPD. A Pre-production Engagement/Technical Guidance Note was published for a targeted consultation with key stakeholders from 20 February to 13 March 2013 and from 1 April 2016 to 24 June 2016, the Local Employment and Training SPD was published for a 12-week representation period. There was also a number of consultation periods on the Employment Land Local Plan, which provides the policy basis for the SPD.
- 5.3 Representations received at all stages were considered and this did result in some amendments to the Local Employment and Training SPD. Amendments are documented in Appendix 4.

Appendices

Appendix 1 – Stakeholders consulted during targeted consultation (2013)

Name	Organisation
	Amicus Horizon
Mr Philip Walmsley	Anchor Housing Association
Anthony Stevens	Anthony Stevens Associates
	Archipeloco Architecture
Sophie Westlake	ASP
Lynetee Baldwin	Baldwin Training
Darren Kent	Banner & Stark
Barker Shorten	Barker Shorten Architects
	Berkley Homes
	Bishop & Levett Ltd
	Brian Grayston Architecture
John Ball	Building Design - Chartered Architects
	Challinor Hall Associates
Laura Warne	CITB - ConstructionSkills
Chris Keet	CKA Architects
	Colin Humphrey Chartered Architect
	Co-Ordinated Design And Construction Ltd
	David Green & Co Ltd
Mrs Diana Vickery	District Valuer Services -Valuation Agency
Steve Domsalla	Domsalla Building Services

Name	Organisation
	Dowsett Associates
	East Sussex County Council
FAO Chairman	Eastbourne Hotels Association
Ray Mason	EDEAL/Chamber
Derek Godfrey	Ellis Building Contractors Ltd
	Elm Architecture
	Elphick Builders
	Ely Planning
Martin Searle	Federation Of Small Businesses
Sandra West	Gemini Drawings
James Cook	GL Hearn
Greg Laye	Greg Laye
	GSL Design Partnership
	Hastings Borough Council
Caroline Proverbs	Hastoe Housing Association Limited
	Home Group
	HT Partnership
	Innerdale Hudson Architects
	James Pearce & Associates
	JH Payne & Sons Ltd

Name	Organisation
Lee Hawkins	Jobcentre Plus
	John D Clarke Architects
	John Parsons Associates
Nathan Anthony	Lee Evans
Simon Russian	Legal & General
	Lewes District Council
Liam Russell	Liam Russell Architects
Lee Botting	LJB Lee Botting Ltd
	MAP Architectural
	Morgan Carn Partnership
Steve Peggs	Network Rail
Chris Wojtulewski	Parker Dann Ltd
	Pellings LLP
Peter Moore	People Matter
Darren Jones	Persimmon Homes (South East)
	Peter Kenwood
Peter Lutterer	Peter Lutterer
Peter Shoesmith	Peter Shoesmith & Co Ltd
	Places for People
Jonathon Stoddart	Premier Marinas
Richard Stevens	Raglan Housing Association Ltd
Mike Reid	Reid & Dean

Name	Organisation
	Roger K Izzard
Anton Bree	Ross & Co Chartered Surveyors
	Rother District Council
	Saxon Weald
Matthew Symmonds	Southdown Surveyors
	Sovereign Harbour Limited
Mark McFadden	Stiles Harold Williams
Carol Pearce	Stredder Pearce
Craig Noel	Strutt & Parker
	Sussex Architectural Services
Melanie Hunt	Sussex Downs College
	Taylor Cranston Construction Ltd
	Taylor Wimpey
Marie Nagy	Teal Planning
Mike Tingley	Tingley Commercial
	Trevor J Hall Ltd
	Turley Associates
Mr Simon Lovell	Warden Housing Association
	Wealden District Council
	Wells Architecture
Mr Matthew Ashton	Westwaddy ADP

Appendix 2 – Summary of Representations received on the Technical Guidance Note – February 2013

Rep ID	Consultee	Summary of Comment	Officer Response	Change
Rep/01	Performance Retail Limited Partnership	The working and cooperation with local Council partners in terms of communication and promotion of vacancies for positions related to the construction and or operation of major schemes within Eastbourne is to be encouraged and welcomed.	Welcomed	No change
Rep/02	Performance Retail Limited Partnership	Recommends a lesser target percentage of employment opportunities generated in the construction phase as impacts the viability of the scheme, choice and competitiveness. Furthermore policy needs to be flexibly written for all different types of construction procurement.	Subsequent legal advice requires removal of term 'Local People' and target.	Removal of term 'Local People' and target.
Rep/03	Performance Retail Limited Partnership	It would be ultra vires for any S106 legal agreement to require 50% of contracts to be for local businesses as impacts the viability of the scheme, choice and competitiveness. Recommends more flexible wording: "Reasonable endeavours to ensure opportunities are given for businesses contracted and sub-contracted in the construction phase of the development will be 'Local Businesses'.	Subsequent legal advice requires removal of term 'Local Businesses' and target and will be encouraging the promotion of works locally.	Removal of term 'Local Businesses' and target.
Rep/04	Performance Retail Limited Partnership	A legal agreement requiring occupiers or tenants to comply with certain targeted employment opportunities can have the effect of precluding future tenants, impacting on scheme viability and long term economic growth. It is not fairly and reasonably related in scale and kind to the development to prescribe such an onerous obligation on the developer and future occupiers	Subsequent legal advice requires removal of term 'Local People' and target.	Removal of term 'Local People' target.
Rep/05	Performance Retail Limited Partnership	Recommends more flexible wording to outline the requirement of Employment and Training Plans (ETP's). Otherwise too onerous on any developer especially those which will have to deal with multiple tenant occupancy. The consultee suggests the following changes to the clause: "Use reasonable	Potentially misunderstands the wealth of bespoke support that can be provided to each tenant. Each tenant will be looking to train and recruit. EBC would work with each to put together an Employment Training Plan. It's a flexible approach to meet the needs of the employer.	No change.

Rep ID	Consultee	Summary of Comment	Officer Response	Change
		endeavours to assist work with the Council in the development and implementation of an Employment and Training Plan to deliver a targeted employment and training campaign linked directly to the construction and operational jobs within the Development to prepare the local labour market and match suitable candidates to job specifications.”	EBC will be assisting them with their employment and training needs	
Rep/06	Performance Retail Limited Partnership	Removal of target for guaranteed job interviews for local unemployed residents who have undertaken specific pre-employment training. Otherwise too onerous on any developer especially those which will have to deal with multiple tenant occupancy.	Subsequent legal advice requires removal of term ‘Local’ but can retain a target group. Unemployment is a local priority and obligation should be retained. It is a target that will be negotiated on a case by case basis with each tenant, including in a multiple tenant occupancy schemes. It’s unlikely to occur in the construction phase as workforce in place.	Removal of term ‘Local’ but to retain obligation for target group. Make sure it is clear that each tenant in a multi-occupancy scheme will have their own targets and Employment Training Plan for the starting workforce, and target unlikely for construction phase.
Rep/07	Performance Retail Limited Partnership	Removal of target of NVQ training for subcontractors. Otherwise too onerous on any developer.	Target taken from CITB Client Based Approach, industry approved. Should be retained.	No change.
Rep/08	Performance Retail Limited Partnership	Additional “use reasonable endeavours” recommended to add clarity in sub-sections of Appendix 1.		Agreed. Add for clarity
Rep/09	Eastbourne Chamber of Commerce	The burden of the paperwork will favour the larger contractors that have the resources to process bureaucracy. It will further deter local indigenous contractors from tendering even if they are afforded the opportunity.	The Council does not want to add extra burdens on contractors. A monitoring role at EBC will assist with paperwork required for monitoring purposes.	No change.
Rep/10	Eastbourne Chamber of Commerce	The initiative seems to indicate there will be a levy for training but where will those trainees work when the project is finished?	Apprentices will remain with employer during the term of their apprenticeship. It does not dictate which firms will employ apprentices so could potentially be local firms. The Training and Apprenticeships in Construction (TrAC) initiative is an option which will involve local people. The	Make sure it is clear that TrAC is one option that is under constant review.

Rep ID	Consultee	Summary of Comment	Officer Response	Change
			work experience placements are also aimed at local people. The construction phase is potentially only one side of the process. It also impacts on the end use of a development by assisting the operator with the employment and training of their starting workforce.	
Rep/11	Eastbourne Chamber of Commerce	Financial contribution another tax.	Financial contribution to be paid by the developer/owner only. The cost is nominal and covers the salary of a monitoring position for one day a week for the duration of the construction phase and an additional 4 weeks if there is an end use of the site. The sum is multiplied by 50% to cover costs out of the funding scope of providers of employment and training support. For a 52 week development with an end use this equates to £6,300 which is low in comparison to other similar approaches made by other local authorities.	No change.
Rep/12	Eastbourne Chamber of Commerce	This is an intervention to try to re-address the skills issue which has arisen because indigenous main contractor SME's have been side-lined by policies that favour the use of national contractors through huge frameworks.	EBC cannot influence the way national companies enter into framework agreements. However the SPD will seek to influence national companies when they develop in Eastbourne so capturing the opportunity for local employment.	No change
Rep/13	Eastbourne Chamber of Commerce	This will only continue to paper over cracks of a policy which already favours multi-national and national contractors in the misguided belief that this will represent best value. This is a bureaucratic approach to address a fundamental failure in a core policy whereas if the root of the problem was addressed there would be no need for this kind of intervention.	Part of this problem is compliance with EU Law and competitiveness. The SPD is designed to help 'Local People' and 'Local Business' benefit from large private developments, within constraints of EU Law.	No change
Rep/14	Eastbourne Chamber of Commerce	There are presently no local facilities or courses available within a 50 mile radius that provides the classroom training or support for any construction management course	Broader training needs are outside of scope of SPD. However it will start to influence the need for such training while also seeking construction firms to support that training on site. It is accepted there is an issue and EBC would support	No change

Rep ID	Consultee	Summary of Comment	Officer Response	Change
			the Chamber directly raising with local training providers and construction training board.	
Rep/15	Eastbourne Chamber of Commerce	Local main contractor companies are often precluded from public sector works as a direct result of local government procurement policies that favour very large organisations.	The SPD is aimed at the private sector and is not a local government procurement policy. However in larger schemes, private or public, local sub contractors often account for a large percentage of the work.	No change
Rep/16	Eastbourne Chamber of Commerce	“Decent homes” works has been given to businesses outside of East Sussex that close up their portacabins or rented offices as soon as a project is finished.	This is outside of the scope of this work	No change
Rep/17	Eastbourne Chamber of Commerce	No real roots are put down and the profit is not recycled back into the local community and the skills not developed at the right level for true sustainability.	Purpose is to help ‘Local People’ and ‘Local Business’ benefit from large private developments, within constraints of EU Law. Jobs for operational phase are sustainable. The SPD is wider than the construction phase. EBC and Eastbourne Homes are to forecast forthcoming construction work and to discuss with Sussex Downs College the linkages between employment and training and the SPD. Chamber is welcome to participate in discussions.	No change
Rep/18	Teal Planning on behalf of Sovereign Harbour Ltd	Concern that seeks to impose additional financial cost on development to support Council’s administrative costs of managing the processes that has not been substantiated and is not supported by the evidence set out.	Nominal contribution as a development partner. Not only for the monitoring of the S106 Agreement but also the coordination of personalised Employment Training Plan’s for developers and operators who will have access to local employment and training support of which most will be free. EBC will have additional hidden costs to absorb.	
Rep/19	Teal Planning on behalf of Sovereign Harbour Ltd	Does not acknowledge for more complex multi-site or multi-phase developments and the cost and administrative implications of the proposals on such schemes.	Should be acknowledged as has been done for multi-operator developments. Each site or multi-site will be negotiated on a case by case basis with flexibility. The fee can be applied for each phase.	Acknowledge multi-site and multi-phase developments in the SPD and that flexibility will be applied.

Rep ID	Consultee	Summary of Comment	Officer Response	Change
			The only administration burden on the construction supply chain is the monitoring form. If the development has an end use, the tenant only needs to complete once for the starting workforce.	
Rep/20	Teal Planning on behalf of Sovereign Harbour Ltd	Will be overly bureaucratic, placing unnecessary administrative burdens on developers, contractors and operators such that it will add further to their financial burden and could act as a potential disincentive to investment or locate in the town.	Should be an incentive to investors as EBC and partners want to help developers, contractors and operators with their employment and training needs. The monitoring role is for one day per week during the course of the development and is not intended to be invasive but of assistance. EBC's approach has purposefully been developed to be flexible and unique to Eastbourne's economy during the recession.	No change
Rep/21	Teal Planning on behalf of Sovereign Harbour Ltd	Suggests the return of quarterly monitoring reports rather than monthly.	Data has to be collated regardless of regularity imposed. If the development has an end use, the tenant only needs to complete once for the starting workforce.	No change
Rep/22	Teal Planning on behalf of Sovereign Harbour Ltd	Apprenticeships and work experience targets too prescriptive.	Targets taken from CITB Client Based approach, industry approved. Targets for operational phase to be negotiated to be flexible to unique needs.	No change
Rep/23	Teal Planning on behalf of Sovereign Harbour Ltd	No guarantee that appropriate candidates will be identified and retained. We suggest the numbers sought within each category are expressed as bands or targets and that categories can be merged if candidates in certain categories cannot be found, enabling more in another group to be appointed.	Targets and categories taken from CITB Client Based approach. Monitoring role will broker with providers to aid identification and retention. If unsuccessful flexibility can be applied.	No change
Rep/24	Teal Planning on behalf of Sovereign Harbour Ltd	The requirement to report where contractors have been staying and for how long will be an additional and unnecessary imposition on contractors. We understand the reason for wanting to collate this information in terms of monitoring linked benefits for the local economy but suggest this is 'nice to know' information rather than critical to the project itself. We suggest such information can be gained more	It's an ideal and the approach adopted can be determined on a case by case basis but it's an opportunity to demonstrate the wider economic benefits of each development on the town which in turn promotes the developer, construction supply-chain and operator positively.	No change

Rep ID	Consultee	Summary of Comment	Officer Response	Change
		accurately through accommodation based surveys and the Council's tracking of occupancy rates within the town's hotel and guest house accommodation. The requirement to provide regular reports on how contractors and sub-contractors have 'been spending their leisure?'. This again is potentially interesting to the Council in terms of understanding linked economic benefits but we suggest verges into private information and time that employers and lead contractors cannot be required or expected to ask.		
Rep/25	Teal Planning on behalf of Sovereign Harbour Ltd	Often larger established firms operate their own employment and internal training programmes and systems, potentially linked with the NVQ or other national training programmes. Where such existing processes exist, firms should be exempted from being required to consider additional training measures.	The Pro-forma is the opportunity for developers and operators to outline their own procedures and how they meet relevant targets. The Pro-forma will be discussed between the developer, operator/s and EBC to create an appropriate and bespoke Employment Training Plan.	No change
Rep/26	Teal Planning on behalf of Sovereign Harbour Ltd	We note that the templates include suggested clauses with % levels to be negotiated and completed on a scheme by scheme basis, but also that some numbers are in fact included, e.g. Appendix 1... [50%] of employment opportunities generated during the construction phases should be local people. The [%] should all be left blank in all cases to make clear that each is to be agreed.	Reference to 'Local People' and 'Local Businesses' to be removed due to legal advice.	Removal of 'Local People' and 'Local Businesses' and any targets in Appendix 1 but retained as starting points for negotiation in the core document.
Rep/27	Eastbourne Homes	Change name to Local Employment and Training Technical Guidance Note.	The Note references 'employment and training'. Makes sense to insert 'and employment'.	Make modification to the name of the Note.
Rep/28	Eastbourne Homes	A need to make the connection between education and sustainable jobs in construction. TrAC should not be the only option for short term developments.	Eastbourne Homes and EBC to map types and value of future construction work in town. EBC to organise a meeting between EBC, Eastbourne Homes and Sussex Downs College to discuss provision of construction training and a model to link training to local employment.	No change.

Rep ID	Consultee	Summary of Comment	Officer Response	Change
Rep/29	Eastbourne Homes	Targets for Construction Skills Certificate Scheme (CSCS) cards should be included - evidence of occupational competence. Suggested target of 80% and methodology to periodically obtain list of those working on site and who have CSCS cards and make random checks on site.	EBC purposefully wants a simple and flexible approach but recognise the importance of CSCS cards.	Add as an additional requirement and to be discussed on a case by case basis as part of individual package.

Appendix 3 – Table of Responses to Draft Local Employment and Training Supplementary Planning Document

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
LETSPD/01	Member of the public	General	<p>I believe the council should involve local schools in the setting up of a local skills agency - getting employers to visit pupils about to leave school who maybe undecided about their future career. It is imperative that employers invest in young people, especially in plumbing, electrical and building careers, so that we have skilled workers for the future. Investing means training in required manual skills of course, but also in all the peripheral duties required in construction - girls too!</p> <p>I also believe that employers, or the local skills agency, should offer further education that is directly related to the prospective employee's chosen career. Many young people slip through the educational net whilst at school, only realising the qualifications and skills they need once confronted with the job requirements. We MUST invest in education alongside employment skills. To turn someone down because he/she failed to obtain GCSEs of 'C' or above is not good enough. We will only get more people in employment by helping them train for the job whilst helping them get the right qualifications and paying them a decent wage - as part of the same apprentice package.</p> <p>There are also older people (aged 25+) who face the same dilemma of having left school without the required qualifications and find themselves without the skills/qualifications required by employers and no chance of now gaining them because of financial</p>	<p>East Sussex County Council (ESCC) has established a Construction Ambassador Programme developed by CITB where representatives from industry have been trained to deliver careers sessions in schools. The programme includes supporting training material.</p> <p>ESCC has also recruited two Enterprise Co-ordinators to work with schools. One project is the recruitment of industry based Enterprise Advisors (EAs). The project aims to match businesses with schools to improve the quality and relevance of careers advice and guidance activities delivered by the schools. The project started in November 2016 and is due to run until July 2016 in the first instance. It is then likely to be extended until July 2017.</p> <p>Across East Sussex a number of employers have been engaged to become EAs with some already being matched to schools. Once all 24 EAs have been engaged and matched, they would be supported in producing a bespoke Careers Strategy for each school involved in the project. It is also intended that each EA will have a support pack.</p> <p>Employment and Training Plans are negotiated at the construction and operation (where appropriate) stages of development. These are monitored regularly and opportunities for local people of all ages to undertake work experience and/or apprenticeships are explored and</p>	None

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<p>restraints. We need to invest in them too, giving them the chance to earn a living whilst learning the job both practically and academically.</p> <p>Eastbourne needs to invest in our young people BIG TIME. Local businesses need to follow suit and be strongly encouraged by the council to commit whole-heartedly.</p>	<p>encouraged. Both of these options enable on the job learning. Main contractors are also invited to participate in careers talks and offer site visits.</p> <p>The Council is also a sponsor in the Big Future Show which is an opportunity for years 10 and 11, young people, parents and family to meet with further education, training providers and prospective employers.</p>	
LETSPD/02	Member of the public	Chapter 7 Appendix 1	<p>Excessive use of the phrase " to use reasonable endeavours". This is hard to define and hard to enforce. Such a vague term should only be deployed where there is no possible alternative. Whilst there may be instances where such text could be acceptable in a planning context, more precise and enforceable obligations should always be preferred. Otherwise the less scrupulous developers are likely to gain unfair advantages over those who take their public obligations more seriously. Such a result leads to a breakdown in respect for the Council's policies and, ultimately, the Council itself. A far more rigorous approach to policy drafting is needed here please.</p>	<p>Agree - revisited legal agreement and reviewed the use of 'reasonable endeavours'.</p>	<p>Legal advice has been sought. Appendix 1 has been revised and reference to 'reasonable endeavours' has been reduced to a minimum.</p>
LETSPD/03	Member of the public	Chapter 2, Page 6	<p>Use of the descriptor 'encouraging' How will encouraging be defined and measured? Could bullet points 4 &5 be more specific and measurable?</p>	<p>Narrative has been extracted from Policy EL1 – Economy and Employment Land, therefore, it would be inappropriate to amend the wording.</p>	<p>None</p>
LETSPD/04	Member of the public	Chapter 7, Page 13	<p>Consider the provision of Traineeships as a measure and activity – Traineeships can be a useful pre-employment/pre Apprenticeship activity.</p>	<p>Measured activity has been taken from the CITB's Client Based Approach to developing and implementing an Employment and Skills Strategy on construction projects through on site training. The CITB is the recognised construction industry expert for education and training. It has set benchmarks dependent on</p>	<p>Revision to include reference to traineeships.</p>

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
				the type of development and build value. The Local Employment and Training SPD based the training and education commitment on the benchmarks. At the time of drafting the SPD the benchmarks did not set targets for traineeships. However in June 2016 V2 of the documentation was released incorporating traineeships. In light of this revision traineeships will be encouraged and supported. It is envisaged that further education and training provider representatives will meet with contractors to discuss work experience and apprenticeship opportunities. At this stage exploration of traineeship opportunities would be welcomed.	
LETSPD/05	Member of the public	Page 23	Residential benchmark standards – consider x1 Apprentice start for £1-3.5m projects	The benchmarks are set by CITB and accepted within the industry. The introduction of an apprenticeship commitment for builds up to £3.5m will affect the commitment target for larger build values and will not conform with CITB benchmarks. It is difficult for small developments, particularly those of less than 12 months duration to achieve apprenticeship requirements. However, contractors are advised of apprenticeship placements via TrAC.	None
LETSPD/06	Member of the public	Page 35	In the monitoring form consider collecting some information from employers regarding the impact of engaging with Work Experience or Apprenticeships. In order to meet the 'Pride of Place' objectives it will be important to collect evidence of impact for case studies etc.	Agree and recommend a Work Experience and Apprenticeship feedback/comment section be added to Appendix 5 – Monitoring Form.	Appendix 5- Monitoring Form updated to incorporate apprenticeship and work experience placement feedback and comments.
LETSPD/07	Member of the public	Chapters 4 and 5	The way in which EBC applies the requirements is contrary to the tests set out in Paras 203/4 of the NPPF and to Para 153	The respondent had recently been in dialogue with the Council in the negotiation of a local labour agreement (LLA) on a local development. During the LLA negotiation, the	None

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<p>That the trigger in the policy for applying the regulations to residential developments is pitched at too low a level and is too vague. Following on from this the reqs in the policy place an unreasonable burden on developers of smaller schemes eg the Heatherleigh. It should be noted that the Heatherleigh was not even a 'major application' as defined in the Management Regulations but was caught by the extension of this definition in the policy to gross increases of 10 units (whatever that means). If the trigger point is to be kept at this low level it should at least be based fairly and squarely on the statutory definition of 'major application' so that everyone knows where they stand.</p> <p>Personally I think that it is ok (subject to the NPPF issues) applying it to a substantial scheme like the Churchill development in Upperton Road but the Heatherleigh was simply the conversion of 55 hotel bedrooms to 28 flats , all internal work and very little new build. If the policy is to be retained the residential trigger should be looked at again.</p> <p>Going back to the NPPF tests in Para 204 what concerns me is that EBC is ignoring the guidance and applying the requirements on scale alone. The first test is the most significant. Aldi and Morrisons were clearly within the scope of this test as they were on prime employment land and the requirements could be applied in full to make the loss of the employment land more palatable in policy terms. In most other cases though the regulations have been applied purely on scale with no regard for the first test in cases where</p>	<p>thresholds for residential development were reviewed, updated and incorporated in the draft SPD prior to consultation. The amendments were made in light of the respondent's observations.</p> <p>Following the representation, EBC sought advice and advised the respondent that it is the Council's decision to determine the threshold at which to seek local labour/training provisions. Whilst it may be considered that the threshold should be higher, the respondent failed to show that the requirement relating to local labour and training for a net increase of 10 or more residential units had had a significant effect on the viability of a scheme.</p> <p>The Council also reviewed the relevant sections of the CIL Regulations (2010 as amended) and considered that the SPD complies with the legal tests and the NPPF.</p>	

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<p>there is no possible policy objection and therefore no need to 'sweeten the pill'.</p> <p>I note that the NPPF tests are referred to briefly in passing in the policy with no real attempt to explain how they would be dealt with.</p>		
LETSPD/08	Member of the public	Chapters 4 and 5	I don't know how much scrutiny will be given to these issues in the process of approving and adopting the SPD. Does it automatically go before an Inspector? If it does and his/her brief is to ensure compliance with the NPPF there could be a problem.	With regard to the process for approving and adopting the SPD, it is anticipated that a report will be presented to Planning Committee and Cabinet in November, and if agreed it will then be forwarded onto Full Council for adoption. There is no requirement for an Examination as the guidance expands on Policies contained within the Employment Land Local Plan that has been considered by an Inspector.	None
LETSPD/09	Highways England	General	No comment – interest lies in proposals impacting operation of strategic road networks.	None	None
LETSPED/10	Historic England	General	No comment.	None	None

Appendix 4 – Schedule of Changes - Draft Local Employment and Training Supplementary Planning Document

Ref	Rep ID	Section	Modification	Reason
A1	LETSPD/02	7.0 Local Employment and Training Measures to be Secured, Para 7.2, page 13	Deletion of text 'to use reasonable endeavours to'	To ensure consistency in revision of documentation and clarify the Council's obligations when negotiating and processing LLAs.
A2	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 18	Para 1.1 added text 'ensure that'	To clarify and improve understanding following deletion of para 1.1.1 'Use reasonable endeavours to ensure that:'
A3	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 18	Deletion of para 1.1.1 'Use reasonable endeavours to ensure that:'	To reduce vague local labour commitment and reduce opportunity for contractors to opt out of obligations.
A4	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 18	Amendment of numbering following removal of para 1.1.1. Deletion of 1.1.1.1, 1.1.1.2, 1.1.1.3, 1.1.1.4 and replacement with revised numbering 1.1.1, 1.1.2, 1.1.3 and 1.1.4.	Renumbering following amendment and to improve presentation.
A5	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 18	Para 1.1.2, deletion of text 'Use reasonable endeavours'	To define delivery output from contractors and remove option to opt out of obligation.
A6	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 18	Para 1.1.2.1 (renumbered 1.1.6) insertion of word 'Provide'	To define delivery output from contractors and remove option to opt out of obligation.
A7	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, pages 18 and 19	Amendment of numbering following removal of paras 1.1.2, 1.1.2.1, 1.1.2.2, 1.1.2.3, 1.1.2.4, 1.1.3, 1.1.4, 1.1.5, 1.1.6, 1.1.7 and replacement with revised numbering 1.1.5, 1.1.6, 1.1.7, 1.1.8, 1.1.9, 1.1.10, 1.1.11, 1.1.12, 1.1.13 and 1.1.14	Renumbering following amendment and to improve presentation.
A8	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 19	Para 1.1.3 (renumbered para 1.1.10) deletion of text 'use reasonable endeavours'	To define delivery output from contractors and remove option to opt out of obligation.

Ref	Rep ID	Section	Modification	Reason
A9	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 19	Para 1.1.4 (renumbered para 1.1.11) deletion of text 'to use all reasonable endeavours to' and replacement with 'and shall'	To define delivery output from contractors and remove option to opt out of obligation.
A10	LETSPD/02	Appendix 1, Template Section 106 Wording for Local Labour, page 19	Para 1.1.5 (renumbered para 1.1.12) deletion of text 'to use all reasonable endeavours to' and replacement with 'and shall'	To define delivery output from contractors and remove option to opt out of obligation.
A11	LETSPD/04	Section 7, Local Employment and Training Measures to be Secured, page 13	Para 7.1, addition of second bullet point stating 'Traineeships in conjunction with work experience placements or as a preparatory phase for progression to an apprenticeship'	To accommodate reference and inclusion of traineeships
A12	LETSPD/04	Section 8, Mechanism for Securing Local Employment and Training Measures, page 17	Para 8.1, Addition of second bullet point stating 'Traineeships combined with work experience or as a preparatory phase to an apprenticeship'	To accommodate reference and inclusion of traineeships
A13	LETSPD/04	Appendix 2, page 21	Addition of second paragraph stating 'Benchmarks have not been included for Traineeships as these will delivered as and when appropriate in conjunction with work experience or as a preparatory phase to an Apprenticeship. The achievement of work experience or Apprenticeship benchmarks via a Traineeship route will be tracked and recorded in the summary report for the development.'	To outline how traineeships will be tracked and recorded
A14	LETSPD/06	Appendix 5, Monitoring Form, page 34	Added additional data collection text and box	To collect feedback and comments from construction contractors on apprenticeship and work experience placements
A15		Date Footer – all pages	Text 'April' deleted and replaced with text 'September'	To reflect date of revised document
A16		Para 2.2, line 7, page 9 Para 4.2, line 2, page 10 Para 6.5, line 4, page 12 Para 7.2, line 1, page 13 Para 8.1, line 6, page 14	Additional text '(or Unilateral Undertaking)', added	When there is no Affordable Housing, Highways requirement or ESCC involvement it may be more effective to enter into a Unilateral Undertaking agreement.

Ref	Rep ID	Section	Modification	Reason
		Para 8.2, lines 2 and 5, page 14 Para 8.3, line 3, page 14 Para 8.7, line 5, page 15 Para 8.8, line 3, page 15 Para 8.9, line 3, page 15 Para 8.10, bullet 1, page 16 Para 8.14, line 3, page 16 Para 8.18, bullet 1, page 17 Para 8.20, line 2, page 18 Para 8.22, bullet 1, page 18 Appendix 1 sub heading, page 19 Para 1.1.11, line 6, page 20 Para 1.1.12, line 5, page 20		The use of a Unilaterail Undertaking would be subject to negotiation and agreement with the agent/developer. The addition of the text 'Unilateral Undertaking' enables flexibility in the application of Local Labour Agreements
A17		Appendix 8, row 23, page 37	Addition of 'Unilateral Undertaking' glossary term.	To provide an explanation of the term Unilateral Undertaking

Appendix 5 – Table of Responses to Local Employment and Training Supplementary Planning Document – Refresh 2024

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
Refresh/ 01	East Sussex County Council	General	<p>Economic Development Section 2, Strategic Context; pages 3-5; Reference should be made to the East Sussex Economic Prosperity Strategy 2024-2050 (currently programmed to go to the East Sussex Full Council meeting for approval in October 2024) in the Strategic Context section. Employability and Skills Paragraph 2.3, Skills East Sussex (SES); page 3; Amend the paragraph to include the following;</p> <p>SES has agreed the following six strategic priorities for 2021-2030:</p> <p>Priority 1: Ensuring that national policy and funding supports the delivery of learning and skills in East Sussex Priority 2: Enabling our Further Education (FE)/Higher Education (HE) establishments to recruit excellent educators with specialist technical knowledge Priority 3: Improving our digital skills and digital inclusion Priority 4: Upskilling our workforce to increase regional productivity Priority 5: Supporting the unemployed and unqualified Priority 6: Skills for a Net Zero future</p> <p>SES has identified six priority sectors within the county. Work on the priorities is taken forward through the sector task groups. There are sector based Task Groups for the following:</p> <ul style="list-style-type: none"> • Construction and Civil Engineering • Creative, Cultural, Digital and Media • Engineering and Advanced Manufacturing • Health and Social Care • Visitor and Cultural Economy 	<p>Reference to the proposed East Sussex Prosperity Strategy 2020 – 2050 which is to be tabled for adoption has been incorporated</p> <p>Updates incorporated</p>	<p>Add details regarding proposed new strategy added at para 2.3, page 4</p> <p>Amendments incorporated. Para 2.4 pages 4 - 5</p>

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<ul style="list-style-type: none"> • Land, Agriculture and Environmental <p>Section 3, Evidence; page 6; Suggest reference is made to NEET data. Monthly dashboards showing participation and NEET data for 16 and 17 year olds is available in the Careers East Sussex Careers Hub Data Centre; Data (careerseastsussex.co.uk)</p>	NEET data dashboards report young people's destination by school. Data provides a useful reference point when exploring educational initiative intervention but does not provide directly relevant data for SPD.	None
			Section 3, Evidence; page 6; Suggest reference is made to Homeless and workless households, temporary accommodation figures – EBC data and Department for Work & Pensions data.	ESiF data relating to the homeless/temporary accommodation data dated 2017/18. Workless households data dated 2011. As both data sets are historic not included.	None
			Section 3, Evidence; page 6; Suggest reference is made to Skills data (East Sussex In Figures)	Incorporated Apprenticeship reporting. Other further education and skill data last dated 2013/19 not included.	Added to Section 3 at 3.6
			Section 4, Use of Planning Obligations and Section 106 Agreements, Paragraph 4.3, page 7; Reference should be made to targeting these interventions to cohorts most in need.	Incorporated	Added to Section 4 at 4.3
			Section 4, Use of Planning Obligations and Section 106 Agreements, Paragraph 4.3, page 7; Include 'Resourcing employment and careers-related events' as a measure.	Incorporated	As above
			Section 7, Local Employment and Training Measures to be Secured, Paragraph 7.1, page 10; Traineeships do not exist anymore, therefore, replace the reference to 'traineeships' with 'work placements' and 'pre-employment support interventions' e.g. confidence-building, stepping stones in to work provision.	Amended text, referencing alternatives.	Added to Section 7 at 7.1
			Section 7, Local Employment and Training Measures to be Secured, Paragraph 7.1, page 10; Include reference to working with the ESCC Employability & Skills (E&S) team to ensure dovetailing and consistency with local E&S offers, e.g. Transform to provide support to	Incorporated	As above

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			access apprenticeships, ESTAR, Careers Hub, Work Experience service.		
Refresh/02	Westcott Leach	General	<p>What support and/or initiatives could be incorporated to encourage the growth of local Eastbourne based businesses, particularly those in construction?</p> <p>A far better procurement system for local government work that allows smaller local businesses to contract directly with public sector bodies and authorities. The present system of working through frameworks with tier one contractors is not healthy or appropriate for smaller contractors where often terms are onerous and unfair. Larger out of area framework contractors do not put down lasting roots in the local community as their business are transient and only present for the duration of the contract and do not support any ongoing positive legacies post contract that will support the local economy and feed in local skills capacity. A significant number of good local main contractors have struggled to sustain their business in recent years because the procurement policy is short sighted and difficult to navigate for smaller businesses. As a consequence, locally there are a dearth of regional sized main contractors which creates a skills and labour sustainability problem locally. Support and a clear strategy is required for any emerging business to fill this gap. It is vital we have indigenous local businesses with a capacity to deliver larger local schemes and projects. If this is established you won't need to wave the stick of these kinds of policies to create a sustainable local skills resource.</p> <p>Are the thresholds for commercial and residential developments, which would trigger a local labour agreement, set at an appropriate level?</p> <p>Some consideration should be given to potential emerging regional SME's that might</p>	<p>EBC does not generally use Frameworks to procure building contractors and prefers to work with local contractors wherever possible. Whilst the Council acknowledges observations regarding the award of contracts to non-local Tier 1 contractors, it is unable to influence the contract award process for privately owned developments.</p> <p>The feedback is focussed on the construction phase and does not acknowledge operational employment or the delivery of programmes to promote the construction sector and initiatives to support local SMEs.</p> <p>EBC supports local start-ups via a funded programme delivered by the Eastbourne Chamber of Commerce.</p>	None

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<p>need some support in structuring their business to meet the requirements. Be aware that there is a cost to the business to implement management and monitoring and to then have a levy payment on top can be penal.</p> <p>What further considerations could the refreshed policy consider?</p> <p>To creating a workforce to support the local construction needs and for the commercial benefits of such developments and building to be sustainable and stay in the town is best achieved by working with and supporting local businesses that want to grow and emerge to fill the capacity, put down sustainable indigenous roots and create a sustainable skilled workforce to service regional needs and capacity. The policy does not presently achieve this, if anything it encourages more transient contracting for Tier 1 contractors and any economic benefit lost to the town.</p>		
Refresh/03	Planetlogic	General	<p>Are the thresholds for commercial and residential developments, which would trigger a local labour agreement, set at an appropriate level?</p> <p>Yes is there building space at a possible reduced rate for disabled people?</p> <p>What further considerations could the refreshed policy consider?</p> <p>Reduced cost land for building disabled adapted homes. Maybe some grants, even.</p>	The Local Employment and Training SPD has no influence regarding reduced cost land supply or grant funding for disabled adaptations to private homes.	None
Refresh/04	NHS Sussex	General	<p>NHS Sussex welcomes the opportunity to comment on the Eastbourne Local Employment and Training Supplementary Planning Document - Lewes and Eastbourne Planning Policy Consultations (lewes-eastbourne.gov.uk)</p> <p>Specific comments relating to proposed actions are set out later in this letter.</p>	<p>The response highlights the importance of collaborative, partnership working across organisations to improve and meet the needs of the local community.</p> <p>Furthermore it highlights the link between employment and health emphasising that employment gives a sense of purpose, having social interactions with those they work with, receiving regular income and opportunities to</p>	<p>'Collaboratively' added at para 1.6, page 3.</p> <p>Added to Section 3 at 3.7.</p>

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<p>Our Sussex Health and Care system has clear strategy in place that seeks to improve the lives of our 1.7 million people who live and work across Sussex. Our Improving Lives Together strategy ensures we focus and deliver against three key areas:</p> <ul style="list-style-type: none"> • Building integrated community teams and local partnerships across Brighton & Hove, East Sussex and West Sussex – to allow services and organisations to work in a joined-up way to better meet the needs of each local community. • Growing and supporting our Sussex health and care workforce – to attract more people to work in health and care, as well as supporting and developing the skills or careers of our existing staff. • Improving the use of digital technology and information – to help join-up our services and enable people to access advice or care more easily. <p>This work can only be achieved by the fundamental principle of working together in a collaborative and integrated way through multi-disciplinary teams across all partner organisations in Sussex.</p> <p>It is encouraging to see the plans shared by Eastbourne Borough Council (EBC) who have a dedicated plan on local employment and training. Workforce is one NHS Sussex key priorities and NHS Sussex recognises its role not just in developing its own people, but in its role as an anchor institution in our communities across Sussex. To support in delivering our aims and aspiration for health and care staff, Our People Plan sets this out and includes five priorities:</p> <ul style="list-style-type: none"> • Working as ‘one team’ • A more multi-skilled workforce 	<p>progress have increases health outcomes. EBC’s employment and training proposals are helping local communities and creating opportunities.</p>	

Rep ID	Consultee	Section	Summary of Representation	Officer Response	Recommended Change
			<ul style="list-style-type: none"> • Creating an inclusive environment • More recruitment and career opportunities • Creating a learning culture <p>The plan shared by EBC links to our priorities shared here, with a direct link in more recruitment and career opportunities that people teams across Sussex have worked hard to take forward with student placements, T-Levels and apprenticeships.</p> <p>In addition to NHS Sussex plans for workforce, there is a clear and direct link between employment and health. People with a sense of purpose, having social interactions with those they work with, receiving regular income and opportunities to progress have increased health outcomes. The plan set out by EBC supports this point in doing more for the local communities of Eastbourne in creating opportunities for our population, which in turn supports our strategy of Improving Lives Together.</p> <p>Moving forward, we welcome the fact that EBC is working closely with partners to revise how local employment and training opportunities will be achieved. Further engagement will support the development of the Integrated Care System in Eastbourne and NHS Sussex looks forward to identifying and developing further collaborative opportunities.</p>		
Refresh/05	Natural England	General	No comment – interest lies in protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.	None	None
Refresh/06	National Highways	General	No comment	None	None
Refresh/07	Historic England	General	No comment – beyond remit.	None	None

Appendix 6 – Schedule of Changes - Local Employment and Training Supplementary Planning Document – Refresh 2024

Ref	Rep ID	Section	Modification	Reason
R01	Refresh/01	2.0 Strategic Context, Para 2.3, page 4	Insertion of additional new paragraph at 2.3 and remaining paragraphs re-numbered	To reference proposed new ESCC strategy which has relevance to LET SPD
R02	Refresh/01	2.0 Strategic Context, Para 2.4, pages 4 - 5	Additional text and amendment to wording original text	To outline ESCC's strategic priorities and align relationship with sector task groups and an amendment to a sector task group title
R03	Refresh/01	3.0 Evidence, Para 3.6, page 7	Addition of new paragraph at 3.6 to include apprenticeship data for Eastbourne	Apprenticeship start and achievement data gives an indication of local skill levels within Eastbourne Borough
R04	Refresh/01	4.0 Use of Planning Obligations and Section 106 Agreements, Para 4.3, page 8	Addition of further text	Adds context highlighting some initiatives targeted to specific audiences. Acknowledges additional measures that may be considered
R05	Refresh/01	7.0 Local Employment and Training Measures to be Secured, Para 7.1, page 10	Deletion, replacement and insertion of additional text	To reflect changes in training provision and table alternative options
R06	Refresh/01	7.0 Local Employment and Training Measures to be Secured, Para 7.1, page 10	Additional bullet point demonstrating partners whom Council work with to enable delivery of employment and training initiatives	To highlight partnership collaboration and working to ensure co-ordinated provision
R07	Refresh/04	1.0 Introduction, Para 1.6, page 3	Text 'collaboratively' added	To demonstrate cohesive, two-way communication and working
R08	Refresh/04	3.0 Evidence, Para 3.7, page 7	Addition of new paragraph at 3.7	To reflect positive relationship between health and employment