

## EMPLOYMENT LAND LOCAL PLAN

## **Schedule of Minor Modifications**

July 2016

- To be read in conjunction with the Employment Land Local Plan Submission version (February 2016) (Submission Document SD/01).
- This Schedule of Minor Modifications includes the minor modifications identified in the Schedule of Minor Modifications (February 2016) (Submission Document SD/02).

Ref	Section/ Paragraph	Modification
Minor-01	Introduction – Format of the Employment Land Local Plan	Amend Title: Format of the Revised Proposed Submission Employment Land Local Plan
Minor-02	Introduction – Format of the Employment Land Local Plan	Amend para 1.5: The Revised Proposed Submission Employment Land Local Plan has been published for a six week period in order to receive representations on matters of soundness in- accordance with Regulation 19 of the Town & Country Planning (Local Planning)- (England) Regulations 2012. The Revised Proposed Submission version The Employment Land Local Plan presents the proposed strategy and policies relating to the employment land supply over the Core Strategy plan period up to 2027.

Ref	Section/ Paragraph	Modification
Minor-03 Introduction – Format of the Employment Land Local Plan		Amend para 1.6: The Revised Proposed Submission Employment Land Local Plan takes into account representations that were received through pre-production stakeholder engagement, via consultation on the Proposed Draft Employment Land Local Plan that took place between December 2013 and March 2014, and representations received between December 2014 and February 2015 and December 2015 and January 2016 following the publication of the Proposed Submission and Revised Proposed Submission versions. The Revised Proposed Submission version has been published to allow further representations following the preparation of a revised Sustainability Appraisal.
Minor-04	Introduction – Format of the Employment Land Local Plan	<ul> <li>Amend para 1.7:</li> <li>The Revised Proposed Submission Employment Land Local Plan has also been informed by: <ul> <li>Employment Land Review (GVA, 2013)</li> <li>Employment Land Strategy and Distribution Options Report (EBC, 2013)</li> <li>Supplementary Employment Land Evidence (GVA, 2014)</li> <li>Employment Land Review Viability Briefing Note (GVA, 2014)</li> <li>Revised Sustainability Appraisal (JAM Consult, 2015)</li> <li>Eastbourne Office Deliverability Assessment (GVA, 2015)</li> </ul> </li> </ul>
Minor-05	Introduction – Relationship with Other Plans and Strategies	Amend para 1.10: The Sovereign Harbour SPD, which was adopted in 2013, has been prepared to provide more detail on the implementation of Core Strategy Policy C14: Sovereign Harbour Neighbourhood Policy. The SPD identifies the issues that need to be addressed through

Ref	Section/ Paragraph	Modification         future development in Sovereign Harbour. It identifies that the main uses of Sites 6 and 7a should be a Business/Office Park of a high quality design to provide a distinctive gateway into the town and Sovereign Harbour, and that office use could also be provided on Site 4.					
Minor-06	Introduction – Relationship with Other Plans and Strategies	Add new para after 1.17: <u>The Employment Land Local Plan has also been prepared having regard to the National</u> <u>Park purposes (under Section 62 of the Environment Act 1995).</u>					
Minor-07	Introduction – Stages in the	Amend Table 1:					
	production of Plan	Stage	Timescale				
		Pre-production engagement	21 June 2013 – 2 August 2013				
		Proposed Draft ELLP (Regulation 18 consultation)	20 December 2013 – 14 March 2014				
		Publication of Proposed Submission Version for representation period	December 2014 – February 2015				
		Publication of Revised Proposed Submission Version for representation period	December 2015 – January 2016				
		Submission to Secretary of State	February 2015 2016				
		Examination in Public	May/June 2015 September 2016				
		Adoption	October 2015 November 2016				
Minor-08	Introduction – How to comment on Revised	Delete sub-section: How to comment on Revised Proposed Submis	ssion Employment Land Local Plan				

Ref	Section/ Paragraph	Modification
	Proposed Submission Employment Land Local Plan	<ul> <li>1.21 The six week representation period on the Revised Proposed Submission- Employment Land Local Plan commenced on 11 December 2015 and finishes on 22- January 2016. The Revised Proposed Submission Employment Land Local Plan is- accompanied by a Revised Sustainability Appraisal Report, which is also available for- comment.</li> <li>1.22 The Revised Proposed Submission Employment Land Local Plan and its Sustainability- Appraisal can be viewed and commented on via the Council's on-line consultation portal, which can be accessed via the Eastbourne Borough Council website- (www.eastbourne.gov.uk/ellp). Representations can also be submitted by email or via- post.</li> <li>Email: planning.policy@eastbourne.gov.uk Regeneration and Planning Policy</li> <li>1 Grove Road</li> <li>Eastbourne</li> <li>BN21 1TW</li> <li>All representations should be received by 5pm on Friday 22 January 2016.</li> </ul>
Minor-09	Context – Existing Situation	Amend para 2.8: Over the past 10 recent years, there has been an overall net increase in employment floorspace in Eastbourne of 4,569 sqm. A significant amount of this growth has been due to redevelopment of areas of the Courtlands Road and Brampton Road Industrial Estates to provide an increased amount of higher quality employment space. There has been an overall increase in the amount of class B8 (Storage and Distribution) uses, however there has been a net loss of all other employment use classes. There has been a significant loss in class B1a (Office) uses in the last two years, particularly to residential use due to the recent changes to Permitted Development rights.

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Minor-10	Context – Key Issues	Amen para 2.27: <b>Suitability and Viability of land at Sovereign Harbour</b> - Land at Sovereign Harbour was identified in an outline application for the development of Sovereign Harbour in 1988. This allocation for 30,000 sqm (GEA) of office space across two sites (known as Sites 6 and 7) was retained through the Eastbourne Borough Plan 2001-2011 (adopted 2003). Despite being a Council priority, the sites have not been developed for this quantum of office space and the Employment Land Local Plan should consider the suitability and viability of land at Sovereign Harbour (ref: 131002) was approved in December 2014. This grants outline permission for employment uses on Sites 4, 6 and 7a, with the quantum to be determined by the Employment Land Local Plan.		
Minor-11	Context – Employment Land Requirements	Amend para 2.38: The Employment Land Review recommends a 6% headroom capacity for Industrial and Warehouse uses, and a 10% headroom capacity for Office uses. This would equate to approximately 43,000 sqm of additional class-B use space over the plan period to 2027.		
Minor-12	Context – Employment Land Requirements	Add new paragraph after para 2.39: In order to allow for employment floorspace requirements to be consistent, the office requirement has been converted from a Net Internal Area (NIA) figure to a Gross External Area (GEA) figure, using a conversion rate of 80%. This means that the total employment land requirement for Eastbourne over the plan period to 2027 is 48,750 sqm (GEA).		

Ref	Section/ Paragraph	Modification			
Minor-13	Strategy – Economy and Employment Land	Amend para 3.9: The requirement for 43,000 sqm 48,750 sqm of employment land will be delivered through intensification of Industrial Estates and development within the Sustainable Centres. However, each location identified is not necessarily capable or suitable to accommodate each of the identified B-class uses. The delivery of B2 or B8 space would not be appropriate in residential areas or locations where the environment is high quality, and provision of high quality office space is unlikely to be attractive to occupiers if it is located in older employment locations where the quality of the environment is poorer. Therefore, different types of employment development needs to be located in a location that is appropriate to its use, which means the more industrial uses being located within the Industrial Estates, and office development being located in high quality environments.			
Minor-14	Strategy – Economy and Employment Land	<ul> <li>Amend para 3.10:</li> <li>Taking this into account, the employment requirement will be distributed in the following way:</li> <li>Intensification of Industrial Estates – 20,000 sqm (GEA) of B1c/B2/B8 floorspace and 1,8750 sqm GEA of B1a/b floorspace</li> <li>Town Centre – 3,000 sqm NIA 3,750 sqm GEA of B1a/b floorspace</li> <li>Sovereign Harbour – 20,000 sqm NIA 23,125 sqm (GEA) of B1 floorspace</li> </ul>			
Minor-15	Strategy – Economy and	Amend para 3.14:			

Ref	Section/ Paragraph	Modification
	Employment Land	The level of development required in Eastbourne will create a significant number of jobs and there is opportunity to create local employment at both construction and operational stages of this development. Eastbourne Borough Council will seek to secure Local Labour Agreements and associated contributions on developments of 1,000sqm or more (including change of use) in order to secure local employment and training measures as part of development proposals, with the objective of improving training and skills in the town for the future economic development of the Borough. This will be achieved through Section 106 Agreements related to specific development proposals, which will secure contributions from development that will support and benefit the local labour market and economy, enabling employment growth, raising skills and giving local people opportunities generated by new developments. A Local Labour Agreement Local Employment and Training Supplementary Planning Document (SPD) will be prepared to guide the implementation of this policy.
Minor-16	Strategy – Key Diagram	Amend Key Diagram:

Ref	Section/ Paragraph	Modification
		Sovereign Harbour (20,000 segn of B1/(B2/B8 floorspace) (20,000 segn of B1/(B2/B8 floorspace)
Minor-17	Policies – Industrial Estates	Amend para 4.3 The Industrial Estates are identified as locations for the provision of 20,000 sqm (GEA) of additional B1c (Light Industry), B2 (General Industry) and B8 (Storage & Distribution) use floorspace, as well as 1,875 sqm (GEA) of additional B1a (Office) and B1b (Research & Development) floorspace, over the plan period through the intensification of existing sites.

Ref	Section/ Paragraph	Modification			
Minor-18	Policies – Industrial Estates	Add new paragraph after para 4.5: The policy requires the delivery of 20,000 sqm (GEA) of net additional industrial and warehouse floorspace and 1,875 sqm (GEA) of office floorspace over the plan period, meaning an increase in provision over and above what is currently provided within the industrial estates. Where a development proposal includes the redevelopment of an existing class B site, the amount of existing floorspace will be deducted from the proposed floorspace with the difference between the two contributing towards the target. For example, if a development requires the demolition of 1,000 sqm of floorspace and results in the delivery of 1,500 sqm a contribution of 500 sqm is made towards the target (1,500 sqm [new floorspace] minus 1,000 sqm [existing floorspace]).			
Minor-19	Policies – Industrial Estates	Amend para 4.6: Since 2012/2013, a total of 5,049 sqm 6,900 sqm of class B floorspace has been delivered within the town's industrial estates (at 1 April 2015 2016). This includes the redevelopment of an existing site that has been vacant for a considerable amount of time to provide new, high quality class B2 floorspace, and the intensification of an existing site to provide nine new class B1a and B8 units totalling 1,755 sqm (Picture 5). In addition, there is 3,722 sqm 1,102 sqm of employment floorspace within the Industrial Estates that has permission but development has yet to start. Table 3 shows the position at 1 April 2015-2016 in terms of completed employment developments within the designated Industrial Estates.			
Minor-20	Policies – Industrial Estates	Replace Table 3:			

Ref	Section/ Paragraph	Modi	Modification				
			Year	Floc	o <del>rspace (sqm)</del>		
			2012/2013	100			
			2013/2014	118	3		
			2014/2015				
			Total				
			Target	<del>20,</del>	000		
			Committed	3,722			
			Residual 2015-2027	11,	229		
					Net additional industrial and warehouse floorspace (sqm)		
			Completed 2012-2016		<u>6,900</u>		
			Average Annual Delive	ery	<u>1,725</u>		
			Residual Requirement		<u>11,998</u>		
			Years of Plan Remainin	ng	11		
			Expected Windfall Delivery		<u>18,975</u>		
			Committed		1,102		
Minor-21	Policies –	Add r	new paragraph after par	a 4.9	9:		

Ref	Section/ Paragraph	Modification
	Industrial Estates	The existing industrial estates are the most appropriate locations to make provision for the requirement for industrial and warehouse floorspace, and therefore industrial and warehouse uses should be the main priority in these locations. However, it is considered that there is scope for a limited amount of new office provision to be accommodated within the industrial estates. The provision of new office space within the Industrial Estates will be supported where the new provision does not prejudice the future delivery of industrial and warehouse floorspace. To that end, the provision of non-ancillary office floorspace is limited to 1,875 sqm (GEA). It is recognised that existing employment sites in industrial and warehouse use may require the provision of some ancillary office space to support their existing operation, and these proposals will be supported.
Minor-22	Policies – Town Centre	Amend para 4.24: The provision of 3,000 sqm 3,750 sqm (GEA) of office space in town centre will help to maintain a healthy office provision and avoid adverse impact on the vitality of the town centre. It should be provided as additional modern space and should complement the existing and refurbished stock. It should provide smaller, flexible, multi-occupier floorspace in the form of good quality managed workspace that is suitable for small and start-up businesses, and is closely aligned to the nature of demand in the Borough. It is recognised that commercial office development is unlikely to be viable on its own. Therefore the delivery of office space in the Town Centre will require cross subsidy from other higher value uses as part of a mixed use development.
Minor-23	Policies – Sovereign Harbour	Amend para 4.33: Over the last 20 years, Sovereign Harbour has provided high quality residential and

Ref	Section/ Paragraph	Modification			>		
		and 7 <u>a</u> ) v of office s	vere identified in ar	has not been deliver	n 1988 for the pro	r (known as Sites 6 vision of 30,000 sqm ty of this quantum of	
Minor-24	Policies – Sovereign Harbour	Amend para 4.40: The quantum of B1 space that should be provided in Sovereign Harbour is 20,000 sqm 23,125 sqm (GEA), with a focus on delivery of high quality space that is keeping with the overall design standards of the area. The requirement for 23,125 sq GEA is considered to equate to 18,500 sqm NIA based on an 80% conversion factor.					
Minor-25	Policies – Sovereign Harbour	The Empl within the sqm GEA Mall will h further de	Amend para 4.42: The Employment Land Review considers that there is sufficient evidence of demand within the Eastbourne market to indicate that the development of 20,000 sqm 23,125 sqm GEA of B1 space at Sovereign Harbour is deliverable. The delivery of the Innovati Mall will help establish Sovereign Harbour as an employment location and will assist further development by providing some on-site servicing, improving the attractiveness and desirability of the sites.				
Minor-26	Implementation and Monitoring -		Amend Table 4 – Employment Land Local Plan Monitoring Framework				
	Monitoring Framework	Policy	Objective	Targets	Indicators	Sources	
	FIGHEWOIK	EL1: Employment	ELLP1: Stimulate Economic Growth	Assumption in favour- of sustainable-	Number of applications for	Commercial Monitoring (EBC)	

Ref	Section/ Paragraph	Modification					
		Land Strategy	ELLP2: Encourage Small and Start-up Businesses ELLP3: Diversify the Local Economy ELLP4: Support	development Meet the requirement for additional employment land	employment use- approved Total amount of employment floorspace provided against requirement	Commercial Monitoring (EBC)	
			Existing Businesses ELLP5: Promote Sustainable Employment Locations	Increase the number of businesses in Eastbourne	Total number of businesses Change in the number of businesses over the year	East Sussex in Figures (Business Demography)	
				Increase the number of business start-ups	Number of business- start-ups Change in the number of business start-ups over the year	East Sussex in Figures (Business Demography)	
				Increase job creation for local people	Number of people employed via Local Employment Technical Note <u>SPD</u>	Commercial Monitoring (EBC)	
				Increase job diversification	Change in numbers of people employed by sector over the year	East Sussex in Figures (Employment by Industry)	
				Enhance the existing education and skills provision	Number of proposals for education and training facilities approved Change in	Commercial Monitoring (EBC) East Sussex in Figures (Further Education: learners,	

Ref	Section/ Paragraph	Modification				
					participation and achievement rates in Further Education	skills and achievements)
				Ensure amount of office space lost does not exceed the allowances in ELLP forecast	Total amount of office (class B1a and B1b) floorspace lost to non-B uses compared to allowances in ELLP forecast	<u>Commercial</u> <u>Monitoring (EBC)</u>
				Ensure amount of industrial space lost does not exceed the allowances in ELLP forecast	Total amount of industrial (class B1c and B2) floorspace lost to non-B uses compared to allowances in ELLP forecast	<u>Commercial</u> <u>Monitoring (EBC)</u>
				Ensure amount of warehouse space lost does not exceed the allowances in ELLP forecast	Total amount of warehouse (class B8) floorspace lost to non-B uses compared to allowances in ELLP forecast	<u>Commercial</u> <u>Monitoring (EBC)</u>
		EL2: Industrial Estates	ELLP2: Encourage Small and Start-up Businesses ELLP4: Support Existing Businesses	Delivery of 20,000- sqm of mixed B- floorspace in- Industrial Estates Delivery of 20,000	Total amount of net additional class B floorspace completed in Industrial Estates in sqm	Commercial Monitoring (EBC)
				sqm of Industrial (class B1c and B2) and Warehouse (class B8) floorspace and	Total amount of class- B1/B2/B8 floorspace- completed in- Industrial Estates in-	Commercial Monitoring (EBC)

Ref	Section/ Paragraph	Modification					
				1,875 sqm of Office (class B1a and B1b) floorspace in Industrial Estates	sqmTotal amount of netadditional office(classes B1a andB1b) floorspacecompleted inIndustrial Estates insqmTotal amount of netadditional industrial(classes B1c and B2)floorspace completedin Industrial Estatesin Industrial Estates	Commercial Monitoring (EBC)	
					Total amount of net additional warehouse (class B8) floorspace completed in Industrial Estates in sqm	<u>Commercial</u> <u>Monitoring (EBC)</u>	
				Resist the loss of B floorspace within Industrial Estates	Amount of class B floorspace lost to non-B uses in sqm within each industrial estate	Commercial Monitoring (EBC)	
		EL3: Town Centre	ELLP1 - Stimulate Economic Growth ELLP5 - Promote Sustainable Employment	Delivery of 3,000 sqm of B1a office- floorspace in the- Town Centre Delivery of 3,750 sqm of office (class	Total amount of class B1a floorspace- completed in the- Town Centre Total amount of office (class B1a/B1b)	Commercial Monitoring (EBC)	

Ref	Section/ Paragraph	Modification	Modification					
			Locations	B1a/B1b) floorspace in the Town Centre	floorspace completed in the Town Centre			
				Resist the loss of B1a- office floorspace to- other uses Resist the loss of office (class B1a/B1b) floorspace to other uses	Amount of class B- floorspace lost to- other uses Amount of office (class B1a/B1b) floorspace lost to other uses in the Town Centre	Commercial Monitoring (EBC)		
					Amount of class B- floorspace lost to- residential use Amount of office (class B1a/B1b) floorspace lost to residential use in the Town Centre	Commercial Monitoring (EBC)		
					Amount of B1a office- floorspace lost to- residential through- 'Permitted- Development' Amount of office (class B1a/B1b) floorspace lost to residential through 'Permitted Development'	Commercial Monitoring (EBC)		
		EL4: Sovereign	ELLP1 - Stimulate	Delivery of <del>20,000</del> <del>sqm</del> <u>23,125 sqm</u> of	Total amount of class B1 floorspace	Commercial		

Ref	Section/ Paragraph	Modification				
		Harbour	Economic Growth ELLP5 - Promote Sustainable Employment Locations	B1 floorspace in Sovereign Harbour	completed at Sovereign Harbour	Monitoring (EBC)