

Ref: EBC-EL-13

Inspector Robert Mellor BSc DipTRP DipDesBEnv DMS MRICS MRTPI  
c/o The Programme Officer  
Mrs Claire Jones-Hughes  
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6 Brading Road  
Brighton  
BN2 3PD

14<sup>th</sup> June 2016

Dear Inspector,

### Eastbourne ELLP Examination Action Points

I write in response to your letter of 27<sup>th</sup> May 2016 and the action points that you identified following the hearing sessions. Please find Eastbourne Borough Council's responses to the questions set out below.

#### Session 1b Strategy, Town Centre Allocations and Monitoring

##### 1.0 Qn 1.5 – Office Development Viability

1.1 Table 1 provides an update on the Sensitivity Analysis provided in Table 9 of SD/25 to establish the rental values needed for a commercial viable development at increased build costs. This demonstrates that a rental value of £21 psf would be required at a build cost of £160 psf, and +£22 psf for a build cost of £170 psf.

**Table 1 - Sensitivity Analysis**

		BUILD COSTS (£psf)								
		90	100	110	120	130	140	150	160	170
RENTS (£psf)	12.5	8.50%	-2.00%	-10.80%	-18.10%	-24.30%	-29.70%	-34.40%	-38.50%	-42.10%
	14	20.00%	9.40%	-0.30%	-8.40%	-15.40%	-21.30%	-26.50%	-31.10%	-35.20%
	15.5	20.00%	20.00%	10.10%	1.20%	-6.40%	-13.00%	-18.70%	-23.80%	-28.20%
	17	20.00%	20.00%	20.00%	10.60%	2.40%	-4.80%	-11.00%	-16.50%	-21.30%
	18.5	20.00%	20.00%	20.00%	20.00%	11.10%	3.40%	-3.30%	-9.20%	-14.50%
	20	20.00%	20.00%	20.00%	20.00%	19.80%	11.50%	4.30%	-2.00%	-7.70%
	21	20.00%	20.00%	20.00%	20.00%	28.50%	19.60%	11.90%	5.10%	-0.90%

1.2 It should be noted that some of the numbers in Table 1 differ from those originally provided in Table 9 of SD/25, even though the same inputs have been applied. This is due to updates in the software used since the original sensitivity test was undertaken. However, it is important to note that, despite this issue, the pattern of the relationship remains the same between rents and build costs.

## 2.0 Qn 1.7 – Office Development Job Density

2.1 At the hearings on 12<sup>th</sup> and 13<sup>th</sup> May, Sea Change Sussex confirmed that a total of 644 sqm of floorspace at Pacific House had been occupied, which equated to 27% occupancy. This provided 50 jobs at a jobs density of 12.88 sqm per job.

2.2 Since the hearing, additional space at Pacific House has been occupied, taking the total occupied floorspace up to 877 sqm, which equates to 37.32% of the total floorspace. This additional occupancy has provided an additional 22 jobs, taking the total jobs provided to 72 jobs at a jobs density of 12.18 sqm per job.

2.3 It should be noted that these job densities only apply to Pacific House, which is not fully occupied, and that additional future development may deliver different job densities.

## 3.0 Qn 1.16 – Policy EL2 Industrial Estates

3.1 At the hearing, EBC agreed to delete the two references in Policy EL2 to 'to the satisfaction of the Council' in order to improve the clarity of the policy. These changes are made through Modification M-04 (*EBC-EL-14 - Schedule of Main Modifications, June 2016*).

3.2 In order to ensure that the Industrial Estates can have sufficient capacity to accommodate the requirement for industrial and warehouse floorspace, Policy EL2 restricts the redevelopment of sites within the industrial estates that are within class B use to non-B uses, as the industrial estates are considered to be the most appropriate location for industrial and warehouse uses.

3.3 However, there are exceptions to this restriction, including an instance where a site was required for a non-B class that could not be located elsewhere due to its un-neighbourliness and incompatibility with a residential area, such as a waste facility or recycling processing plant.

- 3.4 It is accepted that the current wording of Policy EL2 in relation to this only refers to 'an appropriate use', which is not a clearly defined term. It is therefore agreed that this clause should be amended to provide reference to employment generating non-B class uses that cannot be located elsewhere due to their un-neighbourliness, and a modification to Policy EL2 has been proposed accordingly through Modification M-04 (*EBC-EL-14*).
- 3.5 It is also agreed that Policy EL2 should include clarification that the 20,000 sqm target for industrial and warehouse floorspace within the designated industrial estates is a net additional target for floorspace to be provided, taking into account existing class B floorspace that is lost through demolition or retained when a site is redeveloped. As such, a wording change to Policy EL2 to reflect this has been proposed through Modification M-04 (*EBC-EL-14*). It is also proposed that additional wording could be included within supporting text to further explain this and provide an example (*Modification M-05, EBC-EL-14*).
- 4.0 Qn 1.17 – Industrial Estates Floorspace Forecasts
- 4.1 The Town Centre Viability Report (EBC-EL-12) identifies that the provision of 4,500sqm of office floorspace on the Town Centre sites would not result in a viable scheme. However, the provision of 3,000 sqm of office floorspace could result in a viable scheme. Therefore the 1,500 sqm that will be displaced from Sovereign Harbour needs to be re-provided elsewhere.
- 4.2 Since the start of the plan period, a total of 374 sqm of class B1a (office) floorspace has also been provided within the Industrial Estates, although this has tended to be ancillary to existing industrial and warehouse uses. However, it is considered that a limited amount of office floorspace could be delivered in the Industrial Estates over the remaining plan period if the right conditions are met.
- 4.3 It is important to recognise that the existing industrial estates are the most appropriate locations to make provision for the requirement for industrial and warehouse floorspace, particularly as there are very limited alternative locations where such provision could be made, particularly those uses that would be incompatible with the residential area.
- 4.4 As the supply of employment land in Eastbourne is challenged and there are few alternative locations for industrial and warehouse space, it is important that industrial and warehouse space takes precedence within the industrial estates, and the ability of the industrial estates to deliver additional office space without a knock-on effect on industrial land capacity may be challenged.

- 4.5 Over the plan period since 2012, a total of 6,900 sqm of industrial (class B1c and B2) and warehouse (class B8) space has been delivered within the designated Industrial Estates at an average of 1,725 sqm per annum. The continuation of this rate of delivery over the 11 remaining years of the plan period would result in the delivery of 18,975 sqm, of which 1,102 sqm is already committed. This windfall delivery, plus the floorspace already completed, amounts to 25,875 sqm, which exceeds the 20,000 sqm target by 5,875 sqm.
- 4.6 It is proposed that within the Submission ELLP [SD/01] Table 3 (page 26) is updated to provide the current position in terms of completed industrial and warehouse floorspace within the designated industrial estates over the plan period. This is outlined in Modification M-07 (*EBC-EL-14*).
- 4.7 Having regard to these figures, EBC consider that the anticipated windfall delivery rate indicates that there could be limited capacity within the Industrial Estates to accommodate an amount of office floorspace. However it is important to recognise that there are particular circumstances that would need to be met in order for office occupiers to be attracted to an industrial estate location.
- 4.8 One of these factors is the quality of the environment within the Industrial Estates. The ELR [SD/24] is clear that the current scale, nature, quality and character of the industrial estates within the Borough do not easily lend themselves to the creation of the type of environment that would support new office development (*para 8.41, p88*). The need to create a higher quality of environment through office development means that sites being developed for office could only provide a lower amount of floorspace than may be possible in industrial and warehouse development. This means that whilst there might be potential capacity to provide 5,875 sqm of industrial and warehouse space over and above the target, this would not necessarily equate to 5,875 sqm of office floorspace and the potential office capacity would be much lower than this.
- 4.9 However it may be possible in the right location to create the type of environment that would appeal to office occupiers if the provision was limited to 1,500 sqm (NIA), which if delivered in one location could be enough to create a critical mass without significantly impacting upon the ability of the industrial estates to deliver industrial and warehouse floorspace.
- 4.10 There is an example of such a scale of office development within Eastbourne Industrial Estates. Highfield Park, which was built within the last approximately 10 years, includes a high quality office development. This

office provision amounts to three buildings totalling approximately 2,000 sqm within a site of approximately 0.35 hectares.

- 4.11 In order to identify locations within the Industrial Estates that have may have some potential to be attractive to office occupiers, a criteria based approach to assessing locations has been taken.
- 4.12 It is considered that the main criteria that would be used to drive office location decisions are:
- Quality of the Environment
  - Ability to create a critical mass
  - Wider amenity provision (e.g. other services and facilities)
  - Visibility of the location
- 4.13 Additionally, it could be considered that transport connectivity may be a factor that may impact on the desirability of a location for office development.
- 4.14 The designated Industrial Estates are assessed against the criteria outlined above in Appendix 1. This highlights that the Brampton Road, Highfield South and Highfield North Industrial Estates have the most potential to be locations that could appeal to office occupiers. These three industrial estates are all located within the Hampden Park area.
- 4.15 These locations tend to be very visible locations from the A22, are close to wider amenity provision and either have a higher quality environment or have some potential to be able to create it. In addition, the Hampden Park Industrial Estates benefit from being within walking distance of the Hampden Park Railway Station and with very easy access to the A22.
- 4.16 The potential for office development to be successful in this location has already been established through the Highfield Park office development. Therefore it is considered that the Hampden Park area has the most scope for future office development.
- 4.17 Gardners Books are one of the largest employers in Eastbourne and they have a significant presence on Highfield South Industrial Estate. They also currently have an unimplemented planning permission for the demolition of the existing unit at 21-23 Edison Road within the estate and replacement with a new high-bay warehouse (Planning Ref: 150072). If Gardners Books were to consider further expanding their operation and presence on the Highfield South Industrial Estate, this may result in the comprehensive redevelopment of the area. This could provide an opportunity to provide an element of office floorspace in a location that could be attractive to office occupiers.

4.18 In order to ensure that office development within the Industrial Estates does not adversely impact on the delivery of industrial and warehouse space, a modification has been proposed to Policy EL2 (*Modification M-04, EBC-EL-14*).

6.0 Qn 1.18 – Policy EL2 and Office Development

6.1 Policy EL2 does not restrict the development of office space within the industrial estates and EBC have confirmed that office development would be supported in the event that it comes forward within the industrial estates.

6.2 Since the start of the plan period, a total of 374 sqm of office floorspace has been provided within the Industrial Estates. This has mainly been incorporated as part of developments of industrial or warehouse space.

6.3 However, this support for office development in industrial estates is not specifically mentioned within Policy EL2. It is appreciated that this could create uncertainty around whether the provision of office space within the designated industrial estates is acceptable or not.

6.4 As such, a modification is proposed that, whilst identifying that the industrial estates are the priority location for industrial and warehouse use, Policy EL2 would support proposals for a quantum of office development within the industrial estates if certain criteria are met (*Modification M-04, EBC-EL-14*). It is proposed that this is further elaborated on through supporting text via Modification M-08 (*EBC-EL-14*).

6.5 These criteria include demonstration of the application of a sequential test to show that there are no suitable sites for office development available within the Town Centre, and a limit on the maximum amount of office space that should be provided in order to ensure that the delivery of office space would not impact upon the long term delivery of industrial and warehouse floorspace.

6.6 The wording suggested as part of Modification M-04 to Policy EL2 is as follows:

*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:*

- *Suitable sites for office development are not available in the Town Centre;*  
*and*

- *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*

## 7.0 Qn 1.21 – Policy EL3 Town Centre

- 7.1 It is recognised that Policy EL3 as worded only makes office provision mandatory on the last site to be developed. It is accepted that commercial office development is unlikely to be viable and will require cross subsidy from other uses in order for it to be brought forward. The current wording of Policy EL3 may impact on the viability of a scheme and mean that development may not come forward.
- 7.2 Based on the appraisals provided in EBC-EL-12, it is considered that the provision of 4,500 sqm NIA of office floorspace on the town centre sites is unlikely to be viable based on the amount of residential use that could be delivered. However, it also concludes that the provision of 3,000 sqm NIA of office floorspace on DO Site 2 could be viable through cross subsidy.
- 7.3 Therefore it is proposed that the original allocation of 3,000 sqm for the Town Centre be retained, and Policy EL3 be amended to make the provision of 3,000 sqm NIA of office space mandatory on Development Opportunity Site 2 through Modification M-09 (*EBC-EL-14*).
- 7.4 The proposed amendment to Policy EL3 also includes reference to the inclusion of class B1b (Research & Development) floorspace alongside class B1a (Office) floorspace, as both office uses occupy similar types of environment and at similar densities, there is little difference between the nature of the uses and therefore they should be interchangeable.

## **Session 2 Sovereign Harbour (Policy EL4)**

### 10.0 Qn 2.5-2.16 – Floorspace Allocations - Sites 4, 6 and 7a

- 10.1 In order to provide a clearer requirement for the amount of B1 floorspace at Sovereign Harbour, the first paragraph of Policy EL4 has been amended to reference a target figure similar to that in Policy EL2.
- 10.2 It is considered that the policy should reference the Net Internal Area target because NIA aligns closely with employment capacity, and this has been included in the proposed modification to Policy EL4 (*Modification M-15, EBC-EL-14*). It is our view that GEA is a misleading figure as it is the NIA which relates to the job generating lettings area, not GEA, and the relationship

between NIA and GIA/GEA will vary depending on the type of building and who the occupier will be.

- 10.3 However, it is appreciated that an NIA figure does not provide clarity for site capacity assumptions, and therefore it is proposed that the explanatory text makes reference to a GEA figure for Sovereign Harbour, based on the GEA to NIA conversion rate used in the indicative site layouts for Sites 6 and 7a.
- 10.4 The indicative site layouts for Site 6 (REP-10-02) and Site 7a (REP-10-03) demonstrate that 11,100 sqm NIA can be accommodated on Site 6, and 7,400 sqm NIA can be accommodated on Site 7. The GEA floorspace figures for these layouts are:
- Site 6 – 14,541 sqm GEA (of which, Pacific House is 3,573 sqm GEA)
  - Site 7a – 9,765 sqm GEA
- 10.5 This totals 24,306 sqm GEA across the two sites, which equates to an approximate GEA to NIA conversion rate of 76%.
- 10.6 An amendment to supporting text is proposed through Modification M-16 (*EBC-EL-14*) to reflect the GEA figures outlined above.
- 10.7 In accordance with the Section 106 agreement for the Sovereign Harbour outline permission, the overall floorspace allocation at Sovereign Harbour will be reduced from 20,000 sqm NIA to 18,500 sqm NIA. Therefore an amendment to Policy EL4 to reference the requirement for 18,500 sqm NIA is proposed through Modification M-15 (*EBC-EL-14*).
- 10.8 An amendment to Policy EL4 is also proposed to identify that Site 7a will provide a site of at least 1,500 sqm to accommodate a new Community Centre (*Modification M-15, EBC-EL-14*). It is proposed that this is further elaborated on in the supporting text (*Modification M-17, EBC-EL-14*).
- 10.9 It is anticipated that the Community Centre on Site 7a will share car parking with the office provision. As the community centre is a local facility that will mainly be used by local residents, and the hours of use of the community centre and office development will be complementary (i.e. office parking used mainly during the day, community centre parking used mainly during the evening), it is considered that this parking arrangement would be acceptable and would allow for the best use to be made of the site. It also reflects the original permission for a community centre on Site 5 (Planning Ref: 150352) that can no longer be implemented, which only had disabled parking and servicing, with users expected to park in the Waterfront car park.



- 10.10 It is considered that it would be most appropriate for the supporting text to refer to the need for the community centre to share car parking with the office development. This is proposed through Modification M-17 (*EBC-EL-14*).
- 10.11 As suggested, in order to avoid prejudicing the early delivery of Site 4, reference to Site 4 has been deleted from Policy EL4, although supporting text at paragraph 4.47 of the ELLP explains that office development on Site 4 is optional, and this is retained.
- 10.12 In addition, amendments are proposed to Policy EL4 to clarify that both Sites 6 and 7a can accommodate class B1a and B1b use, and the inclusion of B1c is only acceptable on Site 6.

## **Other Matters**

### 11.0 Greenfield vs Brownfield

- 11.1 A thorough search of historic planning applications has been undertaken, but it is not possible to conclusively determine whether Sites 6 and 7a at Sovereign Harbour were restored following aggregate extraction under the NPPF definition.
- 11.2 The history of aggregate extraction at Sovereign Harbour, to the best of Eastbourne Borough Council's knowledge, is outlined below.
- 11.3 In the 1860s, the owner of the Crumbles (the Duke of Devonshire) agreed that the London Brighton and South East Railway could purchase not less than 48,000 cubic yards of shingle per year at a price of one penny per cubic yard<sup>1</sup>.
- 11.4 In 1931, a building company called Hall and Company, later known as Hall Aggregates, took over the lease for gravel extraction and installed a mechanical plant to grade the gravel into varying sizes before being taken away by road transport. This material was used for foundation works on highways and construction sites, sea defences, the Ready Mix Concrete plant, ground cover for waterlogged sites, decorative building work and ground up material for pottery production<sup>2</sup>.
- 11.5 It is understood that the mechanical plant would have been approximately in the location of Site 6. This is shown by the historic mapping provided in

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<sup>1</sup> Source: Ann Botha (2006), *The Crumbles Story: A Tale of Eastbourne's Colourful Heritage*, Second Edition, ALB Books

<sup>2</sup> Source: East Sussex County Council (2009), *Assessing the Historic Environment of the East Sussex Aggregate Resource – Crumbles Foreshore*, [http://archaeologydataservice.ac.uk/archives/view/eastsussex\\_eh\\_2010/downloads.cfm](http://archaeologydataservice.ac.uk/archives/view/eastsussex_eh_2010/downloads.cfm)

Appendix 2, which also confirms that Sites 6 and 7a were used for aggregate extraction, particularly Figures D and E. It is understood that Hall Aggregates eventually closed the works when plans for the harbour development were agreed and extraction ceased in the early 1990s.

- 11.6 During the aggregate excavation, a number of deeper gravel pits were dug, most of which naturally filled with freshwater. However it is understood that some of the pits around the area were filled with landfill (domestic waste).
- 11.7 The first record of planning permission at Sovereign Harbour held by Eastbourne Borough Council was an outline permission for the development of Sovereign Harbour in 1971. A list of applications relating to Sovereign Harbour during the period up to the start of the development of Sovereign Harbour is provided in Appendix 3.
- 11.8 The first consent that included a condition for a programme for the after-use and restoration of land was the 1975 permission for *the renewal of an existing consent to process sand and gravel and to operate concrete mixing and grading plant and improvements to the plant area including the provision of a screen bank and other works, for a period expiring 31st March 1980*, however there are no available site plans to confirm the precise locations.
- 11.9 There were additional applications for renewal of consents and extensions of time, some of which included conditions for restoration, but also confining workings to specific areas, although there are no site plans to confirm exact locations. It is understood that some of these excavated areas later formed the manmade water-filled parts of the harbour.
- 11.10 A 1990 permission was granted for the *construction of landscaping mounds incorporating domestic refuse*, which it is understood involved moving domestic landfill waste from other locations in the Crumbles area into a single location. Another permission from 1993 also involved the relocation of domestic waste deposited between 1960 and 1970 to a controlled area already containing waste, which it is understood to be the Shingle Mound to the south of Site 6.
- 11.12 The evidence to show whether restoration was undertaken on Sites 6 and 7a is inconclusive. There are no longer paper copies of the planning application files available, although electronic versions of the Decision Notices have been saved. All relevant applications reference the site as 'Land at the Crumbles', without a specific location being mentioned. However, since only the Decision Notices were saved, there are no site plans available to indicate the exact area that the applications applied to.

11.13 The historic mapping indicates that Sites 6 and 7a were part of the aggregate extraction, but there is no documentary evidence to confirm whether or not provision for restoration of the sites was made through development control procedures.

### **Session 3 – Other Employment Allocations and Alternative Sites**

#### **12.0 Land North of Hammonds Drive**

12.1 The concept of Eastbourne Park was first established in the Eastbourne Urban Plan, which was approved by Eastbourne County Borough Council in 1970, although the plan was never formally approved by the Secretary of State and therefore was a non-statutory plan.

12.2 The boundary for Eastbourne Park was first defined in a statutory development plan through the Eastbourne Park District Plan, which was adopted in 1990 (Appendix 4, Figure 1). This was when the site Land North of Hammonds Drive was first included within the boundary of Eastbourne Park.

12.3 The Eastbourne Borough Plan was adopted in 1998, and the boundary for Eastbourne Park did not alter from the one in the Eastbourne Park District Plan (Appendix 4, Figure 2).

12.4 The Eastbourne Borough Plan 2001-2011 was adopted in 2003, and this amended the Eastbourne Park boundary (Appendix 4, Figure 3). Further minor amendments to the Eastbourne Park boundary were made through the Eastbourne Core Strategy Local Plan 2006-2027, which was adopted in 2013 (Appendix 4, Figure 4).

12.5 In summary, Land off Hammonds Drive was first included within the boundary of Eastbourne Park in 1990, and has been within the boundary ever since. A plan showing the full boundary of Eastbourne Park and how it has changed since 1990 is provided in Appendix 4 (Figure 5).

I hope this letter and the accompanying appendices address the Inspector's concerns, however we would be happy to provide any further information required.

Yours Sincerely,



**Lisa Rawlinson**  
**Head of Regeneration & Planning Policy**

## Appendix 1 – Assessment of Industrial Estate against criteria for office occupiers

Industrial Estate	Quality of Environment	Ability to create critical mass	Wider Amenity Provision	Visibility	Conclusion
<b>Brampton Road Industrial Estate</b>	Some older and poor quality stock; Potential to develop larger sites gives potential to enhance quality of environment	Good level of potential capacity, including larger sites	Very close to Hampden Park District Shopping Centre  Supermarkets, hotel, restaurant in walking distance	Less visible location to the rear of retail park  Visible from railway	Some potential for office due to potential ability for larger sites to create better quality environment
<b>Highfield South Industrial Estate</b>	Some older and poorer quality stock  Lack of maintenance of public areas	Most potential capacity, but mainly related to existing business (i.e. Gardners Books)	Adjacent to supermarket  Restaurant, hotel and shopping area within walking distance	Very visible location from A22 and just off roundabout	Some potential for office due to visibility and location, however there may be limited capacity to deliver
<b>Highfield North Industrial Estate</b>	High quality environment  Built relatively recently	Existing office development  Little capacity or potential for redevelopment	Adjacent to Supermarket; Restaurant and hotel within estate;  Shopping area within walking distance	Very visible location from A22 and just off roundabout	Strong potential location for office, although limited capacity to deliver it
<b>Birch Road Industrial Estate</b>	Generally older and poorer quality stock impacts character of area.  Bus depot within site.  Lack of maintenance of	Some capacity for future development, but generally small sites	Close to supermarket/ retail park but few other amenities	Visible from Lottbridge Drove, although rear parts of estate hidden	Little potential for office due to smaller sites at rear of estate and inability to provide sufficient site size to improve environment

Industrial Estate	Quality of Environment	Ability to create critical mass	Wider Amenity Provision	Visibility	Conclusion
	public areas				
<b>Hammonds Drive Industrial Estate</b>	Access and movement around site is challenged due to one-way  Lack of maintenance of public areas	Very limited capacity for future development would make it difficult to provide space to create critical mass	Close to supermarket/ retail park but few other amenities	Visible from Lottbridge Drove, although rear parts of estate hidden	Little potential for office due to lack of capacity to create an environment suitable for office occupiers
<b>Finmere &amp; Britland Industrial Estate</b>	Poor quality environment, mainly due to gas holders	Very limited capacity for future development would make it difficult to provide space to create critical mass	Poor access to other facilities/ amenities	Lack of visibility due to concealed entrance and location through a residential area	Unlikely to be potential location for office due to lack of visibility and inability to improve quality of environment
<b>Courtlands Road Industrial Estate</b>	Relatively good environment in some locations due to recent development, although still a lot of old, poor quality stock	Some capacity for future development, but generally small sites	Poor access to other facilities/ amenities	Lack of visibility due to concealed entrance and location through a residential area  Visible from railway	The lack of wider amenity provision and lack of visibility in terms of locations means the site is unlikely to be potential location for office

## Appendix 2 - Historic Mapping of Sovereign Harbour Sites 6 and 7a (from old-maps.co.uk)

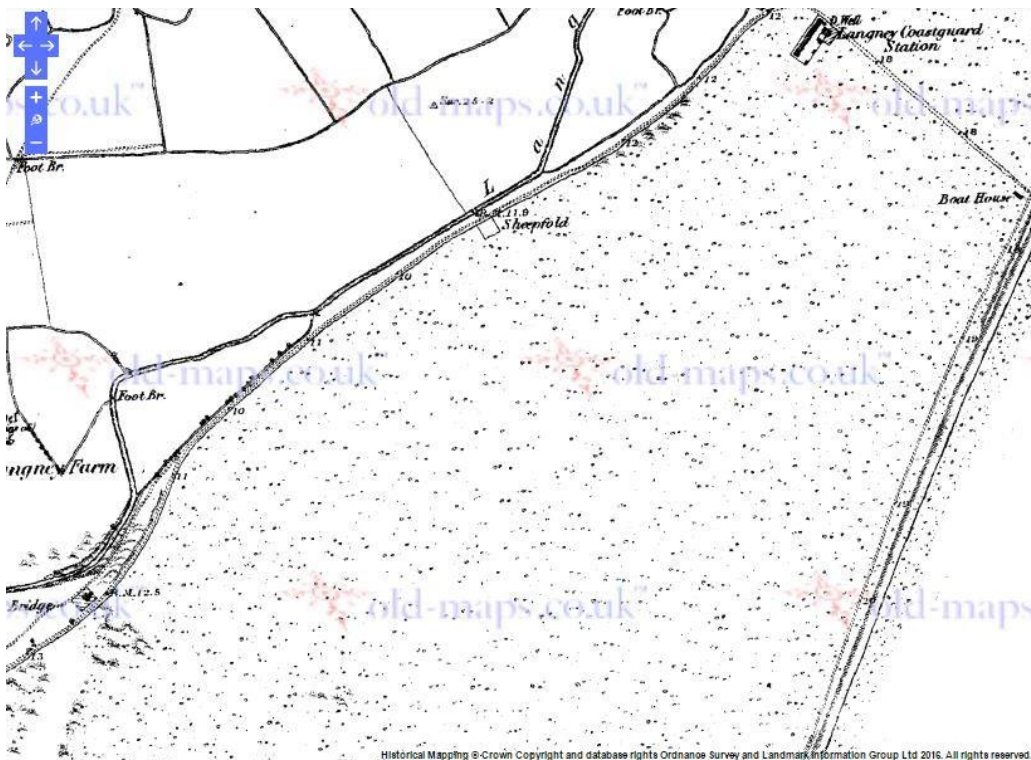


Figure A – 1979: OS County Series: SUSSEX (partial) 1:10,560 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))

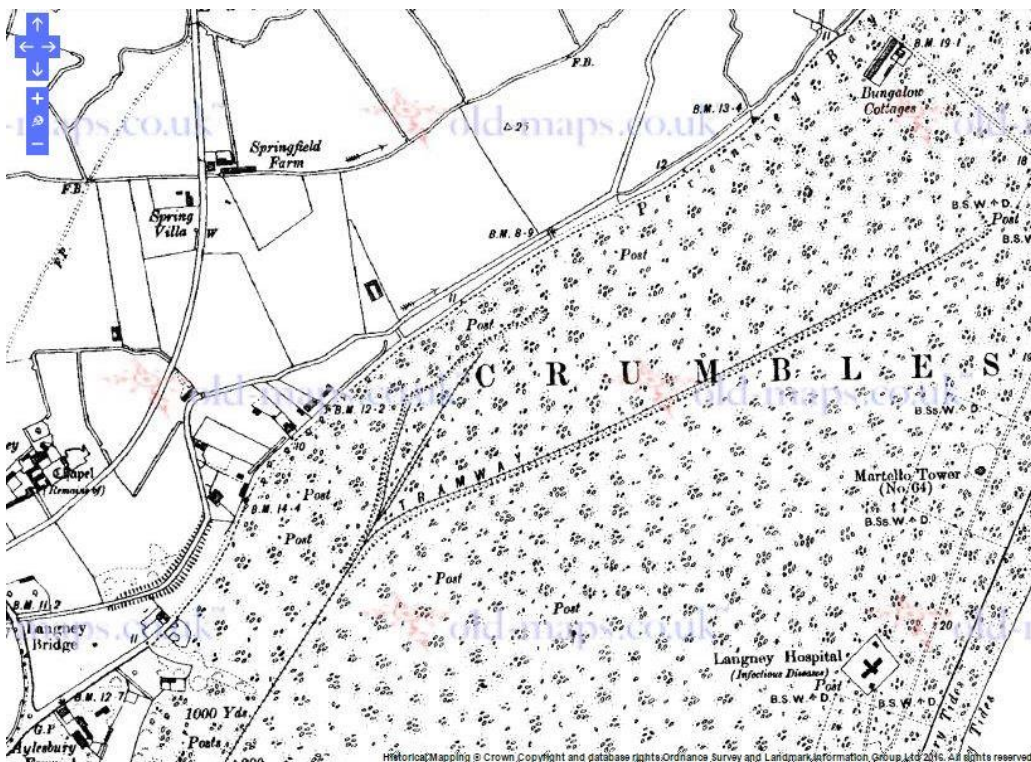


Figure B – 1911: OS County Series: SUSSEX (partial) 1:10,560 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))

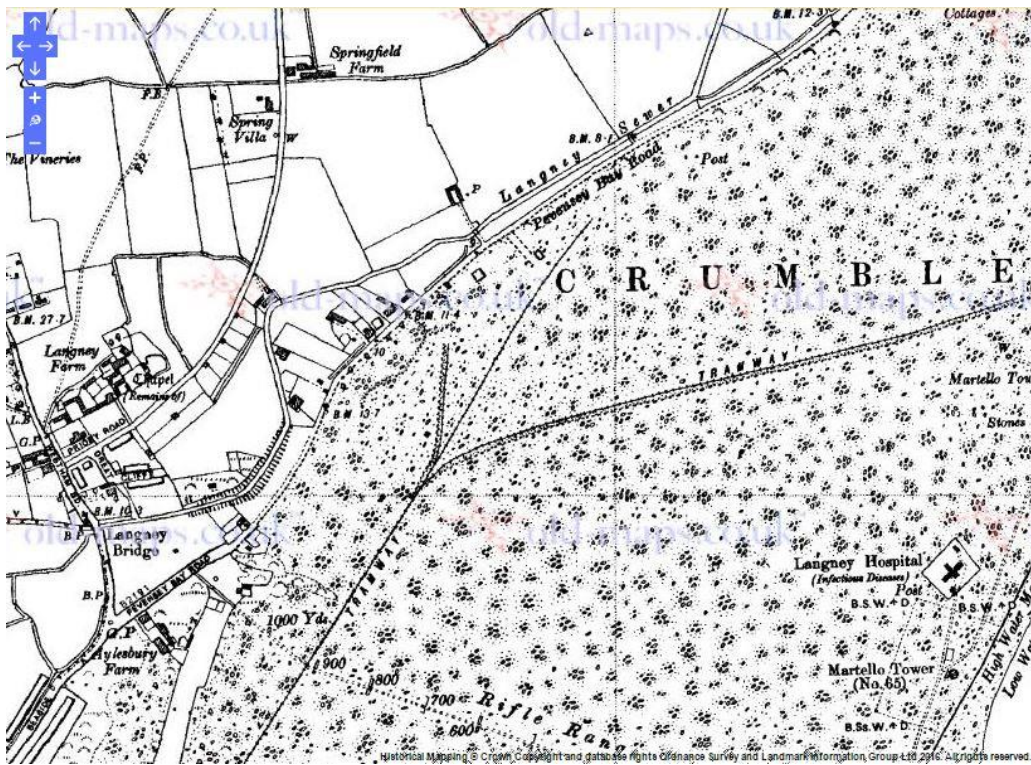


Figure C – 1938: OS County Series SUSSEX (partial) 1:10,560 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))

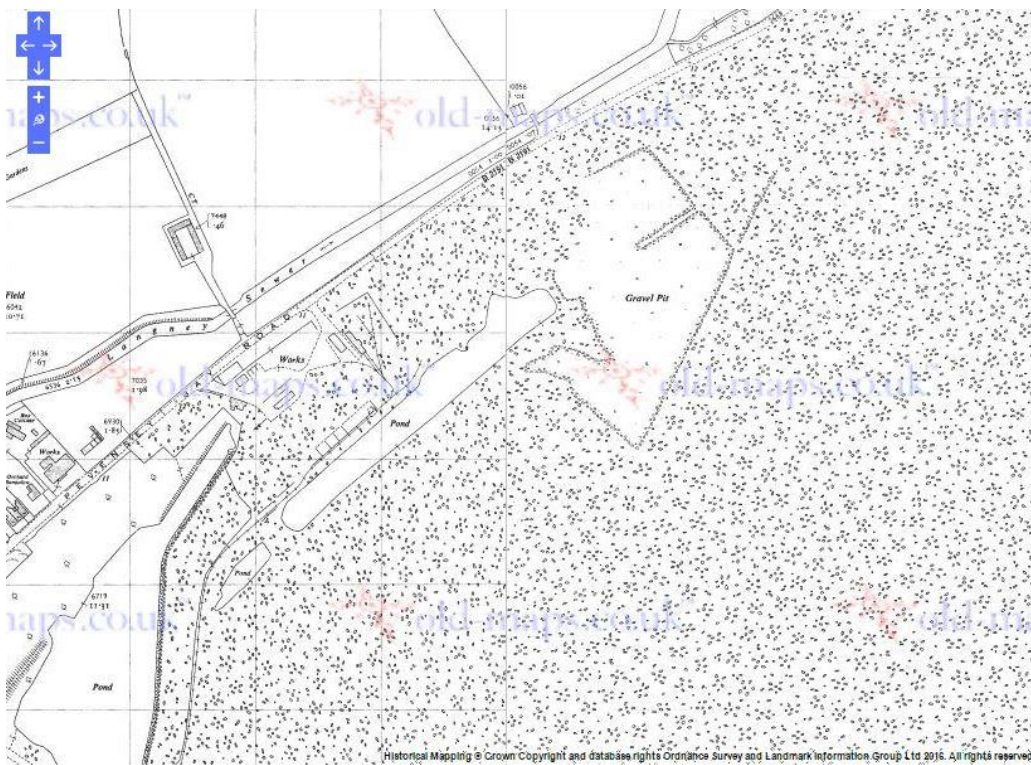


Figure D – 1960: OS Plan 1:1,250 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))



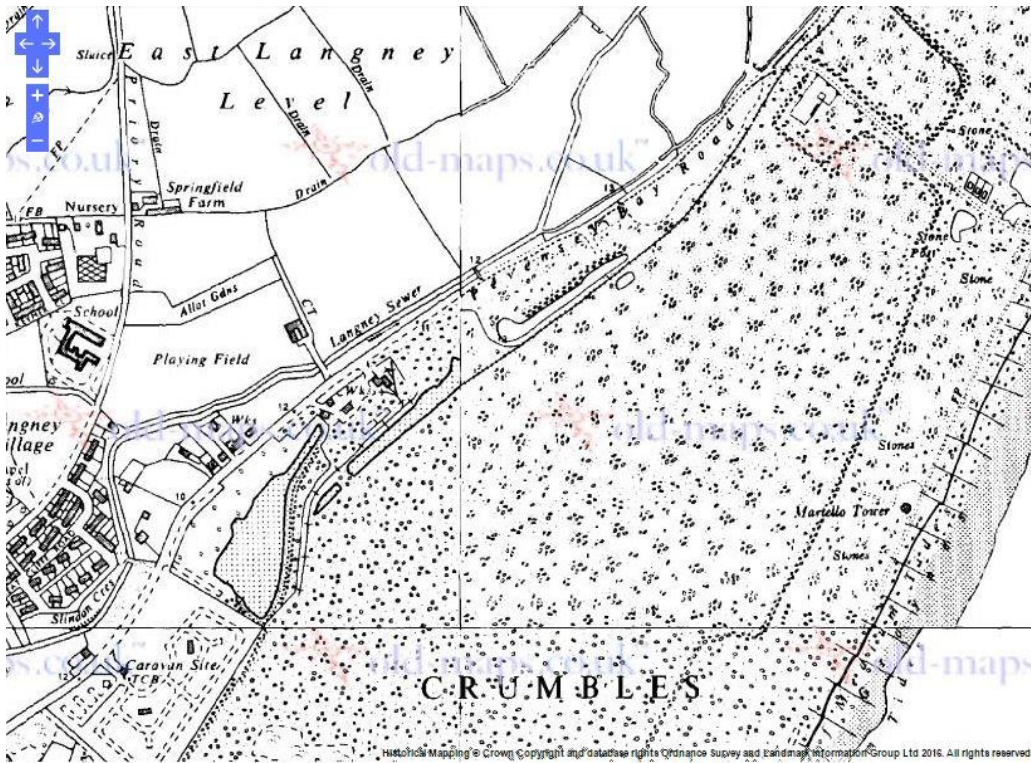


Figure E – 1960-1961: OS Plan 1:10,560 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))

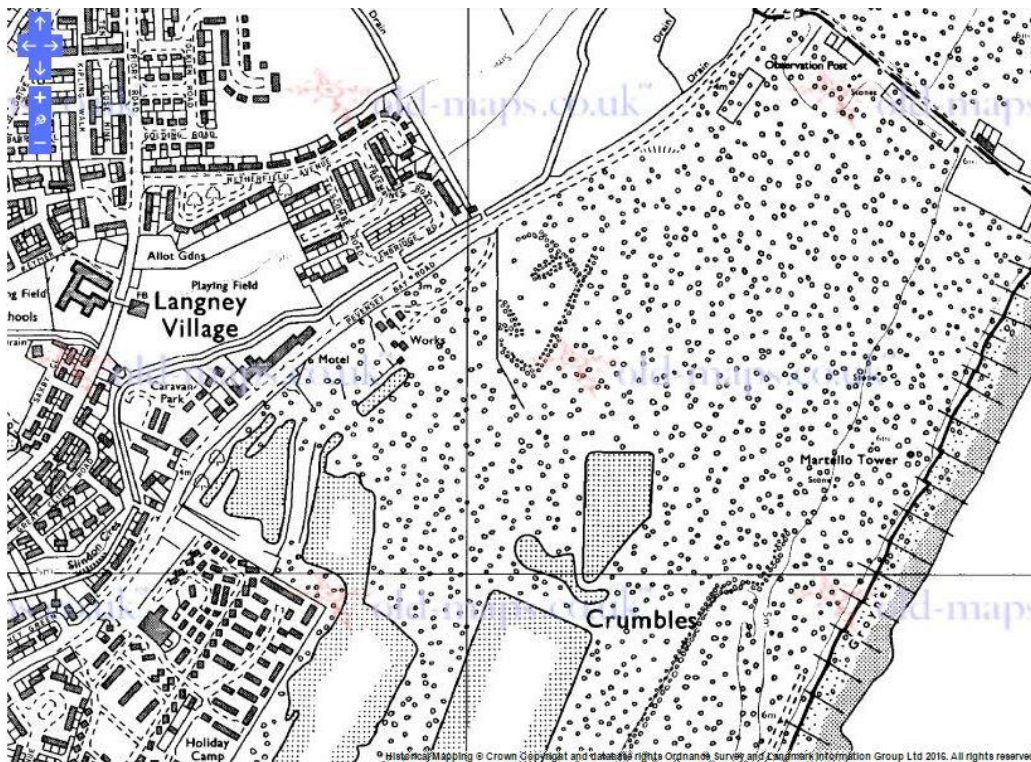


Figure F – 1981: OS Plan (partial) 1:10,000 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))



**Figure G – 1981-1992: OS Plan 1:10,000 (Source: [www.old-maps.co.uk](http://www.old-maps.co.uk))**

### Appendix 3 - Sovereign Harbour Planning Applications

<b>Plan. Ref</b>	<b>Site</b>	<b>Description</b>	<b>Date of Decision</b>	<b>Decision</b>	<b>Conditions relevant to land restoration</b>
EB/1971/0560	Land at the Crumbles (Bounded by Ramsay Way, Pevensey Bay Road, the County Borough Boundary and the Seafront)	Proposed Residential, Educational, Shopping, Offices, Entertainment, Water based Activities, Recreational Facilities and Open Space	18/11/1971	Permission Granted in Outline	<ul style="list-style-type: none"> <li>• None relevant</li> </ul>
EB/1973/0309	Land at the Crumbles	Reservation of land for future primary distributor and main services, subsequent to outline permission EB/1971/0560	19/04/1973	Approved Unconditionally	<ul style="list-style-type: none"> <li>• No conditions</li> </ul>
EB/1974/0567	Land at the Crumbles	The renewal of an existing consent to process sand and gravel and to operate concrete mixing and grading plant. Improvements to the plant area including the provision of a screen bank and other works, for a period expiring 31 <sup>st</sup> March 1980	08/05/1975	Approved Conditionally	<ul style="list-style-type: none"> <li>• Proposals and a programme for the after use and restoration of the site shall be submitted to the Planning authority within three months of the date hereof and thereafter such after-use and restoration shall be carried out to the satisfaction of the County Planning Authority or in default of agreement as shall be determined by the Secretary of State for the Department of the Environment</li> </ul>
EB/1977/0315	Land at the Crumbles, Pevensey Bay Road, Eastbourne	Excavation of sand and gravel to form part of locked harbour/lagoon covered by planning permission 71/560 and Section 52 agreement, conveyance of resulting material to processing plant, covered by planning permission EB/1974/0567(CM)	21/09/1977	Approved Conditionally	<ul style="list-style-type: none"> <li>• Unknown</li> </ul>

Plan. Ref	Site	Description	Date of Decision	Decision	Conditions relevant to land restoration
EB/1978/0193		Removal of Condition 2 from permission EB/1977/0315		Approved Conditionally	<ul style="list-style-type: none"> <li>• Working shall be confined to the two areas edged red and marked 'D' and 'E' on submitted Drawing No 399/PA/2 and to the depths indicated thereon</li> <li>• Proposals and a programme for the after use and restoration of the site shall be submitted to the Planning authority within three months of the date hereof and thereafter such after-use and restoration shall be carried out to the satisfaction of the County Planning Authority</li> </ul>
EB/1982/0280	The Crumbles, Eastbourne	Extension of time for excavation of sand and gravel to form part of locked harbour	25/08/1982	Approved Conditionally	<ul style="list-style-type: none"> <li>• Working shall be confined to the two areas edged red and marked 'D' and 'E' on submitted Drawing No 399/PA/2 and to the depths indicated thereon</li> <li>• After excavation has been completed the site shall be restored in accordance with the proposals approved in the Outline Consent 71/560 and the terms of the agreement made under Section 52 of the Town and Country Planning Act 1971 between the applicants and East Sussex County Council dated 29<sup>th</sup> March 1976</li> </ul>
EB/1984/0135	Land at the Crumbles, off	Installation of a new screening plant, at	19/06/1984	Approved	<ul style="list-style-type: none"> <li>• None relevant</li> </ul>

<b>Plan. Ref</b>	<b>Site</b>	<b>Description</b>	<b>Date of Decision</b>	<b>Decision</b>	<b>Conditions relevant to land restoration</b>
	Pevensey Bay Road	the Sand and Gravel Processing Works		conditionally	
EB/1985/0009	Land at the Crumbles, off Pevensey Bay Road	Installation of a new screening plant	03/05/1985	Approved conditionally	• None relevant
EB/1986/0431	Land at the Crumbles bounded by Ramsay Way, Pevensey Bay Road, the County Borough Boundary and the Seafront	Comprehensive mixed use development for residential, commercial business, hotel, leisure and a retail element not exceeding 240,000 sq ft gross, also including constructions of harbour and associated works	20/05/1988	Approved conditionally	• None relevant
EB/1988/0145	Land at the Crumbles (Including Land adjoining Kings Holiday Park and Pevensey Bay Road)	Excavation of part of site and filling of another part with excavated material	20/05/1988	Approved Unconditionally	• No conditions
EB/1988/0671	Land at the Crumbles (fronting re-aligned Pevensey Bay Road and adjoining Kings Holiday Park)	Erection of a 90,000 sq ft superstore, 125,000 sq ft retail units with 10,000 sq ft garden centre, 5,000 sq ft drive in restaurant and a petrol station, with associated roads, service area and 1,250 customer car parking spaces	10/01/1989	Approved Conditionally	• None relevant
EB/1988/0823	Land at the Crumbles bounded by Ramsay Way, Pevensey Bay Road, the County Borough Boundary and the Seafront	Cut and fill of gravel to achieve land form suitable for construction of roads in accordance with the concurrent planning application EB/1988/0671	02/02/1989	Approved Conditionally	• None relevant
EB/1988/0824	Land at the Crumbles bounded by Ramsay Way, Pevensey Bay Road, the County Borough Boundary and the Seafront	Alignment (horizontal) of specified roads on and servicing the Crumbles Harbour Village development	02/02/1989	Approved Conditionally	• None relevant
EB/1989/0065	Crumbles Harbour Village, Pevensey Bay Road	Construction of estate roads and sewers	21/08/1989	Approved Unconditionally	• No conditions
EB/1989/0066	Land at the Crumbles bounded by Ramsay Way, Pevensey Bay Road, the	Alignment (horizontal) of specified roads on and servicing the Crumbles	21/03/1989	Approved Conditionally	• None relevant

Plan. Ref	Site	Description	Date of Decision	Decision	Conditions relevant to land restoration
	County Borough Boundary and the Seafront	Harbour Village development			
EB/1989/0180	The Crumbles, Pevensey Bay Road	Use of existing batch plant and ancillary buildings for the production and supply of concrete to open market	10/07/1989	Approved Conditionally	<ul style="list-style-type: none"> <li>• Before development commences, details of a landscaped bund to the south west and north west boundaries, linked to the existing bund adjacent to Pevensey Bay Road, shall be submitted and approved by Council Planning Officer</li> <li>• The landscaped bund referred to above shall be constructed in accordance with the approved details prior to the commencement of the development and retained in their entirety until the concrete batching plant is removed</li> </ul>
EB/1989/0519	Crumbles Harbour Village, Pevensey Bay Road	Construction of landscaping mounds incorporating domestic refuse	26/06/1990	Approved conditionally	<ul style="list-style-type: none"> <li>• Only waste materials from the areas identified within the planning application shall be deposited within the application site and no materials, other than topsoil shall be imported from outside the Crumbles Harbour Village land without the consent in writing of the Council Planning Officer.</li> <li>• Before any waste material is removed, a scheme detailing the method of working and reinstatement of areas A, C D and e as shown in plan 1220 shall be</li> </ul>

Plan. Ref	Site	Description	Date of Decision	Decision	Conditions relevant to land restoration
					submitted to the County Planning Officer for his approval in consultation with the County Engineer and the National Rivers Authority. The reinstatement scheme shall indicate the proposals for removing leachate within the areas of domestic landfill, method of reinstatement and finish.
EB/1991/0203	The Crumbles, Pevensey Bay Road	Use of existing batch plant and ancillary buildings for the production and supply of concrete to open market	11/06/1991	Refused	<ul style="list-style-type: none"> <li>• Not applicable</li> </ul>
EB/1991/0500	Land at the Crumbles, Adjacent to Pevensey Bay Road and Old Martello Road	Use of re-located batching plant and ancillary facilities for the production and supply of concrete to the open market	14/01/1992	Approved conditionally	<ul style="list-style-type: none"> <li>• None relevant</li> </ul>
EB/1992/0048	Land at the Crumbles bounded by Ramsay Way, Pevensey Bay Road, the County Borough Boundary and the Seafront	Amendment to condition 1 of outline planning permission EB/86/431	31/03/1992	Approved unconditionally	<ul style="list-style-type: none"> <li>• No conditions</li> </ul>
EB/1993/004	Land at the Crumbles, Pevensey Bay Road	Import of domestic waste (deposited between 1960 and 1970) from other locations on The Crumbles to a controlled area already containing waste. To cover the area with a membrane and suitable material, and to use a car/boat park with suitable landscaping	02/02/1993	Approved conditionally	Only waste materials from the areas identified within the planning application shall be deposited within the application site and no materials, other than topsoil shall be imported from outside the Crumbles Harbour Village land without the consent in writing of the Council Planning Officer Areas E1, E2 and E3 and E4 as

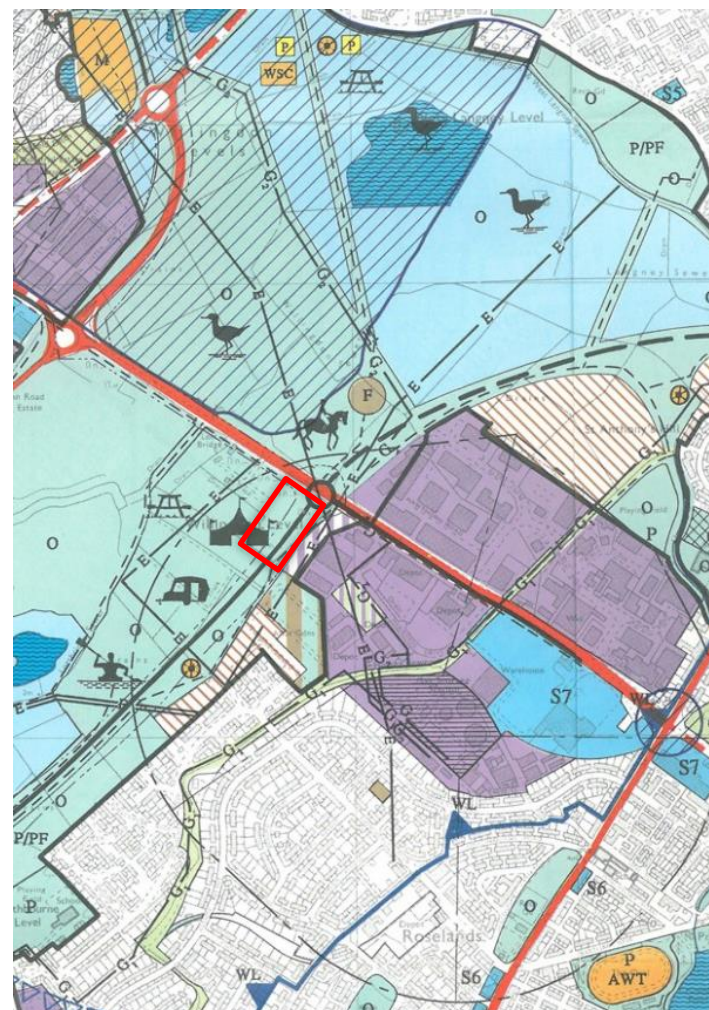
<b>Plan. Ref</b>	<b>Site</b>	<b>Description</b>	<b>Date of Decision</b>	<b>Decision</b>	<b>Conditions relevant to land restoration</b>
					shown on plan 16495 - 1283 Rev D shall be reinstated to the original ground level of filling with suitable inert overburden taken from the excavated areas or by compacting clay or other suitable fill in layers



### Appendix 4 – Evolution of the Eastbourne Park Boundary



**Figure 1 - Extract from Eastbourne Park District Plan (1990) with RM site shown**



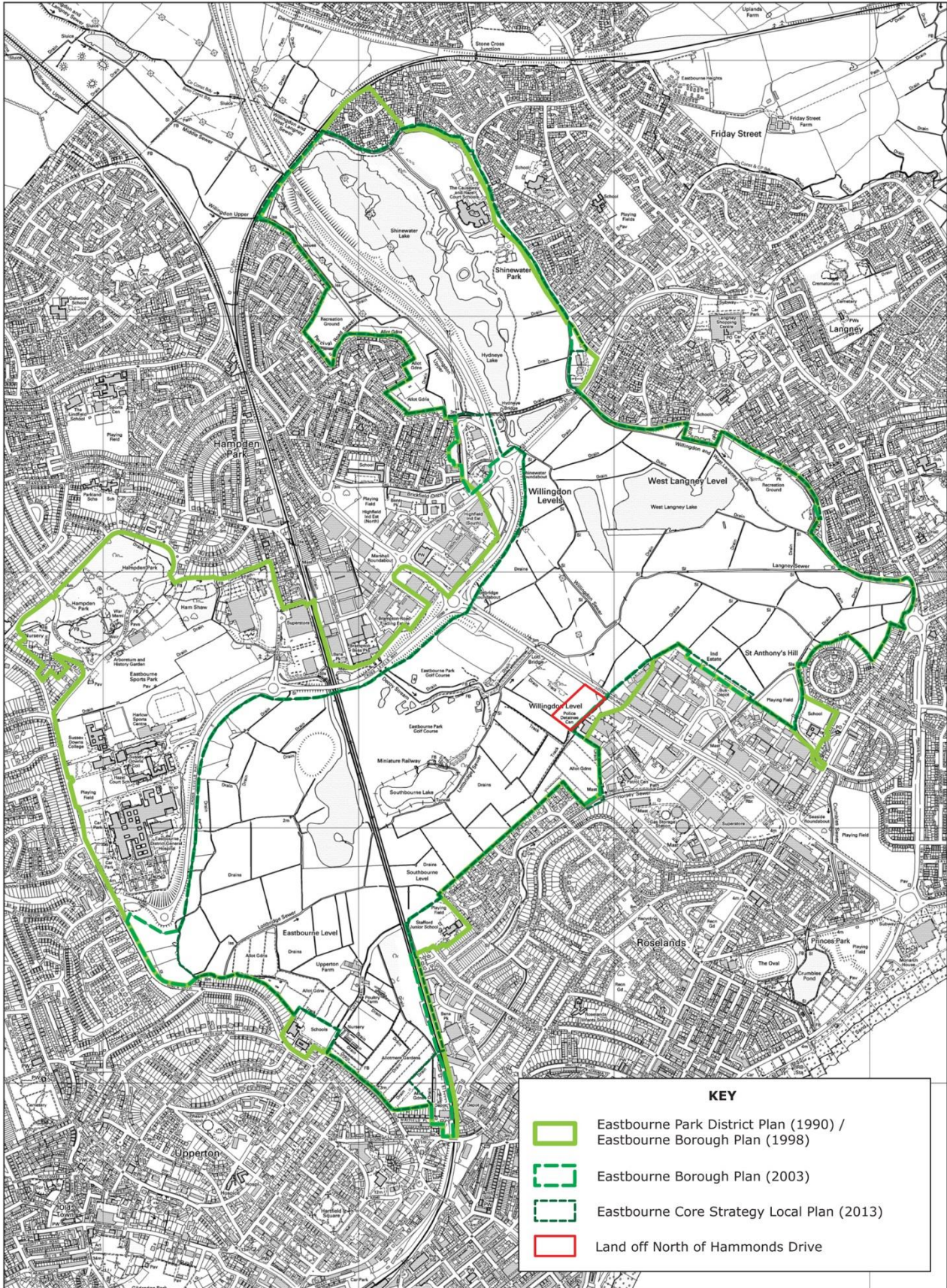
**Figure 2 - Extract from Eastbourne Borough Plan (1998) with RM site shown**



**Figure 3 - Extract from Eastbourne Borough Plan (2003) with RM site shown**



**Figure 4 - Extract from Eastbourne Core Strategy Local Plan (2013) with RM site shown**



**Figure 5 - The evolution of the Eastbourne Park Boundary**