

Eastbourne Borough Council

Employment Land Local Plan Examination

Further comments by Richard J Maile relating to information provided by Eastbourne Borough Council in response to the Inspector's request dated 27 May 2016

A. Schedule of Proposed Modifications EBC-EL-14

Ref M-04 – Policy EL2:

As I have stated on a number of occasions, there is no certainty that land and buildings within the designated Industrial Estates will become available for redevelopment. Any redevelopment that has occurred recently has taken place during a buoyant economy. It does not, therefore, represent a realistic expectation that such sites will come forward over the Plan period. Moreover, many former industrial sites have been lost to other uses, e.g. housing or retail. Policy EL2 does not provide the certainty that is required by the Development Plan system.

Ref M-05:

I welcome the clarification set out in the additional paragraph 4.5, which further supports my comments above.

Ref M-07 – Table 3:

For the reasons detailed above, the net additional industrial and warehouse floorspace set out in the table has been achieved principally during the period of buoyant economic activity.

Ref M-08:

Given the relationship of the land north of Hammonds Drive with the major industrial estates within the Borough it must rank top of any list of additional land for industrial/warehouse/business use.

Ref M-10:

This would appear to recognise the difficulty of providing the suggested allocation of office development within the Town Centre.

B. Eastbourne ELLP Examination Action Points

Paragraph 2.2:

As detailed elsewhere in my responses the space that has been leased out at Pacific House is, in many instances, on leases that provide the tenants with the right to rescind upon giving three months' notice.

Such leases would not find a ready investment market and will therefore rely upon finance from the public sector, a fact referred to on the first day of the Hearing when it was acknowledged that Eastbourne Borough Council has a financial interest in development at Sovereign Harbour.

Paragraph 3.3:

It is clear that the existing Industrial Estates, which are limited in number, may need to accommodate uses that are unneighbourly or incompatible within residential areas, adding further pressure on the limited resource of existing industrial estate land.

Paragraph 4.3:

Once again, it is acknowledged that the existing Industrial Estates are the most appropriate location to make provision for the requirement for industrial and warehouse floorspace.

For the reasons I have given on a number of occasions, the Council's reliance upon densification does not provide the certainty required by the Development Plan system.

Paragraph 4.4:

It would appear that this fact is acknowledged – and I quote from the Council's Statement:

“As the supply of employment land in Eastbourne is challenged and there are few alternative locations for industrial and warehouse space, it is important that industrial and warehouse space takes precedence within the industrial estates ...”

This seems to be an acknowledgement of the failure of the Local Plan to make adequate provision for industrial, warehouse and business uses.

Paragraph 4.7:

This also acknowledges that the anticipated windfall delivery rate indicates that there could be limited capacity within the Industrial Estates to accommodate office floorspace. This concern, added to the possibility of the Town Centre sites becoming non-deliverable, must cause concern in terms of providing for the business needs of the town.

Paragraph 4.13:

There is an acknowledgement of the benefits of transport connectivity, which is a factor that has driven Sussex Police to seek to site their headquarters building upon the land north of Hammonds Drive.

Paragraph 4.15:

This paragraph acknowledges the benefits of locations that are visible from the A22. None could be more visible than the site north of Hammonds Drive.

Paragraph 4.17:

If Gardners Books do redevelop the Highfield South Industrial Estate this could well displace the existing occupiers.

Paragraphs 6.0 onwards:

It is confirmed that the Council may well support further offices within the Industrial Estates, which in turn will reduce the availability of land for other industrial/warehouse/business uses, further eroding the availability of sites to meet the town's needs.

Paragraph 7.1:

The Council acknowledges that the Town Centre sites are unlikely to be viable and will require cross-subsidy. These sites have been available for many years and have not so far elicited any particular interest.

Paragraph 10.4:

The figures here indicate that Site 6 will provide 14,541 m² and Site 7A 9,765 m², of which only some 1,200 m² at Pacific House has currently been occupied on leases that are far from the 'norm' required by institutional investors.

Paragraph 11.1:

The Council admits that it cannot conclusively determine whether Sites 6 and 7A were restored following aggregate extraction. Given the appearance of these sites I would suggest that they have not been the subject of mineral extraction. In any event, the Framework clearly excludes such sites from the definition of Previously Developed Land.

Paragraph 12.1:

I attach a copy of the Eastbourne Urban Plan, which shows the land north of Hammonds Drive as part of the Southbourne Link and therefore not part of Eastbourne Park.

Paragraph 12.2:

Fig. 1 Appendix 4 shows the whole of my land at Hammonds Drive as part of the Southbourne Link, together with the band of opportunity on either side. It is not part of Eastbourne Park. This is repeated in the 1998 extract (Fig. 2) and in the 2003 extract (Fig. 3). Fig. 4 (2013) follows deletion of the Southbourne Link in, I believe, December 2012.

Fig. 5 is to my mind wholly misleading in that it does not show the St Anthony's Link on the opposite side of Lottbridge Drove; neither does it take account of the need for part of the land north of Hammonds Drive to be utilised for highway improvements in connection with the St Anthony's Link.

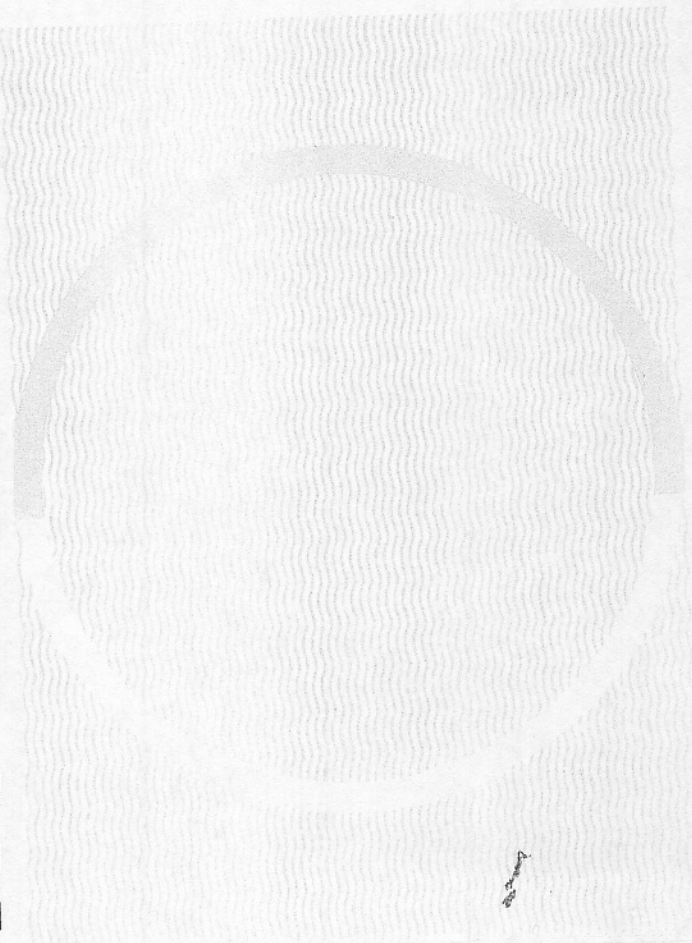
It is clear, therefore, that historically the land has not formed part of Eastbourne Park and that the ditch along the northwest boundary, which has always been the defined boundary of the Park, is the most relevant boundary for the Park. In my Closing Statement I have referred to the fact that this land has no particular merit for inclusion within Eastbourne Park.

Accordingly, therefore, the Council's comments in paragraphs 12.2 – 12.5 are wholly inaccurate in suggesting that the land has been incorporated as part of Eastbourne Park since 1990. This is clearly shown by the documentation produced by the Council and from my lengthy knowledge of this site and my involvement with planning in Eastbourne over the last 50 years.

EASTBOURNE URBAN PLAN

REPORT FOR DEVELOPMENT PLAN SECOND REVIEW

BOROUGH ENGINEER, SURVEYOR & PLANNING OFFICER



R J make

C O U N T Y B O R O U G H O F E A S T B O U R N E

R E P O R T O F T H E

B O R O U G H E N G I N E E R , S U R V E Y O R A N D P L A N N I N G O F F I C E R

O N A D R A F T S E C O N D R E V I E W

O F T H E D E V E L O P M E N T P L A N

I N T H E F O R M O F A N

U R B A N P L A N

A S R E C O M M E N D E D B Y T H E P L A N N I N G A D V I S O R Y G R O U P

A N D D E S C R I B E D I N T H E W H I T E P A P E R ,

T O W N A N D C O U N T R Y P L A N N I N G J U N E 1 9 6 7

O F T H E M I N I S T R Y O F H O U S I N G A N D L O C A L G O V E R N M E N T