

Eastbourne Employment Land Local Plan – Examination in Public

MATTERS STATEMENT

SESSION 1a – LEGAL AND PROCEDURAL

**SESSION 1B – STRATEGY, TOWN CENTRE
ALLOCATIONS, MONITORING**

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Matter 1 - Legal and Procedural Requirements

Qn 1.1 Is another function to establish how much B1(a) business space is to be provided within the mixed use allocations in the Town Centre Local Plan?

1.1.1 Eastbourne Borough Council agrees that another function of the Employment Land Local Plan is to establish how much office floorspace should be provided on the sites allocated within the Town Centre Local Plan.

1.1.2 Town Centre Local Plan Policy TC17: Strategic Approach to Town Centre Development Sites states that *'the five Development Opportunity Sites will deliver a minimum of 450 net residential units and new B1(a) office space, the quantum of which will be confirmed in the Employment Land Local Plan'*.

1.1.3 The provision of office space on the Development Opportunity Sites is addressed through EELLP Policy EL3: Town Centre.

Qn 1.2 Would Richard Maile explain why he considers that there has been a lack of the consultation necessary for the Plan to be legally compliant?

1.2.1 Eastbourne Borough Council maintains that the public consultation undertaken on the Employment Land Local Plan is in accordance with the Council's *Statement of Community Involvement [SD/03]*. The consultation arrangements carried out in preparation of the Employment Land Local Plan is detailed within the *Statement of Consultation and Representations [SD/09]*, however the Council can confirm that Mr Maile:

- Met with consultants on-site during preparation of the Employment Land Review in June 2013
- Responded to the Pre-production Engagement Questionnaire in July 2013

- Provided comments on the Draft Employment Land Local Plan in January 2014
- Submitted representations on the Proposed Submission version (January 2015) and the Revised Proposed Submission version (January 2016)

Matter 2 - Employment Strategy

Qn 1.3 Will the Plan's provision for office development be sufficient to compensate for the recent, committed, and anticipated losses in office floorspace due to permitted development?

- 1.3.1 The *Employment Land Review 2013 [SD/24]* (ELR) provides the basis for the planned provision outlined within the ELLP. The ELR [SD/24], at the time of preparation, undertook a thorough review of the supply of office floorspace within the Borough, considering the level of occupation, the quality and nature of the offer it made to occupiers and, therefore, it's potential to meet future needs.
- 1.3.2 The ELR [SD/24] notes that a number of properties were deemed unlikely to be of sufficient quality, size or configuration to meet future needs, reflected in the large proportion of these spaces that were vacant or under-utilised (*para 4.66, p43*). It was considered at the time that these properties, by their nature, were unlikely to form part of the active portfolio in the future.
- 1.3.3 In order to ensure that sufficient capacity was retained within the Borough to provide accommodation for existing businesses and also accommodate future growth, the ELR [SD/24] established two additional 'allowances' beyond the forecast requirement to enable churn within the market and also ensure there is sufficient 'headroom' within the market to offset any additional unforeseen losses and also respond to the unique characteristics of Eastbourne, which has a considerably restricted land supply.
- 1.3.4 At the time of the ELR [SD/24], the extension to permitted development rights to allow conversion of office premises to residential had not fully taken effect and therefore its impacts could not be factored into the assessment. However, the Council have recorded the level of Prior Notification Applications it has received in order to monitor the potential impact. This was analysed in the *ELR Supplementary Evidence Report*

(2014) [SD/25], which highlighted that, whilst there was initial demand for change of use, at the time the rate at which this occurred had slowed and a large number were yet to be implemented (*paras 2.20 – 2.22, pp9-10*).

- 1.3.5 It is noted that the most significant proposals under the extension to permitted development rights relate to properties that had been deemed in the ELR [SD/24] to no longer make a positive contribution to the local economy and had been wholly or substantially vacant (*para 4.66, p43*). These tended to be larger properties that had been occupied over a long period by single businesses or government agencies, the scale and nature of which are unlikely to be replaced given recent market trends.
- 1.3.6 Importantly, given the nature of the properties, they are also likely to have been occupied at a much lower density than is possible within new buildings, which have different design standards in terms of health and safety, and also provide much enhanced light, air and ICT infrastructure to support greater density. It is therefore likely that the like for like replacement of this stock on a square metre by square metre basis would result in an over-allocation of space within the Borough as the number of jobs that may have remained within the buildings could reasonably be expected to be accommodated within a lower amount of space.
- 1.3.7 In line with the NPPF (*para 20*), the ELLP is seeking to provide a mixed and balanced portfolio of sites and premises to meet the range of requirements within the Borough. As such it has taken into account that some stock does not need to be replaced like for like, but also that new types should be provided for. Through the re-use of existing, good quality stock alongside provision of additional capacity within the town centre and in out of centre locations, the whole portfolio provides sufficient capacity to accommodate both displaced activity and new economic growth.
- 1.3.8 Notably, whilst stock has been lost through permitted development and take up rates have tended to be reasonably consistent, the proportion of vacant stock within the market is actually higher today than the five year

average level (*para 5.8, p14 of the Eastbourne Office Market Report, April 2016 [EBC-EL-04]*). This suggests that there remains 'slack' within the market and there may still be a mismatch between the nature of stock provided and that demand within the local, East Sussex and wider South Coast market areas.

Qn 1.4 If not, does the provision need to be augmented and how might that be achieved?

1.4.1 Eastbourne Borough Council does not consider it is necessary to provide additional capacity over and above that planned for within the ELLP. The approach to forecasting future needs, the provision of additional allowances to provide headroom, the ability to occupy new space at a higher density and the nature of space that has been 'lost' are based on robust assumptions that respond to a range of economic and market signals. As such they provide a sound basis from which to plan for the appropriate level of growth and development within the Borough.

1.4.2 More broadly (and notwithstanding the above), any uplift in planned provision could have significant impacts on the ability of the Borough to fully meet its own growth needs, particularly in relation to housing provision. Eastbourne's land supply is significantly constrained by a range of factors, therefore there is limited scope to allocate new land for any development type. Increasing employment land requirements may require a reduction in the ability of the Borough to accommodate other growth, including housing, retail and other non-B class employment generating uses, particularly in the Town Centre. Alternatively it may require development to be delivered at a scale and density that is out of step with the wider character of the Borough.

Qn 1.5 As Document SD/28 suggests that office development would not be commercially viable either out of centre, or more especially within the town centre, how would it be delivered?

- 1.5.1 The analysis presented within the *Eastbourne Office Delivery Report (2015) [SD/28]* provides a high level analysis of commercial viability based on a range of standard industry assumptions. Sensitivity analysis undertaken by BGVA alongside this headline assessment indicates that office development could move towards viability if rents were to increase. This sensitivity is based on the assumption that other factors remain consistent.
- 1.5.2 Analysis of the Eastbourne and wider South Coast office market within *Eastbourne Office Market Report (2016) [EBC-EL-04]* highlights that rents have begun to climb as the market in the broader area recovers and increased levels of demand are experienced (*para 5.3, p12*). It is also anticipated that rents will continue to strengthen as supply becomes more focused on higher quality, usable stock as older redundant stock is removed through redevelopment. This oversupply of poor quality stock is likely to have had some impact in terms of suppressing values within Eastbourne, which will now be alleviated.
- 1.5.3 The South Coast area (stretching from Hampshire through to Kent) has seen relatively stable levels of demand since 2011, however over the same period rents have experienced a significant upward trend with current averages peaking beyond £15 / sq ft, as shown in *EBC-EL-04 (Figure 8, p7)*. Construction deliveries have also seen a marked upturn in 2015, suggesting that confidence exists within the developer market (*EBC-EL-04, Figure 7, p6*). Combining both factors, alongside a falling vacancy rate and stable occupancy rate, suggests that the wider market within which Eastbourne sits continues to strengthen.
- 1.5.4 More locally within East Sussex, performance has demonstrated similarly positive trends. Floorspace delivery has consistently increased since 2013, with a peak of over 50,000 sq ft delivered in 2015 (*EBC-EL-04, Figure 11, p10*). As development delivery has increased, levels of demand have also showed some positive trends, albeit with greater fluctuation than floorspace delivery. Over the same period rents have risen by

approximately 28%, reaching a high of almost £12 / sq ft on average (EBC-EL-04, Figure 12, p10).

- 1.5.5 Alongside new stock and continued take up, there has been a realignment of stock, facilitated by extensions to permitted development rights, together these have seen vacancy rates fall within East Sussex and occupancy rates rise.
- 1.5.6 Both the South Coast and East Sussex markets have shown strengthening trends post-recession, suggesting that demand has returned to the market following a downturn during the recession. This demand has been focussed on better quality supply, particularly as weaker stock has been redeveloped for other uses, suggesting an increase in development opportunities within the market going forward.
- 1.5.7 Beyond these strategic market considerations there are likely to be site specific opportunities to address the viability 'gap'. This may include the use of public sector funding (potentially using recycled Growing Places Funding) to meet some costs associated with the delivery of commercial space. Further de-risking of the investment, through agreed pre-let to a workspace manager, could also impact some of the assumptions within the assessment as developers are able to price out risks to some extent, such as accessing cheaper finance as banks view the investment as less risky.
- 1.5.8 Within a mixed use development there may be opportunities to 'cross subsidise' development of commercial space from other, more viable elements. This may, however, require some offsetting against other development contributions, and will influence how the development is phased.

Qn 1.6 Are the estimated profit and finance costs reasonable and would they be different if a scheme were to be pre-let or developed for owner occupation?

- 1.6.1 The profit and costs used within SD/28 are in line with industry expectations for a strategic assessment of this type and are drawn from industry recognised databases and BGVA's extensive experience of advising public and private sector clients on development viability.
- 1.6.2 It is to be expected that high level assumptions may vary to assessments prepared for specific development proposals where a much greater level of information is available. However, for the purposes for which they were prepared, they provide a robust basis for considering strategic delivery issues.
- 1.6.3 In general, there is likely to be minimal difference between the assumptions used and those that would be included in a occupier-specific appraisal as broadly both the developer and occupier would seek to achieve market 'norms'. That being said, some elements may be viewed differently if an owner-occupier or pre-let is agreed, for example:
- Based on the certainty of having a known end user, the developer could take a different view of risk and therefore accept a slightly lower profit.
 - There may be lower risks to lenders, which could be reflected in development financing costs.
 - Specification of the development could be tailored to specific occupier needs, potentially impacting construction/fit out costs, which the occupier may also contribute towards.

Qn 1.7 Is there any prospect of public subsidy for further office development either in the town centre or at Sovereign Harbour e.g. by recycling funds from a sale of Pacific House?

- 1.7.1 Seachange Sussex secured £6 million for the Pacific House development from the Growing Places Fund (GPF), on an interest free loan only basis. The loan is paid back from the proceeds of development, ensuring the funding is recyclable for other projects. As such, it is not considered that

the development at Sovereign Harbour has been fully subsidised, and Pacific House is being let at market rates in order to repay the loan.

- 1.7.2 Seachange Sussex also secured £1.7 million funding from the Local Growth Fund (LGF) to develop site infrastructure to unlock development potential on three sites at Sovereign Harbour Innovation Park (Site 6), North Queensway Innovation Park and Bexhill Enterprise Park. At Sovereign Harbour, £600,000 of the funding will be used to extend services for the three remaining development plots on Site 6, which will provide an addition 8,750 sqm of employment space to the already developed Pacific House.
- 1.7.3 Eastbourne Borough Council understands that Seachange Sussex have no intention of selling Pacific House in the short or medium term to fund future developments. Future office development by Seachange Sussex is expected to be funded from loans based on commercial terms and repaid from rental receipts. Seachange Sussex may also make a commercial decision to subsidise some of the Sovereign Harbour development from income from other development in other locations.
- 1.7.4 Eastbourne Borough Council would consider the compulsory purchase of Site 7a in order to assist Seachange Sussex in the delivery of office space at Sovereign Harbour in the event that office development does not come forward on the site in the short to medium term.
- 1.7.5 The nature of the funding for Pacific House, through a 'recyclable' fund suggests there may be future opportunities to utilise a similar approach in other locations within Eastbourne based on the successful repayment of the initial loan.
- 1.7.6 The potential for similar up front 'public sector' support may also be available in the future. The South East LEP is currently in the process of establishing SE FUND, a new investment vehicle that will combine public and private funds to provide project specific funding where banks are unable (or unwilling) to lend.

- 1.7.7 The SE FUND Feasibility Study (CBRE, 2015) focuses the approach on establishing a fund that addresses the 'funding gap' within a project, providing patient investment that will ultimately provide a return. The fund will seek to support the LEP's over-arching economic aims and would be potentially well aligned with future opportunities within Eastbourne to provide new employment generating space that can be demonstrated to provide an income return over time. Funds are intended to be recycled, with any 'profit' being reinvested in future projects.
- 1.7.8 The potential SE FUND priorities (set out within the Feasibility Study) include "Creating Competitive Locations: Infrastructure and Property" which notes a particular issue with the provision of Grade A office space within town centres (page 10).

Qn 1.8 Who now owns site 6 at Sovereign Harbour?

- 1.8.1 The ownership of Site 6 rests with East Sussex Energy Infrastructure and Development Limited (trading as Seachange Sussex) who hold a long 999 year lease on the land, which was bought using a loan provided jointly by Eastbourne Borough Council and East Sussex County Council with 10 year pay-back period. There is a provision in the 10 year loan agreement that any undeveloped parts of the site at the end of the term of the agreement will go back to Eastbourne Borough Council and East Sussex County Council.
- 1.8.2 Seachange Sussex's leasehold interest is confirmed by Recital E of the *Section 106 agreement [SD/38]* pursuant to the Sovereign Harbour outline permission (p1).
- 1.8.3 The freehold of Site 6 at Sovereign Harbour is retained by Sovereign Harbour Limited.

Qn 1.9 Are there any lessons to be drawn for Eastbourne from the Hastings experience?

- 1.9.1 Hastings has been the focus of significant public sector attention in the past decade as a range of partners have sought to make strategic interventions into the town in order to address a number of significant economic and deprivation issues.
- 1.9.2 A key part of the intervention strategy has been to help provide a platform for economic growth that, whilst initially driven by public sector funding, establishes and demonstrates sufficient market demand for the private sector investment to be attracted to the town. This has been driven by the direct delivery of new, high quality, commercial floorspace initially driven by the multi-tenant Creative Media Centre then followed by initial phases of the Priory Quarter at Lacuna Place (late 2008) and One Priory Square (early 2009) and more recently Havelock Place (mid 2014).
- 1.9.3 These developments have attracted a range of private sector occupiers, most notably providing a major presence for SAGA within the town centre. Development has been delivered and managed by SeaChange Sussex, a not for profit development company originating in Hastings but with interests across the county.
- 1.9.4 These developments have had a profound effect on the Hastings market with local performance significantly strengthened following their delivery, as shown in Figure 1.

Figure 1 - Hastings Asking Rents (with Key Public Sector Floorspace Delivery Plotted)

Extract from *Eastbourne Office Market Report (2016)* [EBC-EL-04] (Figure 16, p17)

- 1.9.5 As shown in Figure 1, despite the onset of the recession the completion of Lacuna Place and One Priory Square, both preceded an increase in rents within Hastings, however as the recession worsened rents quickly fell back to pre-recession levels. Whilst these rental levels persisted until 2013 the occupancy rate within the town increased over the same period, establishing a 'new normal' of c.95% occupancy.
- 1.9.6 In the build up to the completion of Havelock Place, rents increased significantly with averages reaching £10.50 / sq ft prior to development completion and peaking at c.£11 / sq ft as the scheme was completed. Importantly for the local office market, whilst rents have fallen back to some degree, they have remained above £10.50 / sq ft, occupancy levels have also shown recent increases, despite more space being provided within the town.
- 1.9.7 Whilst it is impossible to prove that the intervention of the public sector directly within the office market in Hastings is the sole cause of this market improvement, the correlation of timing between major scheme delivery, rental increases and improved occupancy levels appear to be strong. More importantly these trends appear to have greater longevity

than previous market upturns, with rents and occupancy stabilising at higher levels since early 2013 suggesting a permanent shift in market performance may have occurred.

1.9.8 This has clearly been supported by wider interventions, including improvements to the town centre environment and redevelopment of Hasting's station to greatly enhance the gateway to the town. However, prior to the intervention of the public sector and SeaChange Sussex, the Hastings office market was weak with no signs the private was interested in delivering or occupying new development.

1.9.9 The manner in which targeted public sector investment and intervention has supported the establishment of a much stronger market within Hastings by providing an enhanced setting and new space provides a potential model for Eastbourne to follow. The potential exists for Pacific House to play a similar role to the early phases of the Priory Quarter in demonstrating underlying demand for good quality space and supporting an increase in values that can encourage future delivery.

Qn 1.10 Is there any evidence that the loss of office space in Eastbourne due to changes of use as permitted development is increasing office rent levels or will do so in the future?

1.10.1 In market terms it is difficult to isolate the specific impact of lost capacity through permitted development on office rents. However, what is clear from a review of market performance locally and within the South Coast market in *Eastbourne Office Market Report (2016) [EBC-EL-04]* is that rents have been strengthening in recent years.

1.10.2 This has translated into a strengthening of the Eastbourne market, where average rents have, in general, increased progressively since 2008 (*EBC-EL-04 , Figure 14, p13*). The scale and nature of the Eastbourne office market means that any trends will demonstrate some volatility as there are a small number of deals and therefore averages can be strongly

influenced by single deal characteristics. However, despite some periods of negative growth, long term trends are overwhelmingly positive.

1.10.3 As shown in *EBC-EL-04 (Figure 14, p13)*, average rents have increased to almost £11 / sq ft, with sharp increases experienced in 2014. These averages mask stronger performance in some individual deals with good quality space at Ivy House exceeding £14 / sq ft and Pacific House rents even exceeding this level.

1.10.4 There are a number of factors that underpin this performance both at a local and strategic level. It is clear that demand for space has increased, as shown by an increase in the number of deals and quantum of floorspace taken up (*EBC-EL-04, Table 3, p14*). Values have also been driven by a general improvement of the economy in the South East, the delivery of new or refurbished stock into the market and a decrease in the level of supply (either as stock has been taken up or it is removed from the market through permitted development).

1.10.5 Irrespective of the direct cause, it is clear that the prospects for the office market within the South Coast area and, therefore Eastbourne, are more positive than at the time of preparing the ELR [SD/24]. The opportunity therefore exists for Eastbourne to capture a greater share of this strengthening market, however to do so it will need to provide the appropriate nature of stock in appropriate locations that offer potential occupiers choice.

Qn 1.11 Are the Chaucer Business Park offices a speculative commercial development and, if so, does that suggest that the market considers that out of centre office development can be profitable?

1.11.1 Chaucer Business Park was a speculative commercial development, built by a local development company that was also involved in the construction of the Southbourne Business Park in the Courtlands Road Industrial Estate and the Redwood Business Park in the Hammonds Drive Industrial Estate.

- 1.11.2 The construction of the first phase of the Chaucer Business Park commenced in 2007/2008, with permission for class B1 and class B8 units, although subsequent potential occupiers have applied for class B2 and other non-B employment generating uses. The development also includes some Grade A office use.
- 1.11.3 Eastbourne Borough Council understands from discussions with local agents that Chaucer Business Park is considered to be an upmarket scheme, with industrial rental values around £8.50 / sq ft and capital value of £125 / sq ft. During the first phase, each block was offered whilst under construction, with units being offered for freehold. Currently, it is understood that all completed units are occupied and new units will only be offered for leasehold.
- 1.11.4 The limited stock and low vacancy rates in Eastbourne means that there is unsatisfied demand for freehold stock, and it is understood that occupiers are willing to travel up to 20 miles to access freehold stock. In addition, Stiles Harold Williams are currently marketing speculatively developed office space at Chaucer Business Park¹. A marketing brochure for Chaucer Business Park is provided as Appendix 1.1. This does suggest that the market considers that out of centre office development can be profitable.

Qn 1.12 What is the current take up of space at Pacific House, Sovereign Harbour and what rents have been achieved there, having regard to any rent free periods?

- 1.12.1 Pacific House opened for trading in the autumn of 2015, and is the first development on the Sovereign Harbour Innovation Park (Site 6). Pacific House provides 2,350 sqm of flexible office accommodation that could accommodate small, medium and large businesses.

¹ http://property.shw.co.uk/propertyInfo/11535/New_Offices_Chaucer_Industrial_Estate_Dittons_Road_Polegate_BN26_6JF

1.12.2 Eastbourne Borough Council understands that, as Pacific House is designed for multiple occupancy, the Business Plan assumes a steady take-up rate, meaning that it is not expected to be at full occupancy until at least four years after opening.

1.12.3 The business case for Pacific House was based upon 25% occupancy at the end of Year 1. Eastbourne Borough Council understands that the current occupancy is at 27% exceeding the business plan target for Year 1 of 25%, and that the effective rents are above the market averages for Eastbourne. It is also understood that there is additional space under offer. This indicates that Pacific House is letting successfully and that there is demand for Grade A office space in this out of town location.

Qn 1.13 Is 'Other Business Space' limited to B1c and B2 development or does it include any other uses?

1.13.1 The *ELR [SD/24]* (para 7.5) identifies that 'Other Business Space' refers to class B1c and B2 uses. These uses are also categorised in the EELLP as 'Industrial'.

Qn 1.14 Do the windfall losses represent the loss of floorspace to non-business use such as retail?

1.14.1 The windfall losses included within the *ELR [SD/24]* modelling include all losses of B class employment floorspace to non-B class uses. This includes sites that have been redeveloped for residential, retail and other land use classifications that do not fall within B1, B2 or B8 use classes.

Qn 1.15 Do the windfall losses include the floorspace that would be demolished when part of an industrial estate is redeveloped for a more intensive use?

- 1.15.1 The windfall losses allowance does not include class B floorspace that would be demolished when a site is redeveloped for a more intensive class B use.
- 1.15.2 In order to provide space for businesses to relocate to allow sites to be redeveloped for a more intensive use, the employment land requirements also make an allowance for 'churn'.

Qn 1.16 Is Policy EL2 clear as to whether the 20,000 sqm of floorspace represents the gross or net addition of floorspace after allowing for losses through demolition?

- 1.16.1 The 20,000 sqm figure included within ELLP Policy EL2 is drawn directly from the *ELR [SD/24]*, which makes a strategic recommendation based on the need to provide additional capacity within the Borough in the plan period to accommodate employment growth, windfall losses and provide some headroom.
- 1.16.2 The *ELR [SD/24]* is therefore focussed on delivering net additional space to accommodate a level of employment that is greater than that accommodated within the Borough at the time of preparation. As such Policy EL2 should be seeking to deliver 20,000 sqm of floorspace over and above what is already provided. In effect this means that for any redevelopment of functional space on a like for like basis, the only floorspace that would contribute to the 20,000sqm would be anything that is delivered in addition to the original quantum.
- 1.16.3 For example, if a site providing 2,000 sqm of B2 use was redeveloped to provide 3,000 sqm of B2 use, the net gain of 1,000 sqm would go towards meeting the 20,000 sqm requirement. The reason for this is that space that was actively contributing to the economy has been lost in order to deliver the new floorspace, hence there is only a net gain in floorspace capacity.

1.16.4 However, the loss of a site in class B use within the industrial estate to a non-B use such as retail will have been accounted for in the windfall losses, and therefore this loss would not necessitate an increase in the 20,000 sqm requirement. It should be noted that Policy EL2 resists the loss of class B floorspace to non-B uses within the designated industrial estates in the situation described above.

Qn 1.17 How much business floorspace was lost in 2012-2015 or would be lost due to current commitments (including demolished business floorspace during redevelopment for business use and loss to non-business uses - such as the Aldi development)?

1.17.1 Eastbourne Borough Council can confirm that the total net amount of employment space lost due to completed developments since 2012 and committed developments is 29,105 sqm. Table 1 shows the net loss by floorspace, and the full details of each application are provided as Appendix 1.2.

Table 1 - Change in employment floorspace from completed and commitment developments

Employment Space	Gross	Net
B1(a)	8,839	-22,379
B1(b)	0	0
B1(c)	535	-6,552
B2	5,466	-8,051
B8	11,430	8,166
Mixed B	1,900	-289
Total	28,170	-29,105

Completed Developments

1.17.2 Between 1st April 2012 and 1st April 2016, there was a total net loss of 17,083 sqm of all class B employment space. Over the period, there was a net loss of 18,625 sqm of class B1(a) floorspace, and a net loss of 3,643

sqm of class B2 floorspace. However, there was an overall net gain of 6,274 sqm of class B8 floorspace.

Table 2 - Changes in employment floorspace from completed developments by year

Employment Space		Year				Total
		2012/13	2013/14	2014/15	2015/16	
B1(a)	Gross	509	210	2,546	2,633	5,898
	Net	-57	-2,444	-16,374	250	-18,625
B1(b)	Gross	0	0	0	0	0
	Net	0	0	0	0	0
B1(c)	Gross	0	50	295	0	345
	Net	0	-251	7	-596	-840
B2	Gross	0	0	928	593	1,521
	Net	0	-4,110	15	452	-3,643
B8	Gross	5,189	543	2,070	270	8,072
	Net	3,725	430	2,070	49	6,274
Mixed B	Gross	0	0	1,900	0	1,900
	Net	-1,071	0	1,649	-827	-249
Total	Gross	5,698	803	7,739	3,496	17,736
	Net	2,597	-6,375	-12,633	-672	-17,083

1.17.3 Table 2 shows that in the first year of the plan period (2012/13), there was a net gain in employment floorspace, mainly due to the change of use of a Sui Generis use to a class B8 use at 46 and 46B Brampton Road (Planning Ref: EB/2012/0123).

1.17.4 The Year 2013/14 saw a net loss of 6,375 sqm of B class employment space. A large contributor to this was the completion of the redevelopment of a former meat processing factory to a new Morrison's supermarket (planning ref: EB/2011/0050), granted permission in 2011, which resulted in the loss of 3,020 sqm of class B2 floorspace. There was also the loss of 1,090 sqm of class B2 floorspace due to change of use to a class D2 use (planning ref: 130348).

- 1.17.5 There was a net loss of 12,633 sqm in 2014/15, including the conversion of offices to a Free School at the former Dental Estimates Board, Temple Grove, Compton Place Road (planning ref: EB/2013/0038), which involved the loss of 12,525 sqm of class B1(a) floorspace, although this space had been vacant and underused for at least six years.
- 1.17.6 There was a much reduced net loss in 2015/16 of 672 sqm, including a net increase in the amount of office stock for the first time in the plan period, due to the completion of Pacific House at Sovereign Harbour (planning ref: 130967).

Future losses

- 1.17.7 Table 3 identifies that, if the remaining commitment made by the Sovereign Harbour Outline Permission (planning ref: 131002) were to be removed from the commitments, there will be a future net loss of 12,022 sqm of employment floorspace from the commitments across the Borough. This would include a net loss of 3,754 sqm of class B1(a) floorspace, a net loss of 5,712 sqm of class B1(c) floorspace, and a net loss of 4,408 sqm of class B2 floorspace. It also includes a net increase of 1,892 sqm of class B8 floorspace.

Table 3 - Committed losses of employment floorspace

Employment Space		Commitments	Under Construction	Total
B1(a)	Gross	2,651	290	2,941
	Net	-2,579	-1,175	-3,754
B1(b)	Gross	0	0	0
	Net	0	0	0
B1(c)	Gross	0	190	190
	Net	-5,102	-610	-5,712
B2	Gross	3,945	0	3,945
	Net	1,102	-5,510	-4,408
B8	Gross	3,358	0	3,358

	Net	1,892	0	1,892
Mixed B	Gross	0	0	0
	Net	-40	0	-40
Total	Gross	9,954	480	10,434
	Net	-4,727	-7295	-12,022

1.17.8 A significant amount of the loss of class B2 floorspace is a result of approval of planning permission for the redevelopment of the Cosmetica site in Faraday Close to a Aldi food store in March 2015 (planning ref: 140958), which was granted permission contrary to officer recommendation. As at 1st April 2016, this site was still under construction, although it has been completed since the monitoring was undertaken. This has resulted in a loss of 5,137 sqm of B2 floorspace that had been vacant since 2009.

Permitted Development

1.17.9 Of the total net loss of office floorspace from completed or committed developments, 8,108 sqm has or will come from office to residential conversion as permitted development. However it should be noted that a significant number of the office blocks that have been converted were underutilised and often long term vacant before the permitted development rights were changed. Therefore they were not functioning as active office space.

Conclusion

1.17.10 A significant amount of the office and industrial stock that has been or will be lost has been vacant and underused for a significant amount of time and was no longer functioning as active employment space. At the time of preparing the Employment Land Review [SD/24], a large number of properties were deemed to be unlikely to be of sufficient quality, size or configuration to meet future needs, reflected in the large proportion of these spaces that were vacant or under-utilised. It was considered at the time that these properties, by their nature, were unlikely to form part of

the active portfolio in the future. It is in this context that the employment land demand forecasts were made. As such, the provision of additional employment floorspace as identified in the EELLP provides sufficient capacity to accommodate displaced activity and new economic growth.

Qn 1.18 Is intensification of floorspace on existing estates dependent on multi-storey development including office space and, if so, should Policy EL2 be clearer as to whether or not it supports the development of B1a office space on industrial estates?

- 1.18.1 The intensification of floorspace on the existing industrial estates is not dependent on multi-storey office development, but it is dependent on existing sites being used more efficiently. This could be through the provision of changes of use from non-B uses, extensions or the installation of mezzanine floors, but more likely through the redevelopment of sites at higher densities, which could include multi-storey where appropriate, as existing buildings come to the end of their economic lives and are no longer fit for purpose.
- 1.18.2 There is likely to be an ongoing requirement for industrial floorspace to be provided in Eastbourne, given the nature of the local economy. The existing industrial estates are the most appropriate locations to make provision for this industrial floorspace requirement, so it is important that the existing industrial estates support the retention of industrial space and the re-provision of new industrial floorspace.
- 1.18.3 There have been some recent developments within the existing industrial estates that provide examples of the types of development that are expected in the future, and will provide the additional 20,000 sqm of industrial and warehouse space within Eastbourne. These include:
- The demolition of an existing warehouse and replacement with a three-storey building containing two floors of packaging halls and one floor of laboratories at TEVA, 41 Brampton Road (planning ref: EB/2008/0500). This development was completed in 2009 and provided a net increase of 4,250 sqm of class B2 floorspace.

- The erection of nine new Class B1/B8 units on the White Knight Laundry site on Hammonds Drive (planning ref: 130182). This development was completed in 2015 and provided an additional 1,755 sqm of class B1(c) floorspace.
- The redevelopment of a vacant industrial sites at 19 Marshall Road (planning ref: 140093), which was completed in 2014. Although this site only provided a net increase of 875 sqm of class B2 floorspace, the site and building had previously been unused and empty for approximately 15 years having fallen into disrepair.

1.18.4 In terms of office development, the *ELR [SD/24]* identifies that the quality of the environment within the existing industrial estates is likely to act as a barrier to attracting office occupiers, and therefore making office development less likely to come forward in these locations (*para 8.1*).

1.18.5 Whilst EELLP Policy EL2 does not restrict the development of office space within the industrial estates and would support it in the event that it comes forward, it does not actively promote or allocate office use on industrial estates as it is considered that the environmental conditions are likely to be a constraint on delivery.

Qn 1.19 How could a policy require a minimum provision of office floorspace at unspecified locations within 7 multi-use industrial estates as sought by SHL?

1.19.1 Prior to deciding how a policy could require a minimum provision within unspecified locations within the seven industrial estates, it is important to understand whether this is an appropriate approach to delivering office capacity and attracting occupiers to the Borough.

1.19.2 The *ELR [SD/24]* provides a detailed assessment of the existing portfolio of industrial estates across the Borough and considers their potential to accommodate future development across all B class uses (*Section 4, pp33-42*). It recognises that there is limited available development land within the Borough's industrial estates, a reflection of both the continued

strength of the local industrial-based economy and a relatively limited supply of space.

- 1.19.3 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 of a sufficient scale to attract new demand and occupiers (para 8.41, p88). As such, any strategy that seeks to provide new office development within the industrial estates would require wholesale change in land use mix and development quality.
- 1.19.4 With limited available space and fragmented ownerships, opportunities for comprehensive redevelopment are limited, and the SHL strategy would therefore most likely require the re-use of existing active industrial properties, displacing occupiers and leading to a net loss in employment capacity that would need to be re-provided elsewhere. The approach also risks undermining the ability of the Borough to accommodate forecast growth within industrial activities.
- 1.19.5 Given the need to dramatically change the nature of industrial estates in order to change their quality sufficiently to support investment in office floorspace, it is unlikely that the strategy advocated by SHL would be deliverable. As has been demonstrated in recent developments such as Southbourne Business Park or the former White Knight Laundry site, it is more likely that new stock will come forward in line with the predominant character of the existing estate.
- 1.19.6 Further to these more occupier-driven factors, there is also a question of whether a policy such as that advocated by SHL could be demonstrated to be deliverable; how the policy could be implemented in practical terms as applications come forward; and how progress could be monitored over the plan period. Given the policy would require a significant shift in character for the industrial estates, if it cannot be identified where the capacity for such a significant and fundamental change to the industrial estates may exist, any such policy would fail to give confidence to landowners,

investors or occupiers and therefore limit its effectiveness in supporting balanced growth within the Borough.

Qn 1.20 The designated industrial estates feature a number of non B class uses such as car dealers and trade counters. Would Policy EL2 preclude such development in the future and could it be accommodated at any other location?

- 1.20.1 Due to significant environment constraints and a lack of developable land, Eastbourne has a finite supply of employment land. This means that it is not possible to accommodate the widest range of employment generating uses, meaning that choices have to be made that would result in the greatest impact on the local economy . This has resulted in EELLP Policy E2 being preclusive on certain employment generating non-B class uses within designated industrial areas.
- 1.20.2 The *ELR [SD/24]* identifies a significant issue for Eastbourne relating to the loss of class B uses, and the dilution of the perception of the industrial estates as industrial type locations due to increasing employment generating non-B uses (*paras 8.29 – 8.35, pp86-87*).
- 1.20.3 Many of these uses are compatible with class B activity in isolation, however a large collection of these uses can begin to erode the 'business' nature of the location. This will begin to impact on occupier and investor perceptions, reducing confidence that the area will continue to function with a focus on meeting the needs of class B activities.
- 1.20.4 The main entrances to the Hampden Park Industrial Estates and the Lottbridge Drove area are particular locations where this has occurred, where a significant proportion of the area is now occupied by non-B class uses.
- 1.20.5 The increase in non-B class uses creates problems with establishing the image of a high quality business area and can create challenges for business operations. The increased retail creep also limits the potential for

growth and expansion of existing businesses within the area, which restricts some occupiers from accessing or developing larger premises. Employment sites are attractive for redevelopment to other uses, particularly retail type uses, because retail values are well in excess of class B use values.

- 1.20.6 The *ELR [SD/24]* considers that Hampden Park particularly is at a tipping point in terms of non B-class activity (*para 4.24, p36*). It considered that if this is not carefully controlled, it is likely that the class B employment function in the Hampden Park and Lottbridge Drove areas will be fundamentally undermined, and this will limit the long term potential for employment and economic growth in the town.
- 1.20.7 In addition, smaller businesses benefit from being able to establish connections by being located within industrial estates. Some sectors, particularly manufacturing, often rely on other local business in the production line and therefore it is beneficial to the local economy that these types of businesses are located on industrial estates, even if that is at the expense of other retail based employment uses.
- 1.20.8 As such, it is considered justified that EELLP Policy EL2 restricts the provision of new non-B uses within the Industrial Estates to allow additional industrial and warehouse space to be provided and to protect the business nature and investor perceptions of the industrial estates.
- 1.20.9 It is considered that uses such as car dealership are footloose enterprises with a large catchment area. Therefore it is not necessarily important for them to be located within Eastbourne in order to serve any need arising in the area.
- 1.20.10 EELLP Policy EL2 would preclude the redevelopment of sites that are within an existing class B use for non-B uses such as car dealerships, although it would not necessarily preclude the change of use of existing buildings to non-B uses such as trade counters if it can be proven that there is no demand for such premises from class B uses.

Matter 3 - Town Centre Allocations

Qn 1.21 The Town Centre Local Plan policies require residential and retail use on sites 2 and 3 but make any office provision only optional. They also allow for other forms of development on these sites. ELLP Policy EL3 wording similarly would not make provision of any office space mandatory or include any minimum floorspace requirement. Document SD/28 suggests that any office development would incur a substantial financial loss. Other developments may be profitable. In these circumstances how could the ELLP be effective in delivering its strategy for office provision in the town centre?

1.21.1 The letter to the Inspector (*EBC-EL-03*) explained that the requirement to provide a Community Hall on Site 7a at Sovereign Harbour has meant that the B1 allocation at Sovereign Harbour will be reduced from 20,000 sqm to 18,500 sqm, and this will require a modification. This is discussed further in the response to Qn 2.11.

1.21.2 Due to the constrained nature of Eastbourne, the lack of land availability and lack of other suitable locations that would be attractive for office occupiers, it is considered that the remaining 1,500 sqm from the Sovereign Harbour allocation should be re-directed to the Town Centre, taking the total allocation for the Town Centre to 4,500 sqm.

1.21.2 A modification is proposed to address this issue. It is suggested that Policy EL3 could be modified as follows:

Policy EL3: Town Centre

The quantum of office space that should be provided in the Town Centre is ~~3,000~~ 4,500 sqm of floorspace. The requirement for office floorspace in the Town Centre should be provided across Development Opportunity Site 2 and Development Opportunity Site 3 as identified in

the Town Centre Local Plan. Office development should be high quality class B1a/b floorspace that is flexible to meet multi-occupier needs.

Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.

1.21.3 In relation to the effectiveness of the EELLP in relation to delivering office provision in the town centre, the Town Centre Local Plan Policy TC16 identifies that the quantum of office space to be delivered across the five Development Opportunity Sites will be confirmed by the Employment Land Local Plan. The EELLP states that *'if one (of the Development Opportunity Sites) comes forward without sufficient provision of office space, the balance should be provided on the other'* (para 4.26). This means that, after the first of the two sites was developed, the remaining balance of the new allocation of 4,500sqm of office provision would be transferred to the remaining site.

1.21.4 It is considered that this overrides the optional provision of office space, meaning that the remaining requirement will be mandatory on the remaining sites after the first one is developed.

1.21.5 New office provision will be delivered as part of a mixed use development and the flexibility of Policy EL3 will assist with the delivery of the office stock as it will be more able to respond to occupier and market requirements. If provision were to be made in the form of 'managed workspace', this would require a larger quantum of office floorspace within one unit. However, space let directly to tenants could be relatively small with the ability to provide a number of flexible modern 'units' predominantly below 500 sqm. The flexibility provided by Policy EL3 would help meet the nature of demand within the town centre, maximising the occupier potential and attractiveness to developers/operators.

1.21.6 In addition, within a mixed use development there may be opportunities to 'cross subsidise' the development of employment space from other

more viable elements such as residential and retail, making delivery of the office stock more viable.

Qn 1.22 Given the conclusions of Document SD/28 on viability would there be any role for SeaChange or any other public body in bringing forward office development in the town centre, as at Hastings?

- 1.22.1 Given the challenges of delivering new office development within the town centre, there is potentially a role for alternate delivery approaches to be considered. This may include a role for SeaChange Sussex, a different public body, or another form of workspace provider who may operate on a different financial model to more mainstream commercial providers.
- 1.22.2 There are a number of roles that could be played by a management or delivery partner in a future development. The most straight forward would be to utilise funds that SeaChange Sussex have access to via the South East LEP to offset some costs and fund construction. This approach has been taken at Pacific House using Growing Places Funding, which is a revolving fund that may be able to be recycled locally in the future.
- 1.22.3 Outside of this direct delivery/funding role, the opportunity for SeaChange Sussex as a workspace provider could also support delivery by de-risking investment by taking a headlease on commercial space within any development, guaranteeing an income and potentially reducing costs for any developer (such as business rates on vacant space). Space could then be operated as serviced office suites, managed by SeaChange Sussex, with rent of units paying the headlease. By operating on a different profit model to a commercial operator this may enhance opportunities to deliver space.
- 1.22.4 Evidence from Hastings suggests other operators may also be interested in opportunities within this area and be able to successfully run office space on alternate models to standard commercial development. Whilst a re-use project rather than a new development, the 'Meanwhile Spaces'

utilisation of Rock House² has shown how a mix of 'not for profit' approaches combined with some public support and potential future revenue from residential can support the retention and occupation of office space. Other operators across the South Coast (in particular in Brighton) have similar business models and could play a similar role in Eastbourne.

Qn 1.23 On what basis has the figure of 3,000sqm office floorspace (NIA) been arrived at and how might it be distributed between the 2 sites?

- 1.23.1 The *ELR [SD/24]* and the *ELR Supplementary Evidence Report [SD/25]* sought to understand the balance between 'town centre' and 'out of town centre' office provision and how future allocations would affect this balance.
- 1.23.2 The *ELR Supplementary Evidence Report [SD/25]* showed that Eastbourne has an unusually high concentration of town centre office with 90% of Eastbourne's stock being located in the Town Centre, which is markedly different from market norms (*para 2.50, p14*). It suggests that a ratio closer to 70:30 in terms of 'town centre' to 'out of town centre' office stock would be more appropriate to meet market requirements and provide the necessary choice within the market (*para 2.55*). The current ratio in Eastbourne of 90:10 limits occupier choice, which in turn can limit the economic potential of the Borough as businesses cannot find the stock or location they require. Therefore the balance of 'town centre' to 'out of town centre' office stock needed to be addressed in the EELLP office space allocations.
- 1.23.3 The provision of the full office requirement of 23,000 sqm of floorspace in 'out of town centre' locations would result in a ratio of 73:23, which would have been closer to market norms. However, it was recognised that there is a need to deliver some new office stock to maintain the town centre as the core focus of the office market and to provide new high quality office

² <http://www.meanwhilespace.com/projects/current/rock-house/>

stock to replace some of the older stock that it was anticipated would be lost (*SD/25, para 2.64, p17 and SD/24, para 7.39, p80*).

1.23.4 The *ELR [SD/24]* reviewed the Town Centre Local Plan (TCLP) to identify the potential locations for office development within the town centre. In the first instance it assessed the potential attractiveness and suitability of these locations to accommodate office development. This concluded that Development Opportunity Sites 2 and 3 most closely aligned with the basic expectations of office locations (*SD/24, para 4.92, p53*). The future potential of these town centre sites to accommodate new office provision was considered, assuming that that stock will be delivered as part of a mixed use proposal (*SD/24, para 4.90, p48*) in order to allow the delivery of the other requirements set out in the Town Centre Local Plan.

1.23.5 These considerations, in addition to the need to rebalance the office stock portfolio in terms of location, indicated that 3,000 sqm would be an appropriate provision in the town centre (*SD/24, para 7.39, p80*). This was tested to understand how this share of the total requirement being delivered within the town centre, with the remaining share being located elsewhere, would affect the in/out of town balance. This resulted in a ratio of 76:24, which enabled a more balanced approach to be established between in/out of town centre provision, aligning more closely with neighbouring locations and market norms. The Sustainability Appraisal [*SD/06*] indicates that this is the most sustainable approach towards the allocation of new office floorspace (*para 8.3.10, p45*).

1.23.6 Since the submission of the ELLP, the requirement to provide a Community Hall on Site 7a at Sovereign Harbour has meant that the B1 allocation at Sovereign Harbour will reduce from 20,000 sqm to 18,500 sqm, as explained in the letter to the Inspector (*EBC-EL-03*). Due to the constrained nature of Eastbourne, the lack of land availability and lack of other suitable locations that would be attractive for office occupiers, it is considered that the remaining 1,500 sqm should be directed to the Town Centre, taking the total allocation to 4,500 sqm.

- 1.23.7 It is not considered that this increase of 1,500 sqm in the town centre would significantly affect the proposed balance of 'town centre' and 'out of town centre' stock, as it would result in a balance of 77:23 compared to the original proposal that would have resulted in a balance of 76:24. The capacity assessment undertaken in response to Qn 1.24 shows that there is capacity on the town centre sites for this small increase in office floorspace provision without compromising the ability to deliver other uses to increase the sustainability of the town centre.
- 1.23.8 The distribution of space between the two sites that were deemed to offer the most appropriate locations for office development will need to respond to occupier and market requirements. A 'managed workspace' will need a sufficient amount of space to enable their business model to work, which may require the entire allocation in one unit on one site. On the other hand, more general office space that is let directly to tenants will need to provide units that meet their needs and could be a variety of sizes. This flexibility will increase the deliverability of office space in the town centre.

Qn 1.24 Is that floorspace figure compatible with the strategic requirement for a minimum 450 net residential units in the town centre together with other mixed development and the replacement of the station car park?

- 1.24.1 Eastbourne Borough Council consider that the new floorspace requirement of 4,500 sqm is compatible with the strategic requirement for a minimum of 450 net residential units, along with other mixed development and the replacement of the station car park, on the Development Opportunity Sites.
- 1.24.2 Development Opportunity Site 5 has already been developed (planning ref: EB/2012/0110), and Development Opportunity Site 1 has permission for the development of the site to form an extension to the Arndale Centre (planning ref: 131071). A Compulsory Purchase Order was confirmed in February 2016, and the development is due to commence over the summer.

1.24.3 This means that the housing and employment requirement, plus other mixed uses should be delivered across Development Opportunity Sites 2, 3 and 4. A site capacity analysis has been undertaken to identify that Development Opportunity Sites can accommodate the requirement.

1.24.4 The assumptions made are as follows:

- Residential development @ 100 sqm per unit
- Car Parking @ 35 sqm per parking space
- Retail space could include class A1, A3 and A4 uses
- Public space is 25% of the developed site
- Residential parking provided at 1 space per unit
- Office and retail parking provided at 1 space per 35 sqm of floorspace in accordance with the East Sussex County Council parking standards³.

Development Opportunity Site 2

1.24.5 Development Opportunity Site 2 is 3.07 hectares in size. It is allocated for a mix of uses, including class A1 (retail) and class C3 (residential), with other acceptable uses being class A3 (restaurants and cafés), class A4 (drinking establishments), class B1a (offices) and class C1 (hotel). There is also a requirement to provide car parking to replace any existing provision that is lost.

1.24.6 It is considered that any development on this site is likely to retain the existing Enterprise Centre so an allowance of 2,000 sqm is made for this and some surrounding area. The existing car parking would be provided as a multi-storey block and include additional parking for the new retail space. The capacity assessment is set out in Table 4.

³ https://eastsussexgovuk.blob.core.windows.net/media/1762/parking_guidance_non_residential.pdf

Table 4 - Development Opportunity Site 2 Capacity Assessment

Use		Building Height	Site Area
1	Retain Enterprise Centre	Existing	2,000 sqm
2	Replace Existing Parking – 400 spaces + additional 114 spaces for new retail (@ 1 space per 35 sqm of retail floorspace)	4 storeys	4,498 sqm
3	New Retail - 4,000 sqm	2 storeys	2,000 sqm
4	New Office - 4,500 sqm	3 storey	1,500 sqm
5	Parking for Office – 128 spaces @ 1 space per 35 sqm office floorspace	Surface	4,480 sqm
6	New Residential – 200 units	4 storey	5,000 sqm
7	Parking for residential – 200 parking spaces	2 storey	3,500 sqm
8	Public Space – 25% of developed site	Surface	5,745 sqm
		Total	2.87 ha
		Site Area	3.07 ha

1.24.7 Table 4 shows that Development Opportunity Site 2 has capacity to accommodate at least 4,000 sqm of new retail space, 200 residential units and 4,500 sqm of new office space, and associated car parking requirements. This, plus some public space, would equate to 2.87 hectares, which is less than the site area of 3.07 hectares.

1.24.8 In addition, the assessment above assumes that each use is within its own part of the site. It does not take into account that some uses could be mixed in with or above other uses. For example, some office space could be provided above retail, or residential provided on top of car parking space. TCLP Policy TC19 allows for the provision of a taller landmark building above six storeys in height, which would further increase the capacity of the site, including the provision of additional offices.

Development Opportunity Site 3

1.24.9 In total, Development Opportunity Site 3 is 0.73 hectares in size. In February 2016, permission was granted for the redevelopment of part of

the site (the former Caffyns Garage) to form 61 one and two bed sheltered apartments (class C3). This leaves 0.54 hectares of the site remaining, which is allocated for a mix of uses, including class A1 (retail) and class C3 (residential), with other acceptable uses being class A3 (restaurants and cafés), class B1a (offices), class D1 (community use) and class D2 (assembly and leisure).

- 1.24.10 It is considered that this site could accommodate some additional retail and residential uses. Parking should be provided for the residential element, but it is not considered necessary to provide parking for the retail element due to significant levels of parking provided in the town centre. The capacity assessment is set out in Table 5.

Table 5 - Development Opportunity Site 3 Capacity Assessment

Use		Building Height	Site Area
1	New Retail - 1,000 sqm	2 storeys	500 sqm
2	New Residential – 100 units	4 storey	2,500 sqm
3	Parking for residential – 100 parking spaces	2 storey	1,750 sqm
4	Public Space – 25% of developed site	Surface	1,187 sqm
		Total	0.59 ha
		Site Area	0.54 ha*

* Not including the northern part of the site that already has planning permission for residential

- 1.24.11 Table 5 shows that the provision of 1,000 sqm of retail and 100 residential units, plus car parking and public space would require a site area that slightly exceeds the total area of the remaining part of Development Opportunity Site 3.
- 1.24.12 However, again this does not take into account that residential use could be provided above the retail use and car parking. Therefore it is considered reasonable that Development Opportunity Site 3 has the capacity to accommodate at least the amount of development identified in Table 5.

Development Opportunity Site 4

- 1.24.13 Development Opportunity Site 4 is 0.3 hectares in size. It is allocated for class A1 use, with other additional acceptable uses being class A3 (restaurants and cafés), class A4 (drinking establishments), class B1a (offices) and class C3 (residential).
- 1.24.14 Town Centre Local Plan Policy TC21 allows for the provision of a building of four storeys above street level with up to five storeys on the corner between Terminus Road and Langney Road. Assuming that between 60% and 75% of the site was developed with the remaining area providing car parking, and with retail use on the ground floor, it is considered that the upper three to four floors could accommodate between 50 and 90 units.

Summary

- 1.24.15 Of the requirement for 450 residential units, 61 units are already committed through the redevelopment part of Development Opportunity Site 3, leaving 389 units to be delivered across the remaining three sites.
- 1.24.16 Development Opportunity Site 2 could accommodate at least 200 units, whilst Development Opportunity Site 3 could take an additional 100 units on top of the 61 units already committed. It is considered that Development Opportunity Site 4 would have capacity to accommodate up to 90 units to meet the overall housing requirement of 450 units.
- 1.24.17 In this scenario, the modified EELLP office requirement for the town centre of 4,500 sqm is accommodated on Development Opportunity Site 2, and it is considered that there could be at least 0.2 ha of space on Development Opportunity Site 2 to accommodate additional offices if there is a requirement to do so. The provision of uses mixed in with or above other uses, and particularly taller buildings, would further increase the capacity of the site.

Qn 1.25 Should Policy EL3 specify a minimum office floorspace requirement for each opportunity site and would that make delivery more likely?

- 1.25.1 Providing a minimum floorspace requirement would help create some certainty in relation to what is expected to be delivered within each site. However, this may not necessarily make delivery more likely. It could reduce the opportunity for developers to react flexibly to market conditions and provide within a mixed use development the scale and nature of space that may be appropriate.

Qn 1.26 Do the contingency options set out at paragraph 5.15 of the Town Centre Local Plan remain relevant and how would they operate in the event that little or no office floorspace is proposed on sites 2 and 3?

- 1.26.1 Eastbourne Borough Council consider that three of the four contingency options set out in para 5.15 of the Town Centre Local Plan are still relevant in relation to office development. However, given the evidence within the *ELR [SD/24]* that the Transition Areas and the Potential Areas of Change are unlikely to be attractive to office developers (*SD/24, Table 15, pp49-52*), it is considered that the first contingency option in para 5.15 may not be relevant in the context of office delivery.
- 1.26.2 However, it is considered that the other contingency options could still be relevant. As it is defined as a 'Main Town Centre use' in the National Planning Policy Framework, office development would be acceptable in any town centre location, and therefore the contribution of windfall office development should be considered in the event that little or no office floorspace is proposed on Sites 2 and 3.
- 1.26.3 Compulsory Purchase is still also a contingency option. The Council has recently had a Compulsory Purchase Order confirmed by the Secretary of

State that will allow a privately funded £85m retail and leisure development to proceed on Development Opportunity Site 1.

- 1.26.4 The undertaking of an early review of the Town Centre Local Plan to identify additional sites is also a contingency option that is still relevant.

Qn 1.27 Who would be responsible for the submission of the 'implementation and phasing plan' referred to in Policy TC17 and is it intended only to refer to an individual site?

- 1.27.1 It is intended that there would be an 'Implementation and Phasing Plan' for each development on the Development Opportunity Sites, and that the applicant would be responsible for the submission of this 'Implementation and Phasing Plan' when a planning application is submitted to the Council. It is envisaged that this plan would confirm how the scheme would be implemented, and if it is proposed to be delivered in phases, then the proposals will need to demonstrate that development on one part of the site would not prejudice the development of the remainder of the site.
- 1.27.2 The planning application for Development Opportunity Site 1 identified that the development would be built in one phase, and provided a Construction Management Plan to show how the scheme would be implemented.
- 1.27.3 In the planning application for the redevelopment of part of Development Opportunity Site 3 for sheltered housing (planning ref: 150803), the applicant confirmed through their Planning Statement (para 5.9 and para 5.11) that the proposed development would not inhibit or fetter the further delivery of the site.

Qn 1.28 Would the reference in Policy EL3 to B1b floorspace override the lack of such provision in Policies TC19 and TC20 once the ELLP is adopted as the more up-to-date development plan?

- 1.28.1 Eastbourne Borough Council consider that, as class B1(a) and B1(b) 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. In this case, it is considered that it would be appropriate for EELLP Policy EL3 to override Town Centre Local Plan Policies TC19 and TC20.
- 1.28.2 It should also be noted that the Council consider that, in reality, there is likely to be little demand for class B1(b) uses, given the nature of the economy and the sectors that perform well in the location.

Qn 1.29 Would the Council please comment on the SHL scheme? Also where would the station parking be accommodated and where would the remainder of the minimum 450 dwellings requirement set out in the Town Centre Plan be accommodated?

- 1.29.1 In their representations, Sovereign Harbour Limited (SHL) has proposed an alternative approach to allocating land to meet the overall requirement of 23,000 sqm of office floorspace. This is based on:
- 11,100 sqm on Site 6 at Sovereign Harbour
 - 8,900 sqm in the Town Centre
 - 3,000 sqm within the existing industrial estates and other local centres
- 1.29.2 Eastbourne Borough Council does not consider that this alternative proposal would be deliverable, sustainable, in accordance with other requirements, or be in the best interests of Eastbourne's economy.

Balance of Office Stock

- 1.29.3 The *ELR Supplementary Evidence Report [SD/25]* identifies that currently 90% of Eastbourne's office stock is located within the Town Centre (*para 2.50, p14*), and that this does not provide sufficient choice or availability of stock to occupiers who prefer out of town locations. These occupiers are more likely to find space outside of Eastbourne, rather than locate in

the Town Centre (*para 2.67, p17*). It is considered that a proportion closer to 70% town centre to 30% out of town centre would be a more appropriate balance.

- 1.29.4 The provision of 8,900 sqm of office floorspace in the Town Centre would reinforce the inappropriate balance between town centre and out of town centre locations, and would not provide the choice necessary to attract office occupiers who prefer out of centre locations.

Town Centre

- 1.29.5 As part of their representation on the Proposed Submission version, SHL submitted a Town Centre Site Appraisal to show the capacity of the town centre to accommodate 8,900 sqm of office stock.
- 1.29.6 The appraisal identified Development Opportunity Sites 2 and 3 as being capable of accommodating 8,815 sqm NIA of office stock and 154 residential units. This proposal would not allow for the requirement of a minimum 450 dwellings to be provided on the Development Opportunity Sites. If Sites 2 and 3 only provide 154 units, Site 4 would not have capacity to accommodate the remaining 296 units.
- 1.29.7 Whilst the SHL proposal does make some provision for retail, it is not considered that this would be sufficient. The popularity of the Enterprise Centre and the close links with the extension to the Arndale Centre means that the Town Centre would benefit from a more significant amount of retail space in this location.
- 1.29.8 SHL's proposal does not allow the re-provision of the existing station car park on Development Opportunity Site 2. It appears that this re-provision is proposed off-site, which raises questions about its deliverability and how its provision could be required as part of the redevelopment of Development Opportunity Site 2. In addition, the suggested location for this re-provision is along the southern side of the railway station. SHL state that this is *'an extensive covered area which is limited to pick up*

and drop off, but otherwise unused'. However, this area is part of the Grade II Listed railway station, and it is used for short stay station parking, taxi drop-off and coach pick-up and drop-off. Therefore it is not unused and also would not have the capacity to accommodate the full re-provision of car parking from Development Opportunity Site 2.

- 1.29.9 The provision of 8,900 sqm of office stock at the expense of residential, retail and other town centre uses would not have a positive effect on the health of the Town Centre. It is vital that the Town Centre supports an appropriate and diverse mix of uses that will contribute to its overall vitality and economic viability.
- 1.29.10 The Town Centre Local Plan identifies that the provision of new dwellings will provide a local resident population that can help support existing services and facilities. It considers that the provision of a greater mix of uses will enhance the range of employment opportunities on offer, and the creation of a complementary range of land uses will make the Town Centre a vital and attractive place to spend time.
- 1.29.11 The Town Centre Local Plan also identifies that a mix of uses can help to informally 'police' the Town Centre during the evenings and periods when shops and other businesses are closed, and that it can encourage a broader range of people to make use of the Town Centre at different times. Increasing the actual and perceived surveillance of the central area can play a role in crime prevention and reducing the fear of crime, encouraging a greater proportion of the town's population to spend time there. In addition, the National Planning Practice Guidance (*para 005*) identifies that diversity of uses is key to assessing the health of a town centre.
- 1.29.12 In conclusion, the Development Opportunity Sites do not have sufficient capacity to accommodate 8,900 sqm of office floorspace, 450 residential units, additional retail units and replacement car parking as required by the Town Centre Local Plan. The provision of 8,900 sqm of office stock at the expense of these other uses would have an adverse impact on the

wider health of the town centre. Therefore, Eastbourne Borough Council do not consider that such a proposal would meet policy requirements or have a beneficial impact on the health of the town centre or Eastbourne's wider economy.

Qn 1.30 Given that:

- SHL considers that office development would not be viable (without subsidy) either at Sovereign Harbour or in the Town Centre; and**
- the conclusions of Document SD/28 that for office development the losses per square metre in the town centre would be more than double the losses incurred at Sovereign Harbour; how would the increased office floorspace provision sought by SHL in the town centre be delivered?**

1.30.1 The increased development level proposed by SHL would face the same challenges noted in other question responses in terms of office delivery, albeit at a bigger scale. It would potentially require a step change in the town centre office market performance or a greater role for the public sector or specialist providers to help overcome some of the viability challenges. In addition, the increased office floorspace provision sought by SHL in the town centre would minimise the amount of other uses that could be used to cross subsidise the office provision.

1.30.2 More importantly, the key question for this approach would be whether it delivers the nature of space (and choice of locations) that the market tends to require within this part of the South Coast market. The *ELR Supplementary Evidence Report [SD/25]* analysis of market performance demonstrates clear trends that support a more balanced share of office provision in and out of the town centre (para 2.59, p16). Simply delivering more space within the town centre (and consequently less at Sovereign Harbour) fails to address the key weakness of the Eastbourne office portfolio, namely the choice of locations for occupiers. Indeed, it could be argued that it will exacerbate the over-concentration of space

within the town centre and therefore risk the ability of Eastbourne to fulfil its economic potential.

Matter 4 - Monitoring and Review

Qn 1.31 Should the targets be quantified?

- 1.31.1 The monitoring framework for Policy EL1 contains a number of targets that are not quantified. It is considered that it would be very difficult to provide an overall target to be achieved across the plan period as the overall number would be impossible to forecast due to changing circumstances and situations.
- 1.31.2 However, it may be appropriate to amend the targets to reference a year-on-year increase, for example the target for 'an increase in the number of businesses' would become 'an increase in the number of businesses over the financial year'. This would provide a target that is more easily measured and make it easier for the performance of the policy to be assessed.

Qn 1.32 As the policy includes a 43,000sqm floorspace target should the relevant target relate to floorspace rather than employment land?

- 1.32.1 The monitoring target for Policy EL1: Employment Land Strategy references '*meet(ing) the requirement for additional employment land*'. However, the indicator for this target references the '*total amount of employment floorspace provided against the requirement*'. This means that the performance of the policy against the target will be measured by the amount of floorspace delivered. However, Eastbourne Borough Council would be happy to suggest a modification to change reference from 'employment land' to 'floorspace' for the sake of clarity.
- 1.32.2 The targets and indicators for Policies EL2, EL3 and EL4 all contain reference to floorspace rather than employment land.

Qn 1.33 Given that the EELLP target relates to the whole Plan period should there be an interim target for monitoring purposes?

- 1.33.1 An interim target could be introduced, however even at the point this is monitored it would need to take delivery and performance in the wider context of how the wider market is performing, rather than being an isolated indicator of success.
- 1.33.2 Setting interim targets would assume a certain economic trajectory which, over a medium term projection does become less certain. As such it may be that any interim target could be missed but the full plan period target met across the whole time period. Monitoring at a particular point in time may help to understand whether other interventions are required if the local market has underperformed when compared to wider market conditions.

Qn 1.34 Is the 20,000sqm target within Policy EL2 a net or gross figure?

- 1.34.1 The 20,000 sqm target is for industrial and warehouse floorspace that is required within the Borough to meet future requirements, and this target takes into account that there will be windfall losses of industrial and warehouse space across the town that should be compensated for. This means that the Policy EL2 target is a gross figure as losses of sites in B use have already been accounted for.
- 1.34.2 However, the loss of B floorspace to enable a site to be redeveloped for a higher quantum of B floorspace has not been taken into account, and it is the net increase of B floorspace in these situations that count towards the 20,000 sqm target.

Qn 1.35 Should the monitoring framework target include all Class B floorspace?

- 1.35.1 It is not considered that the monitoring framework target should include individual targets for all Class B floorspace. The employment land forecasts in the *ELR [SD/24]* categorise the class B uses into 'office' (class B1a and B1b), 'industrial' (class B1c and B2) and 'warehouse' uses (class

B8). As such, there are no specific targets in the forecast for each individual use class.

1.35.2 However, in relation to Policy EL2, which aims to deliver 20,000 sqm of industrial and warehouse floorspace within the designated industrial estates, it may be appropriate to set individual targets for 'industrial' (class B1c and B2) and 'warehouse' uses (class B8).

1.35.3 It may also be appropriate that the targets for Policy EL3 make reference to 'office' instead of B1a.

Qn 1.36 Should there be an interim target which would trigger review before the end of the Plan period?

1.36.1 An interim target for the delivery of industrial and warehouse space in the Industrial Estates in accordance with Policy EL2 may only be of limited use given delivery will be closely linked to wider market performance, which is beyond the control and influence of the Borough. It may be helpful to have a monitoring point, however setting shorter term review points for a long term target may ultimately be rendered ineffective if the economy turns in a particular direction.

1.36.2 Given the nature of economic cycles an economy is better planned over the longer term to allow whole cycles to be experienced and any downturns to be corrected. Given cycles are only somewhat predictable taking a decision at a snapshot point in time may not be beneficial to long term planning.

Qn 1.37 Should there be an interim target for provision of floorspace?

1.37.1 Similar to the response to Qn 1.33 and Qn 1.36, an interim target for the provision of office floorspace in the town centre may only be of limited use given delivery will be closely linked to wider market performance, which is beyond the control and influence of the Borough. This is especially relevant to the Town Centre as the entire office allocation might

be provided on one single site, which might not be brought forward until the end of the plan period.

Qn 1.38 Does the target need clarification as to whether it is a net or a gross figure?

1.38.1 The target for the delivery of 3,000 sqm (to be amended to 4,500 sqm as a result of the proposed modification) of office floorspace in the Town Centre should be gross floorspace, as the loss of office stock in the town centre has been taken into account through an allowance for windfall losses within the employment land requirements.

Qn 1.39 Should the target apply to the town centre as a whole or specifically to the 2 allocated sites?

1.39.1 The target for Policy EL3 in the monitoring framework references the delivery of 3,000 sqm of B1a office floorspace in the Town Centre as a whole. As a consequence of the modification outlined in response to Qn 1.21, this reference will need amending to 4,500 sqm.

1.39.2 Eastbourne Borough Council consider that, although Policy EL3 identifies that Town Centre Development Opportunity Sites 2 and 3 are the most appropriate locations for office development, the target should apply to the whole of the Town Centre as the policy would not prevent additional office space coming forward on other sites within the town centre through windfall redevelopments.

1.39.3 The need to rebalance the office space portfolio in terms of 'town centre' and 'out of town centre' stock means that if office provision was delivered in the Town Centre but not on the Development Opportunity Sites, the requirement for Town Centre stock would be met, resulting in a reduced requirement to deliver office on the allocation sites. Therefore, it is most appropriate for the target to apply to the town centre as a whole.

Qn 1.40 As the loss of office stock both within and outside the town centre already exceeds the predicted losses assumed in the assessment of needs, and the permitted development rights for change of use have been made permanent, should consideration be given now to the introduction of an Article 4 direction?

- 1.40.1 Eastbourne Borough Council consider that the assessment of the need to introduce an Article 4 Direction to prevent the loss of office stock to residential via permitted development should be made on a qualitative, rather than quantitative basis. The key factor in considering an Article 4 direction should not be how much office stock is lost, but the quality of the stock and where it is located.
- 1.40.2 The total loss of office space to residential via permitted development (completed and committed) is 8,108 sqm. Of this, 6,298 sqm (77%) was lost from the Town Centre neighbourhood. However, a significant number of these Prior Approvals are concentrated in the St Leonards Road/Commercial Road part of the Town Centre, which is considered to be a 'non-core' location within the town centre. In addition, the majority of this stock had been under utilised or vacant for a considerable amount of time as it did not meet the needs of modern office occupiers, and therefore there has not been a significant amount of 'active' stock lost.
- 1.40.3 There has only been one Prior Approval for the conversion of office to residential in what Eastbourne Borough Council consider to be a 'core' location within the Town Centre, and that was the loss of 200 sqm of office space above shops at 18-22 Terminus Road (planning ref: 131010).
- 1.40.4 It should also be noted that the rate at which Prior Approvals are being submitted has noticeably slowed down recently as those office buildings that can viably be converted are likely to have been identified. This means that the rate of loss of office space to residential via permitted development is expected to decrease significantly.

- 1.40.5 There has been no significant loss of office stock due to permitted development within the 'core' town centre area. Stock within this core area tends to be fully active, and therefore it is not expected that there will be any significant loss of office provision in this area as demand is high.
- 1.40.6 As there has been no significant loss of office stock in the core area, it is not considered that an Article 4 Direction is required. Consideration should be given to an Article 4 Direction in the event that high quality and occupied office stock within the core area starts to be considered for residential conversion.

Qn 1.41 For the same reasons, should consideration be given now to increasing the amount of office floorspace to be provided in the town centre?

- 1.41.1 Since the submission of the ELLP, the requirement to provide a Community Hall on Site 7a at Sovereign Harbour has meant that the B1 allocation at Sovereign Harbour will reduce from 20,000 sqm to 18,500 sqm. Due to the constrained nature of Eastbourne, the lack of land availability and lack of other suitable locations that would be attractive for office occupiers, it is considered that the remaining 1,500 sqm should be directed to the Town Centre, taking the total allocation to 4,500 sqm. Therefore the amount of office floorspace being provided in the Town Centre will be increased.
- 1.41.2 Much of the stock lost through permitted development has provided little or no economic value to the Eastbourne economy as it would have been lying vacant or significantly under-utilised for a significant period of time (*SD/24, para 4.66, p43*). The lost stock was not considered as part of the future supply capacity of the Borough and its loss does not directly affect the capacity to accommodate future growth, particularly as few employees were displaced into other locations and therefore absorbing capacity that could have been used to accommodate future growth.

- 1.41.3 Therefore, Eastbourne Borough Council does not consider that there is further need to increase the amount of office floorspace to be provided in the Town Centre above the revised 4,500 sqm.

Qn 1.42 If not, should the EELLP specify a level of loss which would trigger such consideration or review and, if so, what should that be?

- 1.42.1 The relationship between lost floorspace and lost economic capacity is not necessarily linear. The impact of the loss will depend considerably on the nature of stock lost, its quality and suitability for accommodating future demand – these considerations should form the basis for any trigger point rather than a straight forward quantum.
- 1.42.2 A further consideration is the efficiency of space that is lost compared to the capacity of employment within new stock. As noted in the *ELR Supplementary Evidence Report [SD/25] (para 2.69-2.88, pp18-20)* and SHL's previous representations, employment densities within office space have changed significantly in the last decade. As such losses of older stock may not need to be offset by the same scale of new space given these can operate at more efficient occupancy levels.
- 1.42.4 A trigger may therefore be helpful in assessing the risk of continued loss within the Borough, however it would need to be set against the wider context of the usability of space and how actual employment capacity is being provided within the Borough.

Qn 1.43 The Government has recently consulted (December 2015-February 2015) upon possible changes to the National Planning Policy Framework in respect of the long term protection of land for employment use. If carried forward into new policy what implications would that have for the Sovereign Harbour site in particular?

- 1.43.1 Eastbourne Borough Council considers that there could be significant implications for a policy that places a fixed time limit on land retention for commercial uses for Sovereign Harbour and the wider Eastbourne economy.
- 1.43.2 Whilst Eastbourne Borough Council maintains that the full allocation at Sovereign Harbour will be required over the plan period to meet the employment and business needs of the town, it is recognised that evidence suggests that the full allocation is unlikely to come forward in the immediate future. The lack of land availability and the need for new homes means that employment land in Eastbourne comes under significant pressure for development to other uses, particularly residential. If the proposed changes were carried forward into new policy, this would mean that Eastbourne Borough Council could potentially find it difficult to retain land at Sovereign Harbour for employment use.
- 1.43.3 It is considered that there will be implications of this relating to the ability of Eastbourne to meet the employment needs of residents, the ability of Eastbourne to provide choice and attract new business into the local economy, and on the success of employment space that is already being developed at Sovereign Harbour.
- 1.43.4 Evidence in the *ELR [SD/24]* forecasts the need for Eastbourne to provide additional employment land up to 2027 to meet the needs of a changing population. It is important that increases in population as a result of housing growth are counterbalanced with the provision of jobs for the new residents. The unique context of the Borough means that land in Eastbourne is an extremely finite resource, so it is important that land is managed to provide for all uses in an effective fashion. A lack of land availability coupled with a challenging housing target means that there are not many sites left that are suitable for employment development. The loss of Sovereign Harbour as an employment site will mean that Eastbourne will not have sufficient employment land designated to meet future employment needs. The potential that Eastbourne will be unable to

provide enough jobs for its residents could result in an increase in the level of deprivation, especially in the most vulnerable areas.

- 1.43.5 The loss of sites such as Sovereign Harbour because they are not immediately deliverable will restrict the ability of Eastbourne Borough Council to plan for the long term future to ensure that sufficient land is provided for businesses in order to ensure that the economy is successful. There could also be a significant effect on the local economy as local businesses move out because there are not sufficient premises for them to expand, causing economic stagnation in the town. In addition, the loss of potential employment space in an out of town location will maintain an inappropriate balance of 'town centre' to 'out of town centre' stock, reducing choice and providing less flexibility for businesses.
- 1.43.6 Significant efforts have been made to start to establish Sovereign Harbour as a new business location and to establish a market presence. The delivery of Pacific House will begin to address some of the weaknesses of the location, creating a catalyst for economic activity in the area and driving up demand and prices. This will have the potential to both increase achieved rents but also reduce the risk of investment, allowing yields to tighten, delivering an improved capital value of development. The proposed change threatens to undo all the work that has been achieved so far and undermine the investment that has already been made.
- 1.43.7 The proposed change does not provide any incentive for landowners to properly market land allocated for employment use in order to get sites developed.
- 1.43.8 In addition, there are a number of commercial buildings within the Borough that are unlikely to be suitable to meet current business needs, however this does not mean that the employment land and sites themselves are redundant over the life of the plan. Indeed, the majority of the sites within Eastbourne have the attributes necessary for them to continue to be attractive locations for businesses in the future.

1.43.9 Eastbourne Borough Council considers that the retention of employment land designations should be considered in the context of evidenced 'anticipated needs' over the full plan period rather than as a reaction to short term or immediate market conditions. Employment land is always likely to generate a land value that is below other potential uses and will therefore always be under pressure for redevelopment, and the National Planning Policy Framework establishes, it is the purpose of the plan making process to ensure there is sufficient capacity for all anticipated needs.

Appendix 1.1 – Chaucer Business Park Marketing Brochure

Chaucer Business Park
Dittons Road
Polegate
East Sussex
BN26 6JF

New Quality Grade 'A' Offices with
Parking

A+ Energy Efficiency Rating

1,250 sq ft – 19,200 sq ft

To Let

Anticipated Completion –
2016

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Location

Chaucer Business Park is located on the Chaucer Industrial Estate on the south east side of Polegate adjacent to the A27 Polegate bypass and approximately 2 miles to the east of the A27/A22 junction. The Chaucer Business Park was awarded Commercial Development of the year in 2014. Polegate town centre is located approximately 2 miles north of Eastbourne and benefits from its own shopping facilities and mainline railway station with direct links to Gatwick Airport and London Victoria stations. Access to the business park is via the entrance from Dittons Road.

Travel times/distances by car (Approx)		
Polegate	3.2 miles	8 mins
Eastbourne	5.0 miles	12 mins
Hastings	15.24 miles	24 mins
Brighton	19.5 miles	35 mins
Gatwick	45.62 miles	63 mins
London	69.2 miles	90 min

Travel times by train (to Polegate)	
Eastbourne	6 mins
Hastings	37 mins
Brighton	24 mins
Gatwick	45 mins
London Victoria	78 mins

Terms

On Application

Legal Costs

Each party is to be responsible for their own legal fees.

Description

Chaucer office accommodation comprises 8 two storey self-contained premises.

The premises are steel frame construction with a mix of brick, steel profile and glazed cladding to the side elevation.

Offices measure approximately 1,250sq ft – 19,200sq ft with the ability to join several units creating larger offices.

Amenities

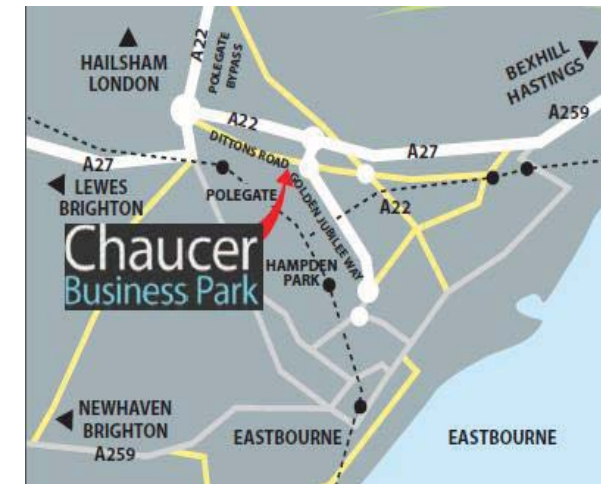
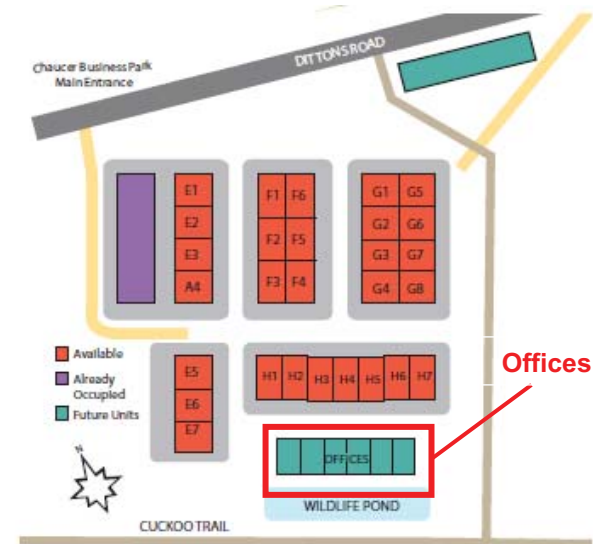
- Suspended ceiling with integrated lighting.
- Personnel doors.
- Allocated car parking.
- Fully carpeted throughout.
- Double glazed.
- Air conditioned.
- Raised floors.
- Male, female and disabled WCs.
- Ultra fast Broadband capabilities.

Rates

To be assessed

VAT

VAT will be chargeable on terms quoted



Viewing

For further information, email details or to arrange an inspection, please contact sole agents:

Jason Roberts: 01323 438460 Email: jroberts@shw.co.uk

Wendy Boorman: 01323 437901 Email: wboorman@shw.co.uk

Appendix 1.2 – Employment Land Monitoring Data

Appendix 1.&- Employment Land Monitoring Data

Year	LA Reference	Site name	Description	Permission	Summary	Location	Neighbourhood	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
									Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
2014/15	141428	Kelvin Lodge Old Wish Road	Proposed change of use of part of Kelvin Lodge from C3 (dwelling) to B1 (Offices)	Full Permission	C3 to B1a	Town Centre	Meads	Meads 02	230	230										
2014/15	EB/2012/0451	5 Courtlands Road	Change of use of part of site from B2 (Industrial use) to B8 (open storage)	Full Permission	B2 to B8	Industrial Estate	Roselands & Bridgemere	St Anthonys 02						0	-820	820	820			
2014/15	EB/2011/0250	Unit 1-3, 1 Finmere Close	Additional first floor storage class B1/B8 with parking and loading facilities	Full Permission	New Mixed B	Industrial Estate	Roselands & Bridgemere	St Anthonys 02										145	145	
2014/15	EB/2010/0514	Unit 4, 1 Finmere Close	Erection of light industrial warehouse unit with ancillary office and parking/loading facilities	Full Permission	Mixed B to B1c	Industrial Estate	Roselands & Bridgemere	St Anthonys 02				295	295					0	-295	
2014/15	141316	Unit 1 Britland Estate	Change of use from indoor skate park (Sui Generis) to the storage and sale of timber & landscaping supplies and associated products (B8 - Storage and Distribution)	Full Permission	Sui Generis to B8	Industrial Estate	Roselands & Bridgemere	St Anthonys 02									930	930		
2014/15	EB/2012/0606	225 - 227 Seaside	Change of use of first floor offices into two self-contained flats	Full Permission	B1a to C3	Other	Seaside	Devonshire 02	0	-172										
2014/15	130994	Marshall Garage Vine Square	Proposed change of use from office, ancillary to use as a garage, (Class B1) to residential (Class C3)	Full Permission	B1a to C3	Other	Seaside	Devonshire 02	0	-70										
2014/15	131070	Willowfield Studios, Willowfield Road	Change of use of ground floor unit, from B1 to D2 as Matial Arts Academy	Full Permission	B1c to C3	Other	Seaside	Devonshire 02				0	-288							
2014/15	130412	White Knight Laundry, Hammonds Drive	Change the permitted use of the unit from B1/B2/B8 to Sui Generis to enable its use as a motor dealership, including MOT facilities	Full Permission	Mixed B to Sui Generis	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02										0	972	
2014/15	EB/2012/0754	4 Hammonds Drive	Erection of storage building to the side	Full Permission	New B8	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02									320	320		
2014/15	141262	Unit 2 Hawthorn Road	Proposed change of use from Class B1/B8 (Business/Storage and Distribution) to B2 (General Industrial) for form garage for servicing, repair and MOT testing of vehicles	Full Permission	Mixed B to B2	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02						928	928			0	-928	
2014/15	130182	White Knight Laundry, Hammonds Drive	Proposed alterations to Units 1-3 Hammonds Drive (White Knight Laundry) and erection of 9No. new Class B1/B8 units	Full Permission	New Mixed B	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02										1755	1755	
2014/15	130342	Police Patrol Centre, Hammonds Drive	Single storey extension at rear, new entrance door on NW elevation, together with two new gated vehicular access, one new pedestrian entrance with canopy and amended parking layout	Full Permission	New B1a	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02	41	41										
2014/15	EB/2013/0038	Dental Practice Board, Temple Grove	Change of use of land from office (B1) to mixed use comprising non-residential education (D1) staff residential units (C2) and office (B1) and demolition of existing single-storey prefabricated building and erection of sports hall, three-storey extension and enclosed entrance court with associated landscaping and play and sports space	Full Permission	B1a to D1	Other	Summerdown & Saffrons	Upperton 02	0	-12525										
2014/15	EB/2011/0402	18-22 Terminus Road	Proposed conversion of office accommodation on first and second floorsto provide 3 residential units (1No. Studio and 2No. 1 bed flats) including provision of balcony at first floor level and roof garden at second floor level	Full Permission	B1a to C3	Town Centre	Town Centre	Meads 02	0	-158										
2014/15	130909	1 Commercial Road	Change of Use of ground floor units 32 and 33 from B1 to D2. The proposed use will be as fitness/yoga/dance studios	Full Permission	B1a to D2	Town Centre	Town Centre	Upperton 02	0	-205										
2014/15	141315	The Point Devonshire Park Offices College Road	Temporary change of use from B1a (Offices) to D1c (Non-residential Institution). For use by Eastbourne College to house a number of classrooms until 31 January 2017, whilst building works on its site are underway	Full Permission	B1a to D1	Town Centre	Town Centre	Meads 02	0	-345										
2014/15	EB/2011/0269	Hurst Motors, Hurst Lane	Application for extension of time for the implementation of permissionEB/2008/0074(FP) for the change of use from workshop and flat to two dwellings	Full Permission	B2 to C3	Other	Upperton	Upperton 02						0	-93					
2014/15	EB/2012/0747	19 The Avenue	Change of use of lower ground floor from office (B1) to self-containedflat and installation of a door	Full Permission	B1a to C3	Other	Upperton	Upperton 02	0	-98										
2015/16	150514	37a The Goffs	Change of use from B1 offices to C3 residential to form four one- bedroom flats with introduction of internal courtyard and replacement of existing doors and windows	Full Permission	B1a to C3	Other	Old Town	Upperton 02	0	-216										
2015/16	150978	82 Church Street	Change of use of ground floor office (B1) to a residential flat (C3)	Full Permission	B1a to C3	Other	Old Town	Old Town 02	0	-41										
2015/16	150111	Willingdon Methodist Church, Wish Hill	Change of use from office (Class B1) to two dwelling houses (Class C3)	Full Permission	B1a to C3	Other	Ratton & Willingdon Village	Ratton 02	0	-150										
2015/16	150396	Unit 4 1 Finmere Close	Change of use from use classes B1 (office) and B8 (warehouse and distribution) to auction rooms (sui generis use) and relocation of existing security entrance gates to the front north side of the building. (Amended description).	Full Permission	Mixed B to Sui Generis	Industrial Estate	Roselands & Bridgemere	St Anthonys 02										0	-307	
2015/16	131069	2A Beach Road	Demolition of existing warehouse and offices (Use Class B1), proposed 5 no. two-storey three bedroom terraced houses and 2 no. one bedroom flats	Full Permission	B1c to C3	Other	Seaside	Devonshire 02				0	-596							
2015/16	140001	Willowfield Studios, 67A Willowfield Road	Conversion of this commercial garage and store into a two storey dwelling with lounge, kitchen / diner on the ground floor and a singlebedroom and full bathroom on the first floor	Full Permission	B1c to C3	Other	Seaside	Devonshire 02	0	-40										
2015/16	130967	Site 6 Sovereign Harbour	Harbour Innovation Mall - Construction of new building consisting of three storeys totalling 2,323m2 net internal area for use within use classes B1(a)(b) and (c), occupying a site of 0.64ha and incorporating130 car parking spaces	Full Permission	New B1a	Other	Sovereign Harbour	Sovereign 02	2350	2350										
2015/16	EB/2013/0051	24 Lottbridge Drive	Erection of extension to the rear to facilitate improved internal arrangement and layout	Full Permission	New B2	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02						73	73					
2015/16	150243	Unit 11 Whiteknight Laundry Hammonds Drive	Change of use of premises to allow for a professional Jaguar and LandRover vehicle Storage, Service and Repair Centre	Full Permission	Mixed B to B2	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02						520	520			0	-520	
2015/16	150053	26-28 Lottbridge Drive	Proposed partial demolition and alterations to existing fenestration to sub-divide existing b8 storage unit into two units. Existing b1 offices to be retained with alterations to internal layout, together with creation of additional 3 car parking spaces	Full Permission	Loss of B8	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02						0	-141					
2015/16	EB/2011/0335	15 Alder Close	Rear extension to warehouse	Full Permission	New B8	Industrial Estate	St Anthonys & Langney Point	St Anthonys 02									270	234		

Appendix 1.& - Employment Land Monitoring Data

Year	LA Reference	Site name	Description	Permission	Summary	Location	Neighbourhood	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
									Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
2015/16	140078	South Wing, Stable Courtyard, 27 Compton Place Rd	Conversion of former stables to (B1) office use	Full Permission	B8 to B1a	Other	Summerdown & Saffrons	Meads 02	65	65							0	-65		
2015/16	140811	24 Longstone Road	Change of use of part existing B1 premises to use as a club for the instruction of martial arts to children and adults(D2)	Full Permission	B8 to D2	Town Centre	Town Centre	Devonshire 02									0	-120		
2015/16	150558	24-26 Terminus Road	Retrospective application under s73a for change of use from shop (A1) to office (B1)	Full Permission	A1 to B1a	Town Centre	Town Centre	Meads 02	218	218										
2015/16	141368	31a Cornfield Road	Change of use from B1 (office) to D1 (massage and therapy clinic).	Full Permission	B1a to D1	Town Centre	Town Centre	Meads 02	0	-152										
2015/16	EB/2012/0591	68 Grove Road	Conversion of second and third floors from office space to 10 residential flats, comprising 4No. 2 bed flats and 1No. 1 bed flats per floor, together with alterations to basement car park	Full Permission	B1a to A1/C3	Town Centre	Town Centre	Meads 02	0	-1244										
2014/15	130564	80 Church Street	Prior Notification of Proposed Change of Use from B1(a) Offices to C3 Dwellinghouses.	Prior Approval - Permitted Development	B1a to C3	Other	Old Town	Old Town 02	0	-707										
2014/15	131010	18-22 Terminus Road	Notification of a proposed change of use from B1 (offices) to C3 (dwellinghouses)	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Meads 02	0	-200										
2014/15	130759	28 St Leonards Road	Application for Prior Notification of a Proposed Change of Use from Class B1(a) (Offices) to Class C3 (dwellinghouses).	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Upperton 02	0	-800										
2014/15	130542	48-50 St Leonards Road	Conversion of Office Space (B1a) to 23 self-contained flats (C3). Change of use as permitted development under Class J	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Upperton 02	0	-1580										
2014/15	130914	66 Cavendish Place	Prior Approval: Change of use from offices (B1) to a single self contained flat, residential (C3)	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Devonshire 02	0	-34										
2014/15	140039	Park View House 19 The Avenue	Conversion of office space (B1a) into a total of 4 residential flats at ground, first and second floors, (C3). Change of use as permitted development under Class J	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Upperton 02	0	-306										
2014/15	141015	Units 1 to 3 Arch Mews 43-45 Longstone Road	Application for Prior Approval under Class J for the Change of Use of units 1-3 Arch Mews, from offices (Class B1) to residential units (Class C3) in the form of 3no. 2 bedroom houses	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Devonshire 02	0	-320										
2015/16	140905	37 Brassey Avenue	Application for Prior Approval under Class J for the Conversion of office Class B1 to residential Class C3.	Prior Approval - Permitted Development	B1a to C3	Other	Hampden Park	Hampden Park 02	0	-45										
2015/16	150912	3 Chiswick Place	Notification for prior approval of a proposed change of use from Class B1(a) (offices) to Class C3 (residential)	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Meads 02	0	-75										
2015/16	130525	38 St Leonards Road	Application for Prior Approval for the Change of Use from B1 (offices) to C3 (residential)	Prior Approval - Permitted Development	B1a to C3	Town Centre	Town Centre	Upperton 02	0	-420										

TOTAL	5898	-18625	0	0	345	-840	1521	-3643	8072	6274	1900	-249
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2012/13	509	-57	0	0	0	0	0	0	5189	3725	0	-1071
2013/14	210	-2444	0	0	50	-251	0	-4110	543	430	0	0
2014/15	2546	-16374	0	0	295	7	928	15	2070	2070	1900	1649
2015/16	2633	250	0	0	0	-596	593	452	270	49	0	-827

Appendix 1.2 - Employment Land Monitoring Data

Developments under construction (1 April 2016)

LA Reference	Site name	Description	Type	Summary	Locality	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
							Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
140958	Cosmetica, 5 Faraday Close	Erection of foodstore together with associated car parking and landscaping	Full Permission	B2 to A1	Hampden Park	Hampden Park 02							0	-5137				
150179	27 St Leonards Road	Change of use from B1 (office) to C3 (residential) - comprising 12no.self-contained flats	Prior Approval - Permitted Development	B1a to C3	Town Centre	Upperton 02	0	-1080										
150457	Seaside Garage 10-16 Fairlight Road	Demolition of existing garage and construction of 4 x 3 bedroom, 2 storey terraced houses. (Amended description)	Full Permission	B2 to C3	Seaside	Devonshire 02							0	-373				
151143	21 Wish Road	Change of use from training centre to B1(office)	Full Permission	D1 to B1a	Town Centre	Meads 02	290	290										
151303	Gloucester House, 9 Gloucteser Mews	Use of first, second and third floor levels of building as 5x residential units (4x1 bed, 1x2 bed). Creation of balcony at third floor level. Associated alterations to external elevations.	Full Permission	B1a to C3	Town Centre	Meads 02	0	-385										
EB/2011/0321	Window Designs, Fort Road	Demolition of existing light industrial building (B1) and erection of enlarged light industrial unit (B1). This application is a renewal of approval EB/2007/0569.(REVISED NOTICE)	Full Permission	New B1c	Seaside	Devonshire 02					190	70						
EB/2012/0724	Land rear of 2-18 Clarence Road	Erection of four detached and two semi-detached 2 bedroom houses	Full Permission	B1c to C3	Seaside	Devonshire 02					0	-680						
TOTAL							290	-1175	0	0	190	-610	0	-5510	0	0	0	0

Appendix 1.2 - Employment Land Monitoring Data

LA Reference	Site name	Description	Permission	Summary	Locality	Ward	B1a		B1b		B1c		B2		B8		Mixed B	
							Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net	Gross	Net
150598	Map House 36-38 St Leonards Road	Change of use from B1 (office) to C3 (dwelling)	Prior Approval - Permitted Development	B1a to C3	Upperton	Upperton 02	0	-930										
151053	41 South Street	Prior approval for change of use from office B1 to dwellinghouse C3 under class O of the GPDO 2015 for use of the first and second floors as 2x1 bedroom flats	Prior Approval - Permitted Development	B1a to C3	Town Centre	Meads 02	0	-150										
160076	157 Terminus Road	Change of use from Office (B1) to Dwellinghouse (C3) (Application for prior approval under Class O, Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015).	Prior Approval - Permitted Development	B1a to C3	Town Centre	Devonshire 02	0	-188										
TOTAL							20301	15071	0	0	0	-5102	3945	1102	3358	1892	0	-40