

**EBC-EL-14 [with Inspector's Comments and Suggested Changes]**

**Employment Land Local Plan - Schedule of Proposed Modifications**

**June 2016**

Ref	Section/ Paragraph	Modification
M-01	Para 3.10	<p>Amend para 3.10:</p> <p>Taking this into account, the employment requirement will be distributed in the following way:</p> <ul style="list-style-type: none"> <li>• Intensification of Industrial Estates – 20,000 sqm GEA of B1c/B2/B8 floorspace <u>and 1,500 sqm NIA of B1a/b floorspace</u></li> <li>• Town Centre – 3,000 sqm NIA of B1a/<u>b</u> floorspace</li> <li>• Sovereign Harbour – <del>20,000 sqm</del> <u>18,500 sqm</u> NIA of B1 floorspace</li> </ul>
M-02	Para 3.14	<p>Amend para 3.14:</p> <p>The level of development required in Eastbourne will create a significant number of jobs and there is opportunity to create local employment at both construction and operational stages of this development. Eastbourne Borough Council will seek to secure Local Labour Agreements and associated contributions on developments of 1,000sqm or more (including change of use) in order to secure local employment and training measures as part of development proposals, with the objective of improving training and skills in the town for the future economic</p>

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		<p>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 <del>Local-Labour Agreement</del> <u>Local Employment and Training Supplementary Planning Document (SPD)</u> will be prepared to guide the implementation of this policy.</p>
M-03	Para 4.3	<p>Amend para 4.3</p> <p>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 &amp; Distribution) use floorspace, as well as 1,500 sqm NIA of additional B1a (Office) and B1b (Research &amp; <u>Development</u>) floorspace, over the plan period through the intensification of existing sites.</p>
M-04	Policy EL2: Industrial Estates	<p>Amend Policy EL2:</p> <p><b>Policy EL2: Industrial Estates</b></p> <p>Within the designated Industrial Estates, redevelopment and intensification of vacant and under-utilised sites to provide class B use floorspace will be supported in order to meet the target of providing <u>a net additional 20,000 sqm (GEA) 18,125 sqm (GEA) of B1c, B2 and B8 floorspace and a net additional 1,500 sqm (NIA) 1,875 sqm (GEA) of B1a and B1b floorspace</u> over the plan period. <u>Where development proposals require the demolition or extension of existing class B floorspace, only the uplift in provision within the site will be considered to contribute towards the target.</u> Proposals for the refurbishment of existing class B floorspace will also be supported.</p>

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		<p><u>Industrial and warehouse uses are the key priorities for the designated Industrial Estates. However, the provision of new class B1a and B1b (office) floorspace within the designated Industrial Estates will be supported, where it can be demonstrated that:</u></p> <ul style="list-style-type: none"> <li>• <u>Suitable sites for office development are not available in the Town Centre; and</u></li> <li>• <u>The amount of non-ancillary office space provided within the Industrial Estates over the plan period does not exceed a maximum of 1,500 sqm NIA 1,875 sqm (GEA)</u></li> </ul> <p>Proposals for the redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated <del>to the satisfaction of the Council</del> that:</p> <ul style="list-style-type: none"> <li>• The proposed alternative use is an <u>employment generating use that appropriate use to the industrial estate</u> that cannot be located elsewhere due to its un-neighbourliness; or</li> <li>• The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and</li> <li>• The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.</li> </ul> <p>Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated <del>to the satisfaction of the Council</del> that that there is no reasonable prospect of the site continuing to be used for class B use.</p>
M-05	Para 4.5	<p>Add new paragraph after para 4.5:</p> <p><u>The policy requires the delivery of 20,000sqm 18,125 sqm (GEA) of net additional industrial and warehouse floorspace and 1,500 sqm 1,875 sqm (GEA) of office floorspace over the plan</u></p>

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		<p><u>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 1,000sqm of floorspace and results in the delivery of 1,500sqm a contribution of 500sqm is made towards the target (1,500 sqm [new floorspace] minus 1,000sqm [existing floorspace]).</u></p>								
M-06	Para 4.6	<p>Amend para 4.6:</p> <p>Since 2012/2013, a total of <del>5,049 sqm</del> <u>6,900 sqm</u> of class B floorspace has been delivered within the town’s industrial estates (at 1 April <del>2015</del> <u>2016</u>). 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 <del>3,722 sqm</del> <u>1,102 sqm</u> of employment floorspace within the Industrial Estates that has permission but development has yet to start. Table 3 shows the position at 1 April <del>2015</del> <u>2016</u> in terms of completed employment developments within the designated Industrial Estates.</p>								
M-07	Table 3 - Employment Land Delivery within Designated Industrial	<p>Replace Table 3:</p> <table border="1" data-bbox="645 1158 1290 1388"> <thead> <tr> <th data-bbox="645 1158 987 1217">Year</th> <th data-bbox="987 1158 1290 1217">Floorspace (sqm)</th> </tr> </thead> <tbody> <tr> <td data-bbox="645 1217 987 1276">2012/2013</td> <td data-bbox="987 1217 1290 1276">100</td> </tr> <tr> <td data-bbox="645 1276 987 1335">2013/2014</td> <td data-bbox="987 1276 1290 1335">118</td> </tr> <tr> <td data-bbox="645 1335 987 1388">2014/2015</td> <td data-bbox="987 1335 1290 1388">4,831</td> </tr> </tbody> </table>	Year	Floorspace (sqm)	2012/2013	100	2013/2014	118	2014/2015	4,831
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M-08	Para 4.9	<p>Add new paragraph after para 4.9:</p> <p><u>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,</u></p>																						

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		<p><u>providing that it meets a sequential test to demonstrate that it cannot firstly be located within the Town Centre, and 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 1,500 sqm NIA. 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.</u></p>
M-09	Policy EL3: Town Centre	<p>Amend Policy EL3:</p> <p><b>Policy EL3: Town Centre</b></p> <p><del>The quantum of office space that should be provided in the Town Centre is 3,000 sqm of floorspace. Within the Town Centre, a total of 3,000 sqm NIA 3,750 sqm (GEA) of office (class B1a and B1b) floorspace shall be provided. The requirement for office floorspace in the Town Centre should shall be provided across-on</del> Development Opportunity Site 2 and <del>Development Opportunity Site 3</del> as identified in the Town Centre Local Plan. Office development should shall be high quality class B1a/b floorspace that is flexible to meet multi-occupier needs.</p> <p>Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.</p>
M-10	Para 4.24	<p>Add new paragraph after para 4.24:</p> <p><u>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</u></p>

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		<u>higher value uses as part of a mixed use development.</u>
M-11	Para 4.26	<p>Amend para 4.26:</p> <p><del>The sites that provide the most potential and best meet the basic expectations for office development are Development Opportunity Site 2 and Development Opportunity Site 3, and therefore the 3,000 sqm of office floorspace should be provided across these two sites. These sites are identified in Figure 2. If one site comes forward without sufficient provision of office space, the balance should be provided on the other.</del></p> <p><u>The 3,000 sqm NIA 3,750 sqm (GEA) of office space should shall be provided on one site in order to allow the maximum critical mass in office space. Development Opportunity Site 2 has the best potential to create a critical mass of offices in a position close to and with good visibility from the railway station, making provision more attractive for office occupiers. Therefore the 3,000 sqm NIA 3,750 sqm (GEA) requirement should shall be delivered on Development Opportunity Site 2, which is identified in Figure 2. However, office provision will also be acceptable on sites identified in the Town Centre Local Plan as being suitable for office development.</u></p>
M-12	Figure 2	Amend Figure 2 to remove DO Site 3 boundary
M-13	Para 4.27	<p>Add new paragraph after para 4.27:</p> <p><u>As the delivery of office space in the Town Centre is likely to be reliant on cross-subsidy from other forms of development as part of a mixed use site, planning applications that include office development on Development Opportunity Site 2 and rely on cross-subsidy should be</u></p>

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		supported by a viability assessment, carried out in accordance with the National Planning Policy Framework and RICS guidance.
M-14	Para 4.28	Delete para 4.28
M-15	Policy EL4: Sovereign Harbour	<p>Amend Policy EL4:</p> <p><b>Policy EL4: Sovereign Harbour</b></p> <p><del>Sovereign Harbour should accommodate 20,000 sqm of additional B1 floorspace. This should be delivered predominantly on Sites 6 and 7a, however Site 4 could accommodate a small amount of office space.</del> <u>Within Sovereign Harbour, a total of 23,125 sqm GEA 18,500 sqm (NIA) of B1 floorspace shall be provided. This shall be delivered predominantly on Site 6 and Site 7a, although office floorspace delivered in other locations within Sovereign Harbour will count towards the target. Site 6 is suitable for all types of class B1 development, whilst Site 7a is suitable for class B1a and B1b development. Site 7a shall also include a site of at least 1,500 sqm in order to accommodate a community centre.</u></p> <p>The B1 floorspace should be provided in a flexible format that will allow businesses to adapt their operations depending on circumstances.</p> <p>Other employment generating uses that are compatible with the residential area (with the exception of class A1, A3 and A5 uses) will be acceptable on any remaining land on Sites 6 and 7a following the delivery of the <del>20,000 sqm</del> <u>18,500 sqm NIA</u> 23,125 sqm (GEA) of B1 floorspace.</p>



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M-16	Para 4.40	<p>Amend para 4.40:</p> <p>The quantum of B1 space that should be provided in Sovereign Harbour is <del>20,000 sqm</del> 18,500 sqm NIA 23,125 sqm (GEA), with a focus on delivery of high quality space that is in keeping with the overall design standards of the area. <u>The floorspace requirement is defined by Net Internal Area (NIA) as this aligns more closely with employment capacity, and the relationship between Gross External Area (GEA) and NIA varies depending on the type of building and who the occupier will be. However, it is considered that tThe requirement for 23,125 sqm GEA is considered to equate to 18,500 sqm NIA based on an 80% conversion factor. would equate to approximately 24,300 sqm GEA.</u></p>
M-17	Para 4.45	<p>Add new paragraph after para 4.45:</p> <p><u>Site 7a is required to accommodate a new Community Centre with a site area of at least 1,500 sqm. In accordance with the Section 106 agreement for the Sovereign Harbour Outline Permission (Planning Ref: 131002), the overall floorspace allocation at Sovereign Harbour has been reduced from 20,000 sqm NIA/25,000 sqm GEA to 18,500 sqm NIA 23,125 sqm GEA in order to accommodate the Community Centre. The Community Centre will share parking provision with the B1 development on Site 7a. As the community centre is a local facility that will mainly be used by local residents, and the peak hours of use of the community centre and office development will be complementary, it is considered that this parking arrangement would be acceptable and would allow for the best use to be made of the site.</u></p>
M-18	Para 4.46	<p>Amend para 4.46:</p> <p>In order to support the creation of a Sustainable Centre at Sovereign Harbour, any remaining</p>

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		space on Sites 6 and 7a that is not used to deliver the <del>20,000 sqm</del> <u>18,500 sqm NIA</u> 23,125 sqm GEA of B1 floorspace could be developed for other employment generating uses that are compatible with the residential area, with the exception of A1 (Retail), A3 (Restaurants & Cafes) and A5 (Hot Foot Takeaway) uses. It is not considered that these uses would be appropriate in this out of town location outside the defined Sovereign Harbour District Centre.