

## EMPLOYMENT LAND LOCAL PLAN

# Representations on the Sustainability Appraisal

*February 2016*



### **Eastbourne Borough Council**

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## Employment Land Local Plan

### Representations on the Sustainability Appraisal

- *Proposed Submission (2014)*
- *Revised Proposed Submission (2015)*

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## Comment Information

<b>Document Section</b>	<a href="#">Employment Land Local Plan - Proposed Submission Version</a> <a href="#">Introduction</a>
<b>Comment ID</b>	PS-ELLP/37
<b>Respondent</b>	<a href="#">Sovereign Harbour Limited (Mark Orriss)</a>
<b>Agent</b>	<a href="#">Teal Planning Ltd (Marie Nagy)</a>
<b>Response Date</b>	03 Feb 2015
<b>Uploaded By</b>	<a href="#">Eastbourne Borough Council (Matthew Hitchen)</a>
<b>Current Status</b>	Accepted
<b>Do you consider the document is Legally Compliant?</b>	Yes
<b>Do you consider the document is Sound?</b>	No
<b>If no, Do you consider it is unsound because it is:</b>	Not Positively Prepared, Not Justified, Not Effective, Not Consistent with national policy
<b>Comment</b>	<b>Sustainability Appraisal</b>

The inconsistencies that have been applied to the scoring of the different development options, the failure to take account of relevant evidence and market indicators, and the failure to appraise all relevant alternative options mean that the SA:

- has not been positively prepared; and
- that the proposed allocations policy that it concludes should be adopted has not been justified and will not be effective in sustainability or in sound planning terms.

The Proposed Submission Sustainability Appraisal Report is therefore Unsound.

A reassessment of the SA/SEA based upon EBC’s own evidence base and the application of a consistent and logical scoring of the different scenarios tested, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.

A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here and that shall have less transport impacts, also has more significant benefits for Eastbourne, the Harbour and its new occupiers.

A higher office allocation for the town centre and mixed employment allocation for the Harbour also fits with:

1. the physical capacity that exists within the town centre to accommodate more office accommodation.
2. a less ambitious but more realistic and deliverable market expectation of what the Harbour sites can accommodate in terms of new office space.

The SA must be reappraised on this basis.

This supports our core objections to the current draft ELLP that are set out within accompanying Submission Statement 1 on behalf SHL.

**What changes do you suggest to make the document legally compliant or sound?**



The SA must be reappraised on this basis.

**Do you consider it necessary to participate at the Examination in Public?**

Yes

**Why do you feel it is necessary to**

THE POINTS OF DIFFERENCE BETWEEN EBC AND SHL ARE OF STRATEGIC AND SITE

<b>participate at the Examination in Public?</b>	SPECIFIC IMPORTANT WHICH MUST BE APPRIASED IN FULL AND ARE THEREFORE BEST CONSIDERED THROUGH EXAMINATION
<b>Attachments</b>	<p> <a href="#">02b - Statement 2 - Sustainability Appraisal - pdf.pdf</a> (2.0 MB)</p> <p> <a href="#">02a - PS ELLP Representation Form - SUSTAINABILITY APPRAISAL - PDF.pdf</a> (124 KB)</p>
<b>Submission Method</b>	Email
<b>Response Status</b>	None
<b>Assigned Officer</b>	=unassigned=
<b>Officer's Response</b>	
<b>Campaign Indidicator</b>	



## EMPLOYMENT LAND LOCAL PLAN

### Proposed Submission Representation Form (Regulation 19)

Please read the accompanying 'Guidance Notes for Respondents – Proposed Submission Employment Land Local Plan' before completing this form.

Eastbourne Borough Council has published the Proposed Submission version of the Eastbourne Employment Land Local Plan for the community and stakeholders to make final representations on issues of soundness or legal compliance, in preparation for formal submission of the document to the Secretary of State in 2015.

The period for representations runs from Friday 12 December 2014 until Friday 6 February 2015. Representations received after 5pm on Friday 6 February 2015 cannot be accepted.

Where possible, please use the on-line consultation portal to make representations. This can be accessed via the Council's website ([www.eastbourne.gov.uk/ellp](http://www.eastbourne.gov.uk/ellp)). Alternatively, completed forms can be returned to [planning.policy@eastbourne.gov.uk](mailto:planning.policy@eastbourne.gov.uk) or by post to Specialist Advisory Team, Eastbourne Borough Council, 1 Grove Road, Eastbourne, BN21 4TW.

For further information please contact the Council's Specialist Advisory Team, on (01323) 410000 or email [planning.policy@eastbourne.gov.uk](mailto:planning.policy@eastbourne.gov.uk).

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### Representation

When the Employment Land Local Plan is examined it will be tested for:

**1. Legal compliance** – That it has been produced in accordance with Government Regulations. This includes the Duty to Cooperate.

**2. Soundness** – That the content is positively prepared, justified, effective and consistent with national policy

Further information on the test of soundness and legal compliance is provided in our accompanying **Guidance Notes for Respondents**.

### **Q1. Which part of the Employment Land Local Plan do you want to make a representation about?**

Chapter:  
SUSTAINABILITY APPRAISAL REPORT

Policy: -

Paragraph Number:  
SECTIONS 1 TO 7 AND APPENDICES

Figure: -

### **Q2. Do you consider the Employment Land Local Plan to be legally compliant?**

Yes

No

If you do not consider it to be legally compliant, please provide details as to why:

-

### **Q3. Do you consider the Employment Land Local Plan to be sound?**

Yes

No

*If you do not consider it to be sound, please provide details as which part of soundness it does not comply with:*

Positive prepared

Justified

Effective	<input checked="" type="checkbox"/>
Consistent with National Policy	<input checked="" type="checkbox"/>
Other	<input type="checkbox"/> -

**Q4. Please set out what changes you consider necessary to make the Employment Land Local Plan legally compliant or sound.**

PLEASE REFER TO -

SUBMISSION STATEMENT 2 - PROPOSED SUBMISSION SUSTAINABILITY REPORT

**Please note** your representation should cover all of the information, evidence and supporting information necessary to support/justify the representation and the suggested change. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

**Q5. If your representation is seeking a change to the Employment Land Local Plan do you consider it necessary to participate at the public examination to help explain the need for the change proposed?**

**No**, I do not wish to take part at the examination

**Yes**, I wish to take part at the examination

*If you do wish to participate in the examination, please outline why you consider this necessary:*

THE POINTS OF DIFFERENCE BETWEEN EBC AND SHL ARE OF STRATEGIC AND SITE SPECIFIC IMPORTANT WHICH MUST BE APPRIASED IN FULL AND ARE THEREFORE BEST CONSIDERED THROUGH EXAMINATION

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q6. Do you wish to be notified of any of the following?**

Submission of the Employment Land Local Plan for examination


Publication of the Inspectors Report

Formal adoption of the Employment Land Local Plan

**Data Protection Act 1998 and Freedom of Information Act 2000**

Representations cannot be treated in confidence and copies of all representations will be made publicly available. The Council will also provide names and associated representations

Employment Land Local Plan Representations on the Sustainability Appraisal  
on its website but will not publish personal information such as telephone numbers, emails or  
private addresses. By submitting your views on the document you confirm that you agree to  
this and accept responsibility for your comments.

<b>Signature:</b>		<b>Date:</b>	03/02/2015
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## **Draft ELLP Submission Statement 2**

On behalf of:  
**Sovereign Harbour Ltd**

In respect of:  
**Sustainability Appraisal Report and Non-Technical Summary**  
**December 2014**

Date: 2 February 2015

Reference: 12001/Reps/14/SS02



## 1.0 **Background**

- 1.1 Representations were submitted on behalf of SHL in response to the Initial ELLP Sustainability Appraisal Report and its accompanying Non-Technical Summary 2013.
- 1.2 These stressed **agreement to the core vision and objectives of the ELLP and its SE/SEA.**
- 1.3 Objections however were made on the grounds that the Initial Report:
- Appraised only six options, whilst a **clear additional alternative** is for an **increased level of office space** being allocated to the **town centre**, balanced by an allocation for a **more mixed employment park with a lower office allocation at Sovereign Harbour.**
  - EBC's **scoring of the options that were tested did not appropriately reflect the sustainability impacts** that would result from a low office allocation for the town centre and a high allocation at the Harbour.
  - The approach taken was **flawed and failed to meet the required SA/SEA regulations and statutory planning guidance** that seek to secure the **most sustainable, deliverable development option.**
- 1.4 The objections were accompanied by what we consider to be a more objective scoring of the options presented by EBC for the town centre and the Harbour and based upon our understanding of the local market at that time.
- 1.5 EBC's updated Sustainability Appraisal 2014, its confirmed **sustainability objectives**, its **rescoring of the original town centre and Harbour development options**, and the **inclusion of a further option** to increase the level of office development within the town centre, **are all welcomed.**
- 1.6 EBC's summary conclusions that the proposed allocation of 20,000sq.m. of B1 development at the Harbour is the 4<sup>th</sup> most sustainable of the seven options now tested is also welcomed. This confirms the position that has been expressed by SHL throughout EBC's current Plan making processes; i.e. that the **town centre is the most sustainable location for new office development.**
- 1.7 The updated SA/SEA however is **still flawed.**
- 1.8 The **conclusions** reached by the **updated Appraisal** do not translate back to and are **not best placed to achieve the underlying sustainability objectives of the ELLP.**
- 1.9 The **SA and the resulting proposed allocations policies must be revisited further**, taking into account the following key considerations.

## 2.0 **Detailed Matters**

- 2.1 The draft ELLP allocations for **new office floorspace** are based upon:
- A forecast demand for additional new floorspace 15,977sq.m.
  - An allowance for windfall losses and churn in office stock (essentially within the town centre) 4,789 sq.m.
  - Resulting in a total allocation requirement of **20,766 sq.m.**
  - Translated into two formal allocations of:
    - o The Town Centre 3,000sq.m.

- Sovereign Harbour **20,000sq.m.**
- Overall Total 23,000sq.m.

- 2.2 As stressed within our previous representations, **the proposed allocation at the Harbour is to effectively provide for (1) all of the new additional space required in the Borough and (2) a significant proportion of the space that is forecast to be lost to other uses within the town centre.**
- 2.3 The acceptance within EBC's draft policies is that the town centre's office stock will reduce.
- 2.4 GVA's ELR 2013 and Supplementary ELR 2014 have advised EBC that this is acceptable within the context of (1) the shortfalls of Eastbourne's town centre stock which is considered dated and to lack flexibility to meet current space requirements and (2) the benefits that new out of town centre space would offer in terms of bringing new high quality stock and a choice of space to the Eastbourne market.
- 2.5 This balancing of the issues to settle upon a recommended allocation of just 3,000 sq.m. of new space within the centre, however, misses a number of significant sustainable planning points.

**Reduction in Town Centre Stock**

- 2.6 The Council's AMRs confirm that the town centre has experienced a net reduction in stock almost year on year over an extended period.

Year	Town Centre Space
	Net Change sq.m. B1a space ^
2005-2006	-155
2006-2007	-285
2007-2008	-268
2008-2009	-108
2009-2010	-81
2010-2011	54
2011-2012	-623
2012-2013	-424
2013-2014	-2,055
Total 2012-2014	-2,479
Total 2005-2014	-3,945

Source: EBC AMRs (^ rounded)

- 2.7 The most recent evidence from 2012, the start of the proposed ELLP, shows that:
- The **last two monitoring years** to March 2104 saw **- 2,479sq.m. of office space** removed from the stock, compared with 3,000sq.m. of new space that is proposed to be built in the centre through to 2027.
  - GVA's Supplementary Report 2014 further refers to **12 Prior Approval Notifications** being submitted to EBC since May 2013 equating to **5,500sq.m. of floorspace**.
  - Our own monitoring of EBC's weekly planning lists below, highlights that new proposals for the loss of office space have continued to come forward since EBC's last AMR (i.e. since March 2014).

Site	Ref	Date Opened	Proposal	Status	B1 change of use floorspace loss
27 St Leonards Rd BN21 3UU	141030	02.08.14	<b>Prior Notification for Conversion of offices in to 12 self contained flats</b> under Class J of The Town and Country Planning (General Permitted Development) (Amendment) (England) Order 2013.	Pending	<b>881sqm</b>
Unit 2 Hawthorn Rd BN23 6QA	141262	16.08.14	<b>Proposed change of use from Class B1/B8</b> (Business/Storage and Distribution) to B2 (General Industrial) for garage for servicing, repair and MOT testing of vehicles.	Approved 26.11.14	<b>Loss of 928sqm</b> of B1(b) Research and Development and 928sqm of B8 Storage and distribution proposed (gross internal)
<i>Willingdon Methodist Church Wish Hill BN20 9HE</i>	141115	30/09/2014	<i>Lawful development certificate for an existing use of the church as office space for beachy head chaplaincy.</i>	<i>Approved 04.12.14</i>	<i>App form not on Council website</i>
Eastbourne Borough Council Devonshire Park College Rd BN21 4JJ	141315	15/10/2014	<b>Temporary change of use from B1a (Offices) to D1c (Non-residential Institution)</b> . For use by Eastbourne College to house a number of classrooms until 31 January 2017, whilst building works on its site are underway.	Approved 24.11.14	<b>344.9sqm</b> (temporary until 31 January 2017)
Smith Osborne Associates Ltd 31A Cornfield Rd BN21 4QG	141368	28/10/2014	<b>Change of use from B1 (office) to D1 (massage and therapy clinic)</b> . There will be no changes to external or internal layout.	Pending	<b>152.46sqm</b>
<b>Total</b>					<b>2306.36 sq.m.</b>
<b>Total Clear Loss of B1a Space</b>					<b>1378.36 sq..m.</b>

2.8 The reduction of office space within the centre has thereby been a long term trend, but one that has been accelerated by the current permitted development rights and that will be encouraged even further by EBC's proposed policy to allow further net losses as a result of its allocations policies.

2.9 Whilst not all of the existing prior approvals may ultimately be implemented:

- others may still come forward;
- the permitted development right time limit may be extended or be made permanent, providing more time for landowners to bring additional change of use schemes forward under this regime; and
- formal change of use applications will undoubtedly and in any case come forward outside of the permitted development route, i.e. following long term trends in the Eastbourne market as stock becomes more dated and also directly as a result of EBC's policies to encourage more residential development in the town centre.

2.10 **The actual result will thereby be a potentially marked reduction in office stock within the town's most sustainable office location.**

2.11 **Notwithstanding this, EBC's updated SA still maintains that a low office allocation will have positive benefits in supporting and encouraging new office jobs with linked benefits for the centre and the town. This cannot be the case when space will reduce.**



### ***Mitigation Options***

- 2.12 ***GVA's Supplementary Evidence Report (para 2.21)*** recognises that the current time limited PD rights may be made permanent. Both GVA and EBC then propose that Article 4 directions may be used to limit the loss of space within the town centre if necessary to curtail the negative impacts that would result on the town's office stock.
- 2.13 The ability of LPAs to use Article 4 Directions to remove such rights however has been restricted by central government in order to help support the delivery of new homes.
- 2.14 Article 4 directions cannot therefore be fully relied upon as a mitigation option should the loss of offices become a major concern within Eastbourne.
- 2.15 The main mitigation for EBC should therefore be to plan positively and proactively for the replacement and enhancement of new high quality, flexible office space within the town centre, through the identification of clear and more substantial allocations.

### ***Reduced Quality and Choice of Space***

- 2.16 Throughout GVA and EBC's appraisals of the Eastbourne office market, they acknowledge that the town centre's stock is dated, lacks flexibility and does not cater for all occupier requirements, in particular new start up businesses that require flexible serviced accommodation and larger re-locators who look for high quality, flexible space.
- 2.17 Whilst they acknowledge that the town centre office market has attracted some investment in the form of office refurbishment schemes, their answer to addressing the town's overall quality issue through strategic plan allocations is to accept the further downgrading of stock in the town centre by pushing the majority of new prime stock out to the Harbour.
- 2.18 By proposing that only a small amount of new floorspace should be provided within the town centre, EBC and GVA are in effect proposing that the quality of the town centre's office stock and the choice available should proportionality worsen further in actual and in relative terms.
- 2.19 By proposing that all of the new out of town centre stock is pushed to the Harbour, also only proposes to offer a single location option for those who are willing or wanting to relocate – with this being to a location on the north-eastern edge of the Borough, at some distance from substantial parts of the town. This single out of town centre option itself will result in a lack of choice in the location, environment and quality of new space provided.
- 2.20 **EBC's SA appraisal however still provides a positive score of the low town centre allocation option, which is nonsensical when it will again result in a net downgrading in the amount, quality and choice of the centre's office space.**

### ***Business Links***

- 2.21 Beyond the direct impacts that will result from EBC's proposed allocations policy, wider business link benefits will also be undermined if the town centre's office stock is reduced.
- 2.22 Within the town centre itself, the loss of office based companies will mean a direct loss of business. This will in particular affect retail and café/ restaurant type businesses and the town centre's weekday evening economy.
- 2.23 At the Harbour, whilst some support services are available (e.g. Class A uses) these do not and cannot replicate the breadth of suppliers that are needed, such as banks, printers, stationers, legal and accounting firms etc; continued access to which from the Harbour will be far less convenient and will require additional business trips.

- 2.24 EBC's policies indeed assume that companies which will be displaced from the town centre will be happy to relocate to the fringe location of Sovereign Harbour even if the costs to their business will be greater (i.e. through increased commuting costs, increased costs to link back to the town centre's service suppliers, and higher rents at the Harbour).
- 2.25 This is a very bold assumption.
- 2.26 Some businesses, for which a town centre location is important, may in fact relocate from the town altogether; choosing another centre rather than a fringe business park location.
- 2.27 EBC acknowledges some of these issues but not all and still does not put sufficient weight to the issue within the SA/SEA scoring.
- 2.28 EBC's own evidence indeed is that the actual strength and vitality of Eastbourne town centre does need to be bolstered.
- 2.29 The Council's most recent AMR 2014 highlights that Class A1 space as well as office space has continued to experienced a net decline within the town centre.

Year	Town Centre Space
	Net Change sq.m. A1 space
2005-2006	-1,334.6
2006-2007	-60
2007-2008	-1,574.6
2008-2009	-738.25
2009-2010	-605
2010-2011	67
2011-2012	-87
2012-2013	+706
2013-2014	-270

EBC AMRs

- 2.30 Whilst the new Arndale extension scheme will provide a significant investment in the centre, this will be focused on commercial retail and leisure businesses only, i.e. those that rely upon footfall.
- 2.31 EBC's policy to encourage more residential development within the centre will also locate people close to the centre's services.
- 2.32 The planned reduction in office space and therefore of office workers within Eastbourne town centre will however have a significant negative impact on the wider town centre economy; directly as a result of workers being relocated elsewhere. Also following the ambitions of EBC's strategic thinking, many of the new residents of the town centre may find themselves working outside of the centre, such that their potential contribution to its important weekday local economy will be undermined.
- 2.33 Further to this, the recent announcement by Cineworld that it is to close its existing cinema at the Harbour in favour of a relocation to the new Arndale Centre extension scheme demonstrates the relative commercial benefits of a town centre location for businesses.
- 2.34 A local newspaper report of Cineworld's decision (see **Annex B**) highlights the operator's decision being made as '*... the time is right to take up a more central location within the town.*' and to this being supported by Eastbourne politicians '*... as a giant leap forward for the town centre's evening economy*'.
- 2.35 A central location thereby has clear commercial benefits, both for the individual companies involved but also for the wider town centre economy that benefits from their presence.

- 2.36 The counter to this is that the Harbour as a fringe location has been unable to retain a key employer and attraction as it remains a weaker location in accessibility terms. The attractions that should help to attract and support office based businesses and their staff will be weakened further once the cinema has relocated. Any reuse of the current cinema site at the Harbour will not be able to provide a full range of business service functions that office based operations require – they will still be peripheral to many of the facilities they need.
- 2.37 The development of Site 4 at the Harbour for commercial uses as an extension to the Waterfront will add to the specialist attractions at the Harbour. The ability to develop the rest of Site 4 and Site 7a fully for non office, but other supporting employment uses, will also provide new attractions that can support and help to retain B1 functions that are best focused on Site 6.
- 2.38 An office allocation of 20,000sq.m. at the Harbour that will require Sites 4 and 7a to be substantially if not fully developed for offices also will not enable these business support benefits to be realised.
- 2.39 Again, EBC's SA does not properly reflect these issues in terms of the wider linkages that businesses seek, the location choices that businesses are making within Eastbourne on access and business linkage grounds, and the implications of this for both the town centre and the Harbour.

#### ***Actual Town Centre Site Capacity***

- 2.40 EBC has still not justified why the 3,000sq.m. allocation should be limited to this amount as a formal requirement.
- 2.41 Further to representations that we have made previously on this point, the accompanying Statement now produced by rCOH for SHL (**see Annex C,**) further shows how the proposed two main town centre allocation sites (Sites 2 and 3) can on their own accommodate a much larger amount of office space without undermining the Council's ambitions in respect of new housing provision. The size of the sites will also enable a choice of new office stock to be provided in the town centre.
- 2.42 This is notwithstanding any additional town centre sites that are available or may come forward, and for which provision is made to be investigated within the adopted Eastbourne Town Centre Local Plan (2013).
- 2.43 The development options available for the two sites can indeed include a mix of prime office types, which could include a new service centre or centres targeted at providing good value, flexible supported accommodation for new business start-ups, growing firms and in-movers, who need flexibility to respond to changing office requirements.
- 2.44 EBC and GVA emphasise the new innovation mall, Pacific House that is under construction on Site 6 at the Harbour. There however is no good reason why the Council should limit its ambitions to providing such serviced accommodation here and indeed many good reasons why the provision of additional facilities should also be provided within the town centre.
- 2.45 These include: the introduction of choice within the serviced office sector; proximity of town centre stock to a higher proportion of the town's existing and planned new resident population; accessibility generally; proximity to convenient business linkages; and overall environmental sustainability benefits, linked with a greater proportion of business related trips being able to be undertaken by non car means.
- 2.46 GVA and EBC still do not recognise the full potential of the town centre to provide replacement and enhanced office space. By restricting the strategic allocation for the town centre, will in effect limit the range of new office space that will be promoted and provided here.

**Sovereign Harbour Office Market**

- 2.47 EBC's consideration of the recent outline planning submission for the Harbour resulted in EBC officers accepting that Site 6 is the priority location for new office space at the Harbour.
- 2.48 They also set out a need for a market and not just design led approach to be taken when appraising the capacity of Site 6 to accommodate new office space; i.e. a market view must be taken of what level of space can be supported here.
- 2.49 With input from Seachange Sussex this highlighted that Seachange's expectations for Site 6 is for a relatively low density office-led campus which will require a high level of car parking provision in order to attract occupiers. i.e. they do not expect that Site 6 can support the full extent of office space that can be accommodated in physical space planning terms.
- 2.50 The outcome of this, through the legal agreement linked with the new outline planning permission for the Harbour, is that Site 6 is required to provide **at least 11,100sq.m. NIA of B1 space**. There is no requirement to provide a greater amount than this but it is possible that this can be increased.
- 2.51 Importantly, in terms of market expectations for the Harbour, Seachange Sussex originally sought for the allocation of Site 6 to be reduced to 10,000sq.m. NIA. This was only increased by EBC when officers accepted that the Site could physically accommodate more than this and that Sites 4 and 7a could not physically accommodate more to make up for any shortfall in what Site 6 delivers.
- 2.52 EBC has also sought clarification from ESCC Highways that a higher parking ratio will be accepted at the detailed design stage, above that set out within the outline scheme.
- 2.53 The following table provides a summary of the assumptions that were set out in the outline application for Site 6, which importantly **were agreed by EBC's Local Plans team in consultation on the proposals**, and the details ultimately negotiated by EBC officers once a **market-led view** had also been taken into account on Seachange Sussex's insistence.

Site 6 Space Planning	SHL Outline Planning Application Assumptions	Details Outlined by EBC / ESCC Highways in Consideration of Site 6's Development Potential	Difference
<b>B1 Floorspace</b>	15,000 sq.m. GEA  Equates to <b>12,750 sq.m.</b> NIA based on a 85% GE NIA ratio	Minimum 11,100 sq.m. NIA  There is no requirement to go above this.  This also represents a higher level than was originally sought which totalled just 10,000sq.m. NIA	1,650 sq.m. NIA additional space capacity over the Site 6 minimum space requirement.
<b>Parking Ratio</b>	ESCC optimum ratio 1 space per 35sq.m. of B1a	Applied 1 space per 25 sq.m. for the innovation mall  Consider 1 space per 30 sq.m. acceptable	Equates to a higher proposed parking provision which will require additional land take within Site 6 and demonstrates an expectation that car trips to the site will be high.

- 2.54 This points to the owners of Site 6 being very cautious about the market potential of the Harbour in terms of the quantum of space it can attract – a view that is consistent with the numerous market appraisals that have been undertaken of the employment land at the Harbour<sup>1</sup> and with the view consistently expressed by and on behalf of SHL.
- 2.55 The supplementary Statement that has been provided by Stiles Harold Williams (SHW) on behalf of SHL and that is appended to Submission Statement 1 of our representations, further addresses the key market considerations of the Harbour.
- 2.56 Given this input by EBC and Seachange and by SHW on behalf of SHL, this must be translated back into a realistic understanding and expectation of what will be delivered at the Harbour and then into what can and must be directed back to the town centre and potentially to other locations within the town, in order to meet EBC's forecast growth requirements alongside sustainable planning objectives.
- 2.57 As outlined above,
- the two town centre strategic allocation sites can accommodate the full 8,900 sq.m. NIA of floorspace assigned to Sites 4 and 7a at the Harbour, without prejudicing new housing provision.
  - this still leaves an allocation of **at least 11,100sq.m. NIA on Site 6** to be developed by 2027, which can be improved upon. This minimum requirement still equates to 70% of the town's total forecast requirement for additional new B1a floorspace.

#### ***Additional Alternative Scenarios***

- 2.58 Whilst EBC has added Town Centre Option 4a to its SA work, it has still not reappraised the additional development scenarios that provide further alternative options for the town.
- 2.59 Alongside appraising a higher allocation within the town centre, it is necessary to appraise the more mixed employment park that could be developed at the Harbour. As set out in our representations to the original SE/SEA 2013, this has clear sustainability benefits over an office only park at the Harbour.
- 2.60 Nor does EBC appraise the benefit of distributing office accommodation beyond the proposed two strategic locations of the town centre and Sovereign Harbour; for example, in favour of providing new space within additional locations that relate better to and form part of the Eastbourne Hailsham corridor. This is especially relevant given that EBC, throughout the ELLP related papers, consistently identifies the corridor as an established key economic driver for growth.

#### ***Scoring of Traffic and Related Environmental Impacts***

##### *Small Town Centre Office Allocation*

- 2.61 A reduced office stock in the town centre balanced by the provision of significant new space at the Harbour, will increase the level of cross commuting that is undertaken by car within and to Eastbourne.
- 2.62 Seachange's requirement to provide a high level of car parking on Site 6 confirms this expectation.
- 2.63 This in turn will result in linked environmental impacts associated with car travel.

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<sup>1</sup> Wealden and Eastbourne ELR 2008; South East Plan Panel Report August 2007; Sovereign Harbour Business Park Site Evaluation May 2007.

- 2.64 Whilst EBC acknowledges this in part, the scoring applied within the SA/SEA to a low town centre office allocation for impacts on traffic, air quality and other linked environmental impacts is not applied consistently.
- 2.65 If a consistent approach is correctly applied, the outcome will be a negative score for the town centre low allocation scenario for all such traffic and traffic related impact criteria.

*Higher Town Centre Office Allocation*

- 2.66 EBC again acknowledges some of the transport benefits that result from a higher town centre allocation but does not apply the scoring system logically when compared with the lower town centre allocation option.
- 2.67 The accessibility analysis of the town centre and Sovereign Harbour that was provided within the representations to the Initial Sustainability Appraisal is provided again here at **Annex D** for ease of reference. It demonstrates how the town centre compares so much more favourably than Sovereign Harbour in accessibility terms.
- 2.68 The sustainability benefits of the centre will improve even further when new planned housing is taken into account.
- 2.69 Whilst completions of new homes during the last monitoring year provide only a snapshot of new housing development, they do demonstrate that the town centre and its adjoining areas are delivering new housing in accordance with the more significant housing allocations that have been assigned to them.
- 2.70 In contrast, the adjoining neighbourhoods to the Harbour are assigned relatively small levels of housing growth through the current Plan period and completions are broadly following their allocations.
- 2.71 The relative sustainability benefits of the town centre are therefore set to increase even more when new housing allocations are also taken into account, i.e. which will concentrate even more people within walking / cycling / readily public transport access of the centre.

<b>Housing Allocations and Delivery 2013-14</b>					
<b>Town Centre and Neighbouring Neighbourhoods</b>			<b>Sovereign Harbour and Adjoining Areas</b>		
	<b>CSLP Allocation to 2027</b>	<b>Delivered 2013-14</b>		<b>CSLP Allocation to 2027</b>	<b>Delivered 2013-14</b>
Town Centre	1,190	36 (3%)	SH	150	0
Meads	358	69 (19%)	Langney	178	19 (11%)
Summerdown & Saffrons	40	1 (3%)	St Anthonys and Langney Point	25	6 (24%)
Upperton	399	2 (1%)			
Seaside	448	93 (21%)			
<b>Total</b>	<b>2,435</b>	<b>201 (8%)</b>	<b>Total</b>	<b>353</b>	<b>26 (7%)</b>

- 2.72 As demonstrated by the site capacity testing undertaken by rCOH, the development of Sites 2 and 3 within the town centre for part office development will not prejudice the delivery of new housing delivery in the centre.
- 2.73 In sustainability terms the maintenance of a good quality office stock and an improved level of stock within the centre will instead complement the new planned residential development and retain and locate more jobs within the Borough's most sustainable office location.

- 2.74 This must be borne out further within the SA/ SEA scoring that has been assigned by EBC to the higher town centre office scenario.

*High Office Allocation at the Harbour*

- 2.75 Whilst there are benefits to providing new employment at the Harbour, the extent of office development proposed that will require high levels of commuting from across Eastbourne and beyond the town, whilst the town centre is being planned to contract as an office hub, does not follow the logic and core objectives of sustainable development.
- 2.76 The relative weighting that EBC has given to the Sovereign Harbour option in the SA/SEA in this regard is still too high.
- 2.77 It downplays the significance of the high level of car travel that would be generated by a large office park of 20,000 sq.m. NIA and the linked environmental effects this would have on peak traffic congestion, such as associated air quality impacts.
- 2.78 It also does not consistently appraise other linked impacts that follow from the concentration of the high level of office space proposed in this fringe urban location (e.g. access to town's existing parks and the town's historic environment).
- 2.79 The new outline scheme for Sites 4, 6 and 7 indeed appraised the traffic and travel effects of the development of these sites on the local network.
- 2.80 This tested the effect of up to 25,268 sq.m. GEA of additional office space at the Harbour as the proposed maximum that might be physically accommodated on the three sites available, subject to the ELLP process. Of this total: 15,000sq.m. GEA was assumed to be located on Site 6; 6668sq.m. GEA on Site 7; and 3,600 sq.m. GEA on Site 4.
- 2.81 This level of development was appraised as resulting in a number of junctions outside of the Harbour approaching or exceeding the generally accepted thresholds for queuing and congestion (i.e. the St Anthony's Avenue Approach, the A259 Pevensey Bay Road junction and the Langney Rise junction).
- 2.82 These outcomes were considered against background traffic levels and projections and the impacts also being considered to be likely worst case scenarios. For instance the outcomes can be improved upon if work based journeys to the Harbour are more spread, following from the amount of office space being reduced in favour of other activities that result in different trip patterns.
- 2.83 East Sussex County Highways in its review of the outline planning scenarios confirmed the technical results presented but sought contributions towards a new Quality Bus Corridor (QBC) to connect between Sovereign Harbour and the town centre. This was to mitigate the impacts of peak commuter traffic and to promote more sustainable transport generally between the Harbour and the town centre.
- 2.84 The request for a financial contribution towards the QBC however could not be met on viability grounds.
- 2.85 This very clearly demonstrates:
- the actual expected effect of a large scale office development at the Harbour on the local network but also how

- in spite of this, due to viability constraints of such development in this location, the required mitigation scheme cannot be funded by the impacting development.

2.86 **EBC has not taken this further background and understanding into consideration as part of the ELLP SA/SEA review. The SA/SEA in its scoring of traffic and transport related issues are therefore flawed.**

### **3.0 SA / SEA Re-Appraisal**

- 3.1 EBC's scoring of the two town centre and one Sovereign Harbour allocation options is again provided here at **Annex A**. Our re-appraisal of these is at **Annex E** and our previous appraisal of the Mixed Employment Park option at the Harbour is reattached at **Annex F**.
- 3.2 Our re-appraisal takes into account a number of key assumptions that we consider have not been taken into account by EBC. Setting these from the outset should help to ensure consistency in the logic that is applied to the scoring of the options as well as help to focus on the core objective which is to clearly identify the most sustainable development option for the Borough. The core underpinning assumptions are:
- a. The town centre is inherently the most accessible location.
  - b. A larger allocation of space within the centre will place the greater amount of development within the easiest reach by the most sustainable transport means by the greatest number of people.
  - c. The town centre allocation sites are of a size, configuration and location that can accommodate a choice of modern, flexible new office space including for innovation and start-up businesses within supported business centre type environments.
  - d. Without new office accommodation being actively planned for, the centre's office stock will contract and the choice of accommodation available to occupiers within the town's most accessible location will reduce, resulting in job losses within the town centre and a weakening of business links, to the detriment of the wider town centre local economy and to the image of Eastbourne centre as a business and investment hub.
  - e. An allocations policy that reduces the town's office stock whilst pushing new stock to a fringe urban location will have significant transport and traffic related environmental effects. These negative attributes must be assigned to the low town centre allocation option as well as to the fringe allocation scenario. Only a higher town centre allocation will have positive transport related benefits.
  - f. Sovereign Harbour can accommodate office development but if this is of a scale and concentration that is so significant, its sustainability attributes will turn from positives to negatives. The right balance must be struck which is not achieved through EBC's proposed development scenario which will require the whole of Site 6, all of the upper floors of Site 4 and the majority if not all of Site 7a to be developed for B1 space.
  - g. This lack of balance will have significant transport impacts that cannot be mitigated by the development itself (*i.e. no contributions will not be made to the proposed QBC*)
  - h. The lack of balance of employment uses at the Harbour will also undermine its attractiveness for office occupiers due to its lack of on-site business support services. A more mixed park will be able to better address this (e.g. enabling a hotel and children's nursery to be provided).



3.3 EBC's assessment and the re-assessment provided here results in the following SA scores.

	<b>Scenario 4 Town Centre (3000sq.m.)</b>	<b>Scenario 4a (Town Centre Increased Office Provision)</b>	<b>Scenario 5 Sovereign Harbour 20,000sq.m. Allocation</b>	<b>Scenario 5A Sovereign Harbour Reduced Allocation within Mixed Employment Park</b>
<b>EBC Updated SA 2014</b>	25	23	15	Not Assessed
<b>Teal Planning Re- Appraisal 2015</b>	-7	+40	+10	+19

3.4 Leading from this, if both EBC and Teal Planning's appraisals are translated into office space allocations that should be assigned to the Town Centre and the Harbour on sustainability grounds, **the weighing must be in favour of a higher allocation for the town centre.**

3.5 If the weighing of the sustainability scores given to these two locations is assigned proportionality to the total 23,000sq.m. NIA of office space that is being planned for, this would result in new space allocations as follows.

	<b>Scenario 4 Town Centre (3000sq.m.)</b>	<b>Scenario 4a (Town Centre Increased Office Provision)</b>	<b>Scenario 5 Sovereign Harbour 20,000sq.m. Allocation</b>	<b>Total Sq. m</b>
<b>EBC Updated SA 2014</b>	25 (62%)		15 (38%)	(40) (100%)
<b>Sq.m.</b>	<b>14,260 sq.m.</b>		<b>8,740 sq.m.</b>	<b>23,000</b>
<b>Teal Planning Re-Appraisal 2015</b>		+40 (80%)	+10 (20%)	(50) (100%)
<b>Sq.m.</b>		<b>18,400 sq.m.</b>	<b>4,600 sq.m.</b>	<b>23,000</b>

3.6 Sustainability testing and market reservations about the actual potential of the office market at the Harbour both point to a reduced allocation of B1a space here, significantly below the 20,000sq.m. NIA proposed by EBC.

3.7 In market terms, SHL has very strong reservations about the potential for the Harbour to accommodate a substantial amount of office space at the Harbour. EBC officers and Seachange Sussex, in applying a market view to the actual capacity of Site 6, also share these reservations, which have rang through all of the independent appraisals that have been undertaken of the Harbour.

3.8 An allocation of at least 11,100 sq.m. NIA on Site 6 at the Harbour to reflect the new outline permission for the Site, with Sites 4 and 7a released of any policy requirement to deliver a specified amount of B1a space, will still go over and above what the sustainability testing and market views suggest should be directed here.

3.9 Nonetheless such an allocation will set EBC and Site 6's other promoters an ambition (and challenge) to achieve this minimum amount and to establish an office park that EBC wishes to see here.

3.10 Allowing other uses on Sites 4 and 7a alongside this allocation will provide better support to Site 6 and improve its chances of being built out fully for B1 space and of retaining the occupiers who are attracted here.

- 3.11 In setting an allocation for the Harbour however this must not be to the full detriment of achieving sound sustainable planning objectives or to meeting the needs of the Eastbourne office market.
- 3.12 The allocation of new office space to the town centre must be increased in order to (1) ensure space that is lost within the town centre is replaced in the centre, (2) to ensure that the amount, quality and choice of the town centre stock is improved upon, and (3) sustainable policy objectives are still met.

#### 4.0 **Summary and Required Changes**

4.1 The inconsistencies that have been applied to the scoring of the different development options, the failure to take account of relevant evidence and market indicators, and the failure to appraise all relevant alternative options mean that the SA:

- has **not been positively prepared**; and
- that the proposed allocations policy that it concludes should be adopted **has not been justified** and will **not be effective** in sustainability or in sound planning terms.

4.2 The Proposed Submission Sustainability Appraisal Report is therefore **Unsound**.

4.3 A reassessment of the SA/SEA based upon EBC's own evidence base and the application of a consistent and logical scoring of the different scenarios tested, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.

4.4 A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here and that shall have less transport impacts, also has more significant benefits for Eastbourne, the Harbour and its new occupiers.

4.5 A higher office allocation for the town centre and mixed employment allocation for the Harbour also fits with:

1. the physical capacity that exists within the town centre to accommodate more office accommodation.
2. a less ambitious but more realistic and deliverable market expectation of what the Harbour sites can accommodate in terms of new office space.

4.6 **The SA must be reappraised on this basis.**

4.7 This supports our core objections to the current draft ELLP that are set out within accompanying Submission Statement 1 on behalf SHL.

**ANNEX A**

**ELLP PROPOSED SUSTAINABILITY APPRAISAL REPORT**

**NOVEMBER 2014**

**EBC TABLE 4 SUMMARY OF APPRAISAL OPTIONS**



Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development
CS1	To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✘✘	○	✘	○	✓
CS2	To improve the health and well-being of the population and reduce inequalities in health	○	○	○	○	○	○	○
CS3	To reduce poverty and social exclusion and to close the gap between the more deprived areas in the Borough and the rest of the town	○	✓	○	○	○	○	✓
CS4	To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work	○	○	○	○	○	○	○
CS5	To reduce crime and the fear of crime	○	○	○	○	○	○	○
CS6	To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town	○	○	✓	○	○	✓	✓
CS7	To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	✓	✘	✓	✓	✓✓	✘	✘
CS8	To develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth	✓	✓✓	✓	✓✓	✓	✓✓	✓
CS9	To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth	✓	✓	✓	✓✓	✓✓	✓✓	✓
CS10	To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities	✓	✓✓	✓	✓	✓	✓	✓
CS11	To develop and maintain a skilled and adaptable workforce to match local employment opportunities	✓	✓	○	✓	✓	✓	✓
CS12	Conserve and enhance the Borough's biodiversity and landscape, and ensure species sustainability	✓	✘✘	○	○	○	✘	✘✘
CS13	To protect, enhance, exploit the learning potential and make accessible for enjoyment by	○	○	○	○	○	○	✘✘

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development
	sustainable modes of transport the Borough's parks, gardens, countryside, recreation areas and historic environment							
CS14	To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	✓✓	✗✗	✓✓	✓✓	✓✓	✓✓	✗✗
CS15	To maintain and enhance the quality of landscapes and townscapes	✓	✗	✓	0	0	0	✗✗
CS16	To reduce air pollution and ensure air quality continues to improve	✗	✗	✗	✗	0	✗	✗
CS17	To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment	0	✗✗	0	0	0	0	✗✗
CS18	To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	0	✗✗	0	0	0	✗	✗✗
CS19	To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change	✗	✗✗	✗	✗	0	✗	✗✗
CS20	To reduce road congestion and pollution levels by encouraging mixed-use development, traffic calming measures, improving travel choice, reducing the need for travel by car, and shortening the number, length and duration of journeys	0	0	✗	✓	✓✓	✗	✗
CS21	To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting	?	?	?	?	?	?	?
CS22	Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	?	?	?	?	?	?	?
EL-SA1	To promote sustainable economic growth	✓	✓✓	✓	✓✓	✓	✓✓	✓✓
EL-SA2	To maximise use of existing employment land	✓✓	✗✗	✗	0	0	✓	✗✗
EL-SA3	To diversify the local economy and support businesses across a range of sectors	✓	✓✓	✓	✓✓	✗	✓✓	✓✓
EL-SA4	To increase the overall number of business enterprises operating in the town	✓	✓	✓	✓✓	0	✓	✓

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development
EL-SA5	To promote and encourage business start ups and small businesses	✓✓	✓	✓✓	✓	✓	✓✓	✓
EL-SA6	To increase the number and range of employment opportunities in the town	✓✓	✓✓	✓	✓✓	✓	✓✓	✓
EL-SA7	To support existing businesses to continue trading in Eastbourne	✓	✓✓	✓	✓✓	✓	✓✓	✓✓
EL-SA8	To improve local business linkages	✓✓	✓✓	✗	✓	✓✓	0	✗
EL-SA9	To reduce economic deprivation in the resident population	✓	✓	✓	✓	✓	✓	✓
EL-SA10	To increase the average incomes of residents in the town	0	✓✓	0	✓✓	✓	✓	✓
EL-SA11	To reduce levels of unemployment	✓	✓	✓	✓	✓	✓	✓
EL-SA12	To ensure no adverse impact on the road network	✗	✗	✗	0	✓✓	✗	✗
EL-SA13	To provide employment opportunities in locations that are accessible for local people and commuters	✓	✓	✗	✓	✓✓	✗	✗
EL-SA14	To reduce resource use from commercial & industrial premises	?	?	?	?	?	?	?
EL-SA15	To reduce the impact of noise from commercial premises on residential areas	✓	✓	✗	0	0	✗	?
<b>Score</b>		<b>23</b>	<b>10</b>	<b>7</b>	<b>25</b>	<b>23</b>	<b>15</b>	<b>-3</b>





**ANNEX B**

**TOWN CENTRE VS SOVEREIGN HARBOUR LOCATION BENEFITS**



## Cineworld to pull out of Sovereign Harbour



Cineworld revealed this week it would be pulling out of Sovereign Harbour to move to the heart of Eastbourne to take up pride of place in the new extension at the Arndale Centre.

The move into a brand new purpose-built digital cinema will take place in late 2017 or early 2018, once the Arndale extension is completed.

Cineworld says it hopes to continue operating from its current site in the Sovereign Harbour Retail Park and is aiming for a seamless transition into its new home. The company has approached its current landlord to achieve this outcome and says that will ensure film-lovers in Eastbourne and the surrounding area will continue to have access to a wide range of films and event cinema.

Cineworld's Kevin Frost said, "Sovereign Harbour has been a great home for us over the years and we have been made to feel very welcome by the community there. But we now feel the time is right to take up a more central location within the town and we are delighted to be moving into the new Arndale extension towards the end of 2017 or early 2018.

"By continuing to trade until our moving date we will both safeguard jobs and continue to offer the people of Eastbourne a welcoming cinema to watch all the latest movies."

News of the Cineworld move was welcomed as a giant leap forward for the town centre's evening economy by politicians from the two main parties.

Eastbourne MP Stephen Lloyd said, "This will quite simply revolutionise the evening life-style of the town centre. We will have seven new restaurants on the first floor of the Arndale extension, a brand new cinema to entice people of all ages to come into the town centre and all this will increase trade for all our town centre restaurants. This is great news for our town."

Conservative councillor David Elkin said he would be sad to see Cineworld leaving Sovereign Harbour, but hoped it would be able to continue trading there for at least another three years.



**ANNEX C**  
**TOWN CENTRE SITES 2 AND 3**



# **The Employment Land Local Plan**

## **Proposed Submission Version**

### **Sites 2 & 3**

Capacity study and policy review  
January 2015





## Introduction

The purpose of this study is to demonstrate the development capacity for employment uses on two sites in Eastbourne town centre and comment on their contribution to the Employment Land Local Plan. It includes illustrative layouts, site areas and building areas that have been prepared and calculated using OS Vectormap.

The two sites are referred to as Site 2 and Site 3 using the same designation as in Eastbourne Borough Council's Proposed Policy 6: EL3 : Town Centre

Given their scale and location there is the potential for these sites to make a significant contribution to (the regeneration of) the town centre. They form a key element in realising the potential for a vibrant, mixed use quarter around the station which would provide a more attractive employment offer for Eastbourne. The successful development of these sites will have wider, positive impacts for the town centre and Eastbourne.

This is a key area of the town centre that demands an approach that is ambitious and deliverable and any proposals for redevelopment need to consider not just capacity and use, but also the urban design context and placemaking.

## Site 2

### The urban design context

Site 2 is located on the northern side of Eastbourne railway station which is in the town centre and part of the main shopping and retail area around Terminus Road. It is also part of an established town centre administration and office hub with a number of existing office uses and businesses in nearby streets including the Council offices in Grove Road opposite the site.

Eastbourne has a relatively compact and attractive town centre with clearly defined elements including the station and the main shopping area in and around the Arndale Centre which is adjacent to the station.

A £90 million plan to transform the Arndale Centre was approved in May 2014 which will provide up to twenty four new shops in an extension between the existing Arndale Centre and the railway station, seven new restaurants and a multiplex cinema.

In addition to this, Eastbourne Borough Council have developed plans for significant public realm improvements to the pedestrian environment along Terminus Road around the station area that are aimed at delivering an improved environment that is "*befitting a key gateway into the Town Centre*". These improvements are planned to be carried out alongside the Arndale Centre extension.

The implementation of both schemes will increase the attractiveness, value and accessibility of the station site.

### The site

The station site is currently characterised by a combination of uses that have developed in an unplanned way and fail to make the most of the opportunities for this area to be an attractive town centre hub. Apart from the station and enterprise centre building, both of which have character and some historic value, the remainder of the site is an unattractive backland given over to parking, storage and other lower grade uses that makes a poor setting for the arrival into Eastbourne by train.

**Land use:** the northern edge of the site is bounded by a mix of commercial and residential uses along St Leonards Road and Commercial Road, with the commercial uses generally being low grade in poor quality buildings. The exception to this is the Enterprise Centre which is a large scale Victorian industrial shed occupied by small scale craft and retail businesses, and the three storey building block fronting Upperton Road with commercial uses at ground level. The Enterprise Centre, set back behind the Upperton Road block, has no street frontage and is set in a large unattractive car park area.

**Access:** the main vehicular access to the parking area is off Terminus Road with a drop off for the station, with a further vehicular access to the parking area opposite St Anne's Road at the St Leonards Road and Commercial Road junction.

**Parking:** There are around 232 parking spaces serving the station, mostly in one large block on the northern side. There are also a number of other parking areas to the east of these serving adjacent commercial premises and storage areas. There are two large multi storey car parks within 200m of the station (3 – 4 minutes walk).

Along the southern side of the station there is an extensive covered area which is limited to pick up and drop off, but otherwise unused.

### Capacity

In considering the development capacity of this site, the following assumptions have been made: **vehicular access will remain unchanged**, the **Enterprise Centre** and the buildings fronting Upperton Road will be **retained** and **station parking** will be **re-provided in its current location at 150 – 200 spaces**, depending on the level of development.

The layout shown in **illustration 1** is based on a development framework that builds on the public realm improvements proposed by Eastbourne Borough Council and creates a more attractive setting for the station and a new employment hub with the following:

- 1 A landscaped 'station square' retaining disabled parking and drop off
- 2 Additional employment space (Block A) as extension/addition to Enterprise Centre
- 3 New employment space (Block B) as bookend to station square
- 4 Redeveloped building (Block C) as employment/mixed use and improved gateway to station square
- 5 New employment space (Block D) as bookend to parking square
- 6 Landscaped parking square
- 7 New employment space (Blocks E1 – E4) as railway edge, gateway
- 8 Landscaped 'green link' as railway edge, gateway and pedestrian route to station square
- 9 Landscaped buffer to existing residential edge
- 10 Potential for an additional 100 parking spaces plus a pick up and drop off area in the underused covered station area

This framework would completely change the character of the area, making it more attractive to potential tenants and providing a structure for the phasing and development of the site. It will also improve the approach to the station and the amenity of existing local residents. There will be a balance to be struck between the amount of parking to be retained to serve the station, the amount of new development and its parking and the space given over to landscape, and there is the flexibility in this approach to adapt to changing circumstances and market demands.

The illustrative framework has been used to produce the schedule of accommodation below which takes a balanced view of the site's capacity. There are a number of other possible layouts and design approaches each of which would be capable of delivering a similar level of development:

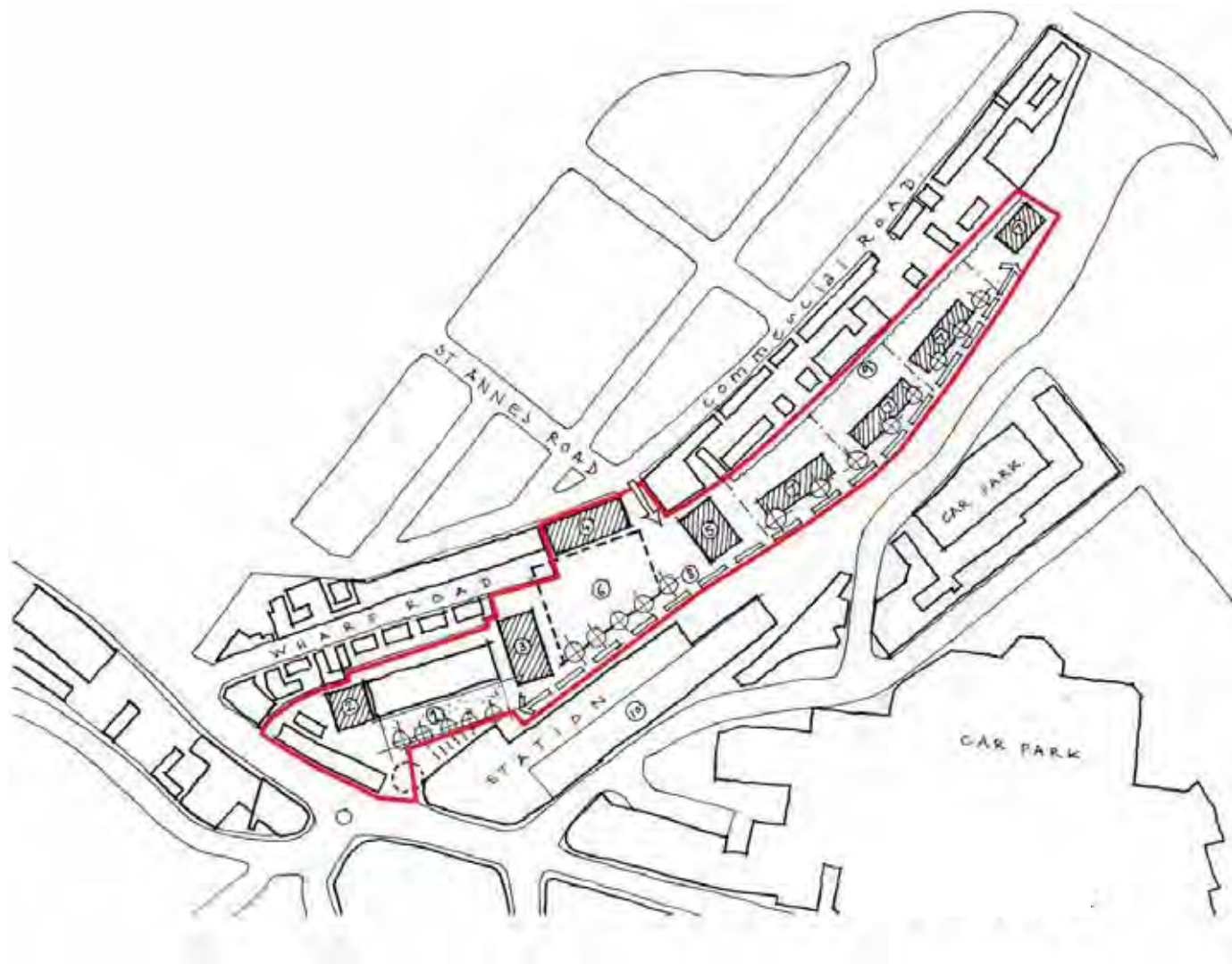


Illustration 1: Site 2 - Station Site

KEY

- 1 Landscaped 'station square'
- 2 Block A
- 3 Block B
- 4 Block C
- 5 Block D
- 6 Landscaped parking square
- 7 Blocks E1 – E4
- 8 Green Link
- 9 Landscaped buffer
- 10 Additional parking spaces

**Schedule of accommodation: option A – employment**

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Block A:	400m <sup>2</sup> x 3 floors - 1,200m <sup>2</sup> GFA	B1a, studios, start up
Block B:	675m <sup>2</sup> x 3 floors - 2,025m <sup>2</sup> GFA	B1a
Block C:	936m <sup>2</sup> x 3 floors - 2,808m <sup>2</sup> GFA	B1a, studios, start up, live/work
Block D:	450m <sup>2</sup> x 3 floors - 1,350m <sup>2</sup> GFA	B1a, studios, start up
Block E1:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E2:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E3:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E4:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up

**Total** **10,263m<sup>2</sup> GFA**  
**8,724 m<sup>2</sup> NIA**

(NOTE: NIA based on 85% net/gross)

**Schedule of accommodation: option B – employment and residential**

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For this option it has been assumed that blocks D and E1 to E4 would be residential, with the remainder for employment uses as option 1, located on the south part of the site as set out in paragraph 4.27 of the ELLP

Block A:	400m <sup>2</sup> x 3 floors - 1,200m <sup>2</sup> GFA	B1a, studios, start up
Block B:	675m <sup>2</sup> x 3 floors - 2,025m <sup>2</sup> GFA	B1a
Block C:	936m <sup>2</sup> x 3 floors - 2,808m <sup>2</sup> GFA	B1a, studios, start up
Block D:	450m <sup>2</sup> x 3 floors - 1,350m <sup>2</sup> GFA	residential
Block E1:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E2:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E3:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E4:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential

**Total** **6,033m<sup>2</sup> GFA employment**  
**5,128m<sup>2</sup> NIA**

**5,670m<sup>2</sup> GFA residential (up to 74 dwellings, 2-bedroom)**

(NOTE: Residential numbers based on 85% net/gross & 65m<sup>2</sup> unit sizes)

## **Conclusion**

This is an important and undervalued site in terms of its location and the contribution it could make to the setting and character of the town centre and the perception of those arriving by rail. It has the capacity for, and requires a level of development that is sufficient to make a significant change if its potential is to be realised.

This capacity study, although not a definitive design proposal, gives a sensible indication of the scale of development that could be achieved and is likely to be required to realise the site's potential and provide a more attractive and flexible town centre employment offer.

## Site 3

### The urban design context

This site occupies a landmark position in the town centre where a number of roads come together and has a visual relationship with both the railway station and the council offices. The block provides an architectural waypoint at this junction with Grove Road heading south towards the seafront and Upperton Road north west to Old Town. The block also marks the boundary between the town centre and the residential areas to the west and south, with the eastern part opposite the station and site 2 as described above. The building at the south eastern end of this block, which is to be retained and is of architectural merit, sets a standard for the scale and character of the redevelopment of the rest of the site. The character of Upperton Road along this stretch is larger scale with five and six storey buildings, whereas the southern side of the site is part of a more domestic, smaller scale setting of Southfields Road.

**Land use:** the site is occupied by a mix of building types with the majority taken up by the post office building and an associated parking/service area. The post office building is of architectural merit, and although for this exercise it has been assumed that the whole of the site could be redeveloped, this building could be retained and converted without making a significant difference to the development capacity. The north western part of the site is occupied by a more modern two storey building that has been vacant and on the market for a few years.

**Access and parking:** There are five existing vehicular access points to the parking and service areas off Southfields Road with two off Upperton Road serving the vacant building on the north western part of the site. There is also a level difference between Southfields Road and Upperton Road such that the parking areas sit below the level of Upperton Road. The station is approximately 100m from the eastern part of the site and there are two large multi storey car parks approximately 400m from the site (4 – 5 minutes walk).

### Capacity

In considering the development capacity of this site, the following assumptions have been made: **building scale will be four storeys** in line with the retained corner building and the general context, **building blocks will be 18m deep** with a footprint to allow for **parking and landscape setting**, **existing vehicular access** will be used, level difference between Southfields Road and Upperton Road can be used to accommodate **undercroft parking**.

The layout shown in **illustration 2** is based on developing the site as three plots which relate to the existing buildings and ownerships giving the following:

- 1 Redevelopment of post office building (Block A) retaining street frontage with vehicle access off Southfields Road and undercroft parking. Four storeys with setback upper floor. A class uses at ground floor, B1 uses on upper floors
- 2 Redevelopment of post office parking/service yard (Block B) continuing street frontage with vehicle access off Southfields Road and undercroft parking. Four storeys with B1 uses on lower two floors and residential on upper floors
- 3 Redevelopment of vacant building site (Block C) continuing street frontage with vehicle access off Upperton Road and undercroft parking. Four storeys all residential

This framework has the flexibility to be developed in a number of other different employment/residential mixes to meet market demands. For this study a split of around 50/50 has been assumed which reflects the change from commercial to residential along Upperton Road. There are a number of other possible layouts each of which would be capable of delivering a similar level of development:

### Schedule of accommodation

Block A: 864m<sup>2</sup> x 4 floors = 3,456m<sup>2</sup> GFA

A1/A3 846m<sup>2</sup>

B1a 2,538m<sup>2</sup>

Block B: 900m<sup>2</sup> x 4 floors = 3,600m<sup>2</sup> GFA

B1a 1,800m<sup>2</sup>

Residential 1,800m<sup>2</sup>

Block C: 1,080m<sup>2</sup> x 4 floors = 4,320m<sup>2</sup> GFA

Residential 4,320m<sup>2</sup>

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**Total 11,376m<sup>2</sup> GFA**

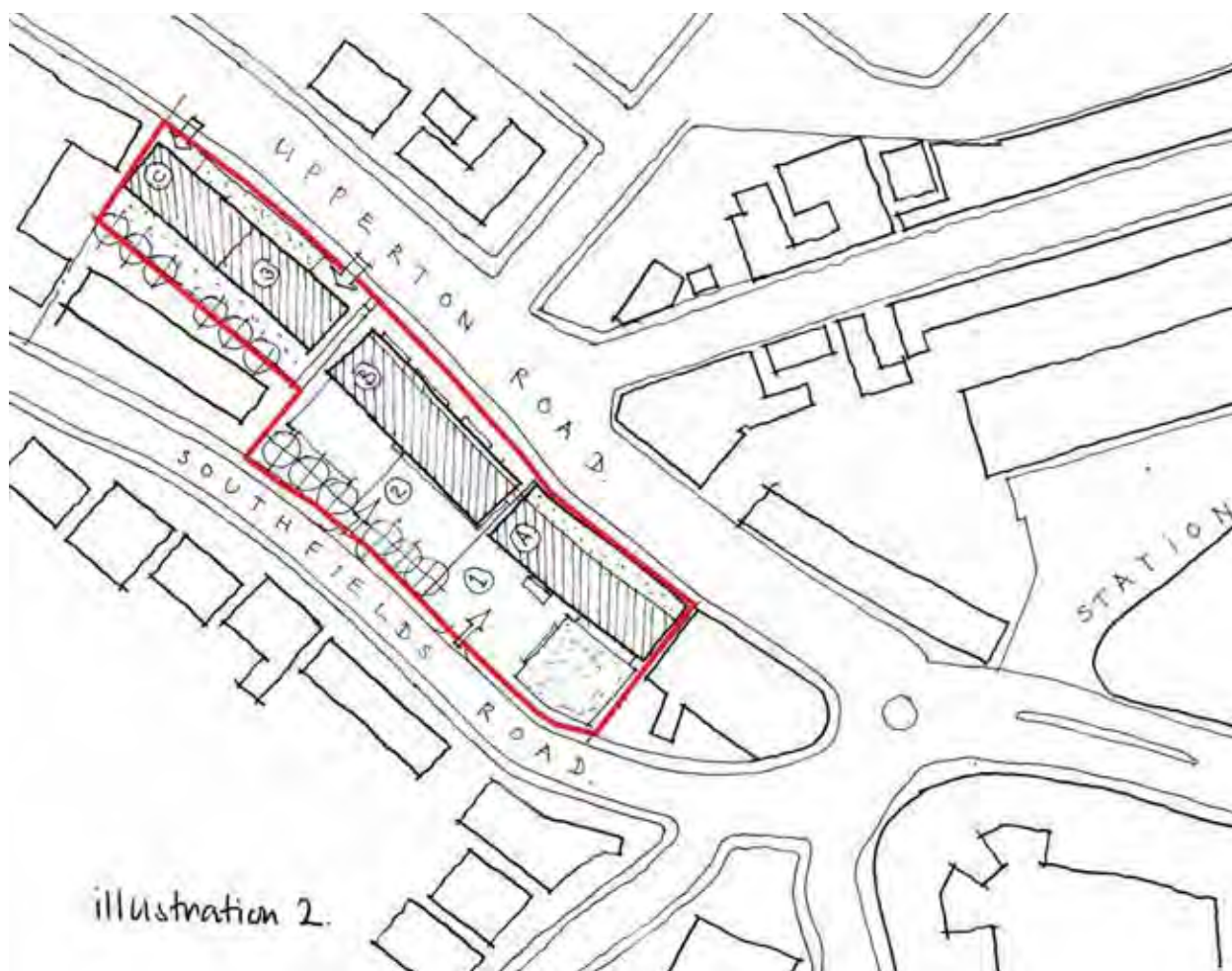
**846m<sup>2</sup> GEA / 720m<sup>2</sup> NIA - A1/A3**

**4,338m<sup>2</sup> GEA / 3,687m<sup>2</sup> NIA - B1**

**6,120m<sup>2</sup> – Residential (up to 80 dwellings, 2-bedroom)**

NOTE: Residential numbers based on 85% net/gross & 65m<sup>2</sup> unit sizes  
Employment NIA based on 85% net/gross





**Illustration 2: Site 3 – Southfields Road Site**

## Conclusion

The mixed use development of this site with three or more separate building blocks would provide the flexibility for the development to meet market demands and to be adaptable over the long term. There would be additional value in having employment related uses on the parts of the site closest to the town centre and for the station site opposite. All uses would benefit from the proximity of the railway station and would contribute to the vibrancy of the station site if it were to be redeveloped as described above. In terms of town centre planning development it would be expected that a masterplan would be prepared as a basis for exploring the collective potential of both sites, and assessing their capacity and mix of uses.

## Summary

The level of development proposed in the town centre at an additional 3,000m<sup>2</sup> would be insufficient to establish a new employment offer that would attract new investors, tenants, businesses and employers.

If delivered on sites 2 and 3 it would equate to a small three storey building with a footplate of about 15m x 33m which would be next to insignificant on both sites and would be nowhere near enough to generate either a sense of place or an employment offer that has enough critical mass to attract businesses and meet the 'in town vibrancy and wider amenity' (as aspired to in **paragraph 4.21. of the Employment Land Local Plan - Proposed Submission Version**).

The Plan should provide for a wider range of users than just 'start ups' if it is to "broaden the stock types available and attract greater levels of demand over the plan period" as stated in **paragraph 4.22**. It needs good quality follow on space too to provide a more rounded, more attractive offer that will give 'vibrancy' and somewhere for start-ups to grow into. It needs to create critical mass and variety, which would be impossible with a couple of small buildings over the Plan period.

Given the "considerable constraints" and "very limited supply of developable land that Eastbourne suffers" (**paragraph 2.25**), Sites 2 and 3 offer an excellent opportunity to achieve this and the following **objectives** of the **Employment Land Local Plan - Proposed Submission Version**, to;

Provide "**flexible, 'mixed' units** that allow businesses to have combined office, workshop and production space within one building". (**Paragraph 2.14**)

"further the **development of 'clusters'**.... as an opportunity to grow existing specialisms through promotion and provision of appropriate space". (**Paragraph 3.12**)

"**maintain the role of offices as a key town centre use and sustain the vibrancy and vitality of the town centre**, but also to **broaden the stock types available** and attract greater levels of demand over the plan period." (**Paragraph 4.22**)

**Resist "The loss of office stock within the Town Centre"** (**Paragraph 4.30**)

(Because the Town Centre is under additional pressure of loss of employment space, through residential conversion, an additional allowance, or increased 'headroom' should be made as part of the Plan.)

A more comprehensive development of these two sites will also meet the following **Vision Objectives** set out in **paragraph 2.42** of the Employment Land Local Plan - Proposed Submission Version, which taken together are more or less a brief for creating a mixed business quarter around the station;

- **ELLP2 - Encourage Small and Start-up Businesses** - To deliver a variety of new employment opportunities by providing a range of flexible employment spaces that can be used by existing businesses and new start-up businesses
- **ELLP3 - Diversify the Local Economy** - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish
- **ELLP4 - Support Existing Businesses** - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.
- **ELLP5 - Promote Sustainable Employment Locations** - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.

The allocation of only 7% of the employment requirement over the Plan period to the Town Centre (paragraph 3.10) seems to fly in the face of the Plans overall objectives, and if adopted could prove to be detrimental to future prosperity of the Town Centre.

#### Summary tables:

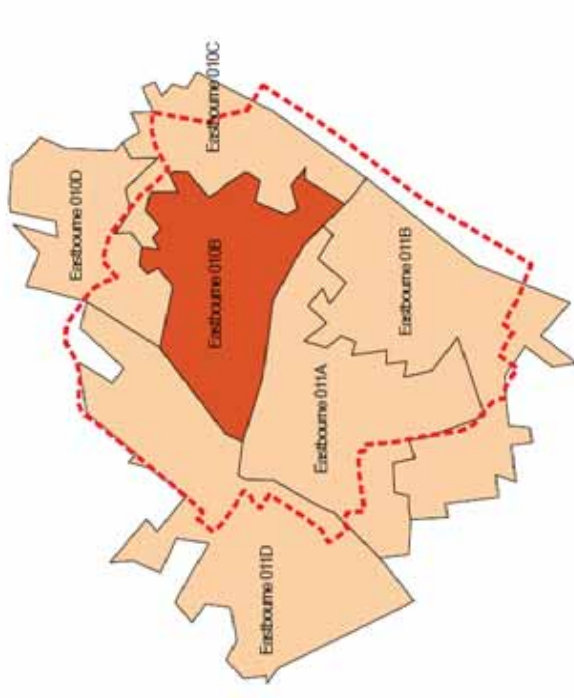
<b>Option A: employment uses only on Site 2; mixed use on Site 3</b>					
	<b>office</b>		<b>commercial</b>		<b>residential</b>
	<b>GFA</b>	<b>NIA</b>	<b>GFA</b>	<b>NIA</b>	
Site 2	10,263	8,724	-	-	-
Site 3	4,338	3,687	846	720	80
<b>Total</b>	<b>14,601m2</b>	<b>12,411m2</b>	<b>846m2</b>	<b>720m2</b>	<b>80</b>

<b>Option B: employment and residential on Site 2, mixed use on Site 3</b>					
	<b>office</b>		<b>commercial</b>		<b>residential</b>
	<b>GFA</b>	<b>NIA</b>	<b>GFA</b>	<b>NIA</b>	
Site 2	6,033	5,128	-	-	74
Site 3	4,338	3,687	846	720	80
<b>Total</b>	<b>10,371m2</b>	<b>8,815m2</b>	<b>846m2</b>	<b>720m2</b>	<b>154</b>

(Study prepared by Brendan O'Neill BA Hons, Dip AA who is a registered architect and director or rCOH)

**ANNEX D**  
**TOWN CENTRE AND SOVEREIGN HARBOUR**  
**SUSTAINABLE NEIGHBOURHOOD ASSESSMENT DATA**





LSOA11NM	Population Census 2011	Working Age People (16-74)	All working	Work mainly at or from home	Public transport	Private vehicle	Foot or cycle	Other
<b>Eastbourne 010B</b>	<b>1990</b>	<b>1671</b>	<b>1036</b>	<b>35</b>	<b>175</b>	<b>423</b>	<b>390</b>	<b>13</b>
Eastbourne 010C	2035	1693	1050	41	183	412	405	9
Eastbourne 010D	1686	1274	887	35	114	453	280	5
Eastbourne 011A	1843	1441	998	64	186	387	357	4
Eastbourne 011B	1721	1135	658	47	89	285	225	12
Eastbourne 011D	1700	1201	758	41	144	358	210	5
<b>Total</b>	<b>12609</b>	<b>9558 (76%)</b>	<b>6057 (48%)</b>	<b>320 (3%)</b>	<b>977 (8%)</b>	<b>2601 (21%)</b>	<b>2101 (17%)</b>	<b>58 (1%)</b>



LSOA11NM	Population Census 2011	Working Age People (16-74)	All working	Work mainly at or from home	Public transport	Private vehicle	Foot or cycle	Other
Eastbourne 014B	1578	1226	777	66	65	589	50	7
Eastbourne 014D	1338	1107	772	50	96	586	35	5
Eastbourne 013E	2004	1449	929	40	88	711	85	5
Eastbourne 014A	2455	1856	1216	80	118	893	107	18
Eastbourne 014C	1600	1140	658	36	77	470	71	4
Eastbourne 013C	1457	970	641	20	50	497	74	0
Eastbourne 013D	1412	986	533	17	43	422	50	1
Total	11844	8734 (76%)	5526 (47%)	309 (3%)	537 (5%)	4168 (35%)	472 (4%)	40 (0.2%)

**ANNEX E**

**EBC ELLP PROPOSED SUSTAINABILITY APPRAISAL REPORT**

**NOVEMBER 2014**

**RE-APPRAISAL OF THE**

**TOWN CENTRE AND SOVEREIGN HARBOUR OPTIONS**





Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development	Comment
CS1	To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home	✓	✓	✘✘	○	○	○	✓	A higher town centre allocation will not undermine new housing delivery
CS2	To improve the health and well-being of the population and reduce inequalities in health	○	○	○	○	○	○	○	
CS3	To reduce poverty and social exclusion and to close the gap between the more deprived areas in the Borough and the rest of the town	○	✓	○	○	○	○	✓	
CS4	To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work.	○	○	○	○	○	○	○	
CS5	To reduce crime and the fear of crime	○	○	○	○	○	○	○	
CS6	To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town	○	○	✓	○	○	○	✓	An office allocation at the Harbour will have not greater impact on local governance than town centre allocations
CS7	To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	✓	✘	✓	X	✓✓	✘	✘	Net office provision in the town centre will reduce and accessibility to town centre services will be undermined as more commuters are pushed to the Harbour
CS8	To develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth	✓	✓✓	✓	X	✓✓	X	✓	A low town centre and high Harbour allocation will have high transport impacts and negative impacts on business linkages. A higher town centre allocation will maintain the centre's office stock and its trading strength and vitality
CS9	To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth	✓	✓	✓	✓✓	✓✓	✓✓	✓	
CS10	To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities	✓	✓✓	✓	X	✓	✓	✓	Net office provision in the town centre will reduce with the ability to support jobs within the low impact location of the town centre
CS11	To develop and maintain a skilled and adaptable workforce to match local employment opportunities	✓	✓	○	X	✓	✓	✓	
CS12	Conserve and enhance the Borough's biodiversity and landscape, and ensure species sustainability	✓	✘✘	○	○	○	✘	✘✘	
CS13	To protect, enhance, exploit the learning potential and make accessible for enjoyment by	○	○	○	X	✓✓	✓	✘✘	<p>A low office allocation will result in a net loss of office provision in the town centre.</p> <p>A higher town centre allocation will maintain and enhance supply and choice within the most sustainable location.</p> <p>ii. The allocation sites at the Harbour provide access to beaches and the harbour but not to the Borough's main existing parks, gardens and historic environment</p>

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development	Comment
	sustainable modes of transport the Borough's parks, gardens, countryside, recreation areas and historic environment								
CS14	To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	✓✓	✖✖	✓✓	✓✓	✓✓	✓✓	✖✖	
CS15	To maintain and enhance the quality of landscapes and townscapes	✓	✖	✓	v	v	v	✖✖	All options will use brownfield sites and improve their townscapes.
CS16	To reduce air pollution and ensure air quality continues to improve	✖	✖	✖	✖	v	✖	✖	A higher town centre allocation will reduce car travel and its linked impacts. This score is consistent with EBCs for CS20
CS17	To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment	0	✖✖	0	0	0	0	✖✖	
CS18	To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	0	✖✖	0	0	0	✖	✖✖	
CS19	To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change	✖	✖✖	✖	✖	v	✖	✖✖	A higher town centre allocation will reduce car travel and its linked impacts. This score is consistent with EBCs for CS20
CS20	To reduce road congestion and pollution levels by encouraging mixed-use development, traffic calming measures, improving travel choice, reducing the need for travel by car, and shortening the number, length and duration of journeys	0	0	✖	x	✓✓	✖	✖	This score is consistent with EBCs for CS16 and CS20. A low town centre allocation will result in a net reduction of the town centre stock and more off-commuting by car.
CS21	To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting	?	?	?	?	?	?	?	
CS22	Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	?	?	?	?	?	?	?	
EL-SA1	To promote sustainable economic growth	✓	✓✓	✓	x	v	v	✓✓	A low town centre allocation will result in a net reduction in stock within the most sustainable location and on existing employment land.
EL-SA2	To maximise use of existing employment land	✓✓	✖✖	✖	x	v	✓	✖✖	A higher town centre allocation will enhance provision in the more sustainable location on sites that are in part in employment use. The new supply will complement and extend the range of the centre's existing stock.
EL-SA3	To diversify the local economy and support businesses across a range of sectors	✓	✓✓	✓	x	v	v	✓✓	
EL-SA4	To increase the overall number of business enterprises operating in the town	✓	✓	✓	x	v	✓	✓	An allocation at Sovereign Harbour will provide new part replacement space but not in the more accessible location or where linkages can be maximised.

Sustainability Objective		Scenario 1: Intensification of Industrial Estates	Scenario 2: Extensions to Industrial Estates	Scenario 3: Redevelopment of sites outside Industrial Estates	Scenario 4: Town Centre	Scenario 4A: Town Centre (Increased provision of office)	Scenario 5: Sovereign Harbour	Scenario 6: Greenfield development	Comment
EL-SA5	To promote and encourage business start ups and small businesses	✓✓	✓	✓✓	✓	vv	✓✓	✓	A higher office allocation will provide scope to provide supported serviced business accommodation for new start up within the town centre, providing choice alongside the Mall at the Harbour and in the most accessible location in the town with the strongest business linkages.
EL-SA6	To increase the number and range of employment opportunities in the town	✓✓	✓✓	✓	x	vv	✓✓	✓	
EL-SA7	To support existing businesses to continue trading in Eastbourne	✓	✓✓	✓	x	vv	✓✓	✓✓	A lower town centre allocation will result in a net loss of space overall.
EL-SA8	To improve local business linkages	✓✓	✓✓	*	✓	✓✓	o	*	
EL-SA9	To reduce economic deprivation in the resident population	✓	✓	✓	✓	✓	✓	✓	A low town centre allocation will reduce stock overall and income potential. The other options will not impact differently on income levels
EL-SA10	To increase the average incomes of residents in the town	o	✓✓	o	x	o	o	✓	The low town centre allocation will reduce stock available to accommodate new jobs increasing unemployment for those that cannot readily commute to the Harbour.
EL-SA11	To reduce levels of unemployment	✓	✓	✓	x	✓	✓	✓	A low town centre allocation will reduce stock in the centre and push more commuters to the Harbour.
EL-SA12	To ensure no adverse impact on the road network	*	*	*	x	✓✓	*	*	
EL-SA13	To provide employment opportunities in locations that are accessible for local people and commuters	✓	✓	*	✓	✓✓	*	*	
EL-SA14	To reduce resource use from commercial & industrial premises	?	?	?	?	?	?	?	
EL-SA15	To reduce the impact of noise from commercial premises on residential areas	✓	✓	*	o	o	*	?	
<b>Score</b>		<b>23</b>	<b>10</b>	<b>7</b>	<b>25</b>	<b>23</b>	<b>15</b>	<b>-3</b>	

Adjusted Score				-7	+40	+10	
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**ANNEX F**

**SOVEREIGN HARBOUR ALTERNATIVE MIXED PARK OPTION**



**EBC: SCENARIO 5: SOVEREIGN HARBOUR Windfall Subsidised B1 Provision, with mixed employment uses**

Sustainability Objective		Assessment	
CS1	To provide the opportunity for everyone to live in a decent, sustainably constructed and affordable home	O	Harbour housing allocation is unaffected by the ELLP
CS2	To improve the health and well-being of the population and reduce inequalities in health	O	Although job creation goes hand in hand with quality of life, minimal impact
CS3	To reduce poverty and social exclusion and to close the gap between the more deprived areas in the Borough and the rest of the town	O	Will create jobs, but unlikely to have a significant effect on poverty and social exclusion
CS4	To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work	O	Economic growth can support educational achievement by creating higher value jobs, but impact considered to be minimal
CS5	To reduce crime and the fear of crime	O	Unlikely to have any effect on crime
CS6	To create sustainable, vibrant communities where everyone participates in local governance and that each person is important to the future of the town	∩∩	Will result in the creation of employment space in a 'Sustainable Centre', improving the sustainability of the Sovereign Harbour neighbourhood
CS7	To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone	X	It is located outside of existing employment areas, and access is likely to be car-based due to relatively poor public transport
CS8	To develop and ensure a broad, low-impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector so that everyone can benefit from economic growth	∩∩	The sites can provide more opportunities for all types of B1, particularly high quality space as demonstrated by the application for an Innovation Mall plus additional uses.
CS9	To ensure development is masterplanned to provide effective commercial infrastructure that will support continued economic growth and not just housing growth	∩∩	The Sovereign Harbour SPD masterplans all of the remaining development sites in Sovereign Harbour.
CS10	To develop a dynamic, diverse and knowledge-based economic sector that excels in innovation with higher-value, lower-impact activities	∩	Development at Sovereign Harbour can create better linkage opportunities to knowledge based economy
CS11	To develop and maintain a skilled and adaptable workforce to match local employment opportunities	∩∩	Will create more job opportunities, but only in uses that are compatible with residential Area
CS12	Conserve and enhance the Borough's biodiversity and landscape, and ensure species sustainability	X	Will result in the loss of shingle habitat
CS13	To protect, enhance, exploit the learning potential and make accessible for enjoyment by sustainable modes of transport the Borough's parks, gardens, countryside, recreation areas and historic environment	O	Development of office will assist in opening up part of site for park as identified in the SPD, but will result in some lost open space
CS14	To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance	∩∩	The development is on previously developed land in a sustainable centre, and therefore has a very positive effect on efficiency in land use.
CS15	To maintain and enhance the quality of landscapes and townscapes	O	Development will be within built up, so should therefore not adverse impact on landscapes. A quality development in this location will also act as a gateway into the town.
CS16	To reduce air pollution and ensure air quality continues to improve	X	Any new development will create some form of air pollution, directly or indirectly
CS17	To maintain and improve the water quality of freshwater bodies, groundwater, waterways and the marine environment	O	Development would be on previously developed land, but proximity to harbour may mean potential impact on marine environment
CS18	To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	X	Location within Sovereign Harbour means that there may be a potential risk of flooding.



CS19	To address the causes of climate change through reducing emissions of greenhouse gases and ensure Eastbourne is prepared for the impacts of climate change	X	Any new development will create some form of air emissions, directly or indirectly
CS20	To reduce road congestion and pollution levels by encouraging mixed-use development, traffic calming measures, improving travel choice, reducing the need for travel by car, and shortening the number, length and duration of journeys	X	Access is likely to be via car through already congested locations.
CS21	To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, re-use, recycling and composting	?	Impact unknown
CS22	Reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources	?	Impact unknown
EL-SA1	To promote sustainable economic growth	√√	High quality development in this high quality location may attract large employers and inward investment
EL-SA2	To maximise use of existing employment land	√√	Development of this land has already identified for employment use
EL-SA3	To diversify the local economy and support businesses across a range of sectors	√√	Potential to create a large number of new jobs across range of B1 sectors
EL-SA4	To increase the overall number of business enterprises operating in the town	√	More business space, especially if space available for small and start-up businesses, will increase number of businesses operating
EL-SA5	To promote and encourage business start ups and small businesses	√√	More spaces of the type of the Innovation Mall will benefit small and start-up businesses
EL-SA6	To increase the number and range of employment opportunities in the town	√√	Will result in more business space and therefore more employment opportunities
EL-SA7	To support existing businesses to continue trading in Eastbourne	√	Existing businesses can relocate to Sovereign Harbour, creating churn and making other sites available for improvement and relocation
EL-SA8	To improve local business linkages	0	There are some existing businesses within Sovereign Harbour. Will help create new business linkages
EL-SA9	To reduce economic deprivation in the resident population	√√	Will create <b>more</b> job opportunities, which will help reduce economic deprivation
EL-SA10	To increase the average incomes of residents in the town	√	High quality office space will attract higher value jobs, which will increase average income.
EL-SA11	To reduce levels of unemployment	√√	More units, more jobs, less unemployment
EL-SA12	To ensure no adverse impact on the road network	X	Access is likely to be via car, which will have adverse impact on road network
EL-SA13	To provide employment opportunities in locations that are accessible for local people and commuters	X	Sovereign Harbour not particularly accessible for local people and commuters
EL-SA14	To reduce resource use from commercial & industrial premises	?	Impact unknown
EL-SA15	To reduce the impact of noise from commercial premises on residential areas	X	It is close to existing residential areas, and therefore there may be some noise impact.
<b>Score</b>		<b>19</b>	

## View Comment

## Comment Information

**Document Section** [Employment Land Local Plan - Revised Proposed Submission version](#) [Introduction](#)

**Comment ID** RPS\_ELLP/43

**Respondent** [Sovereign Harbour Limited \(Mark Orriss\)](#)

**Agent** [Teal Planning Ltd \(Marie Nagy\)](#)

**Response Date** 21 Jan 2016

**Uploaded By** [Eastbourne Borough Council \(Matthew Hitchen\)](#)

**Do you consider the document is Legally Compliant?** Yes



**Do you consider the document is Sound?** No

**If no, Do you consider it is unsound because it is:** Not Positively Prepared, Not Justified, Not Effective, Not Consistent with national policy

**Comment** The RSA remains based upon flawed assumptions that continue to underpin and remain threaded throughout EBC's ELLP documentation. As such the ELLP and its linked evidence and assessments:  
 - have not been positively prepared; and  
 - that proposed allocations policy 3A has not been justified and will not be effective in sustainability or in sound planning terms.

The RSA is therefore unsound.

A reassessment of the RSA, based upon EBC's own evidence base and the application of consistent and logical appraisal assumptions, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.

	<p>A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here still create more new jobs more quickly, in a more efficient and effective use of the land available and will result in less significant transport and associated environmental impacts.</p> <p>Also as appraised on behalf of SHL previously, a higher office allocation for the town centre and mixed employment allocation for the Harbour also fits with:</p> <ol style="list-style-type: none"> <li>1. the physical capacity that exists within the town centre to accommodate more office accommodation.</li> <li>2. a more realistic and deliverable market expectation of what the Harbour sites can accommodate in terms of new office space.</li> </ol>
<p><b>What changes do you suggest to make the document legally compliant or sound?</b></p>	<p>A reassessment of the RSA, based upon EBC's own evidence base and the application of consistent and logical appraisal assumptions, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.</p>
<p><b>Do you consider it necessary to participate at the Examination in Public?</b></p>	<p>Yes</p>
<p><b>Why do you feel it is necessary to participate at the Examination in Public?</b></p>	<p>Our objections relate to the proposed allocation of our clients sites at Sovereign Harbour (Site 4 and 7a). The requirement for the production of the ELLP follows from SHL's previous objections to the CSLP and the proposed allocation of employment space within that.</p>
<p><b>Attachments</b></p>	<p> <a href="#">02b - Statement 2 - Sustainability Appraisal - pdf.pdf</a> (2.2 MB)</p> <p> <a href="#">Sub Form 6 - RSA.pdf</a> (124 KB)</p>

<b>Submission Method</b>	Email
<b>Response Status</b>	None
<b>Assigned Officer</b>	=unassigned=
<b>Officer's Response</b>	
<b>Campaign Indicator</b>	



## EMPLOYMENT LAND LOCAL PLAN

### Revised Proposed Submission Representation Form (Regulation 19)

*Please read the accompanying 'Guidance Notes for Respondents – Revised Proposed Submission Employment Land Local Plan' before completing this form.*

Eastbourne Borough Council has published the Revised Proposed Submission version of the Employment Land Local Plan for the community and stakeholders to make final representations on issues of soundness or legal compliance, in preparation for formal submission of the document to the Secretary of State in 2016.

The period for representations runs from Friday 11 December 2015 until Friday 22 January 2016. Representations received after 5pm on Friday 22 January 2016 cannot be accepted.

Where possible, please use the on-line consultation portal to make representations. This can be accessed via the Council's website ([www.eastbourne.gov.uk/ellp](http://www.eastbourne.gov.uk/ellp)). Alternatively, completed forms can be returned to [planning.policy@eastbourne.gov.uk](mailto:planning.policy@eastbourne.gov.uk) or by post to Regeneration & Planning Policy, Eastbourne Borough Council, 1 Grove Road, Eastbourne, BN21 4TW.

For further information please contact the Council's Regeneration & Planning Policy team, on (01323) 410000 or email [planning.policy@eastbourne.gov.uk](mailto:planning.policy@eastbourne.gov.uk).

#### Personal Details

<b>Title:</b>	Miss	<b>First Name(s):</b>	Marie
<b>Surname:</b>	Nagy		

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### Representation

When the Employment Land Local Plan is examined it will be tested for:

**1. Legal compliance** – That it has been produced in accordance with Government Regulations. This includes the Duty to Cooperate.

**2. Soundness** – That the content is positively prepared, justified, effective and consistent with national policy

Further information on the test of soundness and legal compliance is provided in our accompanying **Guidance Notes for Respondents**.

### **Q1. Which part of the Employment Land Local Plan do you want to make a representation about?**

Chapter:  
Revised Proposed Sustainability Appraisal

Policy: -

Paragraph Number: -

Figure: -

### **Q2. Do you consider the Employment Land Local Plan to be legally compliant?**

Yes

No

If you do not consider it to be legally compliant, please provide details as to why:

-

### **Q3. Do you consider the Employment Land Local Plan to be sound?**

Yes

No

*If you do not consider it to be sound, please provide details as which part of soundness it does not comply with:*

Positive prepared

Justified

Effective

Consistent with National Policy

Other  [Click here to enter text.](#)

**Q4. Please set out what changes you consider necessary to make the Employment Land Local Plan legally compliant or sound.**

Please refer to Teal Planning Submission Statement 2, January 2016

**Please note** your representation should cover all of the information, evidence and supporting information necessary to support/justify the representation and the suggested change. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

**Q5. If your representation is seeking a change to the Employment Land Local Plan do you consider it necessary to participate at the public examination to help explain the need for the change proposed?**

**No**, I do not wish to take part at the examination

**Yes**, I wish to take part at the examination

*If you do wish to participate in the examination, please outline why you consider this necessary:*

Our objections relate to the proposed allocation of our clients sites at Sovereign Harbour (Site 4 and 7a). The requirement for the production of the ELLP follows from SHL's previous objections to the CSLP and the proposed allocation of employment space within that.

**Please note** the Inspector will determine the most appropriate procedure to hear those who have indicated that they wish to participate at the oral part of the examination.

**Q6. Do you wish to be notified of any of the following?**


Submission of the Employment Land Local Plan for examination

Publication of the Inspectors Report

Formal adoption of the Employment Land Local Plan

**Data Protection Act 1998 and Freedom of Information Act 2000**

Representations cannot be treated in confidence and copies of all representations will be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, emails or private addresses. By submitting your views on the document you confirm that you agree to this and accept responsibility for your comments.

<b>Signature:</b>		<b>Date:</b>	21/01/2016
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**Revised Proposed Submission**  
**ELLP**  
**Submission Statement 2**

In respect of:  
**Revised Submission**  
**Proposed Sustainability Appraisal**  
**November 2015 – January 2016**

On behalf of:  
**Sovereign Harbour Ltd**

Date: January 2016

Reference: 12001/Reps/15/SS02

## **Contents**

- 1.0 Context
- 2.0 SA Background
- 3.0 Assessment of Alternative Options
- 4.0 Changes Required

## **Annex**

- A Floorspace Requirement Assessment Summary
- B Town Centre Sites 2 and 3
- C Site 3 Planning Committee Report, Caffynes Garage Site (extracts)
- D Town Centre and Sovereign Harbour Sustainable Neighbourhood Assessment Data
- E Sovereign Harbour Innovation Mall
- F RSA Re-Appraisal of EBC's Preferred Option 3a
- G Sovereign Harbour Alternative Mixed Park Option

## 1.0 Context

- 1.1 This Statement forms part of the package of objections that have been submitted on behalf of Sovereign Harbour Ltd (SHL) in response EBC's latest iteration of its Proposed ELLP and the linked evidence base documents and Sustainability Appraisal (SA) that accompany that document.
- 1.2 This Statement must accordingly be read in conjunction with:
- **SHL Statement 1:** Objections to the Revised Proposed Submission ELLP (RELLP), November 2015-January 2016 and accompanying B/GVA reports.
  - .
  - **Stiles Harold Williams (SHW) Statement:** Objections to the RELLP and B/GVA reports.

## 2.0 SA Background

- 2.1 Representations have previously been submitted on behalf of SHL in response to the:
- Sustainability Appraisal Scoping Report, October 2013
  - Initial ELLP Sustainability Appraisal Report and its accompanying Non-Technical Summary, November 2013
  - Proposed Submission ELLP Sustainability Report and Non-Technical Summary, November 2014
- 2.2 The Initial Report and the Proposed Submission Report were both considered to be unsound for the reasons set out in the earlier representations; linked also to the representations made in objection to the accompanying stages of the Proposed ELLP and to the linked Proposed Changes to the Core Strategy Local Plan (CSLP) Proposals Map.
- 2.3 The Revised Proposed Submission Sustainability Appraisal (RSA) seeks to address the objections made against the earlier version of the document.
- 2.4 The RSA acknowledges that *'there were some defects in the [earlier] SA process, which needed to be corrected if the evidence base for the ELLP was to be considered suitably robust when subjected to Examination in Public (EiP).'*' (RSA, page N6).
- 2.5 It is noted that within the RSA:
- Alternative options are still appraised for different quantum of office space to be allocated within Eastbourne Town Centre, at Sovereign Harbour and at other out of town centre locations;

- These options have rejected the scenario put forward by SHL within the representations to the November 2014 SA which included the potential for a minimum of 3,000sq.m. in other non-town centre locations. This is because EBC has appraised that no other opportunities exist for such provision outside of the town centre or Sovereign Harbour;
  - New alternative scenarios have been tested to still seek to address SHLs objections about the sustainability of the allocations being proposed by EBC.
- 2.6 The fact that the previous SA's have been independently appraised on behalf of EBC as being flawed is welcomed. **The RSA**, which appraises new development options based upon a different appraisal format and set out in a number of different tabulated forms in order to be more robust and transparent, is however **also flawed**.
- 2.7 The core reason for this follows from a number of strategic planning and technical appraisal assumptions that remain threaded throughout EBC's draft documents and linked consultant's reports. We have raised these consistently with EBC and they have still not been addressed. The RELLP, the proposed preferred Policy Option 3A and the linked RSA that appraises this as the most appropriate, sustainable option for Eastbourne therefore remain **unsound**.
- 2.8 The basis for this conclusion follows from the following key matters; our consideration of which is supported by the accompanying Annexes to this Statement, the linked objection Statements and our previous representations.

#### ***Strategic Planning Matters***

1. The location and connectivity of Eastbourne town overall is poor. EBC acknowledges this (EBC, RELLP, para 2.15).
2. The town's strategic position within the core local economic growth corridor that runs north to Polegate and Hailsham, is the key strategic focus for future growth (EBC, RELLP para 2.9). Sovereign Harbour is peripheral to this (see earlier representations and references to the Corridor masterplan document).
3. The town's office market is small and localised and is not expected to be the most significant driver for economic growth within the town. The most significant driver is anticipated to be the industrial sector (B/GVA May 2014 report page 9).
4. The relative peripherality and poor transport connectivity of Sovereign Harbour is widely recognised by EBC and by jam who conclude that mitigation through supported improvements to public transport services is required to overcome this and make the location sustainable (RSA para 9.4.3).

5. The employment sites at the Harbour have not progressed for c20 years even with the assistance of EBC's promotional support. Site 6 is only now progressing with the benefit of significant public funding support (RELLP para 2.16).

#### ***Technical Assessments – Total Floorspace Requirement***

6. The tables at **Annex A** summarise the following matters which have been set out consistently to EBC and that remain unanswered.
7. EBC's ELR forecasts that **1,263 new Class B jobs** will be created and will require accommodation in the Borough to 2027-2031 (RELLP para 2.31).
8. The ELR however still does not make clear how many of the Class B jobs that are forecast to be created in the town through to 2027/2031 will be in Class B1(a) office jobs.
9. EBC is still mixing NIA and GEA floor areas so that the overall total assessed new floorspace requirement of 43,000sq.m. is a hybrid of these two measurements and is in effect meaningless for space planning and total site allocation purposes (RELLP para 2.32 to 2.38). If EBC intend to refer to B1 and B2/B8 space based on different measurements, the overall total area quoted needs to be dropped from the ELLP or clarified.
10. EBC's evidence on the amount of land required for Class B1a/b development remains based upon a relatively low employment space density. EBC still proposes that 12sq.m. NIA per office job (RELLP para 2.32) is appropriate, when the new Innovation Mall on Site 6 at SH indicates a density of 8sq.m. NIA and 10sq.m. NIA represents an appropriate mid-way position (see previous representations).
11. The ELR still does not make clear why a high contingency of +10% for new B1a/b space also needs to be planned for in addition to provision that is made for windfall provision and for churn within the town's office stock.
12. When the proposed office allocation is reappraised against a number of job density levels, this clearly demonstrates that an **over-allocation** is being proposed: **the amount of space EBC states is required to be allocated for B1a/b equates to more than the overall total forecast number of Class B jobs, taking into account B1, B2 and B8 jobs**. As outlined above, both EBC and B/GVA however clearly state that the greatest potential for growth will be in the industrial sector.
13. The justification for the actual amount of B1a/b space being planned for, totalling **23,000sq.m. NIA** therefore still remains unclear and will equate to a **substantial over-provision by some margin**.
14. Such over-provision will render proposed large allocation B1a/b sites void, waiting for demand and take-up to be realised.

15. This represents an unsustainable proposition when considered against EBC's policy objectives to secure economic development, secure new job creation, reduced deprivation, increase incomes, ensure the most efficient use of land and in particular when compared with alternative options that would allow more new office space in the town centre and a more mixed employment park at SH to be created more quickly.

***Technical Assessments – Town Centre Allocation and Potential***

16. EBC's proposed allocation of just 3,000sq.m. NIA within the town centre will represent a net loss of office space from the TC (see **Annex A, Table 2**) and will not protect or strengthen employment, economic development or business linkage benefits within the centre or for the Borough overall.
17. Evidence has been provided to EBC that it's Town Centre Sites 2 and 3 individually can provide a much greater quantum of office space than the 3,000sq.m. NIA that is proposed to be allocated across the TC overall (**Annex B**). Both sites individually can provide new office stock for a range of unit sizes including large floorplates that EBC/B/GVA outline are a key requirement for the local market.
18. This remains the case even following the grant of planning permission for part of Site 2 to be developed for a care home facility, as confirmed by the EBC officer's planning report on that scheme (see **Annex C**).
19. Taken together these two TC sites can provide a large amount of new high quality, flexible space for start up and expanding or relocating businesses, including again for flexible large units.
20. Taken further with EBC's additional opportunity and transition areas within the town centre, a number of additional potential office sites exist within the centre. These contingency options however also represent opportunities for more residential development and as such the Council can draw upon these options to support new residential growth in the centre if necessary. These options are likely to be attractive to developers for residential schemes based on the Council's own appraisal of demand for brownfield redevelopment and conversion residential opportunities in the centre and the extent of conversions to residential use that are listed through the Council's applications register and Annual Monitoring Reports..
21. The location of a larger amount of new office development within the TC will provide more choice for the market and will focus this within the existing established commercial hub of the town, within close proximity to a large local population, and within ready access by non-car means (**Annex D**).

***Technical Assessments – Sovereign Harbour Allocation and Site 6 Potential***

22. The existing outline planning permission for Site 6 requires a minimum of 11,100sq.m. NIA B1a/b/c space to be provided. Whilst reference is made to B1c here this allows for high quality, clean uses that may require larger service vehicles. The quality of the space is expected to remain akin to an office park as per the Innovation Mall that has already been completed.
23. Based on EBC's preferred density of 12sq.m. per job, this amount equates to 925 jobs, or 73% of the total forecast new jobs within the whole of the Borough's Use Class B sector.
24. Based on the density marketed for the Innovation Mall of 8sq.m. NIA per job this will accommodate 1,387 jobs. Based on a more appropriate average density of 10sq.m. NIA this equates to 1,110 jobs.
25. This equates to a substantial proportion of forecast new employment being directed to SH and represents an overprovision based on even EBC's assumed lower job density level.
26. The Innovation Mall on Site 6 at SH provides flexible space, marketed to accommodate up to 20 units / businesses, with scope for businesses to move and adapt their space requirements within the building (**Annex E**).
27. Whilst the outline permission for the site requires a minimum of 11,100sq.m. NIA to be provided on the site, SeaChange's marketing details refers to capacity for 9,777sq.m. NIA. This is a sizeable reduction in assumed capacity and it is for EBC to understand this and to push for the maximum level of space possible within the site in order to ensure the most efficient use of this land is achieved, especially as the Council do refer to new development sites being scarce across the Borough (RELLP para 2.24).
28. As referenced below, if Site 6 does ultimately provide **9,777sq.m. NIA of Class B1 space**, Sites 4 and 7a, which together are smaller than Site 6, cannot make up any resulting shortfall to achieve EBC's preferred allocation of 20,000sq.m. at SH: these sites do not have the physical capacity to accommodate any more than an assumed maximum of 8,900sq.m. NIA.
29. If the Mall is replicated across Site 6, however, even SeaChange's lower total floor area will still accommodate between 814 and 1,222 jobs (based on 12sq.m. NIA and 8sq.m. NIA per job). This still represents (1) a very substantial and greater share of the Borough's total forecast new jobs across the whole of the Class B sector, (2) an over-provision for Class B1 jobs but (3) in any case a very sizeable cluster of new Grade A floorspace within this one location which EBC is eager to establish here.

30. B/GVA's September 2015 document does not provide an update to date, independent viability appraisal and greatly exaggerates the differences between development potential within the town centre and at the Harbour (see SHW Statement 2016).
31. The Mall has been marketed for 12 months and completed for occupancy for c 6 months. Whilst EBC has appraised a high level of local demand for such space and whilst the town centre has experienced steady losses of office space, which would indicate that office occupiers have been displaced from their existing premises and therefore potentially from the town centre, lettings at the Mall have been slow. This has also required a further open marketing week in November 2015 to generate interest. We also understand that lettings are, in some instances at least, based on short letting terms and on rents that equate to a heavily subsidised unviable long term proposition. The B/GVA assessment of 2014 assumed rents of £17psf would be achieved, we understand that £16.50psf has been sought but with no indication provided of the extent of incentives and the length of the lease terms agreed. We understand that incentives have been provided and that leases have been on a 6 month basis only.
32. Rents will need to significantly improve to ensure unsubsidised viability is achieved at SH. This is unlikely to be sustainable for local businesses (see SHW Statement 2016 for SHL).
33. EBC however remains committed to the planned development of Site 6 for high grade B1 space. Even if a greater momentum of take-up is achieved, it will still take some significant time to fully develop and occupy Site 6. If full delivery of the site is achieved, as outlined, it will accommodate a very significant concentration of jobs and will provide a sizeable cluster of businesses.
34. To be sustainable, this must be balanced by the provision of new space and choice within the town centre and preferably also elsewhere along the Eastbourne/Polegate Corridor; otherwise the Eastbourne market will be fully reliant on the SH offer alone, resulting in no choice in terms of location, type of space and letting terms.

#### ***Technical Assessments – Sovereign Harbour Allocation and Potential Sites 7a and 4***

35. In very high level terms, Site 6 is 3.393ha and is to provide a minimum of 11,100sq.m. NIA. Sites 4 and 7a together are only 2.576ha or 76% the site area of Site 6, which indicates the provision of c 8,436 sq.m. NIA if the equivalent build ratio for Site 6 is applied. SHL has previously rounded this up to 8,900sq.m. NIA for policy review purposes. Site 4 however is only appropriate for a potentially small amount of office space on some upper floors and not all of Site 7a is potentially available subject to confirmation of the location of the new community hall building.
36. As outlined, SeaChange is marketing Site 6 on the basis that it will provide 9,777sqm. NIA. (12% reduction on the minimum required by the outline consent). Based on EBC's proposed allocation this would require Sites 4



and 7a to accommodate 10,223sq.m. NIA – more than Site 6 and within a smaller area. This is **not feasible in space planning, land capacity terms.**

37. Notwithstanding this, the additional allocation of Sites 4 and 7a to be set aside still for office space only is **not required to meet the forecast increase in Class B let alone Class B1a/b jobs across the Borough.** This land has been available for c20years and a requirement to set these two sites aside in addition to Site 6 for still longer will not amount to a wasted opportunity as professed by EBC, B/GVA and jam. It will equate to an extended sterilisation of the land when it would be more efficiently, effectively and more quickly developed for alternative employment uses.
38. Alternative uses can be delivered and can generate more new jobs more quickly, across a greater breadth of sectors and skills sets which will in turn provide a wider range of job opportunities for a wider number of local people. These can also be supportive of the office campus of Site 6, to provide a more sustainable and self supporting employment park at the Harbour.
39. A mono-office park, across of the SH sites, will not have this benefit and will be much slower to develop.

#### ***Transport and linked Environmental Links***

40. The RSA has stated that transport mitigation is required to make the Harbour a sustainable office location. It states;

'However, all development in Eastbourne including development at Sovereign Harbour, **must** contribute to the delivery of the whole transport interventions package, the most important for which for Sovereign Harbour is the Seaside Quality Bus Corridor.; (RSA para 9.4.3).

41. Development in the TC will benefit from that location's existing proximity and ease of connectivity to a high proportion of the town's local residents (see **Annex D**). New development within the TC will be able to further promote walking, cycling and use of existing public transport services without significant pressure on existing infrastructure.
42. In contrast, SH is less well linked (**Annex D**). Contributions towards the required mitigation works are also not possible on viability grounds; as accepted by EBC through the outline planning permission which include Sites 4, 6 and 7a. If improved links for an office park are to be provided, this would have to be through further public subsidy.
43. Even then improved bus links will still be focused primarily on the TC to SH corridor and will not be able to provide wider convenient links for office workers based across the town. Even with significant public subsidy services will not be increased sufficiently to improve links for many such commuters and SH will remain car based. **The mitigation identified by jam as necessary is therefore not available.**

44. A more mixed employment park, with passengers drawn to SH by a greater range of uses and across the working day and weekend, will have more potential to support increased bus services between the Harbour and the town centre on an open market basis, resulting from more trips being taken and spread out beyond narrow peak office commuter times.. Any resulting increase in the frequency of services would also benefit the wider residents of and visitors to the Harbour.
45. A more mixed park would also result in less peak hour traffic, less focused car traffic impact and reduced linked peaks in related air quality and emissions when compared with an office only park.
- 2.9 The core assumptions that underpin the RELLP and the RSA's identification of option 3A as the preferred policy option, with low office provision in the TC and an office only park at SH, are thereby still unsound.

### 3.0 Assessment of Alternative Options

#### *SHL Position*

- 3.1 The representations submitted to EBC's 2014 package of documents set out the following policy allocations as the most appropriate sustainable option for the Borough.
- **Minimum** of 8,900 sq.m. NIA of Class B1a/b space within the town centre.
  - **Minimum** of 11,100sq.m. NIA of Class B1a/b space at SH (i.e. Site 6 plus potentially additional space across Sites 7a and 4) with provision for potentially more such space, subject to demand, but with allowance for other employment generating uses on Sites 4 and 7a.
  - **Minimum** 3,000sq.m. NIA of] Class B1a/b space in other district centres and locations across EBC.
- 3.2 The setting of these amounts as minimums for the TC and SH would ensure land is set aside and sites are protected for B1a/B use, but it will not rule out that additional space may come forward. It thereby allows for the market to respond to greater demand if, as anticipated by EBC, this materialises and if in the interest of a sustainable local economy any such additional demand does prove to be financially viable.
- 3.3 The matter for EBC in relation to SH is that 20,000sq.m. of space is only achievable in space planning terms if Site 6 provides the minimum 11,100sq.m. of space. SeaChange does not expect to achieve this and so EBC must determine whether the minimum requirement for Site 6 should instead refer to 9,777sq,m, NIA, rounded to 9,800 sq.m. NIA or even 10,000sq.m. NIA as considered appropriate.

- 3.4 Beyond this the substantive point of difference between EBC and SHL remains that Sites 4 and 7a are **not** required to accommodate Class B jobs. They can be marketed for such leaving this option open to the market, but they would be much better developed for other employment uses that will be delivered more quickly, provide more jobs more quickly and across a wider range of skills sets, supporting Site 6 as a self-supporting and more sustainable office park, with reduced traffic impacts.
- 3.5 The proposed setting of a minimum of 3,000sq.m. NIA for provision elsewhere across the town would provide an incentive for new space to also be provided within the town's additional areas of the strategic Eastbourne, Polegate and Hailsham Corridor. EBC has rejected this even though office campuses have met with some success and development around Hampden Park station could be attractive. However, such a policy does not need to be expressed as a quantum of space but as a generic supportive policy and we consider that this now likely to be a more important option for EBC, in view of pending permitted development rights that will allow Class B1c uses to change to residential use. A policy that supports the move from B1c to B1a would signal the Council's support of higher value employment uses across the town and would provide additional choice for the market.
- 3.6 **We contend that this policy approach as summarised at 3.1 above remains the most appropriate for Eastbourne.**

#### ***EBC's Position***

- 3.5 jam has appraised six allocation options. In response to these we comment as follows.

**Option 1: As existing (no plan) 90% office provision in TC and 10% Out of Town: This is not relevant,** viability matters aside, EBC is committed to delivery Site 6 for Class B1 space and this will provide a sizeable new employment cluster that will complement the town centre and the other existing office campuses within the town. A proportional mix of 90:10 is not in any case by definition a constraint for local office markets. Other centres do continue to perform well, based on a centre focused office market, including nearby Brighton.

**Option 2a: Intensification of Industrial land.** As a general principle for the achievement of the more efficient and effective use of existing estates this clearly presents an appropriate planning option. In view of the way in which some of Eastbourne's estates have supported small office campus development, further such developments should not be ruled out or discouraged by the new ELLP policies. Indeed, as set out above, following pending new permitted development rights this could see some estates under pressure from residential development. An ELLP policy encourages redevelopment for more attractive office space as an alternative option to residential could help to support employment uses generally as an on-going proposition for developers, set within the sustainable

strategic corridor of the town. The above draft option at para 3.1 would allow this with or without a reference to a minimum NIA requirement.

**Option 2b: Extension of Industrial land.** No comment

**Option 3a: As Proposed by EBC: 76% office TC : 24% Out of Centre (3,000sq.m. TC : 20,000sq.m. SH)**

As outlined above, if Site 6 does not provide the minimum 11,100sq.m. NIA of space required by the outline permission for the site, **Sites 4 and 7a cannot accommodate any resulting shortfall** to achieve an overall allocation of 20,000sq.m. at the Harbour. **This would deem this Option unachievable.**

With that aside, as outlined in our previous representations and repeated above, this Option equates to an over-provision for the new office jobs that are forecast to be created in the Borough. However, also as highlighted previously and above, this policy would also represent a net loss of office space from the TC, with the greater majority of new space being provided in the peripheral, less well connected and car based location of SH. **This is unsustainable.**

Significant scope exists for more substantial office development in the TC, which EBC must commit to if it is to support and strengthen the centre overall and make the best use of existing infrastructure and other resources. This need not be to the detriment of meeting new housing requirements.

We have accordingly reappraised this option based on jam's appraisal method but also based upon this core understanding and taking into account the assessment considerations outlined in Section 2 above. As indicated by that reappraisal at **Annex F, policy option 3a is unsound.**

**Option 3b: 80% office TC : As proposed by SHL 20% Out of Centre (9,000sq.m. TC and 14,000sq.m. SH).**

jam describes this as having been proposed by SHL; it has not been and is not proposed here. Our proposal is summarised again here at 3.1 above for reference.

jam's appraisal of a larger amount of office space in the TC and smaller provision at the Harbour is based upon a further repetition of the flawed assumptions and reasoning that has been followed by EBC throughout its testing of new employment land policy as part of the CSLP and the proposed ELLP. Whilst jam has sought to substantiate these assumptions by applying a new appraisal and grading approach within the RSA, the fundamental flaws remain and are repeated. When reassessed based on sound planning reasoning, the outcome is the same; a

policy that requires more office provision in the TC and allows a more mixed employment park at SH is the most sustainable option. This is demonstrated here again but based on jam's appraisal format, at **Annex G**.

**Option 3c: Alternative Option for comparison – 77% office TC : 23% SH (5,000sq.m. TC : 18,000sq.m. SH).**

This option would arise from Site 6 being developed for the c 9,000sq.m. being marketed by SeaChange and 9,000sq.m. being provided on the smaller combined sites 4 and 7a. By definition this does not make sense in simple space planning terms. This option would also still represent a net loss of office space from the TC and would still represent an over provision within one single alternative location (SH) that is unsustainable, requires public subsidy and cannot support the required transport mitigation to make it acceptable in SA terms. This option, as per Option 3a, will not achieve the positive benefits assumed by jam against the CSLP and ELLP policy objectives. We do not therefore review this option further. The re-appraisal outcomes will be as per Options 3a above and **Annex F** attached.

## 4.0 Summary and Required Changes

- 3.1 The RSA remains based upon flawed assumptions that continue to underpin and remain threaded throughout EBC's ELLP documentation. As such the ELLP and its linked evidence and assessments:
- have **not been positively prepared**; and
  - that proposed allocations policy 3A **has not been justified** and will **not be effective** in sustainability or in sound planning terms.
- 3.2 The RSA is therefore **unsound**.
- 2.3 A reassessment of the RSA, based upon EBC's own evidence base and the application of consistent and logical appraisal assumptions, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.
- 2.4 A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here still create more new jobs more quickly, in a more efficient and effective use of the land available and will result in less significant transport and associated environmental impacts.
- 2.5 Also as appraised on behalf of SHL previously, a higher office allocation for the town centre and mixed employment allocation for the Harbour also fits with:

1. the physical capacity that exists within the town centre to accommodate more office accommodation.
2. a more realistic and deliverable market expectation of what the Harbour sites can accommodate in terms of new office space.

**ANNEX A**  
**FLOORSPACE REQUIREMENT ASSESSMENT SUMMARY**

**Table 1**

Matter	EBC Data	Comment
<p><b>Forecast Class B jobs up to 2031</b> (RELLP para 2.31, ELR 2013)</p>	<p><b><u>1,263</u></b></p>	<p>This equates to total new forecast jobs within the Class B1(a,b,c), B2 and B8 Use Class categories</p>
<p><b>Forecast Class B1a/b jobs up to 2031</b></p>	<p>Not stated</p>	<p>Total forecast office jobs not known. The RELLP and B/GVA reports however state that the most significant growth will be within the industrial sectors (B/GVA May 2015 Viability Briefing Note page 9).</p>
<p><b>Employment Floorspace Density Class B1a/b space</b> (RELLP para 2.32)</p>	<p>12.sq.m. NIA per employee</p>	<p>The Innovation Mall on Site 6 is being marketed on the basis that it can accommodate 300 jobs within 2344sq.m. NIA which equates to 8sq.m. NIA per job.</p> <p>A sensitivity test based on 10sq.m. NIA per job is appropriate based on market trends and a range of densities that are likely to result.</p>
<p><b>Office Floorspace Demand over the ELLP period.</b> (RELLP Table 2 page 14)</p> <p>(RELLP para 2.38)</p> <p>(RELLP para 3.10)</p>	<p>New space – 15,977sq.m.                  Windfall allowance – 4,095sq.m.                  Churn allowance – 694sq.m.  <b>Total requirement – 20,766sq.m.</b></p> <p>Contingency headroom 10% Requirement - 2,077sq.m.</p> <p><b>Total Allocation – 23,000sq.m.</b> rounded</p>	<p>The need for a contingency on top of a windfall and churn allowance has not been explained.</p> <p>Based on EBC assumed density of 12sq.m. NIA per job these allowances will accommodate up to <b><u>1,917 new office jobs</u></b>.</p> <p>This is more than all of the forecast increase in all Class B jobs across the ELLP period and equates to an excessive over-provision.</p> <p>The requirement less the proposed headroom, based again on EBC's preferred density will accommodate 1,731 new office jobs which are still be far more than the total forecast increase in Class B jobs across the ELLP period.</p> <p>Still EBC has not explained or justified this. These requirements can be more efficiently planned for still based on a NIA density of 10sq.m. per job.</p> <p>An ELLP and its linked SA that are based on such high levels of over provision are inefficient and do not meet the NPPF tests of soundness.</p> <p>The need for such a large amount of space however will counter the loss of office space in the town centre and reflect EBC's commitment to Site 6 for offices up to 11,100sq.m. NIA</p>
<p><b>Town Centre Allocation</b> (RELLP para 3.10 and Policy EL3 page 28)</p>	<p>3,000sq.m. NIA Class B1a</p>	<p>EBC's own Annual Monitoring Reports have shown a steady net loss of Class B1a floorspace within the town centre (<b>see Table 2 below</b>).</p> <p>This proposed allocation will equate to a net reduction in total floorspace in the centre, a reduction in the choice of space available in the centre and an overall net weakening of the total town centre office sector.</p> <p>The REELP and RSA do not account for this and present their assessments on the basis that the 3,000sq.m. will be additional new space only which will be beneficial to the centre and the borough in overall net terms. <u>It will not.</u></p>



<p><b>Policy EL3 Town Centre</b> (RELLP page 28)</p>	<p>3,000sq.m. allocation to the town centre which should be provided across Sites 2 and 3 whilst proposed for refurbished existing office stock will be supported.</p>	<p>As demonstrated previously to EBC and repeated in <b>Appendix C</b> here:</p> <p><b>Site 2</b> can accommodate up to 8,724sq.m. NIA and as part of a mixed use scheme, 5,670sq.m NIA with 74 2-bedroom dwellings.</p> <p><b>Site 3</b> can accommodate substantially more space. An illustrative scheme shows 3,687sq.m. NIA office space alongside commercial and residential provision. The planning permission for the part development of this site for an extra care home still allows for office space to be provided here.</p> <p>The Town Centre Local Plan also makes provision for additional potential provision within opportunity and transition areas within the town centre. These can provide additional space or alternative opportunities for increase residential provision if EBC is concerned its housing allocation for the town centre is not going to be met.</p>
<p><b>Policy EL4 Sovereign Harbour</b> (RELLP page 32-33)</p>	<p>20,000sq.m. of additional B1 space predominately on Sites 6 and 7a with a small amount on Site 4.</p> <p>Provision for other employment uses following the delivery of the above requirement.</p>	<p>SH is a predominately B1a/b location. Any B1c space will need to be high quality and compatible with B1a/b and residential accommodation. In design terms it will be equivalent to office park standard.</p> <p>This allocation equates to the full assessed requirement for the Borough excluding the headroom allowance (the need for which has again not been explained). This effectively proposes to locate the entire new requirement to this peripheral location, providing no choice or flexibility for occupiers requiring new accommodation.</p> <p>It thereby runs counter to all of the assessments put forward by EBC/ B/GVA / jam in respect of the need to provide choice and flexibility and the need to promote the most sustainable option.</p> <p>Site 6 is required to provide a minimum of 11,100sq.m. NIA of space.</p> <p>Based on EBC's preferred employment density this will accommodate <b>925 jobs or equivalent to 73% of the entire forecast Class B jobs</b> across the Borough over the whole ELLP period.</p> <p>Based on a more appropriate density of 10sq.m. NIA per job, the site will accommodate <b>1,110 jobs or equivalent to 88% of the total Class B jobs</b> forecast for the whole Borough.</p> <p>EBC has still not explained or justified the need for Sites 7a and 4 to provide for additional space on top of what Site 6 can accommodate.</p>
<p><b>Office Viability and Delivery, B/GVA Report to Support the SA, September 2015</b></p>		
<p>Eastbourne-Polegate-Hailsham Corridor (Para 1.21)</p>	<p>This provides the focus for office activity in the future</p>	<p>SH is peripheral to this corridor, as set out in previous evidence, EBC's own Corridor Masterplan document and B/GVA's plan at page 6 of this September 2015 document.</p>
<p>The Eastbourne office market (para 1.30)</p>	<p>The town has a poor(office) market in terms of demand, but also in terms of local office stock and offer with other towns such as Lewes and Hastings having better offerings</p>	<p>The Eastbourne office market is small. Office campus space in the town has been taken-up but within the prime strategic corridor and at much lower rents to that sought at Site 6 of SH (see previous representations by SHL).</p>

		<p>The Innovation Mall has required public subsidy. The lettings that have been achieved have been slow, on terms that do not deem the building commercially viable on open market terms and we understand on short term letting basis. The largest units remain vacant. The mall however can be very readily replicated in terms of the number and size of units and linked facilities, within the TC sites.</p>
<p><b>Comparative Viability Assessment</b> (Section 3)</p>	<p>Detailed assumptions based on rent, yield, build costs, financing and overall development value per sq.m. resulting in a summary assessment that:</p> <p>Town Centre sites generate a Value to Cost of -£839 psm.</p> <p>SH sites generate a Value to Cost of - £385 psm.</p> <p>The RSA on this basis concludes that the most viable option is to direct offices to SH.</p>	<p>Please refer to the SHW Statement 2016.</p> <p>B/GVA has exaggerated the assessed differences in viability of new office development within the town centre and SH</p> <p>Both B/GVA and jam acknowledge that there is no short to medium term prospect of financial viability being achieved at Sovereign Harbour.</p> <p>The actual gap between the cost and value of space at the Harbour can only expect to widen due to ever increasing cost of construction.</p> <p>SH must additionally address locational constraints but in view of it viability shortcomings development here will not be able to support the required improvement in public bus services.</p> <p>SH is unsustainable in locational, wider environmental and financial viability terms.</p>

**Table 2: Eastbourne Town Centre - Net Change in Office Floorspace Provision**

Year 1st April to 31st March	Town Centre Space Net Change sq.m. B1a space ^
2005-2006	-155
2006-2007	-285
2007-2008	-268
2008-2009	-108
2009-2010	-81
2010-2011	54
2011-2012	-623
2012-2013	-424
2013-2014	-2,055
2014-2015	-3,718
Total 2012-2015	-6,197
Total 2005-2015	-7,663

Source: EBC AMRs (^ rounded)

A further 17,249sq.m. of B1a space was lost to Class D1 space this was as a result of the former Dental Practice Board site, outside of the TC, being redeveloped for a community use.

Subsequent conversions of office accommodation have been approved April 2015 onward

**Table 3: SH Space Allocation and Employment Summarises**

	<b>EBC Borough Wide Employment Forecast to 2027</b> <b>1,263 jobs all Class B</b>		
	<b>Site 6</b>	<b>Site 4/7a</b>	<b>Total</b>
<b>Use</b>	B1a,b,c All high quality campus space	B1a/b	-
<b>Site Area ha</b>	3.393	2.576	5.969
<b>Outline Planning Permission</b>	Minimum 11,100sq.m. NIA	Maximum pending ELLP 8,900sq.m. NIA	Pending ELLP 20,000sq.m.
<b>Job Potential</b>			
<b>12sq.m. NIA</b>	925	742	<u>1,667</u>
<b>10sq.m. NIA</b>	1,110	890	<u>2,000</u>
<b>8sq.m. NIA</b>	1,388	1,113	2,501
<b>B1 Job Potential as % of Total Forecast Class B growth</b>			
<b>12sq.m. NIA</b>	73%	59%	<u>132%</u>
<b>10sq.m. NIA</b>	88%	70%	<u>158%</u>
<b>8sq.m. NIA</b>	110%	88%	198%

Excluding town centre and any additional out of town centre office provision.  
Excluding Class B2/B8 forecast growth

**ANNEX B**

**TOWN CENTRE SITES 2 AND 3**

# **The Employment Land Local Plan**

## **Proposed Submission Version**

### **Sites 2 & 3**

Capacity study and policy review

January 2015



## Introduction

The purpose of this study is to demonstrate the development capacity for employment uses on two sites in Eastbourne town centre and comment on their contribution to the Employment Land Local Plan. It includes illustrative layouts, site areas and building areas that have been prepared and calculated using OS Vectormap.

The two sites are referred to as Site 2 and Site 3 using the same designation as in Eastbourne Borough Council's Proposed Policy 6: EL3 : Town Centre

Given their scale and location there is the potential for these sites to make a significant contribution to (the regeneration of) the town centre. They form a key element in realising the potential for a vibrant, mixed use quarter around the station which would provide a more attractive employment offer for Eastbourne. The successful development of these sites will have wider, positive impacts for the town centre and Eastbourne.

This is a key area of the town centre that demands an approach that is ambitious and deliverable and any proposals for redevelopment need to consider not just capacity and use, but also the urban design context and placemaking.

## Site 2

### The urban design context

Site 2 is located on the northern side of Eastbourne railway station which is in the town centre and part of the main shopping and retail area around Terminus Road. It is also part of an established town centre administration and office hub with a number of existing office uses and businesses in nearby streets including the Council offices in Grove Road opposite the site.

Eastbourne has a relatively compact and attractive town centre with clearly defined elements including the station and the main shopping area in and around the Arndale Centre which is adjacent to the station.

A £90 million plan to transform the Arndale Centre was approved in May 2014 which will provide up to twenty four new shops in an extension between the existing Arndale Centre and the railway station, seven new restaurants and a multiplex cinema.

In addition to this, Eastbourne Borough Council have developed plans for significant public realm improvements to the pedestrian environment along Terminus Road around the station area that are aimed at delivering an improved environment that is "*befitting a key gateway into the Town Centre*". These improvements are planned to be carried out alongside the Arndale Centre extension.

The implementation of both schemes will increase the attractiveness, value and accessibility of the station site.

## The site

The station site is currently characterised by a combination of uses that have developed in an unplanned way and fail to make the most of the opportunities for this area to be an attractive town centre hub. Apart from the station and enterprise centre building, both of which have character and some historic value, the remainder of the site is an unattractive backland given over to parking, storage and other lower grade uses that makes a poor setting for the arrival into Eastbourne by train.

**Land use:** the northern edge of the site is bounded by a mix of commercial and residential uses along St Leonards Road and Commercial Road, with the commercial uses generally being low grade in poor quality buildings. The exception to this is the Enterprise Centre which is a large scale Victorian industrial shed occupied by small scale craft and retail businesses, and the three storey building block fronting Upperton Road with commercial uses at ground level. The Enterprise Centre, set back behind the Upperton Road block, has no street frontage and is set in a large unattractive car park area.

**Access:** the main vehicular access to the parking area is off Terminus Road with a drop off for the station, with a further vehicular access to the parking area opposite St Anne's Road at the St Leonards Road and Commercial Road junction.

**Parking:** There are around 232 parking spaces serving the station, mostly in one large block on the northern side. There are also a number of other parking areas to the east of these serving adjacent commercial premises and storage areas. There are two large multi storey car parks within 200m of the station (3 – 4 minutes walk).

Along the southern side of the station there is an extensive covered area which is limited to pick up and drop off, but otherwise unused.

## Capacity

In considering the development capacity of this site, the following assumptions have been made: **vehicular access will remain unchanged**, the **Enterprise Centre** and the buildings fronting Upperton Road will be **retained** and **station parking will be re-provided in its current location at 150 – 200 spaces**, depending on the level of development.

The layout shown in **illustration 1** is based on a development framework that builds on the public realm improvements proposed by Eastbourne Borough Council and creates a more attractive setting for the station and a new employment hub with the following:

- 1 A landscaped 'station square' retaining disabled parking and drop off
- 2 Additional employment space (Block A) as extension/addition to Enterprise Centre
- 3 New employment space (Block B) as bookend to station square

- 4 Redeveloped building (Block C) as employment/mixed use and improved gateway to station square
- 5 New employment space (Block D) as bookend to parking square
- 6 Landscaped parking square
- 7 New employment space (Blocks E1 – E4) as railway edge, gateway
- 8 Landscaped 'green link' as railway edge, gateway and pedestrian route to station square
- 9 Landscaped buffer to existing residential edge
- 10 Potential for an additional 100 parking spaces plus a pick up and drop off area in the underused covered station area

This framework would completely change the character of the area, making it more attractive to potential tenants and providing a structure for the phasing and development of the site. It will also improve the approach to the station and the amenity of existing local residents. There will be a balance to be struck between the amount of parking to be retained to serve the station, the amount of new development and its parking and the space given over to landscape, and there is the flexibility in this approach to adapt to changing circumstances and market demands.

The illustrative framework has been used to produce the schedule of accommodation below which takes a balanced view of the site's capacity. There are a number of other possible layouts and design approaches each of which would be capable of delivering a similar level of development:



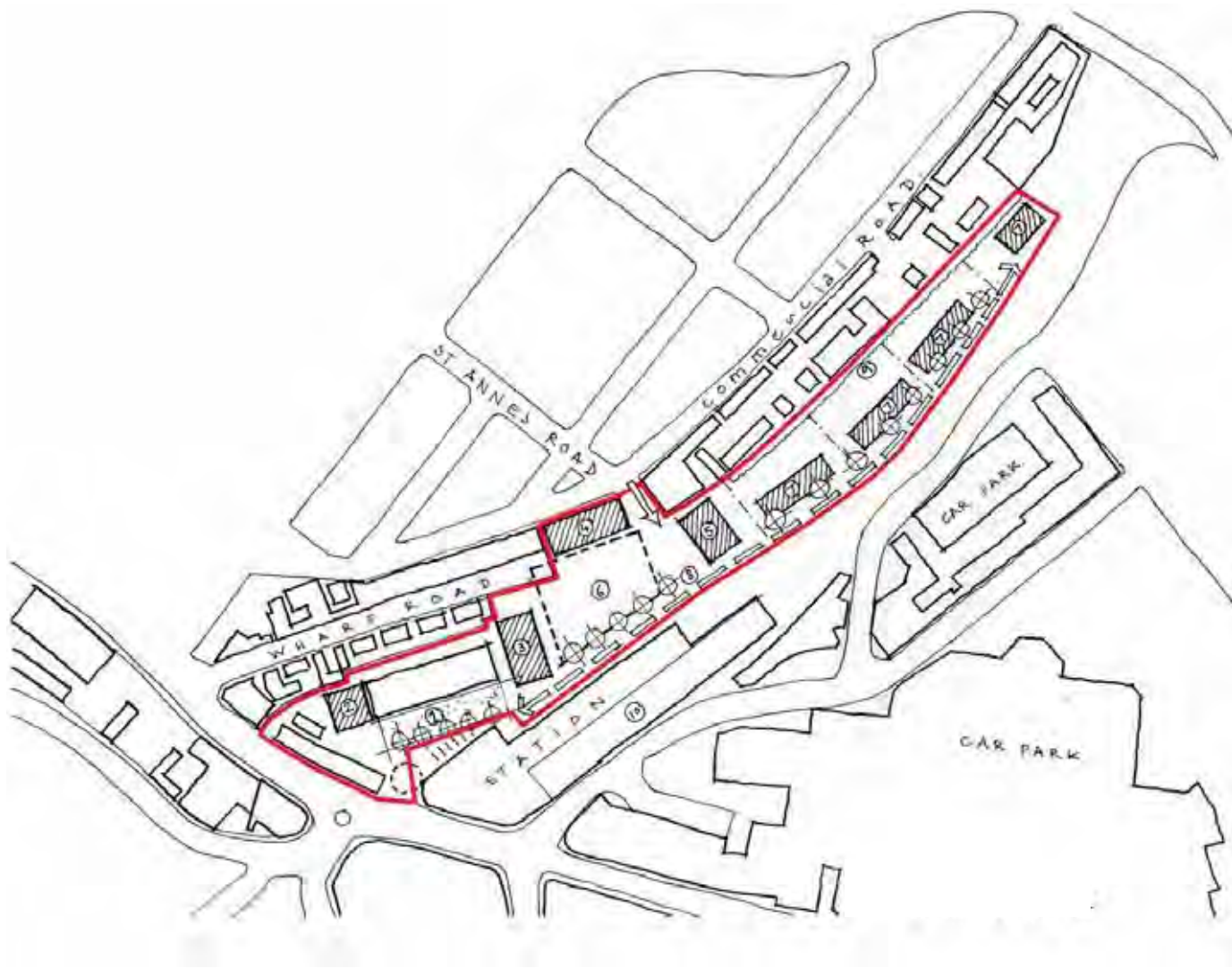


Illustration 1: Site 2 - Station Site

KEY

- 1 Landscaped 'station square'
- 2 Block A
- 3 Block B
- 4 Block C
- 5 Block D
- 6 Landscaped parking square
- 7 Blocks E1 – E4
- 8 Green Link
- 9 Landscaped buffer
- 10 Additional parking spaces

**Schedule of accommodation: option A – employment**

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Block A:	400m <sup>2</sup> x 3 floors - 1,200m <sup>2</sup> GFA	B1a, studios, start up
Block B:	675m <sup>2</sup> x 3 floors - 2,025m <sup>2</sup> GFA	B1a
Block C:	936m <sup>2</sup> x 3 floors - 2,808m <sup>2</sup> GFA	B1a, studios, start up, live/work
Block D:	450m <sup>2</sup> x 3 floors - 1,350m <sup>2</sup> GFA	B1a, studios, start up
Block E1:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E2:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E3:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up
Block E4:	360m <sup>2</sup> x 2 floors - 720m <sup>2</sup> GFA	B1a/b/c, B2, studios, start up

**Total** **10,263m<sup>2</sup> GFA**  
**8,724 m<sup>2</sup> NIA**

(NOTE: NIA based on 85% net/gross)

**Schedule of accommodation: option B – employment and residential**

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For this option it has been assumed that blocks D and E1 to E4 would be residential, with the remainder for employment uses as option 1, located on the south part of the site as set out in paragraph 4.27 of the ELLP

Block A:	400m <sup>2</sup> x 3 floors - 1,200m <sup>2</sup> GFA	B1a, studios, start up
Block B:	675m <sup>2</sup> x 3 floors - 2,025m <sup>2</sup> GFA	B1a
Block C:	936m <sup>2</sup> x 3 floors - 2,808m <sup>2</sup> GFA	B1a, studios, start up
Block D:	450m <sup>2</sup> x 3 floors - 1,350m <sup>2</sup> GFA	residential
Block E1:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E2:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E3:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential
Block E4:	360m <sup>2</sup> x 3 floors - 1,080m <sup>2</sup> GFA	residential

**Total** **6,033m<sup>2</sup> GFA employment**  
**5,128m<sup>2</sup> NIA**

**5,670m<sup>2</sup> GFA residential (up to 74 dwellings, 2-bedroom)**

(NOTE: Residential numbers based on 85% net/gross & 65m<sup>2</sup> unit sizes)

## **Conclusion**

This is an important and undervalued site in terms of its location and the contribution it could make to the setting and character of the town centre and the perception of those arriving by rail. It has the capacity for, and requires a level of development that is sufficient to make a significant change if its potential is to be realised.

This capacity study, although not a definitive design proposal, gives a sensible indication of the scale of development that could be achieved and is likely to be required to realise the site's potential and provide a more attractive and flexible town centre employment offer.

## Site 3

### The urban design context

This site occupies a landmark position in the town centre where a number of roads come together and has a visual relationship with both the railway station and the council offices. The block provides an architectural waypoint at this junction with Grove Road heading south towards the seafront and Upperton Road north west to Old Town. The block also marks the boundary between the town centre and the residential areas to the west and south, with the eastern part opposite the station and site 2 as described above. The building at the south eastern end of this block, which is to be retained and is of architectural merit, sets a standard for the scale and character of the redevelopment of the rest of the site. The character of Upperton Road along this stretch is larger scale with five and six storey buildings, whereas the southern side of the site is part of a more domestic, smaller scale setting of Southfields Road.

**Land use:** the site is occupied by a mix of building types with the majority taken up by the post office building and an associated parking/service area. The post office building is of architectural merit, and although for this exercise it has been assumed that the whole of the site could be redeveloped, this building could be retained and converted without making a significant difference to the development capacity. The north western part of the site is occupied by a more modern two storey building that has been vacant and on the market for a few years.

**Access and parking:** There are five existing vehicular access points to the parking and service areas off Southfields Road with two off Upperton Road serving the vacant building on the north western part of the site. There is also a level difference between Southfields Road and Upperton Road such that the parking areas sit below the level of Upperton Road. The station is approximately 100m from the eastern part of the site and there are two large multi storey car parks approximately 400m from the site (4 – 5 minutes walk).

### Capacity

In considering the development capacity of this site, the following assumptions have been made: **building scale will be four storeys** in line with the retained corner building and the general context, **building blocks will be 18m deep** with a footprint to allow for **parking and landscape setting**, **existing vehicular access** will be used, level difference between Southfields Road and Upperton Road can be used to accommodate **undercroft parking**.

The layout shown in **illustration 2** is based on developing the site as three plots which relate to the existing buildings and ownerships giving the following:

- 1 Redevelopment of post office building (Block A) retaining street frontage with vehicle access off Southfields Road and undercroft parking. Four storeys with setback upper floor. A class uses at ground floor, B1 uses on upper floors
- 2 Redevelopment of post office parking/service yard (Block B) continuing street frontage with vehicle access off Southfields Road and undercroft parking. Four storeys with B1 uses on lower two floors and residential on upper floors
- 3 Redevelopment of vacant building site (Block C) continuing street frontage with vehicle access off Upperton Road and undercroft parking. Four storeys all residential

This framework has the flexibility to be developed in a number of other different employment/residential mixes to meet market demands. For this study a split of around 50/50 has been assumed which reflects the change from commercial to residential along Upperton Road. There are a number of other possible layouts each of which would be capable of delivering a similar level of development:

### Schedule of accommodation

Block A: 864m<sup>2</sup> x 4 floors = 3,456m<sup>2</sup> GFA

A1/A3 846m<sup>2</sup>

B1a 2,538m<sup>2</sup>

Block B: 900m<sup>2</sup> x 4 floors = 3,600m<sup>2</sup> GFA

B1a 1,800m<sup>2</sup>

Residential 1,800m<sup>2</sup>

Block C: 1,080m<sup>2</sup> x 4 floors = 4,320m<sup>2</sup> GFA

Residential 4,320m<sup>2</sup>

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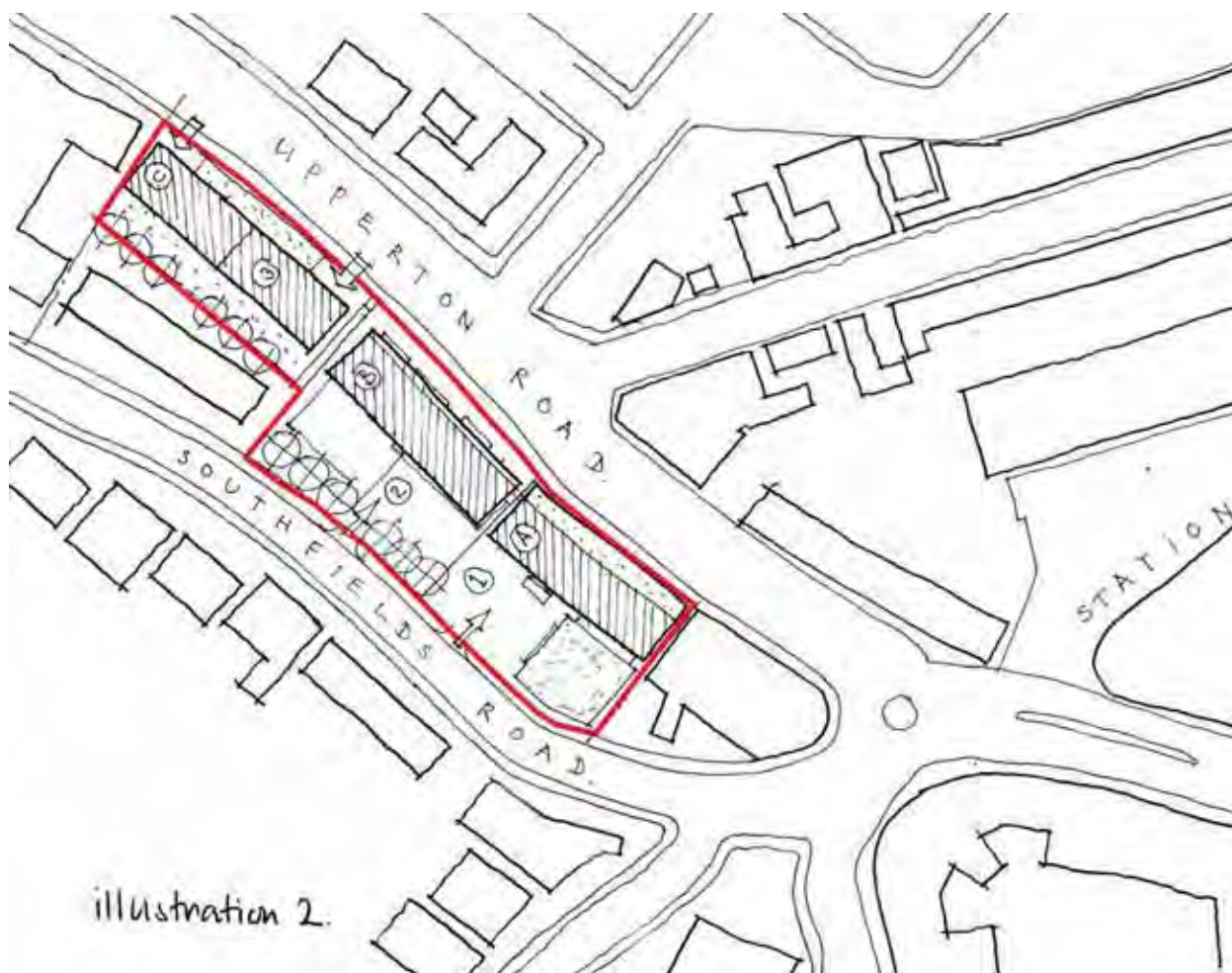
**Total 11,376m<sup>2</sup> GFA**

**846m<sup>2</sup> GEA / 720m<sup>2</sup> NIA - A1/A3**

**4,338m<sup>2</sup> GEA / 3,687m<sup>2</sup> NIA - B1**

**6,120m<sup>2</sup> – Residential (up to 80 dwellings, 2-bedroom)**

NOTE: Residential numbers based on 85% net/gross & 65m<sup>2</sup> unit sizes  
Employment NIA based on 85% net/gross



**Illustration 2: Site 3 – Southfields Road Site**

## Conclusion

The mixed use development of this site with three or more separate building blocks would provide the flexibility for the development to meet market demands and to be adaptable over the long term. There would be additional value in having employment related uses on the parts of the site closest to the town centre and for the station site opposite. All uses would benefit from the proximity of the railway station and would contribute to the vibrancy of the station site if it were to be redeveloped as described above. In terms of town centre planning development it would be expected that a masterplan would be prepared as a basis for exploring the collective potential of both sites, and assessing their capacity and mix of uses.

## Summary

The level of development proposed in the town centre at an additional 3,000m<sup>2</sup> would be insufficient to establish a new employment offer that would attract new investors, tenants, businesses and employers.

If delivered on sites 2 and 3 it would equate to a small three storey building with a footprint of about 15m x 33m which would be next to insignificant on both sites and would be nowhere near enough to generate either a sense of place or an employment offer that has enough critical mass to attract businesses and meet the 'in town vibrancy and wider amenity' (as aspired to in **paragraph 4.21. of the Employment Land Local Plan - Proposed Submission Version**).

The Plan should provide for a wider range of users than just 'start ups' if it is to "broaden the stock types available and attract greater levels of demand over the plan period" as stated in **paragraph 4.22**. It needs good quality follow on space too to provide a more rounded, more attractive offer that will give 'vibrancy' and somewhere for start-ups to grow into. It needs to create critical mass and variety, which would be impossible with a couple of small buildings over the Plan period.

Given the "considerable constraints" and "very limited supply of developable land that Eastbourne suffers" (**paragraph 2.25**), Sites 2 and 3 offer an excellent opportunity to achieve this and the following **objectives** of the **Employment Land Local Plan - Proposed Submission Version**, to;

Provide "**flexible, 'mixed' units** that allow businesses to have combined office, workshop and production space within one building". (**Paragraph 2.14**)

"further the **development of 'clusters'**.... as an opportunity to grow existing specialisms through promotion and provision of appropriate space". (**Paragraph 3.12**)

"**maintain the role of offices as a key town centre use and sustain the vibrancy and vitality of the town centre**, but also to **broaden the stock types available** and attract greater levels of demand over the plan period." (**Paragraph 4.22**)

**Resist "The loss of office stock within the Town Centre" (Paragraph 4.30)**

(Because the Town Centre is under additional pressure of loss of employment space, through residential conversion, an additional allowance, or increased 'headroom' should be made as part of the Plan.)

A more comprehensive development of these two sites will also meet the following **Vision Objectives** set out in **paragraph 2.42** of the Employment Land Local Plan - Proposed Submission Version, which taken together are more or less a brief for creating a mixed business quarter around the station;

- **ELLP2 - Encourage Small and Start-up Businesses** - To deliver a variety of new employment opportunities by providing a range of flexible employment spaces that can be used by existing businesses and new start-up businesses
- **ELLP3 - Diversify the Local Economy** - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish
- **ELLP4 - Support Existing Businesses** - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.
- **ELLP5 - Promote Sustainable Employment Locations** - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.

The allocation of only 7% of the employment requirement over the Plan period to the Town Centre (paragraph 3.10) seems to fly in the face of the Plans overall objectives, and if adopted could prove to be detrimental to future prosperity of the Town Centre.

### Summary tables:

<b>Option A: employment uses only on Site 2; mixed use on Site 3</b>					
	<b>office</b>		<b>commercial</b>		<b>residential</b>
	<b>GFA</b>	<b>NIA</b>	<b>GFA</b>	<b>NIA</b>	
Site 2	10,263	8,724	-	-	-
Site 3	4,338	3,687	846	720	80
<b>Total</b>	<b>14,601m2</b>	<b>12,411m2</b>	<b>846m2</b>	<b>720m2</b>	<b>80</b>

<b>Option B: employment and residential on Site 2, mixed use on Site 3</b>					
	<b>office</b>		<b>commercial</b>		<b>residential</b>
	<b>GFA</b>	<b>NIA</b>	<b>GFA</b>	<b>NIA</b>	
Site 2	6,033	5,128	-	-	74
Site 3	4,338	3,687	846	720	80
<b>Total</b>	<b>10,371m2</b>	<b>8,815m2</b>	<b>846m2</b>	<b>720m2</b>	<b>154</b>

(Study prepared by Brendan O'Neill BA Hons, Dip AA who is a registered architect and director or rCOH)



**ANNEX C**

**Site 3 Planning Committee Report, Caffynes Garage Site (extracts)**

<b>App No:</b> 150803 (APP)	<b>Decision Due Date:</b> 8 October 2015	<b>Ward:</b> Upperton
<b>Officer:</b> Lugh Rainier	<b>Site visit date:</b> 28/09/15	<b>Type/Planning Permission</b>
<b>Site Notice(s) Expiry Date:</b> 10 September 2015		
<b>Neighbour Con Expiry:</b> 10 September 2015		
<b>Press Notice(s) Published:</b> 25/08/15		
<b>Over 6/13 week reason:</b> Reported to Committee within statutory framework		
<b>Location:</b> 7 Upperton Road, Eastbourne		
<b>Proposal:</b> Demolition of existing buildings and redevelopment to form circa 61 one and two bed sheltered apartments for the elderly including communal facilities, access, car parking and landscaping.		
<b>Applicant:</b> Mr Alan King		
<b>Recommendation:</b> Subject to S106 covering local employment issues and age of resident entry to the scheme then planning permission should be granted subject to conditions outlined within this report.		

**Executive Summary:**

The application relates to redevelopment of the former Caffrys Garage site on Upperton Road. The proposed use and scale of development accords the local policies contained within the development plan including the Eastbourne Town Centre Local Plan (ETCLP) and as such there are no objections in principle to the proposed redevelopment.

It is considered that the location, design and siting of the building is such that it would not give rise to a material loss of amenity sufficient to justify a refusal of planning permission.

The proposed use is considered to meet a local need and the level/intensity of off street parking is deemed to be acceptable for this client group.

Issues over demolition and construction access are to be considered via planning conditions.

Subject to a S106 (Legal Agreement) covering local employment issues and age of resident entry to the scheme then planning permission should be granted subject to conditions outlined within this report.

**Town Centre Action Plan adopted November 2013**  
TC1 Character Area  
TC2 Town Centre Structure - 'Improved appearance from Upperton Road'

Access to outside space should be fully explored for the well-being of the residents.

**Highways (S106):** To be reported at Planning Committee

**Neighbour Representations:**

135 neighbour letters were sent out resulting in 10 objections being received commenting in the main on the following issues:-

- loss of light
- Overshadowing
- Construction from Southfields Road may cause congestion and Highway safety problems
- Access would be better from Upperton Road
- Double yellow lines in area for safety reasons
- Southfields Road is an accident black spot
- Loss of privacy
- Building is too close to Upperton Road
- Pedestrian Access should be introduced linking Upperton and Southfields
- Construction Noise and Dust
- Loss of View

The Council have received 3 letters of support to the proposal

**Appraisal:**

**Principle of Development:**

The site is located with Development Opportunity Site 3 (Policy TC20 of the Eastbourne Town Centre Local Plan (ETCLP), 2014). The proposal would provide sheltered housing for the elderly (considered to be C3 Planning Use Class), which is in need locally, in line with Paragraph 50 of the NPPF. The application would provide 61 flats, going some way to meeting the overall housing delivery target for the Development Opportunity Sites within the Town Centre neighbourhood. The application does not prevent the remainder of the Development Opportunity Site coming forward for a mix of uses, therefore is not contrary to Policy TC20 of the ETCLP. The proposal is in general conformity with the Town Centre neighbourhood vision (Policy C1 of the Eastbourne Core Strategy Local Plan, 2013) in that it "delivers new housing through redevelopment".

The Eastbourne Borough Plan (2003) contains a specific planning policy (Policy HD17: Supported and Special Needs Housing) in relation to the development of residential care homes (C3 Planning Use Class). The proposal generally meets the following criteria contained in the policy, in that the site is in a sustainable and accessible location near to public transport routes, and the scheme's design is functional to the needs of its occupants.

It is acknowledged that as a society the population is ageing and as such there is an increasing requirement to meet the needs and requirements of this sector of the community. The applicants are a specialist provider in this field and would go some way to meeting Eastbourne's demand for elderly sheltered accommodation.

It is considered therefore that the principle of residential development in this manner proposal is acceptable.

...

03/01/1998

**Proposed development:**

**General Concept:-**

The scheme relates to the demolition of the entire building to be replaced by a new building providing accommodation for 61 units for private sheltered accommodation. The scheme is to be built/managed by Churchill Retirement Living a specialist provider delivering accommodation that is designed to meet the needs of the independent retired people and provides self-contained apartments for sale within the block.

It is intended that the apartments are sold with a lease containing an age restriction which ensures that only people of 60 years or over, or those over this age with the a partner at least 35 can live in the development. The applicants outline that even with the age restriction as outlined above the average age of the occupiers within their portfolio is 75, the majority of which are single female households.

The development will have a 'lodge manager' employed by the management company and will provide general site maintenance of the buildings/gardens and also security to the residents. The 'lodge manager' is on site during working hours and when off site there is an emergency alarm system fitted in each apartment and communal areas. The development will be accessed via a warden entry system from both the car park level and from Upperton Road.

**New Building:-**

The new building is to have 5 storeys fronting onto Upperton Road and given the change of levels 3 storeys to the rear. The building is to have a flat roof and proposed to use a range of external finishes including facing bricks, render and stone coloured cladding panels.

The proposed building incorporates a curved facade to the south-eastern corner of the building in order to provide some visual interest to views from The Avenue and also views to the site up from the train station and from the Town Centre.

A brick and flint boundary wall is proposed along the Upperton Road frontage of the site.

**Separation Distances & Height:-**

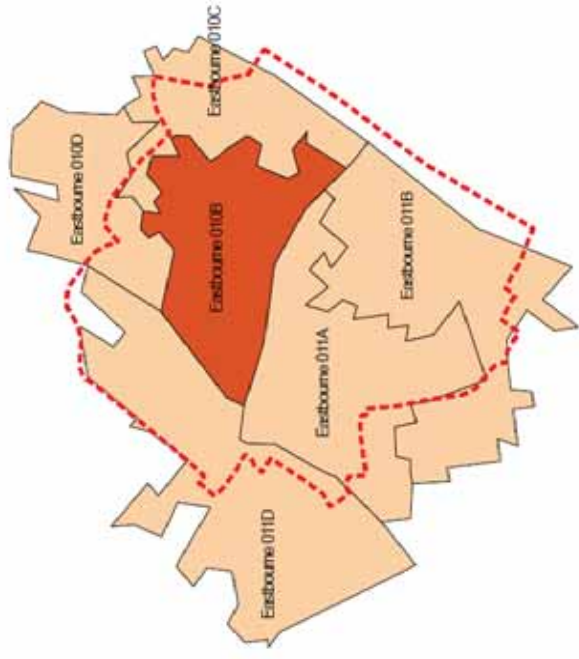
The building is to be located close to the Upperton Road boundary of the site and is sited at the middle of the building, this reflects the curvature of this part of Upperton Road. The frontage of the building is some 30m from properties on the opposite side of Upperton Road. The building is proposed to be sited so the back to back distance is some 21m from the rear of the property Southfields Court, Marlborough Court which lies to the eastern boundary of the site has an 'H' shaped footprint and to the central limb of the 'H' there is a separation of some 18m and a back to back distance to the bottom limb of the 'H' in excess of 23m.

The external height of the building is broadly similar with the properties to the north (opposite) and east (adjacent) of the site and approximately 4m above the height of Southfield Court (rear).

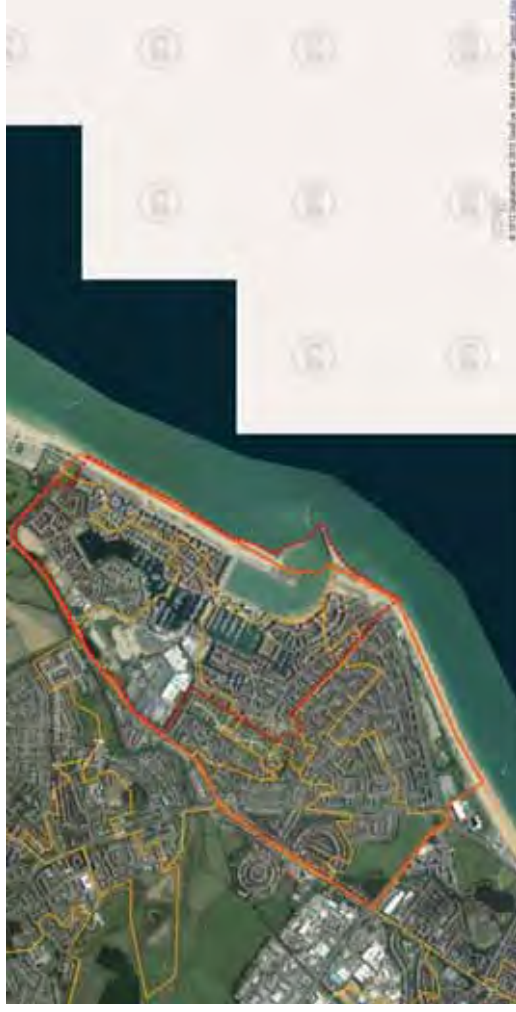
**ANNEX D**

**Town Centre and Sovereign Harbour**

**Sustainable Neighbourhood Assessment Data**



LSOA11NM	Population Census 2011	Working Age People (16-74)	All working	Work mainly at or from home	Public transport	Private vehicle	Foot or cycle	Other
<b>Eastbourne 010B</b>	<b>1990</b>	<b>1671</b>	<b>1036</b>	<b>35</b>	<b>175</b>	<b>423</b>	<b>390</b>	<b>13</b>
Eastbourne 010C	2035	1693	1050	41	183	412	405	9
Eastbourne 010D	1686	1274	887	35	114	453	280	5
Eastbourne 011A	1843	1441	998	64	186	387	357	4
Eastbourne 011B	1721	1135	658	47	89	285	225	12
Eastbourne 011D	1700	1201	758	41	144	358	210	5
<b>Total</b>	<b>12609</b>	<b>9558 (76%)</b>	<b>6057 (48%)</b>	<b>320 (3%)</b>	<b>977 (8%)</b>	<b>2601 (21%)</b>	<b>2101 (17%)</b>	<b>58 (1%)</b>



LSOA11NM	Population Census 2011	Working Age People (16-74)	All working	Work mainly at or from home	Public transport	Private vehicle	Foot or cycle	Other
Eastbourne 014B	1578	1226	777	66	65	589	50	7
Eastbourne 014D	1338	1107	772	50	96	586	35	5
Eastbourne 013E	2004	1449	929	40	88	711	85	5
Eastbourne 014A	2455	1856	1216	80	118	893	107	18
Eastbourne 014C	1600	1140	658	36	77	470	71	4
Eastbourne 013C	1457	970	641	20	50	497	74	0
Eastbourne 013D	1412	986	533	17	43	422	50	1
Total	11844	8734 (76%)	5526 (47%)	309 (3%)	537 (5%)	4168 (35%)	472 (4%)	40 (0.2%)

**ANNEX E**

**Sovereign Harbour Innovation Mall**



## Units, January 2016

Floor Units	Occupied / Let	Under Offer	Vacant	Total
1	4	3	4	11
2	-	1	5	6
3	-	-	2	2
<b>Total</b>	<b>4</b>	<b>4</b>	<b>11</b>	<b>20</b>

Requests for full details of lettings have been made to both SeaChange and EBC. These however have not been provided.

An economic development project from **SeaChange SUSSEX**

For the latest on the Sovereign Harbour Innovation Park, visit [www.seachange.sussex.co.uk/our-programme/eastbourne](http://www.seachange.sussex.co.uk/our-programme/eastbourne)

**Location**  
Sovereign Harbour Innovation Park, Eastbourne, East Sussex BN23 6FA

**Road**  
The A27 connects Eastbourne to London and the M25. The A27 connects to Brighton, the A259 to Hastings, Ashford, the Channel Tunnel, ferry ports and M20.

**Rail**  
Eastbourne station is 4 miles away, with regular trains running to London, Hastings, Ashford and Brighton.

**Air**  
Gatwick is under an hour away by direct train and 49 miles away by road.

**Ferries**  
Eastbourne is 16 miles from Newhaven and 68 miles from Dover.

**Channel Tunnel**  
Frequent trains connect to Lille, Paris and Brussels via Ashford International.

West Sussex County Council is currently seeking applications for the site, which is the part of an innovation, office or contact in relation to the property development. No part of the site is for sale. Callers of any firm (which has authority to make or give any representation on behalf of the firm) in connection with the site, must satisfy themselves independently as to the accuracy of all matters on which they are asked to rely. All negotiations are subject to contract.

March 2016

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**ANNEX F**

**RSA - NOVEMBER 2015**

**RE-APPRAISAL OF EBC's Preferred Option 3a**



**Core Implications. This balance of provision will:**

- Reduce the amount and choice of office space in the town centre
- Result is less opportunity to work in offices within the town centre
- Out commuting will increase to peripheral car based locations and to outside of the Borough
- Business based linkage benefits within the town centre will significantly weakened
- The development lead-in times will be significant and will not result in rapid take up or job creation
- Mitigation with improved public transport at the Harbour cannot be levied onto the development it will require more public cross subsidy
- The viability of the harbour sites will worsen further
- The employment choices at the Harbour will be less diverse than a mixed employment park option
- The choice of jobs and the ability to match jobs to Harbour/ NE Eastbourne residents will be less likely, requiring employees to be drawn from further afield with transport implications

Sustainability Objectives		Option 3A: EBC Preferred Option: 76% Office TC; 24% SH (3,000sq.m. TC; 20,000sq.m. SH)				Commentary
		3A jam	SHL ?	Short term	Medium term	
CS1	<b>Homes</b> To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	j				<p><b>jam</b> By limiting the amount of new development within the Town Centre and providing 20,000sq.m. at Sovereign Harbour, sites within the TC can be retained for residential purposes in order to meet the established housing need.</p> <p><b>SHL</b> jam has notably only graded this a minor positive, short to long term effect. The same if not greater benefits can be achieved through an alternative approach to develop sites within the TC and hence the need for EBC's proposed balance of office allocations to achieve housing growth is not agreed.</p> <p>EBC has identified a number of large allocation sites within the TC that are very well suited for office development (TC Sites 2 and 3). The Council has also identified a number of additional contingency opportunity and transition areas within the TC for office development that can (along with windfall opportunities generally) provide sites for new residential development within the TC.</p> <p>As a more viable development option these opportunity and transition areas will be more attractive to developers as housing sites and the housing need for the Borough will still be met.</p>
CS2	<b>Health</b> To improve the health and wellbeing of the population and reduce inequalities in health.	j				<p>Limiting office development in the TC is unsustainable and is unnecessary to meet housing need.</p> <p><b>jam</b> No Significant impact.</p>

<p><b>CS3</b></p>	<p><b>Social Exclusion</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town.</p>	<p>j</p>	<p><b>jam</b> The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon poverty and social exclusion.  <b>SHL</b> The level and amount of office space in the TC will reduce, removing office jobs from within the most sustainable, readily accessible part of the town for the majority of Eastbourne residents and commuters to the town. The potential to provide office space at SH has existed for 20 years and has only now been progressed with significant public subsidy and with slow take-up on unviable terms. Further office development will take a substantial length of time to be released and will require even more subsidy and subsidised public transport provision.  The speed at which office jobs at SH will be created will be slow and costly to the public purse. It will require lengthier and costly public transport or car based journeys for staff. Funds will be better directed to sites within the established, sustainable TC, allowing the sites at SH to (1) provide office jobs on Site 6 and a more diverse and socially inclusive range of jobs on Sites 7a and 4 which will in turn support the office campus on Site 6 making that site more attractive to occupiers and employees.</p>
<p><b>CS4</b></p>	<p><b>Education</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work.</p>	<p>j</p>	<p><b>jam</b> The option provides greater choice and flexibility to the market, which should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.  <b>SHL</b> Choice and flexibility of office space can and would be better located within the TC. The lead-in times and public subsidy required to realise new office jobs at SH are significant and will constrain job creation. Public funds will be better directed to new premises within the TC / supported training services.</p>
<p><b>CS5</b></p>	<p><b>Crime</b> To reduce crime and the fear of crime.</p>	<p>j</p>	<p><b>jam</b> No significant impact.  <b>SHL</b> The creation of single use office parks do present crime related design issues. Office development within mixed use locations that provide better natural surveillance are more beneficial. Hotel and care home uses are examples of employment generating uses that can sit well alongside office developments in design terms and in the case of hotels also help to directly support and make the office parks more attractive to occupiers. Sites 7a and 4 at SH provide opportunities for such uses alongside a significant new (albeit subsidised) office park on Site 6.</p>
<p><b>CS6</b></p>	<p><b>Communities</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town.</p>	<p>j</p>	<p><b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market and a more sustainable and inclusive community.  <b>SHL</b> Choice and flexibility can be provided more sustainably within the TC. This option will reduce office space and choice of office accommodation within the TC, displacing it to a more peripheral location within the town or to outside of the town altogether. This in turn will require longer / less direct public transport or car based journeys to SH. The speed and extent of new office development and job creation at SH will be slow. A sustainable option that will provide jobs more quickly and in turn greater inclusivity will be the creation of a mixed employment park at SH.</p>

<p><b>CS7</b></p>	<p><b>Accessibility</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone.</p>	<p>j</p>					<p><b>jam</b> 76% of office provision will still be provided within the town centre, which is a very sustainable location with good links via public transport. The provision of 24% of the allocation may increase car use but could also provide more opportunities for the viability of public transport in the future as a result of economic growth.</p> <p><b>SHL</b> An allocation of 3,000sq.m to the TC will result in the net reduction in office space in the TC. A much more significant allocation is needed to replace that which is being lost to other uses and to provide more high quality, flexible space in the town's more sustainable location.</p> <p>The provision of new office space at SH <b>will be slow</b> to realise but it <b>will</b> increase car use. Office development at SH is unviable and cannot support public transport improvements. Any such improvement will need to be publicly subsidised or will require bus operators to respond to increase demand. As a peripheral location on the north-edge of the town, bus connectivity will always be relatively poorly connected to other residential areas of Eastbourne with the exception of the town centre.</p>
<p><b>CS8</b></p>	<p><b>Economy</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth.</p>	<p>j</p>					<p><b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to ore appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability assessment of this option has the best score as the town centre is 118% less viable than out of town sites.</p> <p><b>SHL</b> Choice and flexibility of office space can and would be better located within the TC. This option will reduce the TC offer and will result in slow deliverability of subsidised office space at the less sustainable location of SH, weakening the market offer overall.</p> <p>The SH SPD 2013 is out of date pending the outcome of the ELLP. The Innovation Mall has required public subsidy and has been met with slow take-up on effectively unviable terms.</p> <p>The B/GVA Viability and Deliverability Assessment that has appraised the relative viability of the TC and SH for office development is flawed (Please refer to SHW report) and does not take into account the extent of subsidy required at SH, the rental levels required to sustain such office provision at SH which has not been achieved and is not assumed to be achieved by B/GVA and does not take into account that SH development cannot fund public transport improvements to mitigate for its poor transport and connectivity ratings.</p> <p>SH is not a viable office location. The TC has its challenges as an office location also but it is the most sustainable overall and public funds are better directed to sites within the centre if required in addition to planning policy allocations to support and direct new office development there. Other Council's within the East Sussex local economy area are maintaining this approach including Brighton and Hove Council where 90% of office space is within the city centre.</p>
<p><b>CS9</b></p>	<p><b>Economic Growth</b> To ensure development is masterplanned to provide effective commercial infrastructure that will support and enable continued economic growth and not just housing growth.</p>	<p>j</p>					<p><b>jam</b> The development would form part to of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites. Sovereign Harbour is a masterplanned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1 office). Options to improve the viability of development by assisting in funding the infrastructure requirements should also be investigated.</p>



<p><b>CS12</b></p>	<p><b>Biodiversity</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability.</p>	<p>j</p>				<p><b>jam</b> Whilst the town centre is not located to any sensitive site of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.</p> <p><b>SHL</b> The masterplanned approach for the employment site at SH has been agreed through the outline permission for the site. This has taken into account ecology and biodiversity factors.</p>
<p><b>CS13</b></p>	<p><b>Natural &amp; Historic Environment</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment.</p>	<p>j</p>				<p><b>jam</b> Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for a park as set out in the SPD but will also result in the loss of open space. Any loss will need to be mitigated through new provision.</p> <p><b>SHL</b> The masterplanned approach with the provision of a new public open space on Site 7 (7b) and the provision of a new public square on Site 4 has been agreed through the SPD and the more recent outline permission for these sites. These facilities in turn reduce the amount of space available for employment generating uses but will provide facilities and an attractive environment for new employees as well as residents of the Harbour.</p>
<p><b>CS14</b></p>	<p><b>Land Use</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance.</p>	<p>j</p>				<p><b>jam</b> Development is on previously developed land in both locations and promotes more efficient use of the land, which will create a more balanced office market, whilst enabling homes to be provided within the town.</p> <p><b>SHL</b> The setting aside of Sites 6, 7 and 4 for offices will require further extensive marketing and a very long lead in term. This will render much of the remaining land at the Harbour void for a further extensive amount of time which is not account for in jam's short to long term assessment of the impact of this proposed allocation. A more efficient and effective approach would be to allow a more missed development on Sites 4 and 7.</p>
<p><b>CS15</b></p>	<p><b>Landscape &amp; Townscape</b> To maintain and enhance the quality of landscapes and townscapes.</p>	<p>j</p>				<p><b>jam</b> The development is in built up areas and is unlikely to have an adverse impact on landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated.</p> <p><b>SHL</b> The (re)development of sites within the TC will provide an opportunity for new and improved additions to the centre's town and streetscapes and adjoining public realms. The sites at SH are reclaimed largely empty, disused or under used sites. Local concern has been expressed about the continued location of a managed spoil mound on Site 7a which is to remain whilst it might still be required for ground works on the remaining sites at the Harbour. The setting aside of the sites for office only development will result in a long lead in time for development and the sites remaining in their current situation for longer. A mixed park option would allow them to be developed for high quality development sooner, to the benefit of the streetscape of the Harbour and the role of Site 7a with its frontages on Pevensey Bay Road and Pacific Drive as a gateway location into the Eastbourne and the Harbour.</p>

CS16	<p><b>Air Quality</b> To reduce air pollution and ensure air quality continues to improve.</p>	j						<p><b>jam</b> Development is likely to cause an increase in the levels of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although could provide more opportunity for the viability of public transport in the result as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.</p> <p><b>SHL</b> SH is relatively poorly connected by public transport and will require significant public subsidy to provide easily convenient connections from across Eastbourne in order to encourage workers from across the town to travel there by bus. These effects will worsen as the sites are developed over time. The development is therefore likely to remain very heavily car based and will result in increased air pollution and concentrations of emissions if the Harbour sites are to be in mono-use as an office park with a resulting peak in commuter times. The development for offices cannot subsidise public transport improvements on viability grounds. These effects will be mitigated in part if the Harbour can be developed as a more mixed employment location, spreading the timely of trips to and from the Harbour and reducing peaks in traffic volumes and resulting poorer air quality.</p>
CS17	<p><b>Water Quality</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment.</p>	j						<p><b>jam</b> Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable measures should be identified in consultation with the regulatory authorities.</p> <p><b>SHL</b> Impacts on water quality have been reviewed through the outline planning permission for the sites at SH. This will be reviewed further through detailed design responses. Design solutions have been agreed for the residential schemes on Sites 7c and 8 and no issues should arise for the remaining sites also.</p>
CS18	<p><b>Flood Risk</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	j						<p><b>jam</b> Development is unlikely to reduce the risk of flooding and SH could be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and floor resistant designs are achieved.</p> <p><b>SHL</b> Flood risk has been reviewed through the outline planning permission for the sites at SH. This will be reviewed further through detailed design responses. Design solutions have been agreed for the residential schemes on Sites 7c and 8 and no issues should arise for the remaining sites also.</p>
CS19	<p><b>Climate Change</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts</p>	j						<p><b>jam</b> Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaptation to be implemented through sustainable design practices should be identified.</p> <p><b>SHL</b> The most effective mitigation will be the concentration of new office development within the TC where access by non-car means can be best supported. The concentration of offices at SH will result in increase car traffic and linked emissions that will increase over time as new space is developed.</p>
CS20	<p><b>Transport</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport</p>	j						<p><b>jam</b> Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.</p>

	<p>system away from private motorised vehicles, reducing the need for travel by car and shortening the number, length and duration of journeys.</p>						<p><b>SHL</b> Development at SH will be car reliant. Bus services can be increased but improvements in services will require public subsidy. The Harbour is too peripheral from many parts of the town for even improved services to connect sufficiently with the rest of Eastbourne and to encourage and enable people to travel to the Harbour by bus.</p>
<p><b>CS21</b></p>	<p><b>Waste</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting.</p>	<p>j</p>				<p><b>jam</b> The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.</p>	
<p><b>CS22</b></p>	<p><b>Natural Resources</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources.</p>	<p>j</p>				<p><b>jam</b> The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A larger quantum of development at SH may allow more scope for renewable forms of energy to be applied e.g. through district networks. Mitigation measures will need to be identified that encourage sustainable design and management.</p> <p><b>SHL</b> These matters will be addressed at detailed design stages for all development sites and subject to prevailing regulations and technological developments as appropriate to each location.</p>	
<p><b>EL1</b></p>	<p><b>Economic Growth</b> To promote sustainable economic growth.</p>	<p>j</p>				<p><b>jam</b> A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability assessment of this option has the best score as the town centre is 118% less viable than out of town sites.</p> <p><b>SHL</b> Choice and flexibility of office space can and would be better located within the TC. This option will reduce the TC offer and will result in slow deliverability of subsidised office space at the less sustainable location of SH, weakening the market offer overall.</p> <p>The SH SPD 2013 is out of date pending the outcome of the ELLP. The Innovation Mall has required public subsidy and has been met with slow take-up on effectively unviable terms. The B/GVA Viability and Deliverability Assessment that has appraised the relative viability of the TC and SH for office development is flawed (Please refer to SHW report) and does not take into account the extent of subsidy required at SH, the rental levels required to sustain such office provision at SH which has not been achieved and is not assumed to be achieved by B/GVA and does not take into account that SH development cannot fund public transport improvements to mitigate for its poor transport and connectivity ratings.</p> <p>SH is not a viable office location. The TC has its challenges as an office location also but it is the most sustainable overall and public funds are better directed to sites within the centre if required in addition to planning policy allocations to support and direct new office development there. Other Council's within the East Sussex local economy area are maintaining this approach including Brighton and Hove Council where 90% of office space is within the city centre.</p>	



<p><b>EL2</b></p>	<p><b>Employment Land</b> To maximise use of existing employment land.</p>	<p>j</p>	<p>jam</p> <p>The town centre sites may not be in employment use at present. The land at SH has already been permitted for employment use.</p> <p><b>SHL</b> The Town Centre Local Plan allocation sites with employment uses or set aside for potential employment uses (e.g. sites 2 and 3). The SH sites have been allocated for Class B uses for 20 years and have only just result in development of the Innovation Mall with the requirement for public subsidy and resulting slow lettings. The requirement to hold Sites 4 and 7 for office use will render that land void for a further extended period. To maximise the use of these sites is best achieved through their release for other employment uses that are permitted through the outline permission for the sites which supersedes the SH SPD 2013 and which will be better able to support the office park on Site 6.</p>
<p><b>EL3</b></p>	<p><b>Diverse Economy</b> To diversify the local economy and support businesses across a range of sectors.</p>	<p>j</p>	<p>jam</p> <p>A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013.</p> <p><b>SHL</b> This option will reduce office space within the centre and reduce choice, providing less flexibility for companies to locate and relocate within the town's most sustainable and most well connected location. In turn the business linkage benefits within and for other companies within the TC will weaken. Office provision at SH will be very slow to develop and will require public subsidy. The speed and extent of jobs growth will be weak and the concentration of new office provision at this single peripheral location will provide no choice or flexibility.</p>
<p><b>EL4</b></p>	<p><b>No. of Businesses</b> To increase the overall number of business enterprises operating in the town.</p>	<p>j</p>	<p>jam</p> <p>The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. Opportunities will be provided for existing businesses to expand or relocate to more appropriate premises. The vacation of existing space within the town centre will enable opportunities for new businesses. SH will offer space for both new and relocating businesses within the area.</p> <p><b>SHL</b> This option will reduce office space in the town centre linked with a low level of allocation and the loss of floorspace to other uses within the centre. Development at SH will require public subsidy and delivery with resulting job creation will be slow. The concentration of new office space at SH will provide no choice or flexibility for existing or new firms, the alternative option will be to relocate from Eastbourne altogether. The development of a mixed use employment park at SH will provide more immediate job creation across a wider range of sectors and will be better placed to provide job opportunities for a wider number of local peoples with different skills and interests, set alongside the office park on Site 6.</p>
<p><b>EL5</b></p>	<p><b>Start-ups</b> To promote and encourage business start-ups and small businesses.</p>	<p>j</p>	<p>jam</p> <p>A greater balance of provision within the borough should result in more spaces for start-ups and small businesses.</p> <p><b>SHL</b> The TC sites provide opportunities for innovation and serviced office developments within the most highly connected part of the town for the greatest number of local people, and ready access to the raft of business support services that office based companies typically require. SH provides scope for this within Site 6 but the Innovation Mall has been slow to let and the current letting terms render the scheme unviable. Focusing new provision at SH will also provide no choice for start-ups in terms of the location, type and letting terms for the space available to them.</p>

<p><b>EL6</b></p>	<p><b>Employment</b> To increase the number and range of employment opportunities in the town.</p>	<p>j</p>	<p><b>jam</b> The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation.</p> <p><b>SHL</b> This option will reduce office space and employment in the town centre. Restricting the development of the SH sites to office employment will result in a slow roll out and delivery of the sites and result in the jobs being relocated jobs / a very slow increase in new jobs. The new employment will also be limited to office based sectors and tasks. More office space within the TC will protect existing jobs and help firms to grow / locate to the town. A more mixed employment park at SH will result in quicker job creation across a wider range of sectors and skills sets.</p>
<p><b>EL7</b></p>	<p><b>Existing Businesses</b> To support existing businesses to continue trading in Eastbourne.</p>	<p>j</p>	<p><b>jam</b> A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises.</p> <p><b>SHL</b> This option will reduce office space within the TC. Existing businesses will have less choice in the TC. Their only choice will be to locate to the more peripheral location of the Harbour. The location, form and letting terms available to the will provide fewer options further away from the main business linkages and transport connections offered for them and their staff within the TC.</p>
<p><b>EL8</b></p>	<p><b>Linkages</b> To improve local business linkages.</p>	<p>j</p>	<p><b>jam</b> The provision of 76% office provision within the town centre will enable opportunities for local business linkages to be retained and strengthened. The new development at SH will help create new business linkages.</p> <p><b>SHL</b> This option will reduce office space within the centre. Business links will be weakened as firms relocate to outside of the centre and potentially to outside of the town altogether. The linkages that result from the clients and customers of such businesses will also be lost. It is not clear how jam has appraised that these will be strengthened. Business locating at the Harbour will benefit existing retailers and other services at SH and new links may result within the Harbour. An office park however will be a more limited local economy compared with a mixed employment park that would provide a greater range of services that can help to support office workers e.g. hotels and a children's nursery both of which are already permitted at SH pending the outcome of the ELLP.</p>
<p><b>EL9</b></p>	<p><b>Deprivation</b> To reduce economic deprivation in the resident population</p>	<p>j</p>	<p><b>jam</b> The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon deprivation.</p> <p><b>SHL</b> This option will reduce the level and choice of office space within the town centre provide no choice of alternative provision beyond SH. Development at SH is unviable, will require less convenient journeys to works from across the greater part of Eastbourne and requires subsidy. Focusing development at SH only on office space will provide a narrow range of opportunities within office based skills sets. Increased provision in the TC will protect office jobs, help them to grow where they are most accessible to the greatest number of local people and commuters to the town and enable a wider range of jobs to locate at the Harbour, in turn better helping to address deprivation.</p>

<p><b>EL10</b></p>	<p><b>Incomes</b> To increase the average incomes of residents in the town.</p>	<p>j</p>					<p><b>jam</b> Increasing opportunities for business and the location of new businesses in the area is likely to have a positive impact upon the incomes of residents.</p> <p><b>SHL</b> This will reduce office jobs in the town centre. These may relocate to SH or to outside of the town. This should not affect the salaries of local residents but any increases in commuter costs will impact on their disposable income. The incomes of non office based workers within a more mixed employment park at SH should not be assumed to be less than office based jobs.</p>
<p><b>EL11</b></p>	<p><b>Unemployment</b> To reduce levels of unemployment.</p>	<p>j</p>					<p><b>jam</b> The option provides a greater balance of uses within the town centre offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand and relocate to more appropriate premises.</p> <p><b>SHL</b> This option will reduce office jobs in the town centre. Staff who are unable or unwilling to commute to SH or to other towns as part of a company relocation will effectively be made unemployed with alternative options for office jobs within the TC much weakened by this policy. An office park at SH will create jobs but at a slow progress and subject to public subsidy. Greater office provision within the town centre will protect office employment and employment supported through local business linkages within the centre. A more mixed employment park at SH will create more jobs more quickly and for across a greater range of sectors and skills sets including those that will support and create local linkages for office based jobs at the Harbour.</p>
<p><b>EL12</b></p>	<p><b>Road Network</b> To ensure no adverse impact on the road network</p>	<p>j</p>					<p><b>jam</b> Development within the town centre is well serviced by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make viability of improved public transport service more likely in the future.</p> <p><b>SHL</b> This will reduce office space in the centre and will require employees to commute to the less well connected SH or to outside of the town altogether. SH will remain car based. Improved bus services will require subsidy that cannot be supported by development at SH on viability grounds and even then will not connect sufficiently with the greater Eastbourne area to provide for convenient commutes for most residents. A peripheral location such as SH will always remain car based and the impacts will increase as the sites are developed even over the extended time it will take for all of the land to be taken up for offices.</p>
<p><b>EL13</b></p>	<p><b>Sustainable Transport</b> To provide employment opportunities in locations that are accessible for local people and commuters.</p>	<p>j</p>					<p><b>jam</b> Development within the town centre is well serviced by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future</p> <p><b>SHL</b> This option will reduce office provision in the centre and will require employees to commute to the more peripheral and less well connected SH or to outside of the town altogether. SH will remain car based. Improved public services will require subsidy that cannot be supported by the development of the harbour and will not result in the necessary network of services to enable people to commute from across Eastbourne to SH. Increased office development in the TC will benefit from and continue to support existing public transport networks. A more mixed employment park could help to support improved bus services to and from the TC across the weekday and weekend services due to the more mixed employment and visitor patterns that will result having some sustainable transport benefits for the Harbour overall.</p>

<p><b>EL14</b></p>	<p><b>Resource Use</b> To reduce resource use from commercial &amp; industrial premises.</p>	<p>j</p>					<p><b>jam</b> The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.</p> <p><b>SHL</b> This applies to all development regardless of location and the policy allocation of new office space across Eastbourne</p>
<p><b>EL15</b></p>	<p><b>Noise</b> To reduce the impact of noise from commercial premises on residential areas.</p>	<p>j</p>					<p><b>jam</b> Office use is unlikely to have significant negative impacts of noise upon residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied</p> <p><b>SHL</b> jam's appraisal is agreed but this logically results is a neutral / no impact conclusion rather than the minor positive appraisal set by them.</p>
<p><b>EL16</b></p>	<p><b>Infrastructure</b> To ensure the necessary provision of infrastructure to support economic growth.</p>	<p>j S M L</p>					<p><b>jam</b> The provision of 3,000sq.m. within the town centre will have little effect on the existing infrastructure within the town centre. The provision of 20,000sq.m. provides the opportunity for new infrastructure to be provided that will enable economic growth in the future.</p> <p><b>SHL</b> This option will reduce office development, jobs and linkages within the town centre and will weaken the important weekday economy of the centre. An increased office provision will protect and strengthen the economy of the centre and help to support improvements in the infrastructure of the centre. The planning approval for the extended Arndale Centre (town centre Site 1) demonstrates this potential as it has helped to provide wider townscape and linkage improvements around the site and railway station. Office development at SH requires public subsidy. This is evidenced by the Innovation mall and the outline permission for the sites demonstrates that they cannot support infrastructure improvements or improvements to public transport services. The sites are not contributing to the provision of new community services within the Harbour.</p>
<p><b>Summary of findings:</b></p> <p><b>jam</b> This option tests a revised floorspace of 76:24 between Town Centre and Out of Town provision. B/GVA's Employment Land Review (ELR 2013) and Supplementary Evidence (SE 2014) showed that the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals: the imbalance in the provision of office space within the town centre being noticeably different to market towns within the wider sub-region. By way of comparison a 70:30 split is more usual.</p> <p>The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability assessment has shown that the out of town sites are more viable than town centre sites and are more likely to enhance the economic prospects of Eastbourne as a whole. The new out of town offer also needs to be of a sufficient scale to make an impact in the market and create a cluster of activity that can be self sustaining.</p> <p>Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.</p> <p>The development is likely to result in an increase in the use of resources. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.</p>							

**SHL**

The SH SPD has been superseded by the outline planning permission for a number of the remaining sites at the Harbour, including the remaining employment sites. This confirms the acceptability of a mixed employment park subject to the findings of the ELLP. It also confirms the viability constraints of office development at the Harbour and how such development cannot support infrastructure upgrades including upgrades to public transport services; i.e. which the RSA sets out are required to mitigate the transport and linked negative environmental impacts that will result from major car based office development proposed at SH.

B/GVA's ELR 2013 and Supplementary Evidence 2014 have been subject to robust review and have been found to be flawed. We have seen no evidence to counter our appraisal or to further support EBC / B/GVA's conclusions.

The Viability Assessment in support of the RSA has also been subject to review and has also been found to be flawed such that its conclusions are also not supported (please refer to our previous representations and the linked statements submitted in response to the RELLP and B/GVA's papers).

Other towns and cities within the local area do have office markets heavily concentrated within their central areas. This includes Brighton whose office market is also defined by a 90:10 centre and out of centre split. Sustainable planning solutions should not and cannot be set by broad target splits but must be led by local circumstances, the location choices available and the relative benefits of these in sustainability terms.

This option will reduce office space within Eastbourne town centre. The provision of just 3,000sq.m. of new office space (NIA) will provide only a small amount of new grade A space within the centre and no flexibility or choice for the majority of existing or new firms looking to locate here. The reduction in office space in the centre will have a negative impact on wider local business linkages which provide important daytime and evening business across a raft of sectors within the town centre and that will not be compensated for by new residents moving into the centre to live in particular when they must commute outside of the centre to work. A SH office park will remain car based and will not provide the environmental mitigation necessary to make it sustainable in transport and linked environmental impact terms.

At SH this option will provide office based businesses with effectively just be location choice for new office space, all set in a peripheral location where bus service connections cannot be substantially improved to serve the wider Eastbourne community for cross commuting purposes. The Innovation Mall has required public subsidy and does not provide a viable model for future development phases at SH. Rents will need to increase or build quality costs substantially reduced in order to bring the scheme into long term viability and at prices that tenants will pay in the Eastbourne market.

A more mixed employment park at SH has been accepted in principle subject to the findings of the ELLP. This will still provide at least 11,100sq.m. NIA of office space on Site 6 that is capable of accommodating at least 1,100 off jobs based on 10sq.m. NIA per job and still 917 jobs based on EBC preferred but inefficient 12sq.m. NIA per job. This would be alongside additional jobs within a range of appropriate sectors that can also help to support and link with the office park: namely hotel and children's day nursery uses. The more mixed park will be developed more quickly, create jobs more quickly, make better use of the employment land more quickly and spread car trips to the sites more smoothly plus be better placed to support improved bus services to the town centre across the week days and weekends.

The new approach that has been taken for the RSA does not address these key understandings or issues and does not appraise the space options set out in our last representations which made clear that the TC option was for a minimum of 9,000sq.m. NIA to be provided in the TC and a minimum of 11,100sq.m. at SH but with other options potentially available and not to be ruled out elsewhere in Eastbourne. The core issue remains; the balance of proposed office space allocations between the TC and SH that is preferred by EBC is not sustainable.

The balance proposed by SHL results in a ratio of 80:20 office provision between the TC and SH, is appropriate for the town and not significantly different to the target suggested by EBC but which is again artificial and cannot be blindly applied to all towns without reference to the nature of their office markets and the locations available and most appropriate for new office development.

**ANNEX G**

**SOVEREIGN HARBOUR ALTERNATIVE MIXED PARK OPTION**

**Minimum 9,000sq.m. TC**

**Minimum 11,100sq.m. Site 6 SH,**

**with additional employment uses on Sites 4 and 7a SH**



**Core Implications. This balance of provision will:**

- Protect and enhance office space within the town centre
- Result is retained and new opportunities to work in offices within the town centre
- Protect against excessive out commuting to peripheral car based locations and to outside of the town
- Protect business based linkages within the town centre
- Result in more rapid employment development and job creation at the Harbour
- Be better placed to increase use of public transport between the TC and the Harbour across week days / weekends (i.e. beyond office peak commuter hours)
- The viability of the harbour sites will be improved to positive rather than negative
- The employment choices at the Harbour will be more diverse and better placed to suit a wider range of local residents with different skill sets and interests
- The choice of jobs and the ability to match jobs to Harbour/ NE Eastbourne residents will be improved, enabling more employees to be drawn from the immediate area
- Business linkages within the Harbour will be improved supporting the office park on Site 6 and the wider businesses at SH across the week and weekend.

Sustainability Objectives		Option 3B: 80% Office TC; 20% SH (minimum 9,000sq.m. TC; minimum 11,100sq.m. SH)				Commentary
		3A	Short term	Medium term	Long term	
CS1 Homes To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	jam	j				jam By increasing the amount of new development within the Town Centre, sites within the TC will be lost for residential purposes, which will increase the pressure on meeting the established housing need and provide less homes within the town centre.
						SHL EBC has identified a number of large allocation sites within the TC that are better suited for office development (TC Sites 2 and 3). The Council has also identified a number of additional contingency opportunity and transition areas within the TC for office development that can (along with windfall opportunities generally) provide sites for new residential development within the TC.  As a more viable development option these opportunity and transition areas will be more attractive to developers as housing sites and the housing need for the Borough will still be met.  Limiting office development in the TC is unnecessary in relation to meeting housing need and, for the reasons set out below, is unsustainable.
CS2 Health To improve the health and wellbeing of the population and reduce inequalities in health.	j					jam No Significant impact.

CS3	<p><b>Social Exclusion</b> To reduce poverty and social exclusion and to close the gap between the more deprived areas in the borough and the rest of the town.</p>	j							<p><b>jam</b> The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon poverty and social exclusion.</p> <p><b>SHL</b> jam's assessment is the same as for the Option 3A allocation mix. The increased level of office space in the TC will however protect and increase office jobs where they are more readily accessible to the most local residents of Eastbourne. A reduced office provision at SH will still provide office job opportunities at the Harbour but alongside a wider range of other jobs that will meet a range of skills and interests, all deliverable much more quickly than an office only park at the Harbour.</p>
CS4	<p><b>Education</b> To raise educational achievement levels across the Borough and develop opportunities for everyone to acquire the skills needed to find and remain in work.</p>	j							<p><b>jam</b> The option provides greater choice and flexibility to the market, which should provide opportunities for the creation of jobs and opportunities for new skills for the Borough in the future.</p> <p><b>SHL</b> jam's assessment is the same as for the Option 3A allocation mix. However under this option the choice and flexibility of office space would be better located within the TC. The lead-in times and public subsidy required to realise new office jobs at SH would be less and job creation within a more mixed park at the Harbour would be quicker to deliver. Public funds will be better directed to new premises within the TC / supported training services.</p>
CS5	<p><b>Crime</b> To reduce crime and the fear of crime.</p>	j							<p><b>jam</b> No significant impact.</p> <p><b>SHL</b> jam's assessment is the same as for the Option 3A allocation mix. A more mixed employment park could provide uses that provide greater night time and weekend activity on the SH employment sites (e.g. hotel and nursing home uses). These would provide greater security across the sites in comparison with a mono use office park.</p>
CS6	<p><b>Communities</b> To create sustainable, vibrant communities where everyone participates in local governance, feels they belong and that each person is important to the future of the town.</p>	j							<p><b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market and a more sustainable and inclusive community. However, the increase in office provision in the town centre fails to address current demand for larger floorplates in out of town locations. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity than can be self sustaining.</p> <p><b>SHL</b> jam has agreed that this option provided a greater balance of uses and more flexibility and choice for the office market. The TC allocation sites can equally provide a range of flexible small to large floor plates. The Innovation Mall at SH provides primarily smaller units but also larger floorplates. This space has been available since the summer of 2015 with all of the larger units still available six months following completion and following on-going marketing and a further one week marketing campaign to further raise publicity and awareness of the space available. The lack of rapid take-up does not suggest the pent up demand is as great as EBC / BGVA considers it to be. The Innovation Mall is also considered to be being marketed at subsidised rents which are not sustainable in the long term for space of this type and quality. Rents will have to be increased in order for the existing Mall and additional new space on Site 6 to be viable.</p> <p>Site 6 however does provide scope for a minimum of 11,000sq.m. NIA of office space which itself is of a scale to create the</p>



<p><b>CS7</b></p>	<p><b>Accessibility</b> To improve accessibility by sustainable modes of transport to jobs, health, education, shops, leisure, cultural and community facilities to everyone.</p>	<p>j</p>				<p>cluster considered necessary by EBC / BGVA. That cluster would be better supported, more attractive and more sustainable in the long term if it was supported by a more mixed employment park with business linkage with such uses as a hotel, children's nursery etc. The principle and therefore the benefits of a mixed park has been accepted by EBC through the outline planning permission for the site and so the assessment by jam that the impacts of such a park are 'uncertain' is surprising.</p>
<p><b>CS8</b></p>	<p><b>Economy</b> To develop and ensure a broad, low impact economic base and encourage entrepreneurship to create diverse employment opportunities, particularly in the tourism sector, so that everyone can benefit from economic growth.</p>	<p>j</p>			<p><b>jam</b> 80% of office provision will still be provided within the town centre, which is a very sustainable location with good links via public transport. The provision of 20% of the allocation may increase car use but could also provide more opportunities for the viability of public transport in the future as a result of economic growth.</p> <p><b>SHL</b> The % difference in the total proportion of office space that will result from either Option 3A or 3B being followed is small but the actual effect for the town centre and SH is significant.</p> <p>Option 3B with more new floorspace within the TC will focus travel patterns to the town's most sustainable, best connected location. The smaller allocation at SH will still provide an office cluster but it will reduce the level of car based trips focused on weekday peak commuter times when most office workers will arrive at and leave the park. A more mixed employment park with a range of uses will spread travel patterns to SH and can include uses that have weekend and evening trips also, further spreading peak arrival and departure rates and helping to support improved bus links with the town centre to the benefit of all Harbour residents and visitors. An office only park will not be financially unviable and unable to support improved bus services and in particular over the wider Eastbourne area to be attractive to commuters from across the town.</p>	<p><b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to ore appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation Park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability assessment of this option has the best score as the town centre is 118% less viable than out of town sites. <u>Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self supporting.</u></p> <p><b>SHL</b> jam agrees that this option is still beneficial. They appear to have downgraded its impact to a minor positive however on the basis that the SH office cluster will be smaller.</p> <p>This and jam's short to long term grading of this option does not take into account the extensive length of time that it will take for Sites 6, 7a and 4 to be built out for office only schemes. Importantly also, Site 6 is required under the existing outline permission to provide a minimum of 11,000 sq.m. NIA of office space. Based on a job density of 12sq.m. and 10sq.m. NIA this equates to between 917 and 1,100 jobs. The marketing for the Innovation Mall states that it can accommodate 300 jobs which equate to 1 job per 8sq.m. NIA. Site 6 alone will provide a number of buildings and a high number of office jobs which will form a distinct new office park and business cluster. That site will be supported by the shops and cafes at SH but will have no other services that are available in the TC. A more mixed employment park will provide additional linkages (e.g. hotel, nursery) which will support the office uses, make them more attractive, help to justify the uplift in rents required to make Site 6 more viable on the open unsupported market and therefore ensure the employment park overall is sustainable in the longer term.</p>

<p><b>CS9</b></p>	<p><b>Economic Growth</b> To ensure development is masterplanned to provide effective commercial infrastructure that will support and enable continued economic growth and not just housing growth.</p>	<p>j</p>	<p><b>jam</b> The development would form part to of the Town Centre regeneration. The Town Centre Local Plan has policies that masterplan a mix of uses across sites. Sovereign Harbour is a masterplanned development, which will need to be carried out in accordance with the SH SPD. The SPD requires the provision of extensive employment opportunities through the development of a Business Park (B1 office). <u>The reduction in floorspace at SH and increase in the TC is less viable and deliverable.</u> <b>SHL</b> Evidence of how two TC allocation sites can be successfully developed for substantially more office space to that proposed by EBC has been provided (see paper by rCOH). <b>This would provide new high quality, flexible accommodation within the town's most sustainable, best connected location.</b> The SH SPD has been superseded by the outline planning permission for sites at the Harbour that includes Sites 6, 7a and 4. It is also out of date pending the ELLP. The outline permission acknowledges the provisions that are made within the SPD and pending the ELLP for a more mixed use employment park to be developed at the Harbour. The outline planning permission has also established the viability constraints for office development at SH and how it cannot support upgrades to transport infrastructure including public transport services. An office only park at SH will mean a very long lead in time for new development and very slow employment growth. <b>A mixed park option will be achieved alongside (subsidised) office space on Site 6. New employment across a wider mix of skills levels and sectors will be realised and delivered more quickly than land set aside for office development only.</b></p>
<p><b>CS10</b></p>	<p><b>New Economies</b> To develop a dynamic, diverse and knowledge based economic sector that excels in innovation with higher value, lower impact activities.</p>	<p>j</p>	<p><b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises in accordance with the SH SPD 2013. In turn it should enable more diverse employment opportunities and result in more positive impact upon economic growth. However, <u>development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-supporting.</u></p>
<p><b>CS11</b></p>	<p><b>Skills</b> To develop and maintain a skilled and adaptable workforce to match local employment opportunities.</p>	<p>j</p>	<p><b>SHL</b> This option will increase office provision in the TC and rely on less publicly subsidised new provision at SH. The speed at which the sites at SH will be deliver new offices and resulting employment will be slow but a cluster of at least 11,000sq.m. NIA of office space will nonetheless still be provided. A greater number and mix of new jobs will be created more quickly at SH if Sites 7a and 4 are released for other employment generating uses and these in turn will support and help to make the office space on Site 6 more attractive to occupiers and employees. <b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market, however it retains an over reliance on town centre stock and smaller floorplates. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. However, <u>development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.</u></p>

CS12	<p><b>Biodiversity</b> To conserve and enhance the Borough's diversity and landscape, and ensure species' sustainability.</p>	j							<p><b>SHL</b> The development of new flexible offices can and would be better provided within the TC. A larger allocation within the TC will help to provide new Grade A space with the larger floorplates EBC / B/GVA consider to be required and in the most sustainable part of the town. The development of office space at SH requires public subsidy and will be very slow to deliver. The larger units within the Innovation Mall at SH have not resulted in rapid take up and do not suggest the pent up demand that EBC / B/GVA have highlighted. Site 6 nonetheless will be able to provide the required office cluster that EBC considers to be required here. The SHD 2013 has been superseded by the outline planning permission for the SH employment sites which pending the ELLP makes provision for a mixed use employment park at the Harbour. The mixed use option provides the best option for economic growth and quicker job creation within a more diverse and sustainable Harbour.</p> <p><b>jam</b> Whilst the town centre is not located to any sensitive site of biodiversity, SH will result in the loss of shingle habitat. Suitable mitigation measures will need to be identified in consultation with the regulatory authorities.</p> <p><b>SHL</b> The masterplanned approach for the employment site at SH has been agreed through the outline permission for the site. This has taken into account ecology and biodiversity factors.</p>
CS13	<p><b>Natural &amp; Historic Environment</b> To protect, enhance and make accessible for enjoyment the Borough's parks and gardens, countryside, recreation areas and historic environment.</p>	j							<p><b>jam</b> Whilst the development in the town centre is unlikely to have an impact upon the accessibility of parks and gardens, SH will assist in opening up part of the site for a park as set out in the SPD but will also result in the loss of open space. Any loss will need to be mitigated through new provision.</p> <p><b>SHL</b> The masterplanned approach with the provision of a new public open space on Site 7 (7b) and the provision of a new public square on Site 4 has been agreed through the SPD and the more recent outline permission for these sites. These facilities in turn reduce the amount of space available for employment generating uses but will provide facilities and an attractive environment for new employees as well as residents of the Harbour.</p> <p><b>jam</b> Development is on previously developed land in both locations and promotes more efficient use of the land. However, the physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability. Failure to maximise the potential of employment land at SH would also waste a major opportunity to rebalance the market and address demand for larger floorplates.</p> <p><b>SHL</b> There is capacity within the TC allocation sites to provide large scale office development with a range of floorplates, all within the most sustainable part of the town. This uplift in provision is required in the TC to counter the loss of offices to other uses. Windfall sites are available for redevelopment for new residential schemes within the TC, taking into account the Council's own contingency options within the defined opportunity and transition areas. Such options will provide more attractive options for residential schemes on viability grounds, which points further to the need for EBC to plan positively and proactively for a larger office allocation in the TC.</p> <p>The larger units in the new Innovation Mall at SH have not resulted in rapid take-up and so does not confirm the significant pent up demand for such units as suggested by EBC. The setting aside of Sites 6, 7 and 4 for offices will require extensive lead in times. This will render much of the remaining land at SH void for an extensive amount of time which is not accounted for in jam's short to long term assessment. A more effective approach would be to allow a mixed development.</p>
CS14	<p><b>Land Use</b> To improve efficiency in land use through the re-use of previously developed land and existing buildings first, and encourage urban renaissance.</p>	j							<p><b>jam</b> Development is on previously developed land in both locations and promotes more efficient use of the land. However, the physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability. Failure to maximise the potential of employment land at SH would also waste a major opportunity to rebalance the market and address demand for larger floorplates.</p> <p><b>SHL</b> There is capacity within the TC allocation sites to provide large scale office development with a range of floorplates, all within the most sustainable part of the town. This uplift in provision is required in the TC to counter the loss of offices to other uses. Windfall sites are available for redevelopment for new residential schemes within the TC, taking into account the Council's own contingency options within the defined opportunity and transition areas. Such options will provide more attractive options for residential schemes on viability grounds, which points further to the need for EBC to plan positively and proactively for a larger office allocation in the TC.</p> <p>The larger units in the new Innovation Mall at SH have not resulted in rapid take-up and so does not confirm the significant pent up demand for such units as suggested by EBC. The setting aside of Sites 6, 7 and 4 for offices will require extensive lead in times. This will render much of the remaining land at SH void for an extensive amount of time which is not accounted for in jam's short to long term assessment. A more effective approach would be to allow a mixed development.</p>

CS15	<p><b>Landscape &amp; Townscape</b> To maintain and enhance the quality of landscapes and townscapes.</p>	j							<p><b>jam</b> The development is in built up areas and is unlikely to have an adverse impact on landscape. The quality of development will be managed through the Town Centre Local Plan and SH SPD to ensure that any adverse impacts identified are suitably mitigated.</p> <p><b>SHL</b> The (re)development of sites in the TC will provide an opportunity for improved additions to the centre's town and streetscapes and adjoining public realms. The sites at SH are reclaimed largely empty, disused or under used sites. Local concern has been expressed about the continued location of a managed spoil mound on Site 7a which is to remain whilst it might still be required for ground works on the remaining sites at the Harbour. The setting side of the sites for office only development will result in a long lead in time for development and the sites remaining in their current situation for longer. A mixed park option would allow them to be developed for high quality development sooner, to the benefit of the streetscape of the Harbour and the role of Site 7a with its frontages on Pevensey Bay Road and Pacific Drive as a gateway location into the Eastbourne and the Harbour.</p>
CS16	<p><b>Air Quality</b> To reduce air pollution and ensure air quality continues to improve.</p>	j							<p><b>jam</b> Development is likely to cause an increase in the levels of pollutants both in construction and operation. The quantum of development at SH may also result in more transport by car, although could provide more opportunity for the viability of public transport in the result as a result of economic growth. Suitable mitigation measures would need to be identified in consultation with the regulatory authorities.</p> <p><b>SHL</b> SH is relatively poorly connected by public transport and will require significant public subsidy to provide easily convenient connections from across Eastbourne in order to encourage workers from across the town to travel there by bus. These effects will worsen as the sites are developed over time. The development is therefore likely to remain very heavily car based and will result in increased air pollution and concentrations of emissions if the Harbour sites are to be in mono-use as an office park with a resulting peak in commuter times. The development for offices cannot subsidise public transport improvements on viability grounds. These effects will be mitigated in part if the harbour can be developed as a more mixed employment location, spreading the timely of trips to and from the Harbour and reducing peaks in traffic volumes and resulting poorer air quality.</p>
CS17	<p><b>Water Quality</b> To maintain and improve the water quality of the Borough's freshwater bodies, groundwater, waterways and the marine environment.</p>	j							<p><b>jam</b> Development within the town centre is unlikely to have a significant impact upon water quality. The proximity of the development at SH to the harbour may result in a negative impact upon the marine environment. Suitable measures should be identified in consultation with the regulatory authorities.</p> <p><b>SHL</b> Impacts on water quality have been reviewed through the outline planning permission for the sites at SH. This will be reviewed further through detailed design responses. Design solutions have been agreed for the residential schemes on Sites 7c and 8 and no issues should arise for the remaining sites also.</p>
CS18	<p><b>Flood Risk</b> To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment</p>	j							<p><b>jam</b> Development is unlikely to reduce the risk of flooding and SH could be subject to a risk of flooding. Suitable mitigation measures will need to be identified to ensure that suitable flood management and floor resistant designs are achieved.</p> <p><b>SHL</b> Flood risk has been reviewed through the outline planning permission for the sites at SH. This will be reviewed further through detailed design responses. Design solutions have been agreed for the residential schemes on Sites 7c and 8 and no issues should arise for the remaining sites also.</p>

CS19	<p><b>Climate Change</b> To address the causes of climate through reducing emissions of greenhouse gases and ensure that Eastbourne is prepared for its impacts</p>	j	+	+	+	+	+	<p><b>jam</b> Development will result in an increase in greenhouse emissions. Mitigation measures that minimise the impacts of climate change and enable suitable adaption to be implemented through sustainable design practices should be identified.</p> <p><b>SHL</b> The most effective mitigation will be the concentration of new office development within the TC where access by non-car means can be best supported. A more mixed employment park at SH will still result in more car based trips but the peaks in commuter traffic and resulting emissions will be reduced. A more mixed park will also be better placed to support improved bus services to the town centre across the weekday and weekend travel patterns. Whilst this is still graded minor negative, this option would still be an improvement on Option 3A in respect of climate change effects.</p>
CS20	<p><b>Transport</b> To reduce road congestion and pollution levels by encouraging mixed use development, traffic calming measures, rebalancing transport system away from private motorised vehicles, reducing the need for travel by car and shortening the number, length and duration of journeys.</p>	j						<p><b>jam</b> Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future.</p> <p><b>SHL</b> Development at SH will be car reliant but a more mixed office park will be better placed to support improved bus services across the weekday and weekend travel patterns.</p>
CS21	<p><b>Waste</b> To reduce the amount of waste for disposal by addressing and promoting the waste hierarchy of minimisation, reuse, recycling and composting.</p>	j						<p><b>jam</b> The increase in development is likely to increase the amount of waste produced in both construction and operation. Suitable mitigation measures will need to be identified to minimise such impacts.</p>
CS22	<p><b>Natural Resources</b> To reduce the use of non-renewable forms of energy and ensure the prudent use of natural resources.</p>	j						<p><b>jam</b> The development is likely to result in an increase in non-renewable forms of energy and other natural resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable energy given the small fragmented development sites available. A small quantum of development at SH may reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management.</p> <p><b>SHL</b> The town centre includes large allocation sites which have the potential to provide a single site design response for renewable energy options. The Sites at SH are large but the Innovation Mall which represents Phase 1 of Site 6 has not provided any significant renewable energy benefits. Its defined low energy benefits can equally be provided within town centre schemes. EBC will need to provide evidence that future phases within an office park will provide additional benefits. More centralised energy solutions at SH however are likely to be cost prohibitive due to the upfront costs and long lead in times for office space, lettings and income to be realised.</p>
EL1	<p><b>Economic Growth</b> To promote sustainable economic growth.</p>	j						<p><b>jam</b> The option provides a greater balance of uses within the borough offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013 and as demonstrated by the development of an Innovation park. In turn this should enable more diverse employment opportunities and result in a positive impact upon economic growth. In addition, the viability and deliverability assessment of this option has the best score as the town centre is 118% less viable than out of town sites. However, the viability of town centre development is 118% less viable and less</p>

							<p>deliverable than out of town sites. <u>Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.</u></p> <p><b>SHL</b> The SH SPD 2013 is out of date pending the outcome of the ELLP. The Innovation Mall has required public subsidy and has been met with slow take-up on effectively unviable terms. The B/GVA Viability and Deliverability Assessment that has appraised the relative viability of the TC and SH for office development is flawed (Please refer to SHW report) and does not take into account the extent of subsidy required at SH, the rental levels required to sustain such office provision at SH which has not been achieved and is not assumed to be achieved by B/GVA and does not take into account that SH development cannot fund public transport improvements to mitigate for its poor transport and connectivity ratings.</p> <p>Choice and flexibility of office space can and would be better located within the TC. This option will increase the TC offer and will reduce the extent of land set aside for office space that will require public subsidy if viable rental terms are to be achieved and sustained here. It will release the remaining sites (7a and 4) for other employment generating uses that will contribute towards more quickly to business growth and job creation and that will help to support and sustain the office park on Site 6.</p>
<p><b>EL2</b></p> <p><b>Employment Land</b> To maximise use of existing employment land.</p>	<p>j</p>	<p>j</p>				<p><b>jam</b> The town centre sites may not be in employment use at present. The land at SH has already been permitted for employment use. Physical limitations regarding the level of floorspace that can be accommodated within the town and competition for other uses may create difficulties for viability and deliverability. Failure to maximise the potential of employment land at SH would waste a major opportunity to rebalance the market and address demand for larger floorplates.</p> <p><b>SHL</b> The Town Centre Local Plan allocation sites include large sites with employment uses or set aside for potential employment uses (e.g. sites 2 and 3). The SH sites have been allocated for Class B uses for 20 years and have only just result in development of the Innovation Mall with the requirement for public subsidy and resulting slow lettings. The larger units within the Mall have been very slow to let and as such do not support the pent up demand for such space as suggested by EBC/B/GVA. The requirement to hold Sites 4 and 7 for office use will render that land void for a further extended period. To maximise the use of these sites is best achieved through their release for other employment uses that are permitted through the outline permission for the sites which supersedes the SH SPD 2013 and which will be better able to support the office park on Site 6.</p>	
<p><b>EL3</b></p> <p><b>Diverse Economy</b> To diversify the local economy and support businesses across a range of sectors.</p>	<p>j</p>	<p>j</p>				<p><b>jam</b> The option provides a greater balance of uses within the Borough offering more choice and flexibility to the market, <u>however it retains an over reliance on town centre stock and smaller floorplates.</u> The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises, in accordance with the SH SPD 2013. <u>However, development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that is self supporting.</u></p> <p><b>SHL</b> This option will increase office space within the TC and increase choice including for larger floorplates, providing more flexibility for companies to locate and relocate within the town's most sustainable and most well connected location. In turn the business linkage benefits within and for other companies within the TC will be protected and strengthened. Office provision at SH will still be provided and will be of a scale and physical concentration on Site 6 to create cluster sought by EBC / B/GVA. The release of Sites 7a and 4 for other employment uses will provide a greater mix of employment options which will support the office park</p>	

<p><b>EL4</b></p>	<p><b>No. of Businesses</b> To increase the overall number of business enterprises operating in the town.</p>	<p>j</p> <p>S M L</p>	<p><b>jam</b> The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. However, fewer opportunities will be provided for existing businesses to expand or relocate to more appropriate larger premises. The provision of town centre space is also less viable and deliverable. SH will offer space for both new and relocating businesses within the area but may not provide the critical mass to create a cluster of activity that can be self supporting.</p> <p><b>SHL</b> This option will increase office space in the town centre and provide opportunities for larger units to be provided here, offering more choice and flexibility for existing and new firms to stay / locate in the most sustainable part of the town and in turn to protect and strengthen business links within the centre. A sizeable office cluster of at least 11,000sq.m. NIA will still be provided on Site 6 but supported by the more rapid take up of Sites 4 and 7a for other employment generating uses that will help to support and sustain the office cluster. The more mixed park will be more self supporting than a mono-use office park that will be slow to build out and that will require public subsidy or a significant hike in open market rents in order to be viable.</p>	<p>and provide a more mixed and sustainable development at SH with greater opportunity to be 'self-supporting'.</p>
<p><b>EL5</b></p>	<p><b>Start-ups</b> To promote and encourage business start-ups and small businesses.</p>	<p>j</p>	<p><b>jam</b> A greater balance of provision within the borough should result in more spaces for start-ups and small businesses.</p> <p><b>SHL</b> jam has appraised this option on exactly the same basis as for EBC's preferred option 3A, suggesting both allocation mixes will have the same minor positive effect for new start up businesses.</p> <p>The provision of more office space in the TC however will maintain and increase the extent and quality of TC provision and provide scope for a range of unit sizes within the town's most sustainable location that provides the widest business links and widest range of business support services. This can include incubator and service office space that is attractive to start-ups. The Innovation Mall at Site 6 at SH already provides opportunities for start-ups and whilst lettings have been slow this option remains and can be added to further in later phases on Site 6. Sites 7a and 4 however will be released under this option to provide wider support services that will help to create a more self supporting location at SH with facilities that will support start ups and other businesses there.</p>	
<p><b>EL6</b></p>	<p><b>Employment</b> To increase the number and range of employment opportunities in the town.</p>	<p>j</p>	<p><b>jam</b> The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stock and smaller floorplates which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that is self supporting.</p> <p><b>SHL</b> This option will increase office space and employment in the town centre and can include larger floorplates. The larger units provided so far on Site 6 have not resulted in rapid take-up and the scheme has required significant public support and subsidy. It will require an uplift in rentals in order to ensure its long term viability. Site 6 nonetheless provides scope for at least 11,000sq.m. NIA of office space which is a sizeable cluster that will be best supported by a more mixed employment park, which taken as a whole will be more viable and self-supporting that a slow to deliver mono-use office park.</p>	

<p><b>EL7</b></p>	<p><b>Existing Businesses</b> To support existing businesses to continue trading in Eastbourne.</p>	<p>j</p>		<p><b>jam</b> A greater balance of uses within the town will be provided offering more choice and flexibility to the market. The office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. However, the option retains an over reliance on town centre stock and smaller floorplates which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that is self supporting.</p> <p><b>SHL</b> Please refer to the comments above.</p>
<p><b>EL8</b></p>	<p><b>Linkages</b> To improve local business linkages.</p>	<p>j</p>		<p><b>jam</b> The provision of 80% office provision within the town centre will enable opportunities for local business linkages to be retained and strengthened. The new development at SH will help create new business linkages. However, development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that is self supporting.</p> <p><b>SHL</b> This option will increase office space within the centre. Business links will be maintained and strengthened as firms remain within or relocate to the centre. The linkages that result from the clients and customers of such businesses will be strengthened. A sizeable office cluster will still be provided on Site 6 and this will benefit existing retailers and other services at SH and new links may result within the Harbour. The office park however will be further supported by other businesses on Sites 7a and 4 e.g. hotels and a children's nursery, both of which are already permitted at SH pending the outcome of the ELLP. These other users will be quicker to deliver and more viable than a mono-use office park and so the linkages benefits that will be offered will be more quickly and more readily realised.</p>
<p><b>EL9</b></p>	<p><b>Deprivation</b> To reduce economic deprivation in the resident population</p>	<p>j</p>		<p><b>jam</b> The option provides a greater balance of uses within the town offering more choice and flexibility to the market. The potential for new office provision at SH should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. In turn this should have a positive impact upon deprivation.</p> <p><b>SHL</b> jam has appraised this option on exactly the same basis as for EBC's preferred option 3A, suggesting both allocation mixes will have the same minor positive effect for new start up businesses.</p> <p>This option will increase the level and choice of office space within the town centre and will provide greater choice of alternative provision in addition to that at SH. Office jobs will still be available at SH but alongside a wider range and mix of jobs provided as part of a more viable mixed employment park that will be much quicker to deliver. The employment benefits overall will be more mixed, more quickly provided, with greater and more rapid positive effects on tackling local deprivation.</p>



<p><b>EL10</b></p>	<p><b>Incomes</b> To increase the average incomes of residents in the town.</p>	<p>j</p>	<p><b>jam</b> Increasing opportunities for business and the location of new businesses in the area is likely to have a positive impact upon the incomes of residents.</p> <p><b>SHL</b> jam has appraised this option on exactly the same basis as for EBC's preferred option 3A, suggesting both allocation mixes will have the same minor positive effect for local incomes.</p> <p>This will protect and increase office jobs in the town centre, still provide office jobs at SH but provide additional jobs more quickly at the Harbour, having a more positive and more rapid impact on local job opportunities and incomes.</p>
<p><b>EL11</b></p>	<p><b>Unemployment</b> To reduce levels of unemployment.</p>	<p>j</p>	<p><b>jam</b> The option should enable more diverse employment opportunities and result in a positive impact upon economic growth. However, the option retains an over reliance on town centre stock and smaller floorplates which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that is self supporting.</p> <p><b>SHL</b> This option will protect and increase office jobs in the town centre. Staff who are unable or unwilling to commute to SH or to other towns as part of a company relocation will have continuing office job opportunities in the TC. Wider business links and related jobs in the TC will also be protected and maintained. Office jobs will still be provided at SH but alongside additional jobs that will be quicker to realise, providing more rapid opportunities across a greater range of sectors and skills sets. EBC has already agreed the principle of mixed employment at SH pending the ELLP. Jam's appraisal that this option will result in uncertain impacts is therefore surprising and unclear especially when considered against a preferred option for a mono-office park at the Harbour which is unviable and will be very slow to deliver.</p>
<p><b>EL12</b></p>	<p><b>Road Network</b> To ensure no adverse impact on the road network</p>	<p>j</p>	<p><b>jam</b> Development within the town centre is well serviced by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make viability of improved public transport service more likely in the future.</p> <p><b>SHL</b> Jam's written summary above is the same as for their appraisal of Option 3A but they have notably appraise this Option 3B as having uncertain effects rather than minor negative impacts on the road network.</p> <p>This option will increase office space in the centre and will require fewer office employees to commute to the less well connected SH or to outside of the town altogether. SH will remain car based but with more mixed employment its impacts on peak hour commuter traffic will be less and the mixed park will be more viable, with more diverse employment patterns which will be better able to support improved bus services with the town centre across the week and weekend travelling patterns. This will be to the wider benefit of all Harbour residents and visitors.</p>

<p><b>EL13</b></p>	<p><b>Sustainable Transport</b> To provide employment opportunities in locations that are accessible for local people and commuters.</p>	<p>j</p>	<p>jam Development within the town centre is well served by public transport. Development at SH is likely to be car reliant and may result in increased congestion in areas that are already congested. However, the quantum of development may make the viability of improved public transport service more likely in the future</p> <p><b>SHL</b> Jam's written summary above is the same as for their appraisal of Option 3A but they have notably appraise this Option 3B as having uncertain effects rather than minor negative impacts on the road network.</p> <p>Please refer to our summary above (EL13).</p>
<p><b>EL14</b></p>	<p><b>Resource Use</b> To reduce resource use from commercial &amp; industrial premises.</p>	<p>j</p>	<p>jam The development is likely to result in an increase in the use of resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable energy given the small fragmented development sites available. A smaller quantum of development at SH may reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.</p> <p><b>SHL</b> This applies to all development regardless of location and the policy allocation of new office space across Eastbourne.</p> <p>The town centre includes large allocation sites which have the potential to provide a single site design response for renewable energy options. The Sites at SH are large but the Innovation Mall which represents Phase 1 of Site 6 has not provided any significant renewable energy benefits. Its defined low energy benefits can equally be provided within town centre schemes. EBC will need to provide evidence that future phases within an office park will provide additional benefits. More centralised energy solutions at SH however are likely to be cost prohibitive due to the upfront costs and long lead in times for office space, lettings and income to be realised.</p>
<p><b>EL15</b></p>	<p><b>Noise</b> To reduce the impact of noise from commercial premises on residential areas.</p>	<p>j</p>	<p>jam Office use is unlikely to have significant negative impacts of noise upon residential areas. Where uses that generate noise are identified suitable mitigation measures e.g. hours of work should be applied</p> <p><b>SHL</b> jam's appraisal is agreed but this logically results is a neutral / no impact conclusion rather than the minor positive appraisal set by them.</p>

<p><b>EL16</b></p> <p><b>Infrastructure</b> To ensure the necessary provision of infrastructure to support economic growth.</p>	<p><b>j</b></p>	<p><b>jam</b> The provision of 9,000sq.m. within the town centre may put constraints on the existing infrastructure within the town centre. The provision of 14,000sq.m. provides the opportunity for new infrastructure to be provided that will enable economic growth in the future but may not provide the critical mass required.</p> <p><b>SHL</b> This option will increase office development, jobs and linkages within the town centre and will protect and strengthen the important weekday economy of the centre. Jam's appraisal that this may put constraints on infrastructure within the town centre is not explained. Contrary to this, it will further protect and encourage additional investment in that infrastructure to the wider benefit of the site and the town overall. The linked investment in infrastructure is demonstrated by the benefits secured as part of the approved extension of the Arndale Shopping Centre. A more mixed park at SH, which is supported by EBC pending the outcome of the ELLP, will still provide a critical mass of employment based development that will be more quickly delivered and more viable and better placed to support additional infrastructure investment. A mono-office park at SH will have a significant lead in time for delivery and is unviable. Jam's appraisal that this option 3B has uncertain effects is therefore not explained and surprising.</p>
<p><b>Summary of findings:</b></p> <p><b>jam</b> This option tests a revised split in floorspace of 80:20 between the TC and Out of Town provision. B/GVA's Employment Land Review (ELR 2012) and Supporting Evidence (SE 2014) showed that such the current ratio of 90:10 was unusual and does not fully reflect or respond to market signals: the imbalance in the provision of office space within the town centre being noticeably different to market norms within the wider sub-region. By way of comparison a 70:30 split is more usual. The option also responds to representations received that proposed 9,000sq.m. of office space provision in the town centre and 14,000sq.m. at SH.</p> <p>The option should enable more diverse employment opportunities and result in a positive impact upon economic growth and job creation. However, the option retains an over reliance on town centre stick and smaller floorplates, which conflicts with demand and is less viable and deliverable. Development at SH also needs to be of a sufficient scale and critical mass to create a cluster of activity that can be self-sustaining.</p> <p>Whilst the provision of office space within the town centre may encourage more people to use sustainable modes of transport, the lack of choice within the town for business may force business outside the town, which could result in further out-commuting. The concentration of office accommodation within the town centre could also lead to an over-concentration of congestion of the road network in the town centre.</p> <p>The development is likely to result in an increase in the use of resources. A greater quantum of office space within the town centre is likely to be more difficult to apply renewable energy given the small fragmented development sites available. A smaller quantum of development at SH may reduce the potential for renewable forms of energy to be utilised efficiently. Mitigation measures will need to be identified that encourage sustainable design and management and encourage efficiency.</p> <p><b>SHL</b> Other towns and cities within the local area also have concentrations of office stick with their town centres. A generic ratio of 70:30 town centre to out of centre is a generic figure that will not be relevant to or appropriate for all centres. In the case of Eastbourne, the office market is small but is being undermined further by competition for town centre sites from other uses. An allocations policy that results in a 80:20 split would be more balanced and would offer choice but it must be noted that:</p> <ul style="list-style-type: none"> <li>- This option should be expressed as a minimum of 9,000sq.m. NIA for the TC and a minimum of 11,000sq.m. NIA on at SH,</li> <li>- This allows for certainty over delivery in both locations and does not rule of more provision in the TC, provision on Sites 7a / 4 beyond the provision required on Site 6 or indeed offices coming forward elsewhere in the town.</li> <li>- An allocation of more than 3,000sq.m. NIA is required in the TC to maintain supply but the most sustainable policy response should also be to increase that supply. Site options exist for this and those sites do provide scope for offices with larger floorplates.</li> </ul>		

- Additional replacement and new office floorspace will not put pressure on the local roads and infrastructure, it will support and encourage the use of public transport, locate offices closest to a larger walk-in population.
- The Innovation mall at SH which is being marketed at low rents has not been snapped up and the larger units have been slow to let.
- A large office park at SH will be very slow to deliver and will be unviable without significant subsidy or a large increase in rents that cannot be sustained by the Eastbourne market.
- An office park will also be car reliant and will result in greater cross commuting across Eastbourne putting more pressure on the local road network, including through and beyond the TC.
- A more mixed park will be more quickly delivered with a raft of linked economic and wider social and other environmental benefits for the town.