

EMPLOYMENT LAND LOCAL PLAN

Representations on Revised Proposed Submission version

February 2016



Eastbourne Borough Council

Regeneration & Planning Policy

1 Grove Road

Eastbourne

BN21 1TW

Tel: 01323 410000

Email: planning.policy@eastbourne.gov.uk

Web: www.eastbourne.gov.uk

Employment Land Local Plan

Representations on Revised Proposed Submission

Representation received between 11 December 2015 and 22 January 2016

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Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Relationship with Other Plans and Strategies Content
Comment ID	RPS_ELLP/1
Respondent	Anne Schauerte
Response Date	11 Dec 2015
Do you consider the document is Legally Compliant?	Yes
Do you consider the document is Sound?	Yes
If no, Do you consider it is unsound because it is:	
Comment	How on earth is anyone on earth to know if this document is legally compliant - I am not a lawyer - these questions are futile.
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	
Attachments	
Submission Method	Web
Response Status	None

Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Relationship with Other Plans and Strategies Content
Comment ID	RPS_ELLP/2
Respondent	Alison Price
Response Date	11 Dec 2015
Do you consider the document is Legally Compliant?	No
Do you consider the document is Sound?	No
If no, Do you consider it is unsound because it is:	
Comment	<p>we don't need more offices, the roads are already overrun with commercial vehicles parking overnight and in residential areas. unless this is controlled then more offices will add to the problem for residents. there are no retail outlets in the north harbour. the innovation park is not fitting with the overall look of the area, and is in the wrong place for a residential area. there could be retail like John Lewis or marks and Spencer's. the roads are not controlled so either yellow lines and active policing is required, especially the new developments and speed at which people drive through</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the	No

Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Attachments

Submission Method Web

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

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Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Relationship with Other Plans and Strategies Content
Comment ID	RPS_ELLP/3
Respondent	Bespoke (P Humphreys)
Response Date	21 Dec 2015
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:	
Comment	<p>Comments on the "<i>Sustainable Community Strategy and Corporate Plan</i>" are made in respect of the "Revised Sustainability Appraisal (JAM Consult, 2015)" which is assumed to the latest document</p> <p>As with most other Eastbourne Borough Council documents it does not really address the reality that South Wealden and Eastbourne will increasingly become viewed as one from the residents perspective, if not from the Council's. Only occasional reference is made of intra council plans but the tables, content and actions do not seem to include them. Resources such as transport, housing and employment in nearby Wealden and to a lesser extent Rother will have a significant effect on Eastbourne. Also the same for flood risk, water usage, and other environmental factors. For example the proposal to have 10,000 extra homes in Hailsham If all the new housing were built Hailsham/Eastbourne</p>

area would have a population of 170,000 people.

Table A3 (p99 JAM Report) "Compatibility matrix" shows climate change objectives are "not compatible" with "Homes , the Economy and Economic Growth" . "The building of new homes and businesses is likely to have a negative impact on climate change owing to the increases in CO2 emissions that will result." This does not include, it is assumed, the Wealden additional planned houses. So as Bespoke and Cycle and East Sussex have commented on in the past there needs to be real sustainable communities where there are safe routes for non cars users. Employment locations would need safe cycle parking, safe routes for pedestrians as well and ideally changing facilities.

There are concerns with having only general aspirations without real targets. Bespoke are specifically interested in provision for cycling and this is referenced in their comments to other EBC and ESCC strategies. However none of the Council's strategies have stated track-able targets for sustainable transport . Compare this to other Councils in the country. Such as those who refer to the DfT target of doubling cycle numbers in 10 years then outline how they will achieve this. In the JAM report reference is made to linked reports such as SWETS, that estimate as a percentage how much slower traffic will become, with and without sustainable options, within the Hailsham and Eastbourne Corridor. Here it only states the very general "Development is likely to be car reliant and may result in increased congestion in areas that are already congested"

This JAM report hopes that Public Transport will adjust this balance in the future. However the hard reality in terms of buses, as shown in ESCC SWETS review is that buses would

have to become a better option than cars, with bus lanes and priority adjustments away from the car. Just having congested roads with buses will not be enough. See Brighton and Hove for a local example of what would be required. The same logic is applicable to walking and cycling

Finally a sustainability report should refer to the health of the population and what actions within "Public Health" need to be taken. A search through the report does not find reference to this

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

It is not easy to suggest a revised wording as in the points above would require a different approach to the content. It would need a different scope in terms of geography and content.

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

No

Why do you feel it is necessary to participate at the Examination in Public?

Attachments

Submission Method

Web

Response Status

None

Assigned Officer

=unassigned=

Officer's Response

Campaign Indicator

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Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Relationship with Other Plans and Strategies Content
Comment ID	RPS_ELLP/4
Respondent	Sustrans (Nathan Catt)
Response Date	22 Dec 2015
Do you consider the document is Legally Compliant?	Yes
Do you consider the document is Sound?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>I passionately support any actions to deliver more sustainable transport infrastructure. Cycle lanes, one way streets, 20mph limits, traffic calming, secure bike storage are all necessary to support growth in Eastbourne. Improvements need to be made before major projects go ahead to enable a change in behaviour that will be long lasting.</p>
What changes do you suggest to make the document legally compliant or sound?	<p>More emphasis on pledges to install, and more detail around the specifics of, sustainable infrastructure.</p>
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the	

Examination in Public?	
Attachments	
Submission Method	Web
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

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Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Relationship with Other Plans and Strategies Content
Comment ID	RPS_ELLP/5
Respondent	Sustrans (Nathan Catt)
Response Date	22 Dec 2015
Do you consider the document is Legally Compliant?	Yes
Do you consider the document is Sound?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Yes, vital that a strategy is in place to support cycling and walking. Infrastructure really needs to be in place before projects are started though to tackle the congestion issues already affecting the town and to help foster a change in mood towards sustainable transport.</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Attachments

Submission Method Web

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

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Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Stages in the production of Plan Content
Comment ID	RPS_ELLP/6
Respondent	Sustrans (Nathan Catt)
Response Date	22 Dec 2015
Do you consider the document is Legally Compliant?	No
Do you consider the document is Sound?	No
If no, Do you consider it is unsound because it is:	
Comment	Sorry, I'm probably not the first to comment but the dates following the consultation have the wrong year.
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	
Attachments	
Submission Method	Web
Response Status	None

Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

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Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Industrial Estates Content
Comment ID	RPS_ELLP/7
Respondent	Sustrans (Nathan Catt)
Response Date	22 Dec 2015
Do you consider the document is Legally Compliant?	Yes
Do you consider the document is Sound?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>I'd strongly recommend the plans including a number of taller buildings across all sectors to maximise the usefulness of the land. With so much green space to protect buildings being designed now with a 20-30 year lifespan need to be at their maximum possible potential for floor space on numerous levels. The proposals should try to negate wherever possible the installation of low-rise buildings which would make more likely the need to build on green space in the future.</p> <p>I appreciate that the landscape is an important factor when considering the height of new buildings but when compared to taking away irreplaceable green space there seems little meaningful argument.</p>
What changes do you suggest to make the document legally compliant or sound?	

Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	
Attachments	
Submission Method	Web
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

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Comment Information

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

Comment ID RPS_ELLP/8

Respondent [Highways England \(Felicity Drewett\)](#)

Response Date 05 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? Yes

If no, Do you consider it is unsound because it is:

Comment Thank you for your email dated 11 December 2015, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on

the safe and efficient operation of the Strategic Road Network (SRN).

Having examined the above documents, we have no comments to make at this time.

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

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Attachments  [Highways England.pdf](#) (23 KB)

Submission Method Email

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

Hitchen, Matt

From: Bowie, David <David.Bowie@highwaysengland.co.uk>
Sent: 05 January 2016 11:02
To: Planning Policy Email
Cc: SE NDD BMT; Cleaver, Elizabeth; Pettyt, Thomas; FERRIS, TONY; Gee, Stephen
Subject: Employment Land Local Plan - Revised Proposed Submission version

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

For the Attention of: Regeneration & Planning Policy Team

Consultation: Employment Land Local Plan - Revised Proposed Submission version

Thank you for your email dated 11 December 2015, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

Having examined the above documents, we have no comments to make at this time.

Regards

David

David Bowie

Highways England | Bridge House | 1 Walnut Tree Close | Guildford | Surrey | GU1 4LZ

Mobile: + 44 (0) 778 856 7435



Web: <http://www.highways.gov.uk>

Highways England Company Limited | Registered Office: Bridge House,
1 Walnut Tree Close, Guildford GU1 4LZ | Registered in England and Wales No. 9346363

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Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Industrial Estates
Comment ID	RPS_ELLP/9
Respondent	Richard Maile
Response Date	21 Jan 2016
Uploaded By	Eastbourne Borough Council (Matthew Hitchen)
Do you consider the document is Legally Compliant?	No
Do you consider the document is Sound?	No
If no, Do you consider it is unsound because it is:	
Comment	<p>Not legally compliant - Lack of Consultation</p> <p>Not sound - The Local Plan fails the test of soundness. It is not consistent with National policy in the Framework at paragraph 7 (building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation). It also fails to meet the requirements of paragraph 14 (the presumption in favour of sustainable development) and paragraph 15, which reflects the presumption in favour of sustainable development.</p> <p>It is also contrary to paragraph 20, which seeks to achieve economic growth, and paragraph 21 bullet points 2, 4 and 5.</p>

	<p>The allocations in the Local Plan provide solely for B1 (office) uses and a reliance upon windfall sites (densification). It does not provide the flexibility the Framework requires; neither does it, in the case of the site at Lottbridge Drove, allow for improvements to infrastructure in the form of the St Anthony's Link</p>
<p>What changes do you suggest to make the document legally compliant or sound?</p>	<p>Additional allocations to take account of pressing needs.</p>
<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>Yes</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	<p>To put forward arguments to indicate that the Local Plan fails to meet National policy and local needs (see correspondence from local agents attached).</p>
<p>Attachments</p>	<p> Richard Maile 2.pdf (319 KB)</p> <p> Richard Maile 1.docx (73 KB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	
<p>Campaign Indicator</p>	



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). Alternatively, completed forms can be returned to 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.

Personal Details

Title:	Mr	First Name(s):	Richard
Surname:	Maile		

Organisation:	Richard J Maile BSc FRICS		
Position:	Principal		
Agent acting on behalf of:	Richard Maile and David Bowerman DL, CBE.		

Address:	72 Portland Road, Worthing, West Sussex		
Post Code:	BN11 1QG		

Phone Number:	01903 231438	Fax Number:	n/a
E-Mail Address:	rjm@richardmaile.plus.com		

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: Introduction and Strategy

Policy: EL2

Paragraph Number: 1.17

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:

Lack of consultation.

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 The Local Plan fails the test of soundness. It is not consistent with National policy in the Framework at paragraph 7 (building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation). It also fails to meet the requirements of paragraph 14 (the presumption in favour of sustainable development) and paragraph 15, which reflects the presumption in favour of sustainable development.

It is also contrary to paragraph 20, which seeks to achieve economic growth, and paragraph 21 bullet points 2, 4 and 5.

The allocations in the Local Plan provide solely for B1 (office) uses and a reliance upon windfall sites (densification). It does not provide the flexibility the Framework requires; neither does it, in the case of the site at Lottbridge Drove, allow for improvements to infrastructure in the form of the St Anthony's Link.

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

Additional allocations to take account of pressing needs.

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:

To put forward arguments to indicate that the Local Plan fails to meet National policy and local needs (see correspondence from local agents attached).

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.

Signature:	Richard J Maile	Date:	12/01/2016
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30 HIGH STREET, HAILSHAM, EAST SUSSEX, BN27 1BB

Email: Hailsham@rossandco.co.uk

Richard Maile Esq
72 Portland Road
Worthing
West Sussex
BN11 1QG

11th January 2016

Dear Richard

RE: LOTTBRIDGE DROVE LAND

Further to our various communications, I considered it prudent to provide you with my opinion on the current proposed Employment Land Local Plan Revised Proposed Submission to be submitted by Eastbourne Borough Council.

As you are aware, Ross & Co have been actively involved in offices/industrial/employment land in the Eastbourne and South Weald area since 1982, and indeed the former owners, Keith and Rosemary Ross, acted for many of the small and substantial businesses in both acquiring and developing premises in and around Eastbourne and are well known to the Local Authority. I was recently involved in the disposal of the site which was formerly used by Merrydown on the outskirts of Hailsham and is currently commencing construction for in excess of 200,000 sq ft with a pre-let arranged via this office. Furthermore I am retained by two national new car dealers and am also aware of two further new car dealers who are seeking premises in Eastbourne, but if they are unsuccessful may go to other towns.

Eastbourne has already seen a huge loss of office premises in the town with permitted development rights allowing the conversion of both purpose built and converted premises, and this will no doubt be exerting pressure on rents in the area and whilst some of those businesses may transfer to any out-of-town location this will, in the long term, have an impact on the office supply in Eastbourne town centre. Of even greater concern is the loss of industrial premises/B1, in particular the major redevelopment of the Morrisons site and the current development for Aldi in the nearby vicinity. Whilst there are proposals for development at Sovereign Harbour, access to this area at peak periods (speaking from my experience of living at the harbour) is an absolute nightmare and will most definitely have connectivity problems and hence why the sites have remained available for many years with little or no serious interest. Much of the existing stock in the Eastbourne area was constructed in the 1960s/1970s and, whilst there are opportunities in some instances to enhance densification, these are limited. Construction costs are significant and whilst a unit is occupied and financially viable it is unlikely to be redeveloped. I understand Pacific House, Sovereign Harbour

comprises approximately 25,235 sq ft which was available from July 2015 and as far as I am aware there has only been one office let which provides evidence that the majority of office space that is required in Eastbourne is better placed in the town.

With regard to your specific site you will recall that we have been involved in the site since 2003 when the original Option was agreed, which has now expired. At the outset of the Option Agreement there was a proposal to link Lottbridge Drove with Kings Drive and your land was therefore blighted with the possibility of a compulsory purchase. However, you will recall the interest was sparked on the basis that there was a possibility that not all the land would be required and therefore some might be developable, in particular providing additional space to Eastbourne Police who have developed the adjoining site, and there was an opportunity of a partial land swap allowing them to extend their site whilst providing us with a further frontage in front of their existing unit. The Highways Department have, I understand, subsequently decided not to proceed with this link road, although I understand the link road the other side of Lottbridge Drove running behind St Anthony's is still on the agenda, and you are happy to provide some of the front area of your land for any necessary road junction.

I am aware that other agents in the town are also somewhat baffled by the Eastbourne Council proposal although our opinions appear to have been totally disregarded. There have been housing estates springing up all around the Eastbourne area and yet there appears to be a lack of foresight for employment in and around the town.

Businesses simply will not locate to an area where access is poor and whilst there are certain traffic issues that develop along the Lottbridge Drove area, this will be further complicated by more development at the Harbour.

I trust the above is helpful.

Yours sincerely

A handwritten signature in black ink, appearing to read 'A. G. Bree', written over a light grey rectangular background.

Anton G K Bree FRICS

For and on behalf of Ross & Co

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/10
Respondent	Natural England (Catherine Tonge)
Response Date	15 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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Thank you for giving Natural England the opportunity to comment on Eastbourne Employment Land revised proposed submission version.</p> <p>We have nothing material to add to our comments on the earlier version of this document.</p> <p>We agree with the conclusions in the HRA Screening report that the Plan is unlikely to impact on International sites provided satisfactory measures are employed. It should be noted that, for Pevensey Levels, care needs to be taken, not only in consideration of drainage issues but also avoiding introduction of invasive non-native species, for example in creation of landscaping features such as decorative ponds.</p>

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing this document. Nevertheless, I hope you have found our comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.

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

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Attachments  [Natural England.pdf](#) (34 KB)

Submission Method Email

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

Hitchen, Matt

From: Tonge, Catherine (NE) <Catherine.Tonge@naturalengland.org.uk>
Sent: 15 January 2016 16:10
To: Planning Policy Email
Subject: Eastbourne Borough Council Employment Land Local Plan - Revised Proposed Submission version
Attachments: NE Feedback Form 2015.pdf
Follow Up Flag: Follow up
Flag Status: Flagged

Thank you for giving Natural England the opportunity to comment on Eastbourne Employment Land revised proposed submission version.

We have nothing material to add to our comments on the earlier version of this document.

We agree with the conclusions in the HRA Screening report that the Plan is unlikely to impact on International sites provided satisfactory measures are employed. It should be noted that, for Pevensey Levels, care needs to be taken, not only in consideration of drainage issues but also avoiding introduction of invasive non-native species, for example in creation of landscaping features such as decorative ponds.

Due to the current pressure of consultations on land-use plans, I have not been able to spend the time I would have wished reviewing this document. Nevertheless, I hope you have found our comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible. If discussion would be helpful, please contact me.

If you wish to comment on the service provided by Natural England please use the appended form.

Catherine

Catherine Tonge
Lead Adviser
Sussex Coast & Marine
Natural England
Mobile: 07768 038881

Home-based. Post to:

Mail Hub Block B
Whittington Road
Worcester
WR5 2LQ

<https://www.gov.uk/government/organisations/natural-england>

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing

Teleconference details - 0800 5285280 (mob: 0207 979 0003) access code 2216839
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Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/11
Respondent	Southern Gas Networks (Stuart Forrest)
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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Dear Sir/Madam,</p> <p>Thank you for your invitation to comment on the Eastbourne Borough Council, Revised Proposed Submission version of your Employment land Local Plan.</p> <p>A couple of areas mentioned within the Local Plan have brought some comment from interested parties within SGN as follows:</p> <ol style="list-style-type: none">1. Developments at Sovereign Harbour, lie on the extremity of our Medium Pressure Network and could require some localized reinforcement, dependent on the actual location of any addition loading.2. Eastbourne Holder Station is highlighted within the Local Plan under Appendix 2: Designated Industrial Estates (Finmere

and Britland). SGN still have working plant within this site which would need to be relocated if developed.

Other than these points, SGN do not envisage any immediate infrastructure concerns, in the areas highlighted within your Local Plan, regarding future employment development proposals.

However, should any such reinforcement be required, then this would be dealt with on an individual basis, under our Gas Transporter License (Covered by the Gas Act 1986), as quoted:

Our principle statutory obligations relevant to the development of our gas network, arise from the Gas Act 1986 (as amended), an extract of which is given below:-

Section 9 (1) and (2) which provides that:

1. General powers and duties.

(1) It shall be the duty of a gas transporter as respects each authorised area of his:-

(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and

(b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him –

(i.) to connect to that system, and convey gas by means of that system to, any premises; or

(ii.) to connect to that system a pipe-line system operated by an authorised transporter.

(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.

(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -

(a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.

We would not therefore develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.

As SGN is the owner and operator of significant gas infrastructure within the Surrey area and due to the nature of our license holder obligations;

- ▶ *Should alterations to existing assets be required to allow development to proceed, then the alterations will require to be funded by a developer.*

- ▶ *Should major alterations or diversions to such infrastructure be required to allow development to proceed this could have a significant time constraint on development and as such any diversion requirements should be established early in the detailed planning process.*

We would therefore request that where the Council are in discussions with developers, via the Local Plan, these early notification requirements are highlighted.

Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of bio-methane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure.

Again where the Council are in discussions with developers, via the Local Plan, we would hope that these early notification requirements are highlighted.

We hope that the above information is sufficient for your requirements at present, if however you require any further information, please direct your queries to our department email box at strategicplanning@sgn.co.uk.

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

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Attachments

 [Southern Gas Networks.pdf](#) (122 KB)

Submission Method Email

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

Hitchen, Matt

From: Robertson, Gary <gary.robertson@sgn.co.uk>
Sent: 21 January 2016 13:47
To: Planning Policy Email
Cc: Simpson, David
Subject: [RPS_ELLP] Employment Land Local Plan - Revised Proposed Submission version - Invitation to Join

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir/Madam,

Thank you for your invitation to comment on the Eastbourne Borough Council, Revised Proposed Submission version of your Employment land Local Plan.

A couple of areas mentioned within the Local Plan have brought some comment from interested parties within SGN as follows:

1. Developments at Sovereign Harbour, lie on the extremity of our Medium Pressure Network and could require some localized reinforcement, dependent on the actual location of any addition loading.
2. Eastbourne Holder Station is highlighted within the Local Plan under Appendix 2: Designated Industrial Estates (Finmere and Britland). SGN still have working plant within this site which would need to be relocated if developed.

Other than these points, SGN do not envisage any immediate infrastructure concerns, in the areas highlighted within your Local Plan, regarding future employment development proposals.

However, should any such reinforcement be required, then this would be dealt with on an individual basis, under our Gas Transporter License (Covered by the Gas Act 1986), as quoted:

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Section 9 (1) and (2) which provides that:

9. General powers and duties.

(1) It shall be the duty of a gas transporter as respects each authorised area of his:-

(a) to develop and maintain an efficient and economical pipe-line system for the conveyance of gas; and

(b) subject to paragraph (a) above, to comply, so far as it is economical to do so, with any reasonable request for him –

(i.) to connect to that system, and convey gas by means of that system to, any premises; or

(ii.) to connect to that system a pipe-line system operated by an authorised transporter.

(1A) It shall also be the duty of a gas transporter to facilitate competition in the supply of gas.

(2) It shall also be the duty of a gas transporter to avoid any undue preference or undue discrimination -

(a) in the connection of premises or a pipe-line system operated by an authorised transporter to any pipe-line system operated by him; and in the terms of which he undertakes the conveyance of gas by means of such a system.

We would not therefore develop firm extension or reinforcement proposals until we are in receipt of confirmed developer requests.

As SGN is the owner and operator of significant gas infrastructure within the Surrey area and due to the nature of our license holder obligations;

- Should alterations to existing assets be required to allow development to proceed, then the alterations will require to be funded by a developer.*
- Should major alterations or diversions to such infrastructure be required to allow development to proceed this could have a significant time constraint on development and as such any diversion requirements should be established early in the detailed planning process.*

We would therefore request that where the Council are in discussions with developers, via the Local Plan, these early notification requirements are highlighted.

Additionally, SGN are aware of the advances being made in renewable technologies, especially those related to the production of bio-methane. Should any developer be proposing to include such technology within their development, then we would highlight the benefits of locating these facilities near existing gas infrastructure.

Again where the Council are in discussions with developers, via the Local Plan, we would hope that these early notification requirements are highlighted.

We hope that the above information is sufficient for your requirements at present, if however you require any further information, please direct your queries to our department email box at strategicplanning@sgn.co.uk.

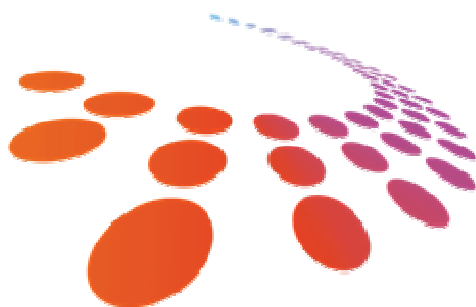
Gary Stuart Robertson
Network Officer (Planning)

T: +44 (0)131 469 1785 (Int: 31785)
E: Gary.Robertson@sgn.co.uk

SGN, 5 Lonehead Drive, Newbridge, Edinburgh EH28 8TG
Sgn.co.uk
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From: Eastbourne Borough Council - Online Consultations (do not reply) [<mailto:do-not-reply@planningpolicyconsult.eastbourne.gov.uk>]

Sent: 11 December 2015 08:00

To: Forrest, Stuart <stuart.forrest@sgn.co.uk>

Subject: [RPS_ELLP] Employment Land Local Plan - Revised Proposed Submission version - Invitation to Join

Eastbourne Borough Council - Planning Consultations

Employment Land Local Plan - Revised Proposed Submission version

You've been invited to participate in the **Employment Land Local Plan - Revised Proposed Submission version** consultation by the consultation manager, Eastbourne Borough Council (Matthew Hitchen).

This consultation is open from 11 Dec 2015 at 09:00 to 22 Jan 2016 at 17:00.

Eastbourne Borough Council is publishing a Revised Proposed Submission version of the Employment Land Local Plan for the community and stakeholders to make final representations in preparation for formal submission of the document to the Secretary of State in 2016, in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The Employment Land Local Plan guides job growth and economic development in Eastbourne up to 2027 by identifying an appropriate supply of land for future employment development, in order to achieve a sustainable economy and make Eastbourne a town where people want to live and work. It relates to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes. Once adopted, the Employment Land Local Plan will form part of the Development Plan for Eastbourne.

The Employment Land Local Plan and its supporting documentation can be accessed on-line at www.eastbourne.gov.uk/ellp, or alternatively it is available to view at:

- Eastbourne Borough Council Offices (1 Grove Road, Eastbourne, BN21 4TW).

The community and other stakeholders are invited to make representations on the Employment Land Local Plan, which should be based on matters of soundness. Further information on soundness can be found in the guidance note accompanying the Plan. Representations can be made via the on-line consultation portal, which can be accessed via the website (www.eastbourne.gov.uk/ellp). Alternatively, representations can be made via email to planning.policy@eastbourne.gov.uk, or via post using the Representation Form, available from the website, to: Regeneration & Planning Policy, Eastbourne Borough Council, 1 Grove Road, Eastbourne, BN21 4TW.

The representation period commences on 11 December 2015 and is open for a six week period to 22 January 2016. Representations must be received no later than 5pm on Friday 22 January 2016.

If you have already made a representation on the Proposed Submission version between December 2014 and February 2015, this is still a valid representation and will be passed on to the Inspector with any additional representations received during this Revised Proposed Submission representation period.

For further information on the Employment Land Local Plan, please contact the Council's Regeneration & Planning Policy Team on (01323) 410000 or by email at planning.policy@eastbourne.gov.uk.

- [Participate in this consultation](#)

If you would like to change your email alerts, please visit [the website](#)

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Scotia Gas Networks Limited reg. 0495 8135

Employment Land Local Plan Representations on Revised Proposed Submission Version
Southern Gas Networks plc reg. 0516 7021
SGN Commercial Services Limited reg. 0596 9465
SGN Connections Limited reg. 0561 8886
SGN Contracting Limited reg. 0537 2264
SGN Natural Gas Limited reg. 0882 2715

All of the above are registered in England and Wales. Registered office: St Lawrence House, Station Approach, Horley, Surrey RH6 9HJ

Scotland Gas Networks plc is registered in Scotland no. SC26 4065. Registered office: Axis House, 5 Lonehead Drive, Newbridge, Edinburgh EH28 8TG

View Comment

Comment Information

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

Comment ID RPS_ELLP/12

Respondent [Willingdon & Jevington Parish Council \(Stephen Keogh\)](#)

Response Date 21 Jan 2016

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

Do you consider the document is Legally Compliant? No

Do you consider the document is Sound? No

If no, Do you consider it is unsound because it is:

Comment

The Council notes that as a result of this and other Plans development to meet Eastbourne's housing need is being proposed in Wealden District Council area which includes Willingdon.

The Council further notes that it is stated in Chapter 17 of the Non Statutory Wealden Local Plan 2005, Paragraph 17.4:

"In recognition of the close inter-relationship between Polegate, Willingdon and Eastbourne in terms of transport, infrastructure and community services, a Planning Forum will be established. This will comprise principally representatives from Wealden District Council and Eastbourne Borough Council with the objective of liaising on common issues and co-

ordinating land use planning matters in a way which helps facilitate the Local Plan strategy."

It was the clear expectation of this Council, and the District Councillors at that time, that they would have input to this Forum so as to represent the wishes and aspirations of our residents. This has not taken place and the Council asks that they be involved in the future on all matters which may affect Willingdon.

Paragraph 1.18 – South East Local Enterprise Partnership – Strategic Economic Plan

The Council is interested to see that funding has been committed from the Governments Local Growth Fund for transport schemes for the "Hailsham, Polegate and Eastbourne Sustainable Corridor" and an "Eastbourne and South Wealden walking and cycling package".

The Council is not aware of this funding and asks to be involved in how it is used particularly since the principal bus services from Wealden to Eastbourne run through Willingdon.

Paragraph 5.3 – Infrastructure

This Council has consistently expressed strong concern about the lack of infrastructure necessary to support the large scale development proposed by Wealden District Council for this area.

The South Wealden and Eastbourne Transport Study was undertaken before the latest proposals for development in south Wealden which includes doubling the size of Hailsham, 5,000 dwellings at Arlington and very large developments at Willingdon, Polegate and Stone Cross. The Study could not have fully

taken into account these proposals because they were not known at that time.

Your employment land proposals are clearly intended to provide increased employment opportunities to people living outside Eastbourne and will result in increased traffic on all road accesses to Eastbourne.


Your Council will be aware of the congestion already on the A2270 at Willingdon and Polegate with often long queues of traffic stretching back in both directions particularly at peak periods giving rise to "rat running" through the residential streets of Willingdon.

Your Council will also be aware of serious congestion at peak periods on all access routes into and out of Eastbourne ie Kings Drive/Willingdon Road/Cross Levels Way/Lottbridge Drove/Langney Rise (B2014)/St Anthonys Avenue/Seaside Roundabout/Pevensy Bay Road (A259)/Hide Hollow/Friday Street/Golden Jubilee Way (A22)/Hampden Park level crossing.

Since there is already congestion on all local roads, it has to follow that the new developments in south Wealden coupled with your own development plans, increased employment opportunities and improved shopping in Eastbourne Town Centre will result in even more traffic and congestion.

Your Council will also be aware of serious problems with commuter parking at Polegate Railway Station already even before the new development is built.

This Council believes that your employment land proposals must be considered alongside development proposals in south Wealden and the increased traffic arising and, above all, improved local road infrastructure provided.

What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	
Attachments	 Willingdon and Jevington Parish Council.docx (15 KB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

Revised Proposed Submission Employment Land Local Plan - Response from Willingdon and Jevington Parish Council

The Council notes that as a result of this and other Plans development to meet Eastbourne's housing need is being proposed in Wealden District Council area which includes Willingdon.

The Council further notes that it is stated in Chapter 17 of the Non Statutory Wealden Local Plan 2005, Paragraph 17.4:

“In recognition of the close inter-relationship between Polegate, Willingdon and Eastbourne in terms of transport, infrastructure and community services, a Planning Forum will be established. This will comprise principally representatives from Wealden District Council and Eastbourne Borough Council with the objective of liaising on common issues and co-ordinating land use planning matters in a way which helps facilitate the Local Plan strategy.”

It was the clear expectation of this Council, and the District Councillors at that time, that they would have input to this Forum so as to represent the wishes and aspirations of our residents. This has not taken place and the Council asks that they be involved in the future on all matters which may affect Willingdon.

Paragraph 1.18 – South East Local Enterprise Partnership – Strategic Economic Plan

The Council is interested to see that funding has been committed from the Governments Local Growth Fund for transport schemes for the “Hailsham, Polegate and Eastbourne Sustainable Corridor” and an “Eastbourne and South Wealden walking and cycling package”.

The Council is not aware of this funding and asks to be involved in how it is used particularly since the principal bus services from Wealden to Eastbourne run through Willingdon.

Paragraph 5.3 – Infrastructure

This Council has consistently expressed strong concern about the lack of infrastructure necessary to support the large scale development proposed by Wealden District Council for this area.

The South Wealden and Eastbourne Transport Study was undertaken before the latest proposals for development in south Wealden which includes doubling the size of Hailsham, 5,000 dwellings at Arlington and very large developments at Willingdon, Polegate and Stone Cross. The Study could not have fully taken into account these proposals because they were not known at that time.

Your employment land proposals are clearly intended to provide increased employment opportunities to people living outside Eastbourne and will result in increased traffic on all road accesses to Eastbourne.

Your Council will be aware of the congestion already on the A2270 at Willingdon and Polegate with often long queues of traffic stretching back in both directions particularly at peak periods giving rise to “rat running” through the residential streets of Willingdon.

Your Council will also be aware of serious congestion at peak periods on all access routes into and out of Eastbourne ie Kings Drive/Willingdon Road/Cross Levels Way/Lottbridge Drove/Langney Rise (B2014)/St Anthony's Avenue/Seaside Roundabout/Pevensey Bay Road (A259)/Hide Hollow/Friday Street/Golden Jubilee Way (A22)/Hampden Park level crossing.

Since there is already congestion on all local roads, it has to follow that the new developments in south Wealden coupled with your own development plans, increased employment opportunities and improved shopping in Eastbourne Town Centre will result in even more traffic and congestion.

Your Council will also be aware of serious problems with commuter parking at Polegate Railway Station already even before the new development is built.

This Council believes that your employment land proposals must be considered alongside development proposals in south Wealden and the increased traffic arising and, above all, improved local road infrastructure provided.

Stephen Keogh
Parish Clerk
Willingdon and Jevington Parish Council

19 January 2016

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/13
Respondent	South Downs National Park Authority (Anna Ludford)
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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Thank you for consulting the South Downs National Park Authority (SDNPA) on the Eastbourne Employment Land Local Plan. The NPA welcome this opportunity to comment.</p> <p>The Authority would consider that Eastbourne Borough Council and the SDNPA have engaged positively in the formulation of planning policy and the preparation of joint evidence studies. The two authorities have continued to meet regularly. This cross-boundary working clearly meets the Duty to Cooperate.</p> <p>We would like to make the following comments on the Employment Land Local Plan:</p> <p>General</p>

We acknowledge the existing references to the National Park but would welcome reference to the duty to have regard to the National Park purposes (under section 62 of the Environment Act 1995).

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

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Attachments

 [SDNPA Comments on Eastbourne Employment Land LP - Jan 2016.pdf](#) (95 KB)

Submission Method Email

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

View Comment


Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Industrial Estates
Comment ID	RPS_ELLP/14
Respondent	South Downs National Park Authority (Anna Ludford)
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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Policy EL2</p> <p>We support the protection of existing industrial estates in policy EL2, and the policy of intensifying existing employment sites and focusing new development in the two main sustainable locations. We would expect EBC to have regard to the purposes of the National Park in deciding any applications for intensification or extension of employment sites, especially with regard to the effects of outdoor lighting.</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the	No

Examination in Public?

Why do you feel it is necessary to participate at the Examination in Public?

Attachments


 [SDNPA Comments on Eastbourne Employment Land LP - Jan 2016.pdf](#) (95 KB)

Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Town Centre
Comment ID	RPS_ELLP/15
Respondent	South Downs National Park Authority (Anna Ludford)
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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Para 4.31</p> <p>With regard to the town centre, we would support measures to protect the office stock, with particular regard to developments that affect the vitality and viability of the town centre and its services, as a gateway to the South Downs National Park, a location for the provision of services and employment opportunities to residents of the National Park and the end point of the South Downs Way National Trail.</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the	No


Examination in Public?	
Why do you feel it is necessary to participate at the Examination in Public?	
Attachments	 SDNPA Comments on Eastbourne Employment Land LP - Jan 2016.pdf (95 KB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Implementation and Monitoring Infrastructure
Comment ID	RPS_ELLP/16
Respondent	South Downs National Park Authority (Anna Ludford)
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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Para 5.3</p> <p>We support the fact that the quantum of employment development proposed does not create a requirement for additional highway infrastructure measures beyond those already proposed.</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to	

participate at the Examination in Public?

Attachments

 [SDNPA Comments on Eastbourne Employ Land LP - Jan 2016.pdf](#) (95 KB)

Submission Method Email
Response Status None
Assigned Officer =unassigned=
Officer's Response
Campaign Indidicator



21 January 2016

Regeneration & Planning Policy Team,
Eastbourne Borough Council,
1 Grove Road,
Eastbourne,
BN21 4TW

Dear Sir/Madam,

Subject: Eastbourne Employment Land Local Plan – Revised Proposed Submission Consultation

Thank you for consulting the South Downs National Park Authority (SDNPA) on the Eastbourne Employment Land Local Plan. The NPA welcome this opportunity to comment.

The Authority would consider that Eastbourne Borough Council and the SDNPA have engaged positively in the formulation of planning policy and the preparation of joint evidence studies. The two authorities have continued to meet regularly. This cross-boundary working clearly meets the Duty to Cooperate.

We would like to make the following comments on the Employment Land Local Plan:

General

We acknowledge the existing references to the National Park but would welcome reference to the duty to have regard to the National Park purposes (under section 62 of the Environment Act 1995).

Policy EL2

We support the protection of existing industrial estates in policy EL2, and the policy of intensifying existing employment sites and focusing new development in the two main sustainable locations. We would expect EBC to have regard to the purposes of the National Park in deciding any applications for intensification or extension of employment sites, especially with regard to the effects of outdoor lighting.

Para 4.31

With regard to the town centre, we would support measures to protect the office stock, with particular regard to developments that affect the vitality and viability of the town centre and its services, as a gateway to the South Downs National Park, a location for the provision of services and employment opportunities to residents of the National Park and the end point of the South Downs Way National Trail.

Para 5.3

We support the fact that the quantum of employment development proposed does not create a requirement for additional highway infrastructure measures beyond those already proposed.

Yours faithfully,



Lucy Howard
Planning Policy Manager
lucy.howard@southdowns.gov.uk
01730 819284

South Downs Centre, North Street,
Midhurst, West Sussex, GU29 9DH

T: 01730 814810

E: info@southdowns.gov.uk

www.southdowns.gov.uk

Chief Executive: Trevor Beattie

View Comment

Comment Information


Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/17
Respondent	Locate East Sussex (Philip Johnson)
Response Date	22 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:	
Comment	<p>Locate East Sussex works to promote business growth in East Sussex by working closely with companies and District, Borough and County Councils. We have had the opportunity to look at the draft Employment Land Local Plan and are pleased to offer the following comments.</p> <ul style="list-style-type: none">▶ companies that we engage with on a regular basis bring to our attention the general scarcity of commercial space and development opportunities in the borough▶ a local commercial agent commented to us: "...the supply chain has pretty much dried up and the outlook is bleak for the Borough. Invariably demand will/has outstripped supply which will lead to hikes in rent and sale prices."

- ▶ commercial agents are also concerned with the amount of commercial space being converted for residential use, especially in St Leonards Road in the town centre
- ▶ for Eastbourne-based medium-sized companies that need to grow whilst retaining their workforce and town-centre locations, there are no current opportunities for growth because of the lack of availability of larger premises in the borough
- ▶ there are minimal opportunities for entrepreneurial small businesses to grow because of limited availability of town centre premises within walking distance of rail and bus terminals
- ▶ whilst Locate East Sussex has been proactive in promoting Pacific House at Sovereign Harbour for consideration by local companies looking for space to grow, concerns by potential occupants have been expressed about the relative cost premium, distance from town centre, broadband/fibre connectivity and limited public transport access

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

Do you consider it necessary to participate at the Examination in Public? No

Why do you feel it is necessary to participate at the Examination in Public?

Attachments	 locate east sussex.docx (46 KB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indidicator	



Regeneration & Planning Policy
Eastbourne Borough Council
1 Grove Road
Eastbourne BN21 4TW

e. planningpolicy@eastbourne.gov.uk

22 January 2016

Locate East Sussex
Summerfields Business Centre
Bohemia Road
Hastings
East Sussex
TN34 1UT

t. 0844 4159255

e. philip.johnson@locateeastsex.org.uk

Dear Sir

Employment Land Local Plan

Locate East Sussex works to promote business growth in East Sussex by working closely with companies and District, Borough and County Councils. We have had the opportunity to look at the draft Employment Land Local Plan and are pleased to offer the following comments.

- › companies that we engage with on a regular basis bring to our attention the general scarcity of commercial space and development opportunities in the borough
- › a local commercial agent commented to us: "...the supply chain has pretty much dried up and the outlook is bleak for the Borough. Invariably demand will/has outstripped supply which will lead to hikes in rent and sale prices."
- › commercial agents are also concerned with the amount of commercial space being converted for residential use, especially in St Leonards Road in the town centre
- › for Eastbourne-based medium-sized companies that need to grow whilst retaining their workforce and town-centre locations, there are no current opportunities for growth because of the lack of availability of larger premises in the borough
- › there are minimal opportunities for entrepreneurial small businesses to grow because of limited availability of town centre premises within walking distance of rail and bus terminals
- › whilst Locate East Sussex has been proactive in promoting Pacific House at Sovereign Harbour for consideration by local companies looking for space to grow, concerns by potential occupants have been expressed about the relative cost premium, distance from town centre, broadband/fibre connectivity and limited public transport access

Please let me know if there is any further information that you require.


Yours sincerely

A handwritten signature in black ink, appearing to read "Philip Johnson".

Philip Johnson, Programme Director
February 2016

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/18
Respondent	Historic England (Alan Byrne)
Response Date	22 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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	<p>Thank you for consulting Historic England on the above revised plan.</p> <p>We have not comments to make to the changes to proposed site allocations for employment development.</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Attachments	 Historic England.pdf (29 KB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indidicator	

Hitchen, Matt

From: Byrne, Alan <Alan.Byrne@HistoricEngland.org.uk>
Sent: 22 January 2016 15:46
To: Planning Policy Email
Subject: Employment Land Local Plan - Revised Proposed Submission version

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Sir,

Thank you for consulting Historic England on the above revised plan.

We have not comments to make to the changes to proposed site allocations for employment development.

Yours faithfully,

Alan Byrne
Historic Environment Planning Adviser
National Planning and Conservation Department
Direct Line: 01483 252020
Historic England | South East | Eastgate Court
195-205 High Street | Guildford | GU1 3EH

We have launched four new, paid-for Enhanced Advisory Services, providing enhancements to our existing free planning and listing services. For more information on the new Enhanced Advisory Services as well as our free services go to our website: HistoricEngland.org.uk/EAS

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View Comment

Comment Information

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

Comment ID RPS_ELLP/19

Respondent [Seachange Sussex \(John Shaw\)](#)

Response Date 22 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? Yes

If no, Do you consider it is unsound because it is:

Comment Eastbourne Borough Council has the lowest employment land supply of the 5 Boroughs and Districts with only 43,000m² net internal area of business floorspace allocated in this Employment Land Local Plan. This is against a background of having a population of (NOMIS – 2016) 99,412 (2011 Census) making it the largest conurbation in East Sussex with an economically active 80% of the working age population. Unusually, the office stock serving the dominant service sector has historically been principally located in the town centre (still representing the location of approximately 90% of the office stock). Also, critically there has been an absence of Grade A office space in the Town Centre, unsurprisingly with few opportunities to bring forward any meaningful critical mass of office/business development. The only such location available to

accommodate modern business space with a critical mass sufficient to create an identifiable office location has been Sovereign Harbour, where the local authority has sought development since 1988.

Sovereign Harbour also benefits from having a recent history of complementary developments which have made it an important residential community as well as a major retail and leisure destination.

The landowner has historically not sought to promote or develop employment uses thus creating a situation of "no supply" which unsurprisingly has evidenced "no demand" with which to generate demand and indeed giving out the message that land was solely for sale for residential, retail and leisure uses. Against this background the local authority partners Eastbourne Borough Council and East Sussex County Council opened up discussions with Sovereign Harbour Limited to acquire site 6 (now designated Sovereign Harbour Innovation Park) comprising 3.4 hectares and able to accommodate 11,000 m² of B1 space in March 2014.

Subsequent to acquisition, Sea Change Sussex, supported by Eastbourne Borough Council, East Sussex County Council and the South East Local Enterprise Partnership (SELEP) have taken forward Pacific House, a 2.344m² net lettable area business centre designed with maximum flexibility to accommodate needs from 59m² for small businesses/self-employed through to medium sized occupiers with larger needs.

Letting commenced in the autumn and is proceeding satisfactorily.

We are also proceeding with further infrastructure for the overall site to shorten the development timetable for the balance of 8756m² of development potential left on the present Sovereign Harbour Innovation Park (formerly site 6).

We welcome the planning consent granted to Sovereign Harbour Limited and their

commitment to the Section 106 agreement securing employment was for site 7A and site 4 providing the further 9,000 m² net internal area allocated in the Local Plan.
 Given the 2027 timeframe for development of this land we believe it to be timely to ensure the pro-active marketing and development of the target site 7a to ensure an orderly progression from site 6, and at the same time adding a single user site to the Sovereign harbour Innovation Park offer.
 This would extend the offer of the Sovereign Harbour Innovation Park or medium to large employers bringing quantum economic uplift. It also provides the ability for early development of an eastern gateway development on the Pacific Drive/Pevensy road roundabout to complement Pacific House on the western side, thus delivering a very powerful marketing message of Sovereign Harbour as a business location.

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

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


Yes


Why do you feel it is necessary to participate at the Examination in Public?

Sea Change Sussex is the economic regeneration company for East Sussex which delivers economic infrastructure and business space. Sovereign Harbour is an important strategic site for employment development. Sea Change Sussex supports the full development of the employment land allocation in Sovereign Harbour, Eastbourne and wider East Sussex.
 Sea Change Sussex is delivering public investment for economic regeneration in East Sussex and has a major interest in the significant infrastructure improvement being exploited through adequate employment land

supply opportunities which can only grow with the policy and funding support that has been given by Government, South East Local Enterprise Partnership (SELEP), East Sussex County Council (ESCC) and Eastbourne Borough Council (EBC) amongst others. We are the developers on behalf of local partners for Sovereign Harbour Innovation Park and its first phase, the recently completed Pacific House. In particular, we would be supporting the Employment Land Local Plan proposals as a minimum.

Attachments

 [Additional Background Comments from Sea Change Sussex - 22.01.16.pdf](#) (183 KB)

 [Seachange Sussex RPS_ELLP_Representation_Form 2016 - Final 22.01.16.pdf](#) (131 KB)

Submission Method Email
Response Status None
Assigned Officer =unassigned=
Officer's Response
Campaign Indicator



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). Alternatively, completed forms can be returned to 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.

Personal Details

Title:	Mr	First Name(s):	John
Surname:	Shaw		

Organisation:	Sea Change Sussex		
Position:	Chief Executive		
Agent acting on behalf of:	N/A		

Address:	Innovation Centre, Highfield Drive, St Leonards on Sea		
Post Code:	TN38 9UH		

Phone Number:	01424 858287	Fax Number:	01424 858101
E-Mail Address:	traceymurray@seachangesussex.co.uk		

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: All

Policy: EL1, EL2, EL3, EL4

Paragraph Number: All

Figure: All

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:

[Click here to enter text.](#)

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.

No changes

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:

Sea Change Sussex is the economic regeneration company for East Sussex which delivers economic infrastructure and business space. Sovereign Harbour is an important strategic site for employment development. Sea Change Sussex supports the full development of the employment land allocation in Sovereign Harbour, Eastbourne and wider East Sussex.

Sea Change Sussex is delivering public investment for economic regeneration in East Sussex and has a major interest in the significant infrastructure improvement being exploited through adequate employment land supply opportunities which can only grow with the policy and funding support that has been given by Government, South East Local Enterprise Partnership (SELEP), East Sussex County Council (ESCC) and Eastbourne Borough Council (EBC) amongst others.

We are the developers on behalf of local partners for Sovereign Harbour Innovation Park and its first phase, the recently completed Pacific House.

In particular, we would be supporting the Employment Land Local Plan proposals as a minimum.


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 | <input checked="" type="checkbox"/> |
| Publication of the Inspectors Report | <input checked="" type="checkbox"/> |
| Formal adoption of the Employment Land Local Plan | <input checked="" type="checkbox"/> |

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.

Signature:		Date:	22/01/2016
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Additional Background Comments from Sea Change Sussex

Eastbourne Borough Council has the lowest employment land supply of the 5 Boroughs and Districts with only 43,000m² net internal area of business floorspace allocated in this Employment Land Local Plan. This is against a background of having a population of (NOMIS – 2016) 99,412 (2011 Census) making it the largest conurbation in East Sussex with an economically active 80% of the working age population.

Unusually, the office stock serving the dominant service sector has historically been principally located in the town centre (still representing the location of approximately 90% of the office stock).

Also, critically there has been an absence of Grade A office space in the Town Centre, unsurprisingly with few opportunities to bring forward any meaningful critical mass of office/business development.

The only such location available to accommodate modern business space with a critical mass sufficient to create an identifiable office location has been Sovereign Harbour, where the local authority has sought development since 1988.

Sovereign Harbour also benefits from having a recent history of complementary developments which have made it an important residential community as well as a major retail and leisure destination.

The landowner has historically not sought to promote or develop employment uses thus creating a situation of “**no supply**” which unsurprisingly has evidenced “no demand” with which to generate demand and indeed giving out the message that land was solely for sale for residential, retail and leisure uses.

Against this background the local authority partners Eastbourne Borough Council and East Sussex County Council opened up discussions with Sovereign Harbour Limited to acquire site 6 (now designated Sovereign Harbour Innovation Park) comprising 3.4 hectares and able to accommodate 11,000 m² of B1 space in March 2014.

Subsequent to acquisition, Sea Change Sussex, supported by Eastbourne Borough Council, East Sussex County Council and the South East Local Enterprise Partnership (SELEP) have taken forward Pacific House, a 2.344m² net lettable area business centre designed with maximum flexibility to accommodate needs from 59m² for small businesses/self-employed through to medium sized occupiers with larger needs.

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We are also proceeding with further infrastructure for the overall site to shorten the development timetable for the balance of 8756m² of development potential left on the present Sovereign Harbour Innovation Park (formerly site 6).


We welcome the planning consent granted to Sovereign Harbour Limited and their commitment to the Section 106 agreement securing employment was for site 7A and site 4 providing the further 9,000 m² net internal area allocated in the Local Plan.

Given the 2027 timeframe for development of this land we believe it to be timely to ensure the proactive marketing and development of the target site 7a to ensure an orderly progression from site 6, and at the same time adding a single user site to the Sovereign harbour Innovation Park offer.

This would extend the offer of the Sovereign Harbour Innovation Park or medium to large employers bringing quantum economic uplift. It also provides the ability for early development of an eastern gateway development on the Pacific Drive/Pevensey road roundabout to complement Pacific House on the western side, thus delivering a very powerful marketing message of Sovereign Harbour as a business location.

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/20
Respondent	National Grid (National Grid National Grid)
Response Date	25 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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	

Attachments	 National Grid Employment Land LP REP 06.01.16.pdf (58 KB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	



Planning Policy Team
Eastbourne Borough Council
1 Grove Rd,
Eastbourne
BN21 4TW

Robert Deanwood
Consultant Town Planner

Tel: 01926 439078
n.grid@amecfw.com

Sent by email to:
planningpolicy@eastbourne.gov.uk

06 January 2016

Dear Sir / Madam

**Eastbourne Borough Council: Employment Land Local Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

Further Advice

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Robert Deanwood
Consultant Town Planner

n.grid@amecfw.com

Amec Foster Wheeler E&I UK
Gables House
Kenilworth Road
Leamington Spa
CV32 6JX

Laura Kelly
Town Planner, National Grid

laura.kelly@nationalgrid.com

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

Yours faithfully

[via email]

**Robert Deanwood
Consultant Town Planner**

cc. Laura Kelly, National Grid

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction
Comment ID	RPS_ELLP/21
Respondent	Health and Safety Executive (John Moran)
Response Date	28 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?	Yes
If no, Do you consider it is unsound because it is:	
Comment	See attached letter
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	No
Why do you feel it is necessary to participate at the Examination in Public?	
Attachments	HSE Letter B - Encroachment Eastbourne Council local plan response.DOCX (56 KB)

Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	



Health and Safety Executive

Eastbourne Borough Council,
1 Grove Road,
Eastbourne,
East Sussex BN21 4TW

Reference

Hazardous Installations Directorate

John Moran

CEM HD5E
2.2 Redgrave Court
Merton Road
BOOTLE
L20 7HS

Tel: 0151 951 4551

LOCAL.PLANS.CEMHD.5@hse.gsi.gov.uk

<http://www.hse.gov.uk/>

Howard Harte – Head of Unit

Date Tuesday, 16 February 2016

Dear Sir/Madam

CONSULTATION ON YOUR LOCAL PLAN – REPRESENTATIONS BY HSE

Employment Land Local Plan - Revised Proposed Submission version

Thank you for your request to provide a representation on the **Employment Land Local Plan - Revised Proposed Submission version** consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved.

HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with HSE may contribute to achieving compliance:

1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents
2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended¹ requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III)². Regulation 10(c)(i) requires that regard also be had to the

¹ Amended by r.33 - Schedule 5 of The Planning (Hazardous Substances) Regulations 2015

² Article 13(1) provides that Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment are taken into account in land use policies or other relevant policies. They shall pursue those objectives through controls on: (a) the siting of new establishments; (b) modifications to establishments covered by Article 11; and (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting or developments may be the source of or increase the risk or consequences of a major accident

need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes

At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to vary, relinquish or revoke hazardous substances consents³. Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: <http://www.hse.gov.uk/landuseplanning/padhi.htm>

Encroachment of Local Plan Allocations on Consultations Zones

We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocations that could be effected are listed in the attached annexes.

Compatibility of Development with Consultation Zones

The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.

Housing Allocations

Inner Zone – Housing is not compatible with development in the inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.

Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units *and* at a density of no more than 40 per hectare.

Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.

Workplace Allocations

Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m² total floor space are compatible with the inner zone.

Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.

³ Hazardous substances consents are granted by the Hazardous Substances Authority (HSA), which is usually the planning authority. The consent process is regulated by the HSA under The Planning (Hazardous Substances) Regulations 2015. The HSA must consult HSE on consent applications. In assessing the application for consent, HSE will produce a map with risk contours (or zones), representing the risk to a hypothetical house resident. Should the HSA grant consent, this map defines the consultation distance within which HSE must be consulted over any relevant future planning applications

Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m² are compatible with the middle zone.

Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000m² total floor space are compatible with the outer zone.

This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on *Development Type Tables of HSE's Land Use Planning Methodology*, which is available at: <http://www.hse.gov.uk/landuseplanning/methodology.pdf>

Mixed-Use Allocations

Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to the Web App to determine HSE's advice regarding mixed-use developments.

Verification of Advice using the Web App

The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE's extranet system along with advice on HSE's land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE's Planning Advice Web App; further information is available on HSE's website: <http://www.hse.gov.uk/landuseplanning/padhi.htm> . When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.

Identifying Consultation Zones in Local Plans

HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.

Identifying Compatible Development in Local Plans

The guidance in HSE's Land Use Planning Methodology, available at <http://www.hse.gov.uk/landuseplanning/methodology.pdf> will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends

that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on *Development Type Tables* and the *Decision Matrix* are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.

There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of the Web App.

Development Proximity Zone (DPZ)

Following the Buncefield incident in 2005, HSE reviewed the consultation distances of all sites which met the criteria for large-scale petrol storage sites, and an additional zone (DPZ) was introduced 150 metres from the boundary of the relevant storage tank bunds. The Web App cannot be used to determine HSE's advice on developments within the DPZ, and LPAs must refer any planning applications or pre-planning enquires on developments within the DPZ to HSE. Further guidance is available on HSE's website:
http://www.hse.gov.uk/foi/internalops/hid_circs/technical_general/spc_tech_gen_43/index.htm

Provision of Information to Interested Parties – Pipeline Operators

The pipeline operator/s referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter.

If you have any questions about the content of this letter, please contact me at the address given in the letterhead.

Yours faithfully



John Moran

HM Specialist Inspector of Health and Safety (Risk Assessment)

Annex 1 - Eastbourne - Sites on Employment

REFNO	ADDRESS	HIDCI5_NO	CZL_SITE_O	CZL_ADDRES	CZL_ADDRES	CZL_ADDRES	CZL_ADDRES	CZL_ADDRES	ZONE
EL2-2	Highfield North Industrial Estate	H0908	Eastbourne & District Calor Gas Supplies	Hargreaves Road	Eastbourne	BN23	6QN	Outer	
EL2-3	Highfield South Industrial Estate	H0908	Eastbourne & District Calor Gas Supplies	Hargreaves Road	Eastbourne	BN23	6QN	Outer	
EL2-4	Hammonds Drive Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Outer	
EL2-4	Hammonds Drive Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Middle	
EL2-4	Hammonds Drive Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Inner	
EL2-5	Birch, Hawthorn and Compton Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Outer	
EL2-5	Birch, Hawthorn and Compton Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Middle	
EL2-5	Birch, Hawthorn and Compton Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Inner	
EL2-6	Finmere and Britland Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Outer	
EL2-6	Finmere and Britland Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Middle	
EL2-6	Finmere and Britland Industrial Estate	H0904	Transco PLC	Finmere Road	Eastbourne	BN22	8QW	Inner	

Annex 2 - Eastbourne - Pipes on Employment

REFNO	ADDRESS	HSE_REF	TRANSCO_RE	P_OPERATOR	P_NAME	GEOMETRY_T
EL4-1	Site 6, Pacific Drive, Sovereign Harbour	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Outer Zone
EL4-1	Site 6, Pacific Drive, Sovereign Harbour	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Inner Zone
EL4-2	Site 7a, Pacific Drive, Sovereign Harbour	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Outer Zone
EL4-2	Site 7a, Pacific Drive, Sovereign Harbour	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Inner Zone
EL2-4	Hammonds Drive Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Middle Zone
EL2-4	Hammonds Drive Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Outer Zone
EL2-4	Hammonds Drive Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Outer Zone
EL2-4	Hammonds Drive Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Inner Zone
EL2-4	Hammonds Drive Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Inner Zone
EL2-5	Birch, Hawthorn and Compton Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Middle Zone
EL2-5	Birch, Hawthorn and Compton Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Outer Zone
EL2-5	Birch, Hawthorn and Compton Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Outer Zone
EL2-5	Birch, Hawthorn and Compton Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Inner Zone
EL2-5	Birch, Hawthorn and Compton Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Inner Zone
EL2-6	Finmere and Britland Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Middle Zone
EL2-6	Finmere and Britland Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Outer Zone
EL2-6	Finmere and Britland Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Inner Zone
EL2-6	Finmere and Britland Industrial Estate	8034	2293	Southern Gas Networks	Mayfield / Eastbourne (GM4)	Inner Zone
EL2-6	Finmere and Britland Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Inner Zone
EL2-7	Courtlands Road Industrial Estate	8040	2299	Southern Gas Networks	Mill Road / Cooden (GM9)	Outer Zone

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Relationship with Other Plans and Strategies
Comment ID	RPS_ELLP/22
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	<p>In our previous representations we stated that the ELLPs reference to the following key strategic matters is helpful</p> <ul style="list-style-type: none"> - local priorities being to unlock and assemble strategic sites - the regeneration of the Town Centre - The presumption in favour of sustainable development - The emphasis on the Hailsham, Polegate and Eastbourne Sustainable Corridor. <p>We also stated that reference should be given to the adopted Eastbourne Town Centre Local Plan 2013 (TCLP) and to the adopted Sovereign Harbour SPD, 2014.</p> <p>The need for reference to be made to the SPD reflects how that document allows for Site 7</p>

to be part developed for housing and public open space development; significantly impacting on the amount of land available for potential employment use within that site.


The RELLP now refers to these additional documents but rather selectively.

The SH SPD, February 2013 is an earlier policy document that sits alongside the adoption of the CSLP (2013) but predates the CSLP Inspector's direction (November 2012) that employment land requirements must be reviewed further and set out within the required ELLP document. It also predates the grant of outline planning permission for Sites 4, 6 and 7 at the Harbour and the more recent reserved matter approval for the development of Site 7b and 7c for non-employment uses.

Through EBC's recent consideration of development control matters at the Harbour, Council officers have confirmed that the outline permission indeed supersedes the SPD.

As such the ELLP's brief reference to the SPD and its requirement for a Business / Office Park on Sites 6 and 7 with the potential for office use also on Site 4 needs to be qualified within the RELLP to acknowledge that the SPD provides a context for the southern part of Site 7a to be developed for employment generating uses, with the extent of any required office provision within that site and within Site 4 to be determined by the ELLP.

This clarification is particularly important as the linked RSA makes numerous references to the SH SPD but without acknowledging how its requirements have in part been superseded.

What changes do you suggest to make the document legally compliant or sound?	Para 1.10 must be amended to reflect that within Site 7 only Site 7a is available employment generating uses.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	Our objections relate to the proposed allocation of our client's 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.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 1 - ELLP Representation Form - Chpt 1.pdf (124 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Introduction Stages in the production of Plan
Comment ID	RPS_ELLP/23
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	This table should be updated to refer to dates in 2016 / the updated ELLP programme going forward.
What changes do you suggest to make the document legally compliant or sound?	This table should be updated to refer to dates in 2016 / the updated ELLP programme going forward.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	Our objections relate to the proposed allocation of our client's 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.

Attachments

-  [01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf](#) (2.8 MB)
-  [Sub Form 1 - ELLP Representation Form - Chpt 1.pdf](#) (124 KB)
-  [01b - Statement 1 - Draft ELLP - pdf.pdf](#) (1.1 MB)

Submission Method Email

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Existing situation
Comment ID	RPS_ELLP/24
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	<p>Reference is made at Para 2.8 to an overall net increase in employment floorspace in Eastbourne over the past 9 years and to this being in the office (B1a) sector amongst others.</p> <p>EBC's own monitoring however shows that office stock within the town centre has in fact decreased almost year on year over some time, with the rate of loss being accelerated recently. This situation has continued subsequent to our last representations, as reflected in the further update below and by additional subsequent planning submissions to EBC since March 2015 onwards</p> <p>As set out in our previous representations and repeated here for ease of reference, we consider that acceleration to result from:</p>

- (1) the relative size, strength and predominantly local nature of the Eastbourne office market overall. This has been reviewed and acknowledged in detail on behalf of both EBC and SHL through representations on the CSLP and TCLP;
- (2) the permitted development regime that allows office conversions to residential use;
- (3) Eastbourne's current adopted plan regime that also encourages residential development in the town centre outside of the permitted development rights;
- (4) the adopted TCLP which, pending the ELLP, points to a very low allocation of new office space for the town centre, thereby requiring developers to deliver very little office space in the centre.

The fact that EBCs summary highlights a long term growth in office provision across the town, even though the town centre's stock has been in decline, points to the most recent growth being within out of town centre locations.

This also follows evidence already submitted by Stiles Harold Williams on behalf of SHL in relation to the CSLP, which highlighted the development of office campuses within highly accessible, established employment locations but which nonetheless in occupancy terms have met with very challenging conditions.




Those significant and substantial challenges have essentially arisen again from:

- the scale and nature of the local market;

and

- the ability of occupiers to pay the higher rents such campus schemes must command in order to be viable. This has restricted occupier interest to just a small sub-set of the local market.

These trends are also reflected in the take-up of space in the Innovation Mall on Site 6 and

	<p>across office campus' to the north of Eastbourne town centre. The campus' at Polegate outside of the Borough but within the strategic corridor are performing well. The campus' within Eastbourne also in the corridor have had to reduce their rents whilst the extent of take up and the rents secured at the Innovation Mall do not suggest the extent of requirement and pent up demand, essentially in the face of continuing losses of office space within the town centre.</p> <p>This sub-section of the RELLP does not reflect any of these trends or characteristics of the local market.</p>
What changes do you suggest to make the document legally compliant or sound?	As set out previously, EBC must revisit its summary understanding of the actual trends that are affecting the local office market, and how these relate to the town centre and office campus / business park sectors.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	Our objections relate to the proposed allocation of our client's 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.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email

Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Existing situation
Comment ID	RPS_ELLP/25
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	<p>Para 2.9</p> <p>Our objections to this section of the draft ELLP remains.</p> <p>As set out previously, this paragraph acknowledges the importance of Eastbourne’s position on the A22-A27 corridor.</p> <p>As is also acknowledged by EBC, the town’s position in the Eastbourne-Polegate-Hailsham corridor provides a key north-south growth axis (Draft ELLP Para. 1.15).</p> <p>These locational advantages establish Eastbourne town centre, with its road, rail and service facilities, as one of the key economic hubs within the sub-regional economy. The office campus developments that have been</p>

successful to date are also within the Eastbourne section of the corridor and it is those at Polegate that continue to perform relatively well (see accompanying SHW Statement).

Sovereign Harbour however is very peripheral to this hub in location and connectivity terms.

All of the policies that follow within later sections of the RELLP and the accompanying RSA discard this context. They set aside one of the area’s key local assets (the town centre) in favour of planning for its further demise in terms of the quantity of new office stock to be planned for there, and also make no provision for new stock to be promoted at other locations within the Borough’s section of the growth corridor. This is all in favour of a proposed single new out of centre office allocation within the Borough, in one of the town’s least well connected areas.

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

As set out previously, in order to maintain a thread through the ELLP, from a clear and accurate understanding of the local market, through to actual policies, the document must acknowledge the relationship between the sub-regional growth corridor, the role of Eastbourne town centre within this, the benefits of seeking other opportunities elsewhere between the town centre and Polegate, but also the relative locational and market constraints of Sovereign Harbour.

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

Yes

Why do you feel it is necessary to participate at the Examination in Public?

Our objections relate to the proposed allocation of our client's 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.

Attachments

-  [01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf](#) (2.8 MB)
-  [Sub Form 2 - ELLP Representation Form - Chpt 2.pdf](#) (125 KB)
-  [01b - Statement 1 - Draft ELLP - pdf.pdf](#) (1.1 MB)

Submission Method Email

Response Status None

Assigned Officer =unassigned=

Officer's Response

Campaign Indicator

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Existing situation
Comment ID	RPS_ELLP/26
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	<p>Para 2.10 & 2.14 – 2.15</p> <p>Para 2.10 of the Draft ELLP refers to the town’s commercial floorspace stock comprising a range of sizes, ages and types of space that offers a degree of choice. It also highlights that low vacancy levels outside of the town centre are healthy signs for the market.</p> <p>Para 2.14 however states that much of the town’s large scale office stock is no longer fit for purpose, does not meet occupier needs and lacks flexibility to be able to accommodate office, workshop and production space within one building.</p>

Para 2.15 then stresses the location and connectivity constraints of Eastbourne as a whole.

From here, the RELLP still progresses later in the document to an allocations policy that will:

- result in the further reduction in the town centre's office stock;
- rely on the majority of new stock being directed to one single peripheral location.

This represents a continuing leap from assessment of current conditions to policy responses, and points to a lack of appreciation of the local market and of the accommodation and location options and choices that will result from the document's allocations policy.

In short, as set out consistently in previous representations:

- ▶ Unless the amount of new supply is increased in the town centre to replace and improve its existing but already depleted offer, the level, quality and choice provided by its office stock will be further weakened and downgraded;
- ▶ Directing the majority of the new stock to one single location within the Borough will not provide choice. It will mean: one location option; one connectivity option in terms of a peripheral location with accessibility constraints to the rest of Eastbourne and its strategic train and road connections; one local setting and environment option; and a rental and service charge regime, which as acknowledged by B/GVA (Supplementary Report 2014 para 5.9), will mean significantly higher charges.
- ▶ As demonstrated by the previous report by Stiles Harold Williams in response the Proposed ELLP 2014 and within their new

accompanying Statement January 2016, where recent out of centre office stock has come forward in the town this has been in more accessible locations but has not achieved anywhere near the rental levels B/GVA has assumed are required and possible to achieve in order for unsubsidised office development at the Harbour to be viable. This will actively constrain the delivery of office space at the Harbour, reflecting again the significant location and market weaknesses that have blighted the employment sites here over some significant time.

- ▶ In location terms, whilst EBC acknowledges the strategic constraints of Eastbourne as a whole, the Council then fails to relate how the constraints of such a peripheral location are magnified further at the Harbour. The Harbour is peripheral within the town and relative to Eastbourne's main public transport hubs and to the main axis of existing economic activity and anticipated further growth potential. Discussion by those who attended an ELLP stakeholder event held by EBC and B/GVA in 5 June 2013 and as attended by SHL and Teal Planning, indeed focused very heavily on the A22/A27 corridor, with Sovereign Harbour being barely mentioned.
- ▶ The focus that is placed in the ELLP on the type of flexible accommodation that is considered a priority for the town, and that can provide for a range of activities that includes 'workshops and production', is only suitable for Site 6 at the Harbour. It is not appropriate for Sites 4 or 7a - the only other potential employment land options that remain here.

- ▶ This mix of B1 space is acceptable on Site 6 as it is adjacent to existing commercial development, is at some distance from existing and planned new residential development and can readily accommodate heavy goods vehicles, as the access route to the site will not impact on residential areas. As outlined in Statement 2, however, it is assumed that Site 6 will accommodate primarily high quality office type development and this accords with the floorspace summary and allocation details set out in the RELLP (para 2.30 – 2.37)
- ▶ Through the new outline planning permission for the Harbour (ref 131002), Site 6 can accommodate at least 11,100sq.m. of B1 space which allows for B1a, b and c uses. This minimum can be increased for instance by reducing car parking and increasing overall build density in the interest of fully maximising the development potential of the site.
- ▶ We note however that SeaChange Sussex is now marketing Site 6 on the basis that it can accommodate c. 9,777sq.m. NIA of B1 space. As outlined accompanying Statement 2 it is for EBC to push for the most efficient and effective use of that land in accordance with its sustainable planning objectives.
- ▶ Even if Site 6 does ultimately accommodate this lower floorspace, based on the efficient job densities that are achieved by current working practices and that will be required to justify the higher rents sought at Site 6, this will still accommodate a significant number of new jobs and will still provide the sizeable office cluster that is sought be EBC here.
- ▶ In contrast, Sites 4 and 7a are recognised by EBC through both the

Sovereign Harbour Supplementary Planning Document (2014) and the outline planning permission (ref 131002) as being suitable in location and environmental terms for Class B1(a) development and for other linked development that is compatible with residential development, such as care-homes, hotels, children's nurseries. They cannot in location terms accommodate workshop and production floorspace. Also significantly, they are not required to meet forecast growth in B1a/ b space.




- ▶ Within the town centre, Site 2 adjoins existing commercial development, is in a location that already accommodates large service vehicles and is large enough to accommodate a range of accommodation types, including for start up, office and workshop type uses (see Supporting Statement 2). Town centre Sites 2 and 3 also individually and together also provide significant scope for new Class B1 space, without undermining the potential to accommodate other uses.

These location and market issues are addressed further by Stiles Harold Williams within their previous and new Statements and by our review of the accompanying Revised Sustainability Appraisal (See Submission Statement 2) which places the relative location benefits and constraints of the Harbour in a wider sustainable planning context, beyond just market considerations.

The RELLP still does not recognise or address these issues.

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

EBC, as outlined previously, must revisit its understanding of the Eastbourne office market:
 - how and where the new priority space requirements can be accommodated;

<p>Do you consider it necessary to participate at the Examination in Public?</p>	<ul style="list-style-type: none"> - what impact a low office allocation for the town centre will have on the centre; - how existing out of centre office schemes are in reality performing in value and rental terms; and - what the actual realistic potential of the Harbour Sites 4 and 7a are to: <ul style="list-style-type: none"> o deliver the type of Class B space that EBC stresses is required o deliver more narrowly defined but viable Class B1a office space o meet sustainable planning objectives. <p>Yes</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	<p>Our objections relate to the proposed allocation of our client's 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>Attachments</p>	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	
<p>Campaign Indicator</p>	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Recent developments and future projects
Comment ID	RPS_ELLP/27
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	<p>Para 2.16 summaries the details of the Innovation Mall on Site 6. Notably, as outlined in previous representations, the Mall is stated as having the potential to accommodate up to 300 new jobs. This equates to a jobs density of 8sq.m. NIA which is of note and relevant for the overall density that can be achieved on this site overall.</p> <p>The B/GVA reports for EBC have set out various appraisals for the Site 6 development and this has been added to further through their further accompanying Appraisal of September 2015. That suite of documents has in turn been reviewed by SHW whose previous documents and new accompanying Statement on the RELLP sets out significant and critical viability issues for Site 6.</p>

Whilst EBC remains committed to supporting the development of Site 6 for Class B1 use, this does not and cannot be translated into concluding that Sites 4 and 7a are (1) required for even further office space to be provided here and (2) such space presents a long term viable and sustainable option for the Harbour and for Eastbourne overall.

The Town Centre allocation Site 3 has also been part approved for its redevelopment for an extra care housing scheme. As outlined in Supporting Statement 2, this still leaves a substantial part of that site available for office development of a scale that could on its own surplus the total space EBC proposes to allocate to the town centre overall.

The ELLP should further acknowledge this within this sub-section of the RELLP and as background to RELLP Policy EL3 Town Centre; i.e. as a signal to developers that office development is required here.

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




This sub-section should be updated to reflect further changes to recent developments and projects, as background to the ELLP policies.

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

Yes

Why do you feel it is necessary to participate at the Examination in Public?




Our objections relate to the proposed allocation of our client's 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.

Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Key Issues
Comment ID	RPS_ELLP/28
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	<p>The headline supply issues identified in this sub-section are agreed. The continuing summary that is provided here however still does not fully or correctly reflect the relevant matters that need to be taken into account in the setting of the RELLP's allocations policies.</p> <p>Para 2.24 continues to deal with the Loss of employment land to other uses. It states that if losses of key sites continue within existing employment locations, this has the potential to undermine the B class nature of these sites. This equally applies to the loss of office space in the town centre.</p> <p>EBC acknowledges this is an issue and that office space is under pressure for redevelopment to residential schemes. The continuing proposed balance between EBC's</p>




	<p>forecast losses in office stock in the centre (which has continued subsequent to our last representations) and the proposed allocation of new space to the centre will however have the very effect that the RELLP says should be avoided.</p>
<p>What changes do you suggest to make the document legally compliant or sound?</p>	<p>Para 2.24, as outlined previously, should be amended to reflect that a core objective of the RELLP must be to maintain and increase the town centre's stock of offices in order to replace that which has been lost, to further enhance the role of the town centre as an employment location, and to ensure that a choice of office stock is retained and improved within the centre for the benefit of Eastbourne overall.</p>
<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>Yes</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	<p>Our objections relate to the proposed allocation of our client's 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>Attachments</p>	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	

Campaign Indidicator

View Comment

Comment Information




Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Key Issues
Comment ID	RPS_ELLP/29
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	<p>Para 2.25 deals with the Identification of sites. It states that sites for additional employment development should be the most appropriate and sustainable locations. This understanding and resulting objectives are supported.</p> <p>The RELLP's later sections however still fail to reflect the most sustainable development option for the Borough. This is demonstrated further through the assessment of alternative options as now appraised by jam on behalf of EBC, but as reviewed and reappraised further within our accompanying Statement 2.</p>
What changes do you suggest to make the document legally compliant or sound?	As per our previous representations, in order to ensure all locational issues are acknowledged and carried forward appropriately in the RELLP allocations policies, Para 2.25 must be amended to:

<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>- acknowledge the location and connectivity benefits of Eastbourne town centre and of the A22/A27 economic corridor. - make direct reference to the linked Sustainability Appraisal (updated further to address the objections made to the current version of that document).</p> <p>Yes</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	<p>Our objections relate to the proposed allocation of our client's 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>Attachments</p>	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	
<p>Campaign Indidicator</p>	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Key Issues
Comment ID	RPS_ELLP/30
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	<p>Para 2.26 follows exactly the previous draft of the ELLP and deals with the Requirements for Office Space in the Town Centre. This continues to refer to the need to strike the right balance between town and out of town office provision in order to maintain the role of offices as a key town centre use but to also broaden the choice of space that is on offer.</p> <p>In acknowledging that different office occupiers have different locational preferences, this sub-section, as outlined previously, must also still stress the need to:</p> <ul style="list-style-type: none"> - reflect location preferences but also meet sustainable planning objectives; - ensure the office stock in the town centre is not further weakened in terms of its amount, choice and quality. A higher allocation to the town centre is needed to ensure this does not

	<p>occur;</p> <ul style="list-style-type: none"> - acknowledge that in order to provide a genuine improvement in the choice of space available this will require more improved space in the centre and in a range of other locations across the town. A single out of town centre location will not address the supply issues identified, it will weaken the commercial core of the town centre and provided limited choice for office occupiers in the town who do require new accommodation.
What changes do you suggest to make the document legally compliant or sound?	As outlined in previous submissions, this sub-section must be revisited to more fully reflect the above issues and to ensure a thread is maintained through the RELLP: i.e. from the assessment of location issues through to an appropriate allocations policy that will best address the matters identified.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	Our objections relate to the proposed allocation of our client's 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.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None

Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Key Issues
Comment ID	RPS_ELLP/31
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	<p>Para 2.27 deals with the Suitability and Viability of land at Sovereign Harbour. This refers to the original allocation of 30,000sqm of office space at the Harbour and that this now needs to be revisited. In our previous representations we requested that this be amended to clarify that the requirement outlines at that stage was a GEA floorspace figure.</p> <p>EBC has made this requested change, however, circumstances at the Harbour sites have moved on further subsequent to our previous request. Sites 7b and 7c now have detailed approval to be developed for residential and public open space uses and Site 6 is being marketed for less than the 11,100sq..m. NIA of floorspace that is specified within the outline planning</p>

permission for the remaining employment sites at the Harbour.

Additionally the viability position of Site 6 has been reappraised further by B/GVA (September 2015) and in turn has been reviewed by SHW (see accompanying Statements). B/GVA has not in fact undertaken an independent and updated viability review and SHW's re-appraisal demonstrates the viability issues for the open office market generally but including at Sovereign Harbour, which has the added disadvantage of being unsustainable in location, accessibility and transport terms. Given these substantial constraints, whilst EBC remains committed to supporting B1 space on Site 6 that would be more appropriately assisted by other employment uses that will support and help to sustain it.

In this way Sites 4 and 7a can work together better with Site 6 as a more viable, self-sustainable employment park and work together better with other office locations within the Borough that will provide a breadth of options and choices for the market.

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




This sub-section must also be revisited to reflect the above issues.

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

Yes

Why do you feel it is necessary to participate at the Examination in Public?




Our objections relate to the proposed allocation of our client's 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.

Attachments	 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)
	 Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)
	 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment




Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Key Issues
Comment ID	RPS_ELLP/32
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	<p>Para 2.28 deals with the Eastbourne and South Wealden area and acknowledges the particular relationship and strength of connections between Eastbourne, Polegate and Hailsham. In order to maintain a thread between the market supply issues and a sustainable allocations policy that will help to better address these, this sub-section should make particular reference to the importance of this economic corridor to a range of employment activities, including to office based companies. This includes for those companies that require the flexible accommodation in good accessible, non peripheral locations that EBC has identified as a key priority.</p> <p>As evidenced by SHW (See their accompanying Statement January 2016),</p>

	<p>campus development in the Polegate area indeed continues to perform comparatively well.</p>
<p>What changes do you suggest to make the document legally compliant or sound?</p>	<p>This sub-section should be amended to acknowledge the role and strengths of the Eastbourne-Polegate-Hailsham corridor for all Class B sectors including offices.</p>
<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>Yes</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	<p>Our objections relate to the proposed allocation of our client's 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>Attachments</p>	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	
<p>Campaign Indicator</p>	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Employment Land Requirements
Comment ID	RPS_ELLP/33
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	<p>EBC’s assessment of new employment land requirements has remained a substantive issue between EBC and SHL from the outset of the CSLP and now subsequently the draft ELLP processes.</p> <p>We have reviewed and responded to EBC’s evidence base and resulting policy proposals throughout, on the basis that the data is unclear and does not logically translate into the quantum and distributions of space proposed. Our last representations addressed this through a review of B/GVA’s ELR November 2014. This has not been addressed by EBC and as such our objections to this supporting evidence remains (please refer to our representations of 2015).</p>

	<p>Our Supporting Statement 2 on the RSA also addresses this with a further summary of the ELR assumptions at its Annex A and subsequent Annexes.</p> <p>For the reasons set out previously, in our earlier representations and in Statement 2 on the RSA, the proposed allocation of 23,000sq.m. NIA of floorspace for Class B1a/b has still not been justified and represents a substantial overprovision and in turn an unsustainable policy proposition.</p>
What changes do you suggest to make the document legally compliant or sound?	The RELLP must be amended to ensure appropriate transparency and clarity is expressed in all of its references to base data and to how this then translates into new floorspace requirements and back into the number of jobs that could be accommodated based upon the contingencies that are proposed.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	Our objections relate to the proposed allocation of our client's 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.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP Representation Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email

Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Context Vision and Objectives
Comment ID	RPS_ELLP/34
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	We note that our request that CSLP Objectives 3 (Town Centre Regeneration), 8 (Sustainable Travel) and 10 (Sustainable Neighbourhoods) have been added to this sub-section of the RELLP.
What changes do you suggest to make the document legally compliant or sound?	This is welcomed and is supported.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the	Our objections relate to the proposed allocation of our client's sites at Sovereign Harbour (Site 4 and 7a). The requirement for

Examination in Public?	the production of the ELLP follows from SHL's previous objections to the CSLP and the proposed allocation of employment space within that.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 2 - ELLP_Representation_Form - Chpt 2.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Strategy Employment Land Strategy and Distribution
Comment ID	RPS_ELLP/35
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	<p>Para 3.2 still stresses that the focus has been on ensuring that employment land requirements are met in the most sustainable and effective way and that by selecting the town centre and the Harbour to meet new requirements will allow different deliverable sites to work together.</p> <p>It now refers to the proposed distribution of new floorspace having been informed by the new Sustainability Assessment which has been undertaken set against a new assessment framework. As outlined in our Statement 2, the RSA itself is flawed.</p> <p>Whilst a new approach may have been applied, it remains based upon a series of flawed data and background assumptions,</p>

such that its conclusions bring us back full circle to EBC's pre-determined policy, which is to see Sites 6 and 7a fully developed for essentially office development. This however will not balance the local office market or mean the SH and TC office offers will 'work together'. Rather, the town centre office stock will be diminished, its related business links and sustainable location benefits undermined and weakened, and the offer of new stock elsewhere in the Borough will be focused within the peripheral, unviable and unsustainable location of SH, offering no flexibility or choice.

EBC can review and reappraise this proposition over and over again but the fundamental premise is flawed. The appraisal provided by the Council does not alter or change this.

Para 3.4 still stresses that the town centre will be improved by the proposed policies in the RELLP. This however ignores the fact that the policies promote new housing development over improved new office space, even though those living in the new town centre homes will have less office based work opportunities within the centre itself and those whose jobs are displaced will either be required to commute out to the Harbour or to other towns or campuses outside of the Borough to work.

Para 3.5 states that the concentration of new Class B development at the Harbour will address issues of site access, linkages and contributions to community infrastructure. It will not.

As demonstrated by the recent outline planning permission for the Harbour the viability of Class B space is such that it cannot fund the mitigation scheme required to make it acceptable in transport / linkage terms (i.e. it cannot help fund the quality bus corridor

that will aid links to the town centre). The Innovation Mall on Site 6 has also been planned around a high occupancy and employment density and a high (above optimal) level of parking provision.




Additionally, the Class B element of the outline scheme across the SH employment sites is making no contributions towards community infrastructure whatsoever within the Harbour. The new community hall and the new public open spaces are all being delivered as a result of the housing element of the outline scheme. The employment space on Site 6 is being subsidised and Sites 4 and 7a are unviable for large scale office schemes – the open market rents needed to enable these sites to come forward are not achievable and they cannot support linked community or infrastructure programmes.

Para 3.7 still refers to the intensification of existing industrial estates and how these present opportunities to provide new, higher density space. Building on this, the existing office campuses that are now located along the Eastbourne, Hampden Park to Polegate corridor, provide further opportunities for campus type development that will also complement the town's office stock.

As outlined consistently through the CSLP and ELLP processes, this growth corridor represents a better connected and more sustainable location for office development in terms of public transport links and should again be recognised as such within the ELLP. SHW's new accompanying Statement 2016 further demonstrates this.

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

This is welcomed and is supported.

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 3 - ELLP Representation Form - Chpt 3.pdf (125 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Strategy Economy and Employment Land
Comment ID	RPS_ELLP/36
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	<p>This section of the ELLP has been amended to clarify the amounts of new employment space that are proposed to be allocated across the Borough. These do mix GEA and NIA floor areas but the clarification that has now been provided is helpful.</p> <p>Para 3.9 outlines that not all industrial estates will be appropriate for higher quality (e.g. office) accommodation and as such Para 3.10 proposes to limit the intensification of industrial estates to Class B1c, B2 and B8 space only.</p> <p>This still fails to recognise how office campus' have and can successfully be established within and alongside industrial estates and how the presence of office functions and</p>

activities can support more industrial businesses – e.g. in the form of readily accessible business based bank branches, accountancy and IT based companies.

The pending new permitted development rights that will allow light industrial space to be converted to residential use, subject to certain criteria being met, is likely to place some of EBC's employment estates and campus' under additional pressure from higher value uses. A policy that will allow new higher quality and value office space to be established within the estates will help to provide an alternative development option, protect and promote employment uses within established employment locations and provide more choice of location options, all within the Borough's recognised and better connected growth corridor.

For the reasons set out in this Statement and at Annex A within Submission Statement 2 that deals with the RSA, Para. 3.10s proposed allocation of 3,000sq.m. NIA of Class B1a space in the town centre is inappropriate and still does not meet the soundness tests of new policy making. The further loss of office space within the town centre subsequent to our last representations on the ELLP, balanced by a comparative slow take-up of the new space that has been let within the new Innovation Mall on Site 6, further substantiates this position. The amount of space allocated within the TC and that can be readily accommodated within the centre on identified and additional windfall sites must be increased.

For the reasons also set out here, at Annex A and within Submission Statement 2, Para 3.10s proposed allocation of 20,000sq.m. NIA of B1 space at the Harbour also fails to meet the soundness tests. Site 6 cannot accommodate such an amount of open B1 space and Sites 4 and 7a are appropriate only

for Class B1a/b space within the Class B space categories but are not required for that use to meet forecast employment growth in those sectors. An allocation for Sovereign Harbour must reflect:

- The policy directions of the adopted Sovereign Harbour SPD, which acknowledges the environmental settings of Sites 4, 6 and 7a and what type of employment uses are appropriate on each.
- The details of the approved outline planning permission that allows for a minimum of 11,100sq.m. NIA of Class B1 space on Site 6.
- An understanding now that SeaChange is marketing Site 6 overall to provide for up to 9,777sq.m. NIA of space but the need for EBC to require the most efficient and maximised density of development is achieved on this site.
- The inability of Sites 4 and 7a, which are even when taken together, smaller than Site 6, to make up for any shortfall in provision on Site 6 so that the proposed 20,000sq.m. NIA allocation cannot be met across the sites if Site 6 does not provide the amount of space expected through the outline permission.
- The review of the viability of Class B1 space at the Harbour, taking into account SHW's critique of the appraisals undertaken by B/GVA (see accompanying SHW Statement 2016).
- The reworking of the RSA based upon what we consider to be more appropriate core assumptions of how the town centre and Harbour should be assessed in sustainability terms and against EBC's sustainable policy objective (see Submission Statement 2).

Para 3.11 refers to other SeaChange Sussex developments as examples of schemes that are considered to be good local examples of flexible accommodation for start-up and smaller businesses. Of the three examples quoted however, two are within central or edge of central locations: Basepoint

Enterprise Centre in Newhaven and Priory Quarter in Hastings. The third example, the North Queensway Innovation Park, Hastings is an out of centre campus site but it has been very slow to develop and its marketing details are focused on large units for manufacturing firms (See Annex A). Each of the development has experienced significant viability issues and has ultimately been required to be let at significantly below forecast rents (see SHW previous representations to the Draft ELLP December 2014).

Taken individually and together these considerations all point to the need to:

- increase the allocation of space to the town centre,
- reduce the minimum requirement of B1 space at the Harbour to enable other employment uses to be provided here that will work better and together with an office focused campus on Site 6, and
- support additional space and choice of new accommodation along the Borough's core growth corridor.

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

The background summary sections of this Chapter at Para 3.1 to 3.7 must be redrafted to better reflect sound deliverable objectives for the ELLP.

The B1 allocation at the Harbour should be restricted to Site 6 only and stated as equating to a minimum of 11,100sq.m. NIA. This follows the viability and sustainability rating of Sovereign Harbour and the requirements set out within the outline planning permission for the SH employment sites. It will again be for EBC to work with SeaChange to ensure the site is developed to this density, in the interest of ensuring the more efficient use of this site is secured.

This should be expressed as a minimum figure

in order to provide the developer(s) of the site and EBC Council with the basis to strive for the most efficient development of this site. This again does not preclude additional Class B1a space being secured within Site 4 and 7a, the requirement for which however will be tested through the open market alongside marketing for other appropriate employment uses that will support, work with and help to promote the office campus on Site 6.

The allocation of additional provision along the growth corridor can still be expressed as a minimum requirement or as a generally supportive policy only. This however is needed to provide more choice for occupiers within the town's core growth hub.

Key Diagram on Page 22 of the RELLP should accordingly also be amended to reflect this.


Yes


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


Why do you feel it is necessary to participate at the Examination in Public?

This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.

Attachments

 [01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf](#) (2.8 MB)

 [Sub Form 3 - ELLP Representation Form - Chpt 3.pdf](#) (125 KB)

 [01b - Statement 1 - Draft ELLP - pdf.pdf](#)
(1.1 MB)

Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Industrial Estates
Comment ID	RPS_ELLP/37
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	<p>Policy EL2 and its sub-section should be extended as set out in our earlier representations to:</p> <ul style="list-style-type: none"> ▶ protect existing Class B1a/b floorspace within the town outside of the town centre and ▶ to require new Class B1a/b opportunities within the industrial estates, the town's other centres, and within the Eastbourne section of the Polegate-Hailsham growth corridor. <p>This option has been too readily dismissed by EBC and is considered to be an even more important policy response now taking into account existing and pending new permitted development rights that allow conversion of premises to residential use.</p>

The setting of a minimum B1a/b requirement for within the existing estates / growth corridor is considered beneficial but not paramount for strategic planning permission. The previous definition of a minimum requirement of 3,000sq.m. NIA of B1a/b space within the growth corridor equates to the B/GVA recommended contingency allowance for such new space, that we in any case contend represents a substantial proposed overprovision based on the Council's own assessment of new employment growth.

As set out previously, this will not prejudice other Class B development from coming forward but will add to the choice of new office space that is available within the town, providing a better range of location options for those wishing to remain or locate in Eastbourne.

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

Policy EL2 should be amended as follows:

Policy EL2: Industrial Estates, the Eastbourne-Polegate Corridor and Local Centres

Within the designated Industrial Estates, redevelopment and intensification of vacant and under-utilised sites to provide class B use development will be supported in order to meet the target of providing 20,000sq.m. GEA of B1c, B2 and B8 floorspace over the plan period.

The development of new Class B1a/b floorspace will be supported as part of redevelopment schemes within the existing Industrial Estates, where this does not prejudice the delivery of appropriately located Class B1c, B2 and B8 floorspace, within Eastbourne's section of the Eastbourne-Polegate-Hailsham Corridor and within the other district and local centres of Eastbourne. [Appropriate development within these locations will provide a minimum of 3,000sqm NIA of B1a /b floorspace].

Proposals for the refurbishment of existing class B floorspace will also be supported.

Proposals for the development of sites within a designated industrial estate in class B use (including in class B1a and B1b use) to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:

- ? The proposed alternative use an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or
- ? The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and
- ? The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.




Within the designated Industrial Estates, change of use of units in class B use (including in class B1a and B1b use) to other employment generating non-B class uses may be granted where it can be demonstrated to the satisfaction of the Council that that there is no reasonable prospect of the site continuing to be used for class B use.

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

Yes

Why do you feel it is necessary to participate at the Examination in Public?

This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.

Attachments	 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)
	 Sub Form 4-EL2 - ELLP Representation Form.pdf (124 KB)
	 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indidicator	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Town Centre
Comment ID	RPS_ELLP/38
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	<p>Para 4.18 acknowledges that the town centre remains an important location of office provision, whilst Para 4.15 acknowledges that the centre’s existing stock is mainly dated. As such Para 4.19 states that this does not meet the demands of many occupiers. Para 4.21 outlines that occupiers are increasingly polarised between those wishing to be in centre and those wishing to go out of centre.</p> <p>The resulting continuing proposed allocation of 3,000sqm. NIA outlined at Para 4.24 and in Policy EL3, together with the paragraphs that outline the potential of Sites 2 and 3 in the centre (Para 4.26-4.28), present a number of problems and highlight significant flaws in EBCs proposed policy centre for the centre.</p>

- ▶ EBC has still not justified why an allocation for the centre must be 3,000sq.m. NIA only.
- ▶ For the reasons set out in previous representations and repeated here, an allocation of 3,000sq.m. NIA will not replace and will not enhance the town centre's office stock. It will mean the further depletion of its stock in terms of the amount, quality and choice available, as has been evidenced by the continuing loss of office space within the centre following the submission of our last representations on the ELLP.
- ▶ The sustainability outcomes of such a low allocation are appraised in our Submission Statement 2. This reassesses this proposed allocation using jam's alternative appraisal framework but against more appropriate background assumptions of how sustainability will best be achieved. This shows again that such a low allocation results in a significant number of minor and major negative outcomes when appraised against EBC's policy criteria.
- ▶ As highlighted previously, this policy will not therefore fulfil the expectations of Para 4.24 and the need to 'maintain a healthy office provision and avoid adverse impact on the vitality of the town centre'.
- ▶ As demonstrated previously and re-attached as part of our Supporting Statement 2 document, the town centre has the potential to accommodate significantly more new office space without prejudicing new housing supply. It is for planning policy to provide a strong clear steer and requirement to ensure this is delivered by not providing an open door for developers to pursue

residential and other commercial uses only.

- ▶ An allocation of at least 8,900sq.m. NIA of B1a/b space can still comfortably be accommodated within Sites 2 and 3. This should be expressed as a minimum requirement for Sites 2 and 3.
- ▶ Beyond this, Policy EL3 should again also make clear reference to a support for new office space throughout the centre and to an expectation that all mixed use developments will provide an element of new office space, and to the need to provide a clear justification where this is not proposed.

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




Policy EL3 should be amended as follows:

Policy EL3: Town Centre

The quantum of office space that should be provided in the Town Centre is a minimum of 8,900sqm NIA of floorspace, The requirement for office floorspace in the town centre should be provided across Development Opportunity Site 2 and Development Opportunity Site 3 as identified in the Town Centre Local Plan. Office development should be high quality class B1a floorspace that is flexible to meet multi-occupier needs.

Development opportunities for the provision of additional new office floorspace will also be supported elsewhere within the town centre including within the other Development Opportunity Sites, Transition Areas and Potential Areas of Change as defined within the Town Centre Local Plan.




Proposed redevelopment of sites that are within an existing office use and development proposals for new mixed use development schemes within the Town Centre will be required to include new office floorspace

<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>unless it can be demonstrated to the satisfaction of the Council that this is inappropriate in that location, is unviable or cannot be accommodated on design feasibility grounds.</p>
<p>Why do you feel it is necessary to participate at the Examination in Public?</p>	<p>Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.</p> <p>Yes</p> <p>This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.</p>
<p>Attachments</p>	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 4-EL3 - ELLP Representation Form.pdf (124 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	
<p>Campaign Indidicator</p>	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Town Centre
Comment ID	RPS_ELLP/39
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	<p>This paragraph refers to the loss of office space within the town centre being monitored and Article 4 directions potentially being used to help prevent this.</p> <p>As demonstrated by the Council's own Annual Monitoring Reports, the loss of office space has continued. In view of these continuing trends and to help ensure that an appropriate level and choice of office space is protected within the centre, the Council must now indicate what level of floorspace loss it will take to be the trigger for considering using its Article 4 powers.</p>
What changes do you suggest to make the document legally compliant or sound?	Para 4.30 must be expanded to clarify the trigger that will be applied for the use of Article 4 directions.

Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 4-4.30 - ELLP Representation Form.pdf (124 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment

Comment Information

Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Sovereign Harbour
Comment ID	RPS_ELLP/40
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	<p>Para 4.33 refers to the longstanding allocation of Sites 6 and 7 at the Harbour for office space, with reference to an outline planning consent for 30,000sq.m of office space across these sites. As outlined previously, this should read, 30,000sqm GEA of floorspace.</p> <p>Para 4.36 provides a summary of the funding that has been given to assist the development of the Innovation Mall on Site 6. B/GVA has appraised the viability of the Harbour previously and their Viability Briefing Note of September 2014 provides a further review in order to compare the viability of new office stock within the town centre and at Sovereign Harbour, i.e. in further support of the proposed allocation of 20,000sq.m. of B1 space at the Harbour.</p>




SHW has critiqued B/GVA's previous assessments and their accompanying additional Statement reassesses their September 2014 review.

Sovereign Harbour does not provide a financially viable, open market proposition for high quality Grade A B1a/.b floorspace. The Mall has required funding support. It has not resulted in a rapid take-up of space even though office floorspace has continued to be lost within the town centre. Rentals have not reached the levels originally assumed for the building and the rents that are quoted as having been achieved and being sought do not take into account the incentives that have been offered and the extent of shared, break out space that is also available to tenants and directly reduces the £psf ratios achieved. Projected build costs will be substantially higher still for later phases of the development and rents cannot be expected to match these in order to retain a stable, let along an increase in net rental levels and resulting yields.

The town centre market is also challenging for new office space, but the B/GVA 2014 appraisal has greatly exaggerated the differences between the centre and SH. In planning terms the town centre remains the most sustainable location and the best connected in location, transport and business linkage terms.

Based on our previous representations and as summarised further in our linked Statement 2, Sites 4 and 7a are not required to accommodate forecast growth in office employment. They can still be marketed for this use but alongside other employment uses, so that they can be positioned to accommodate the most viable uses for which there is a clear and demonstrable demand

<p>What changes do you suggest to make the document legally compliant or sound?</p>	<p>and which will provide new employment more quickly for the Harbour.</p> <p>EBC has not provided any evidence to change this assessment and conclusion of what form of development is required and most appropriate for the Harbour employment sites. Our previous and longstanding objections still stand and form part of our on-going representations on the emerging ELLP.</p> <p>The supporting text within Paras 4.32 to 4.47 should be updated to reflect a true and objective appraisal of employment use prospects at the Harbour.</p>
<p>Do you consider it necessary to participate at the Examination in Public?</p>	<p>Policy EL4 should be amended as follows:</p> <p>Policy EL4: Sovereign Harbour</p> <p>Sovereign Harbour should accommodate a minimum of 11,100sq.m. NIA of additional B1 floorspace. This should be delivered on Site 6 and should be provided within a flexible format that will allow businesses to adapt their operations depending on circumstances.</p> <p>Additional Class B1a floorspace will also be acceptable on Site 4 and Site 7a as indicated on the Proposals Map.</p> <p>Other employment generating uses that are acceptable for Sites 4 and 7a must be compatible with the residential developments that adjoin the Sites and will include:</p> <ul style="list-style-type: none"> ? On Site 4 uses within Class A1 to A5, C1 and D1. ? On Site 7a uses within Class C1, C2 and D1.
<p>Why do you feel it is necessary to</p>	<p>Yes</p> <p>This sub-section must be redrafted to stress the relative sustainability credentials and</p>

<p>participate at the Examination in Public?</p>	<p>benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.</p>
<p>Attachments</p>	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 4-EL4 - ELLP Representation Form.pdf (124 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
<p>Submission Method</p>	<p>Email</p>
<p>Response Status</p>	<p>None</p>
<p>Assigned Officer</p>	<p>=unassigned=</p>
<p>Officer's Response</p>	
<p>Campaign Indidicator</p>	

View Comment

Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Policies Sovereign Harbour
Comment ID	RPS_ELLP/41
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	<p>Figure 3</p> <p>Support - We note that Figure 3 has been amended and this is supported.</p>
What changes do you suggest to make the document legally compliant or sound?	
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the	This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically


Examination in Public?	important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.
Attachments	<p> 01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf (2.8 MB)</p> <p> Sub Form 4-EL4 - ELLP_Representation_Form.pdf (124 KB)</p> <p> 01b - Statement 1 - Draft ELLP - pdf.pdf (1.1 MB)</p>
Submission Method	Email
Response Status	None
Assigned Officer	=unassigned=
Officer's Response	
Campaign Indicator	

View Comment


Comment Information	
Document Section	Employment Land Local Plan - Revised Proposed Submission version Implementation and Monitoring Monitoring Framework
Comment ID	RPS_ELLP/42
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	Table 3 sets out the summary of the ELLP policies and provides a linked framework for monitoring purposes.
What changes do you suggest to make the document legally compliant or sound?	This must also be updated to reflect the allocations amendments required in order to make the ELLP sound.
Do you consider it necessary to participate at the Examination in Public?	Yes
Why do you feel it is necessary to participate at the Examination in Public?	This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth

corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.

Attachments

 [01b - Statement 1 - Draft ELLP - Annex B - SHW Statement.pdf](#) (2.8 MB)

 [Sub Form 5 - ELLP Representation Form - Chpt 5.pdf](#) (124 KB)

 [01b - Statement 1 - Draft ELLP - pdf.pdf](#) (1.1 MB)

Submission Method Email
Response Status None
Assigned Officer =unassigned=
Officer's Response
Campaign Indicator



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.

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

Personal Details

Title:	Miss	First Name(s):	Marie
Surname:	Nagy		

Organisation:	Teal Planning Ltd		
Position:	Director		
Agent acting on behalf of:	Sovereign Harbour Ltd		

Address:	Brentano Suite, Solar House, 915 High Road, North Finchley, London		
Post Code:	N12 8QJ		

Phone Number:	020 8369 5119	Fax Number:	-
E-Mail Address:	mnagy@tealplan.com		

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: 1.0

Policy: -

Paragraph Number: para 1.10

Figure: Table 1

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 1, 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 client's 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.

Signature:		Date:	21/01/2016
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EMPLOYMENT LAND LOCAL PLAN

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Personal Details

Title:	Miss	First Name(s):	Marie
Surname:	Nagy		

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Position:	Director		
Agent acting on behalf of:	Sovereign Harbour Ltd		

Address:	Brentano Suite, Solar House, 915 High Road, North Finchley, London		
Post Code:	N12 8QJ		

Phone Number:	020 8369 5119	Fax Number:	-
E-Mail Address:	mnagy@tealplan.com		

Representation

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

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

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

Chapter: 2.0

Policy: -

Paragraph Number: See Q4 below

Figure: Table 1

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 1, January 2016

Amendments required to

Para 2.8

Para 2.9

Para 2.10

Para 2.14

Para 2.15

Para 2.16

Para 2.17

Para 2.24

Para 2.25

Para 2.26

Para 2.27

Para 2.28

Para 2.30-2.38

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 client's sites at Sovereign Harbour. The requirement for the production of the ELLP follows from SHL's objections to the CSLP and the proposed allocation of Class B1 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

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Signature:		Date:	21/01/2016
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E-Mail Address:	mnagy@tealplan.com		

Representation

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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

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

Chapter: 3.0

Policy: -

Paragraph Number: See Q4 below

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 -

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 1, January 2016

Amendments required to

Para 3.1 to 3.7

Para 3.8 to 3.15

Key Diagram page 22

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 client's sites at Sovereign Harbour. The requirement for the production of the ELLP follows from SHL's objections to the CSLP and the proposed allocation of Class B1 space within that.

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

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Publication of the Inspectors Report

Formal adoption of the Employment Land Local Plan

Data Protection Act 1998 and Freedom of Information Act 2000

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Signature:		Date:	21/01/2016
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EMPLOYMENT LAND LOCAL PLAN

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Surname:	Nagy		

Organisation:	Teal Planning Ltd		
Position:	Director		
Agent acting on behalf of:	Sovereign Harbour Ltd		

Address:	Brentano Suite, Solar House, 915 High Road, North Finchley, London		
Post Code:	N12 8QJ		

Phone Number:	020 8369 5119	Fax Number:	-
E-Mail Address:	mnagy@tealplan.com		

Representation

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

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

Chapter: 4.0

Policy: EL2

Paragraph Number: Para 4.1 to 4.14

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 -

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 1, January 2016

Re-wording of Policy EL2

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 client's sites at Sovereign Harbour. The requirement for the production of the ELLP follows from SHL's objections to the CSLP and the proposed allocation of Class B1 space within that.

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

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Publication of the Inspectors Report

Formal adoption of the Employment Land Local Plan

Data Protection Act 1998 and Freedom of Information Act 2000

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EMPLOYMENT LAND LOCAL PLAN

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Personal Details

Title:	Miss	First Name(s):	Marie
Surname:	Nagy		

Organisation:	Teal Planning Ltd		
Position:	Director		
Agent acting on behalf of:	Sovereign Harbour Ltd		

Address:	Brentano Suite, Solar House, 915 High Road, North Finchley, London		
Post Code:	N12 8QJ		

Phone Number:	020 8369 5119	Fax Number:	-
E-Mail Address:	mnagy@tealplan.com		

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: 4.0

Policy: EL3

Paragraph Number: Para 4.15 to 4.31

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 -

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 1, January 2016

Re-wording of Policy EL3

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

Chapter: 4.0

Policy: -

Paragraph Number: Para 4.30

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:

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

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

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Re-wording of Para 4.30

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Chapter: 4.0

Policy: EL4

Paragraph Number: Para 4.32 to 4.47

Figure: -

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Yes

No

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-

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Re-wording of Policy EL4

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Chapter: 5.0

Policy: -

Paragraph Number: -

Figure: Table 3

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?

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Effective

Consistent with National Policy

Other -

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

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Update of Table 3

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Revised Proposed Submission ELLP
Submission Statement 1

In respect of:
The EBC
RELLP, December 2015

On behalf of:
Sovereign Harbour Ltd

Date: January 2016

Reference: 12001/Reps/15/SS01

CONTENTS

- 1.0 Introduction
- 2.0 RELLP, Chapter 1.0, Introduction
- 3.0 RELLP, Chapter 2.0 Context
- 4.0 RELLP, Chapter 3.0 Strategy
- 5.0 RELLP, Chapter 4.0 Policies
- 6.0 RELLP, Chapter 5.0 Implementation and Monitoring
- 7.0 Conclusion

Annex

- A. SeaChange Development Examples Referenced at RELLP Para 3.11
- B. Stiles Harold Williams Statement Revised Proposed ELLP Commentary on Bilfinger/GVA Eastbourne Office Deliverability Assessment to support the Sustainability Appraisal

Accompanying and Previous Representations Forming Part of our Submission (with EBC and on public record)

Accompanying January 2016 Statements

- Teal Planning Submission Statement 2 on the Revised Submission Proposed Sustainability Appraisal

Previous Submissions Draft ELLP December 2015

- Teal Planning Submission Statement 1 – Draft ELLP, February 2015
 - Annex A – Teal Planning Review – GVA ELR Supplementary Report 2014
 - Annex B – Stiles Harold Williams – Evidence Based Assessment, GVA ELR Supplementary Report 2014
 - Annex C – rCOH – Sites 2 and 3, capacity Study and policy Review
- Teal Planning Submission Statement 2 – Draft Sustainability Report, February 2015
- Teal Planning Submission Statement 3 – Changes to Proposal Map, February 2015
- Teal Planning Submission Statement 4 – Draft ELLP Chapter 1, Para 1.14, February 2015

Previous Submissions Earlier Consultation Stages

- Teal Planning Statement in response to Proposed Draft ELLP, dated March 2014
- Teal Planning response to EBC Sustainability Appraisal Scoping Report, August 2013
- Teal Planning response to EBC ELLP Questionnaire, August 2013

- Teal Planning responses to and EIP statements relating to the Town Centre Local Plan
- Teal Planning and SHW responses to and EIP statements relating to the Core Strategy Local Plan

1.0 Introduction

- 1.1 Representations were submitted on behalf of SHL in response to the **initial Draft ELLP 2013** and the **Proposed Submission ELLP 2014**.
- 1.2 Objections were made on the grounds that the evidence upon which the draft documents were based, the accompanying Sustainability Appraisals and the resulting draft policy documents, were all **unsound**.
- 1.3 Linked objections were also submitted to the **Proposed Changes to the Proposals Map, 2014**, relating to the land identified for potential allocation at Sovereign Harbour.
- 1.4 Following the review of the Revised Proposed Submission ELLP (**RELLP**) and its supporting documents, the amended **Proposed Changes to the Proposals Map, 2015** are **agreed** and no comments are made to that updated document.
- 1.5 The position of Sovereign Harbour Ltd (SHL) in respect of the **emerging ELLP**, the **SA** and **linked evidence**, however, remains **unchanged**.
- 1.6 This **Statement (Submission Statement 1)** sets out objections to the **RELLP**.
- 1.7 It must be read in conjunction with:
- **Submission Statement 2:** Objections to the Revised Proposed Submission Sustainability Appraisal, November 2015 (RSA),
 - **Statement by Stiles Harold Williams, January 2016**, which focuses upon the evidence base documents provided on behalf of EBC by B/GVA (See **Annex B**).
 - **Our previous representations to the earlier stages of the emerging ELLP.** Whilst we note that a number of minor changes have been made within the current iterations of the document, the **substantive matters** and **objections** to the emerging policies **still remain**. The evidence provided in support of our earlier objections therefore remains relevant and are referred to as appropriate with the following further objections.
- 1.8 On the basis of the appraisals provided, each of the main ELLP related documents is **unsound**. They **have not been positively prepared**, their conclusions and proposals **have not been justified**, the resulting outcomes of their policies **will not be effective** in terms of meeting their core objectives and the objectives of sustainable planning and they are **inconsistent with national planning policy**.

2.0 RELLP, Chapter 1.0, Introduction

A. Relationship with Other Plans and Strategies – Para 1.10

2.1 In our previous representations we stated that the ELLPs reference to the following key strategic matters is helpful

- local priorities being to unlock and assemble strategic sites
- the regeneration of the Town Centre
- The presumption in favour of sustainable development
- The emphasis on the Hailsham, Polegate and Eastbourne Sustainable Corridor.

2.2 We also stated that reference should be given to the adopted **Eastbourne Town Centre Local Plan 2013 (TCLP)** and to the adopted **Sovereign Harbour SPD, 2014**.

2.3 The need for reference to be made to the SPD reflects how that document allows for Site 7 to be part developed for housing and public open space development; significantly impacting on the amount of land available for potential employment use within that site.

2.4 The RELLP now refers to these additional documents but rather selectively.

2.5 The **SH SPD, February 2013** is an earlier policy document that sits alongside the adoption of the CSLP (2013) but predates the CSLP Inspector's direction (November 2012) that employment land requirements must be reviewed further and set out within the required ELLP document. It also predates the grant of **outline planning permission for Sites 4, 6 and 7 at the Harbour** and the more recent **reserved matter approval** for the development of **Site 7b and 7c** for non-employment uses.

2.6 Through EBC's recent consideration of development control matters at the Harbour, Council officers have confirmed that the outline permission indeed supersedes the SPD.

2.7 As such the ELLP's brief reference to the SPD and its requirement for a Business / Office Park on Sites 6 and 7 with the potential for office use also on Site 4 needs to be qualified within the RELLP to acknowledge that the SPD provides a context for the southern part of Site 7a to be developed for employment generating uses, with the extent of any required office provision within that site and within Site 4 to be determined by the ELLP.

2.8 This clarification is particularly important as the linked RSA makes numerous references to the SH SPD but without acknowledging how its requirements have in part been superseded.

OBJECT - Required Change

2.9 **Para 1.10 must be amended to reflect that within Site 7 only Site 7a is available employment generating uses.**

B. Table 1 Timescale for the production of the ELLP

OBJECT - Required Change

2.10 **This table should be updated to refer to dates in 2016 / the updated ELLP programme going forward.**

3.0 RELLP, Chapter 2.0 Context

A. Existing Situation - Para 2.8

3.1 Reference is made at Para 2.8 to an overall **net increase in employment floorspace in Eastbourne** over the past 9 years and to this being in the **office (B1a) sector** amongst others.

3.2 EBC’s own monitoring however shows that **office stock within the town centre has in fact decreased** almost year on year over some time, with the rate of loss being accelerated recently. This situation has continued subsequent to our last representations, as reflected in the further update below and by additional subsequent planning submissions to EBC since March 2015 onwards

Year 1 April to 31 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)

3.3 As set out in our previous representations and repeated here for ease of reference, we consider that acceleration to result from:

- (1) the **relative size, strength and predominantly local nature of the Eastbourne office market overall**. This has been reviewed and acknowledged in detail on behalf of both EBC and SHL through representations on the CSLP and TCLP;
- (2) the **permitted development regime** that allows office conversions to residential use;
- (3) Eastbourne’s current **adopted plan regime** that also encourages residential development in the town centre outside of the permitted development rights;
- (4) the **adopted TCLP** which, pending the ELLP, points to a **very low allocation of new office space** for the town centre, thereby requiring developers to deliver very little office space in the centre.

3.4 The fact that EBCs summary highlights a long term growth in office provision across the town, even though the town centre’s stock has been in decline, points to the most recent growth being within out of town centre locations.

- 3.5 This also follows evidence already submitted by Stiles Harold Williams on behalf of SHL in relation to the CSLP, which highlighted the development of office campuses within highly accessible, established employment locations but which nonetheless in occupancy terms have met with very challenging conditions.
- 3.6 Those significant and substantial challenges have essentially arisen again from:
- the **scale and nature of the local market**; and
 - the **ability of occupiers to pay the higher rents such campus schemes** must command in order to be viable. This has restricted occupier interest to just a small sub-set of the local market.
- 3.7 These trends are also reflected in the take-up of space in the Innovation Mall on Site 6 and across office campus' to the north of Eastbourne town centre. The campus' at Polegate outside of the Borough but within the strategic corridor are performing well. The campus' within Eastbourne also in the corridor have had to reduce their rents whilst the extent of take up and the rents secured at the Innovation Mall do not suggest the extent of requirement and pent up demand, essentially in the face of continuing losses of office space within the town centre.
- 3.8 This sub-section of the RELLP does not reflect any of these trends or characteristics of the local market.

OBJECT - Required Change

- 3.9 As set out previously, EBC must **revisit its summary understanding of the actual trends that are affecting the local office market**, and how these relate to the town centre and office campus / business park sectors.

B. Strengths and Weaknesses of Economy

Para 2.9

- 3.10 Our objections to this section of the draft ELLP remains.
- 3.11 As set out previously, this paragraph acknowledges the importance of Eastbourne's position on the **A22-A27 corridor**.
- 3.12 As is also acknowledged by EBC, the town's position in the Eastbourne-Polegate-Hailsham corridor provides a key north-south growth axis (**Draft ELLP Para. 1.15**).
- 3.13 **These locational advantages** establish Eastbourne town centre, with its road, rail and service facilities, as one of the key economic hubs within the sub-regional economy. The office campus developments that have been successful to date are also within the Eastbourne section of the corridor and it is those at Polegate that continue to perform relatively well (see accompanying SHW Statement).
- 3.14 **Sovereign Harbour however is very peripheral to this hub in location and connectivity terms.**
- 3.15 All of the policies that follow within later sections of the **RELLP and the accompanying RSA** discard this context. They set aside one of the area's key local assets (the town centre) in favour of planning for its further demise in terms of the quantity of new office stock to be planned for there, and also make no provision for new

stock to be promoted at other locations within the Borough's section of the growth corridor. This is all in favour of a proposed single new out of centre office allocation within the Borough, in one of the town's least well connected areas.

OBJECT - Required Change

- 3.16 **As set out previously**, in order to **maintain a thread through the ELLP, from a clear and accurate understanding of the local market, through to actual policies**, the document must acknowledge the relationship between **the sub-regional growth corridor**, the **role of Eastbourne town centre** within this, the **benefits of seeking other opportunities** elsewhere between the town centre and Polegate, but also the **relative locational and market constraints of Sovereign Harbour**.

Para 2.10 & 2.14 – 2.15

- 3.17 **Para 2.10** of the Draft ELLP refers to the town's commercial floorspace stock comprising a range of sizes, ages and types of space that offers a degree of choice. It also highlights that low vacancy levels outside of the town centre are healthy signs for the market.
- 3.18 **Para 2.14** however states that much of the town's large scale office stock is **no longer fit for purpose, does not meet occupier needs and lacks flexibility** to be able to accommodate **office, workshop and production space within one building**.
- 3.19 **Para 2.15** then stresses the **location and connectivity constraints of Eastbourne** as a whole.
- 3.20 From here, the RELLP still progresses later in the document to an allocations policy that will:
- result in the **further reduction in the town centre's office stock**;
 - rely on the **majority of new stock being directed to one single peripheral location**.
- 3.21 This represents a **continuing** leap from assessment of current conditions to policy responses, and points to a lack of appreciation of the local market and of the accommodation and location options and choices that will result from the document's allocations policy.
- 3.22 In short, **as set out consistently in previous representations**:

- Unless the amount of new supply is increased in the town centre to replace and improve its existing but already depleted offer, the **level, quality and choice provided by its office stock will be further weakened and downgraded**;
- Directing the majority of the new stock to **one single location within the Borough will not provide choice**. It will mean: one location option; one connectivity option in terms of a peripheral location with accessibility constraints to the rest of Eastbourne and its strategic train and road connections; one local setting and environment option; and a rental and service charge regime, which as acknowledged by B/GVA (Supplementary Report 2014 para 5.9), will mean significantly higher charges.
- As demonstrated by the previous report by Stiles Harold Williams in response the Proposed ELLP 2014 and within their new accompanying Statement January 2016, where **recent out of centre office stock** has

come forward in the town this has been in more accessible locations but has not achieved anywhere near the rental levels B/GVA has assumed are required and possible to achieve in order for unsubsidised office development at the Harbour to be viable. This will actively constrain the delivery of office space at the Harbour, reflecting again the significant location and market weaknesses that have blighted the employment sites here over some significant time.

- In location terms, whilst EBC acknowledges the strategic constraints of Eastbourne as a whole, the Council then fails to relate how the constraints of such a peripheral location are magnified further at the Harbour. The Harbour is peripheral within the town and relative to Eastbourne's main public transport hubs and to the main axis of existing economic activity and anticipated further growth potential. Discussion by those who attended an ELLP stakeholder event held by EBC and B/GVA in 5 June 2013 and as attended by SHL and Teal Planning, indeed focused very heavily on the A22/A27 corridor, with Sovereign Harbour being barely mentioned.
- The focus that is placed in the ELLP on the type of flexible accommodation that is considered a priority for the town, and that can provide for a range of activities that includes 'workshops and production', is only suitable for Site 6 at the Harbour. It is not appropriate for Sites 4 or 7a - the only other potential employment land options that remain here.
- This mix of B1 space is acceptable on Site 6 as it is adjacent to existing commercial development, is at some distance from existing and planned new residential development and can readily accommodate heavy goods vehicles, as the access route to the site will not impact on residential areas. As outlined in Statement 2, however, it is assumed that Site 6 will accommodate primarily high quality office type development and this accords with the floorspace summary and allocation details set out in the RELLP (para 2.30 – 2.37)
- Through the new outline planning permission for the Harbour (ref 131002), Site 6 can accommodate at least 11,100sq.m. of B1 space which allows for B1a, b and c uses. This minimum can be increased for instance by reducing car parking and increasing overall build density in the interest of fully maximising the development potential of the site.
- We note however that SeaChange Sussex is now marketing Site 6 on the basis that it can accommodate c. 9,777sq.m. NIA of B1 space. As outlined accompanying Statement 2 it is for EBC to push for the most efficient and effective use of that land in accordance with its sustainable planning objectives.
- Even if Site 6 does ultimately accommodate this lower floorspace, based on the efficient job densities that are achieved by current working practices and that will be required to justify the higher rents sought at Site 6, this will still accommodate a significant number of new jobs and will still provide the sizeable office cluster that is sought by EBC here.
- In contrast, Sites 4 and 7a are recognised by EBC through both the Sovereign Harbour Supplementary Planning Document (2014) and the outline planning permission (ref 131002) as being suitable in location and environmental terms for Class B1(a) development and for other linked development that is compatible with residential development, such as care-homes, hotels, children's nurseries. They cannot in location terms accommodate workshop and production floorspace. Also significantly, they are not required to meet forecast growth in B1a/ b space.
- Within the town centre, Site 2 adjoins existing commercial development, is in a location that already accommodates large service vehicles and is large enough to accommodate a range of accommodation

types, **including for start up, office and workshop type uses (see Supporting Statement 2)**. Town centre **Sites 2 and 3** also individually and together also provide significant scope for new Class B1 space, without undermining the potential to accommodate other uses.

3.23 These location and market issues are addressed further by Stiles Harold Williams within their previous and new Statements and by our review of the accompanying **Revised Sustainability Appraisal** (See **Submission Statement 2**) which places the relative location benefits and constraints of the Harbour in a wider sustainable planning context, beyond just market considerations.

3.24 **The RELLP still does not recognise or address these issues.**

OBJECT - Required Change

3.25 **EBC, as outlined previously, must revisit its understanding of the Eastbourne office market:**

- how and where the new priority space requirements can be accommodated;
- what impact a low office allocation for the town centre will have on the centre;
- how existing out of centre office schemes are in reality performing in value and rental terms; and
- what the actual realistic potential of the Harbour Sites 4 and 7a are to:
 - o deliver the type of Class B space that EBC stresses is required
 - o deliver more narrowly defined but viable Class B1a office space
 - o meet sustainable planning objectives.

C. Recent Development and Future Projects para 2.16 to 2.17

3.26 **Para 2.16** summaries the details of the **Innovation Mall on Site 6**. Notably, as outlined in previous representations, the Mall is stated as having the potential to accommodate up to 300 new jobs. This equates to a jobs density of 8sq.m. NIA which is of note and relevant for the overall density that can be achieved on this site overall.

3.27 The B/GVA reports for EBC have set out various appraisals for the Site 6 development and this has been added to further through their further accompanying Appraisal of September 2015. That suite of documents has in turn been reviewed by SHW whose previous documents and new accompanying Statement on the RELLP sets out significant and critical viability issues for Site 6.

3.28 Whilst EBC remains committed to supporting the development of Site 6 for Class B1 use, this does not and cannot be translated into concluding that Sites 4 and 7a are (1) required for even further office space to be provided here and (2) such space presents a long term viable and sustainable option for the Harbour and for Eastbourne overall.

3.29 The **Town Centre allocation Site 3** has also been part approved for its redevelopment for an extra care housing scheme. As outlined in Supporting Statement 2, this still leaves a substantial part of that site available for office development of a scale that could on its own surplus the total space EBC proposes to allocate to the town centre overall.

- 3.30 The ELLP should further acknowledge this within this sub-section of the RELLP and as background to RELLP Policy EL3 Town Centre; i.e. as a signal to developers that office development is required here.

OBJECT - Required Change

- 3.31 This sub-section should **be updated to reflect further changes to recent developments and projects, as background to the ELLP policies.**

D. Supply Issues (para. 2.23 to 2.29)

- 3.32 The headline supply issues identified in this sub-section are agreed. The **continuing summary** that is provided here however **still does not** fully or correctly reflect the relevant matters that need to be taken into account in the setting of the RELLP's allocations policies.

- 3.33 **Para 2.24** continues to deal with the **Loss of employment land to other uses**. It states that if losses of key sites continue within existing employment locations, this has the potential to undermine the B class nature of these sites. **This equally applies to the loss of office space in the town centre.**

- 3.34 EBC acknowledges this is an issue and that office space is under pressure for redevelopment to residential schemes. The **continuing proposed** balance between EBC's forecast losses in office stock in the centre (**which has continued subsequent to our last representations**) and the proposed allocation of new space to the centre will however have the very effect that the RELLP says should be avoided.

OBJECT Required Change

- 3.35 **Para 2.24, as outlined previously,** should be amended to reflect that a core objective of the RELLP must be **to maintain and increase the town centre's stock of offices** in order to **replace that which has been lost, to further enhance the role of the town centre** as an employment location, and to ensure that a **choice of office stock** is retained and improved within the centre for the **benefit of Eastbourne overall.**

- 3.36 **Para 2.25** deals with the **Identification of sites**. It states that sites for additional employment development should be the **most appropriate and sustainable locations**. This understanding and resulting objectives are supported.

- 3.37 The RELLP's later sections however **still** fail to reflect the most sustainable development option for the Borough. **This is demonstrated further through the assessment of alternative options as now appraised by jam on behalf of EBC, but as reviewed and reappraised further within our accompanying Statement 2.**

OBJECT - Required Change

- 3.38 **As per our previous representations,** in order to ensure all locational issues are acknowledged and carried forward appropriately in the RELLP allocations policies, **Para 2.25** must be amended to:

- **acknowledge the location and connectivity benefits of Eastbourne town centre and of the A22/A27 economic corridor.**

- make direct reference to the linked Sustainability Appraisal (updated further to address the objections made to the current version of that document).

3.39 **Para 2.26** follows exactly the previous draft of the ELLP and deals with the **Requirements for Office Space in the Town Centre**. This continues to refer to the **need to strike the right balance between town and out of town office provision** in order to maintain the role of offices as a key town centre use but to also broaden the choice of space that is on offer.

3.40 In acknowledging that different office occupiers have different locational preferences, this sub-section, **as outlined previously**, must also still stress the need to:

- **reflect location preferences** but also **meet sustainable planning objectives**;
- ensure the **office stock in the town centre** is **not further weakened** in terms of its **amount, choice and quality**. A higher allocation to the town centre is needed to ensure this does not occur;
- acknowledge that in order to provide a **genuine improvement in the choice of space available** this will require more improved space in the centre and in a range of other locations across the town. **A single out of town centre location will not address the supply issues identified, it will weaken the commercial core of the town centre and provided limited choice for office occupiers in the town who do require new accommodation.**

OBJECT - Required Change

3.41 **As outlined in previous submissions**, this sub-section must be revisited to more fully reflect the above issues and to ensure a thread is maintained through the RELLP: i.e. from the assessment of location issues through to an appropriate allocations policy that will best address the matters identified.

3.42 **Para 2.27** deals with the **Suitability and Viability of land at Sovereign Harbour**. This refers to the original allocation of 30,000sqm of office space at the Harbour and that this now needs to be revisited. In our previous representations we requested that this be amended to clarify that the requirement outlines at that stage was a GEA floorspace figure.

3.43 EBC has made this requested change, however, circumstances at the Harbour sites have moved on further subsequent to our previous request. Sites 7b and 7c now have detailed approval to be developed for residential and public open space uses and Site 6 is being marketed for less than the 11,100sq.m. NIA of floorspace that is specified within the outline planning permission for the remaining employment sites at the Harbour.

3.44 Additionally the viability position of Site 6 has been reappraised further by B/GVA (September 2015) and in turn has been reviewed by SHW (see accompanying Statements). B/GVA has not in fact undertaken an independent and updated viability review and SHW's re-appraisal demonstrates the viability issues for the open office market generally but including at Sovereign Harbour, which has the added disadvantage of being unsustainable in location, accessibility and transport terms. Given these substantial constraints, whilst EBC remains committed to supporting B1 space on Site 6 that would be more appropriately assisted by other employment uses that will support and help to sustain it.

3.45 In this way Sites 4 and 7a can **work together better** with Site 6 as a more viable, self-sustainable employment park and **work together better** with other office locations within the Borough that will provide a breadth of options and choices for the market.

OBJECT - Required Change

3.46 This sub-section must also be revisited to reflect the above issues.

3.47 **Para 2.28** deals with the **Eastbourne and South Wealden area** and acknowledges the particular relationship and strength of connections between Eastbourne, Polegate and Hailsham. In order to maintain a thread between the market supply issues and a sustainable allocations policy that will help to better address these, this sub-section should make particular reference to the importance of this economic corridor to a **range of employment activities, including to office based companies**. This includes for those companies that require the flexible accommodation in good accessible, non peripheral locations that EBC has identified as a key priority.

3.48 As evidenced by SHW (See their accompanying Statement January 2016), campus development in the Polegate area indeed continues to perform comparatively well.

OBJECT - Required Change

3.49 This sub-section should be amended to acknowledge the role and strengths of the Eastbourne-Polegate-Hailsham corridor for all Class B sectors including offices.

E. Employment Land Requirements (para. 2.30 to 2.38)

3.50 EBC's assessment of new employment land requirements has remained a substantive issue between EBC and SHL from the outset of the CSLP and now subsequently the draft ELLP processes.

3.51 We have reviewed and responded to EBC's evidence base and resulting policy proposals throughout, on the basis that the data is unclear and does not logically translate into the quantum and distributions of space proposed. **Our last representations addressed this through a review of B/GVA's ELR November 2014. This has not been addressed by EBC and as such our objections to this supporting evidence remains (please refer to our representations of 2015).**

3.52 Our Supporting Statement 2 on the RSA also addresses this with a further summary of the ELR assumptions at its Annex A and subsequent Annexes.

3.53 For the reasons set out previously, in our earlier representations and in Statement 2 on the RSA, the proposed allocation of 23,000sq.m. NIA of floorspace for Class B1a/b has still **not been justified** and represents a **substantial overprovision** and in turn an **unsustainable policy proposition**.

OBJECT - Required Change

3.54 The RELLP must be amended to ensure appropriate **transparency and clarity** is expressed in all of its references to **base data** and to how this then translates into **new floorspace requirements** and back into the **number of jobs** that could be accommodated based upon the contingencies that are proposed.

F. Vision and Objectives (para. 2.39 to 2.42)

3.55 We note that our request that CSLP Objectives 3 (Town Centre Regeneration), 8 (Sustainable Travel) and 10 (Sustainable Neighbourhoods) have been added to this sub-section of the RELLP.

3.56 [SUPPORT - This is welcomed and is supported.](#)

4.0 RELLP, Chapter 3.0 Strategy

A. Employment Land Strategy and Distribution - Para 3.1 – 3.7

- 4.1 **Para 3.2** still stresses that the focus has been on ensuring that employment land requirements are met in the **most sustainable and effective way** and that by selecting the town centre and the Harbour to meet new requirements will allow different **deliverable sites to work together**.
- 4.2 It now refers to the proposed distribution of new floorspace having been informed by the new Sustainability Assessment which has been undertaken set against a new assessment framework. As outlined in our Statement 2, the **RSA itself is flawed**.
- 4.3 Whilst a new approach may have been applied, it remains based upon a series of flawed data and background assumptions, such that its conclusions bring us back full circle to EBC's pre-determined policy, which is to see Sites 6 and 7a fully developed for essentially office development. This however will not balance the local office market or mean the SH and TC office offers will 'work together'. Rather, the town centre office stock will be diminished, its related business links and sustainable location benefits undermined and weakened, and the offer of new stock elsewhere in the Borough will be focused within the peripheral, unviable and unsustainable location of SH, offering no flexibility or choice.
- 4.4 EBC can review and reappraise this proposition over and over again but the fundamental premise is flawed. **The appraisal provided by jam for the Council does not alter or change this.**
- 4.5 **Para 3.4** still stresses that the town centre will be improved by the proposed policies in the RELLP. This however ignores the fact that the policies promote new housing development over improved new office space, even though those living in the new town centre homes will have less office based work opportunities within the centre itself and those whose jobs are displaced will either be required to commute out to the Harbour or to other towns or campuses outside of the Borough to work.
- 4.6 **Para 3.5** states that the **concentration of new Class B development at the Harbour will address issues of site access, linkages and contributions to community infrastructure. It will not.**
- 4.7 As demonstrated by the **recent outline planning permission for the Harbour** the **viability** of Class B space is such that it **cannot fund the mitigation scheme required** to make it acceptable in transport / linkage terms (i.e. it cannot help fund the quality bus corridor that will aid links to the town centre). The Innovation Mall on Site 6 has also been planned around a high occupancy and employment density and a high (above optimal) level of parking provision.
- 4.8 Additionally, the Class B element of the outline scheme across the SH employment sites is **making no contributions towards community infrastructure whatsoever within the Harbour**. The new community hall and the new public open spaces are all being delivered as a result of the housing element of the outline scheme. The employment space on Site 6 is being subsidised and Sites 4 and 7a are unviable for large scale office schemes – the open market rents needed to enable these sites to come forward are not achievable and **they cannot support linked community or infrastructure programmes**.
- 4.9 **Para 3.7** still refers to the **intensification of existing industrial estates** and how these **present opportunities to provide new, higher density space**. Building on this, the existing office campuses that are now located along

the Eastbourne, Hampden Park to Polegate corridor, provide further opportunities for campus type development that will also complement the town's office stock.

- 4.10 As outlined consistently through the CSLP and ELLP processes, this growth corridor represents a better connected and more sustainable location for office development in terms of public transport links and should again be recognised as such within the ELLP. SHW's new accompanying Statement 2016 further demonstrates this.

OBJECT - Required Change

- 4.11 This sub-section must be redrafted to stress the relative sustainability credentials and benefits of Eastbourne town centre, Sovereign Harbour and the wider more strategically important Eastbourne to Polegate growth corridor. This will provide the appropriate basis for the reassessment of the linked Sustainability Appraisal and the resulting policies for the distribution of new employment space across the Borough.

B. Economy and Employment Land, Policy EL1 & Para 3.8 – 3.15

- 4.12 This section of the ELLP has been amended to clarify the amounts of new employment space that are proposed to be allocated across the Borough. These do mix GEA and NIA floor areas but the clarification that has now been provided is helpful.
- 4.13 **Para 3.9** outlines that not all industrial estates will be appropriate for higher quality (e.g. office) accommodation and as such **Para 3.10** proposes to limit the intensification of industrial estates to Class B1c, B2 and B8 space only.
- 4.14 This still fails to recognise how office campus' have and can successfully be established within and alongside industrial estates and how the presence of office functions and activities can support more industrial businesses – e.g. in the form of readily accessible business based bank branches, accountancy and IT based companies.
- 4.15 The pending new permitted development rights that will allow light industrial space to be converted to residential use, subject to certain criteria being met, is likely to place some of EBC's employment estates and campus' under additional pressure from higher value uses. A policy that will allow new higher quality and value office space to be established within the estates will help to provide an alternative development option, protect and promote employment uses within established employment locations and provide more choice of location options, all within the Borough's recognised and better connected growth corridor.
- 4.16 For the reasons set out in **this Statement and at Annex A within Submission Statement 2** that deals with the RSA, **Para. 3.10s** proposed allocation of **3,000sq.m. NIA of Class B1a space in the town centre is inappropriate** and still does not meet the soundness tests of new policy making. The further loss of office space within the town centre subsequent to our last representations on the ELLP, balanced by a comparative slow take-up of the new space that has been let within the new Innovation Mall on Site 6, further substantiates this position. **The amount of space allocated within the TC and that can be readily accommodated within the centre on identified and additional windfall sites must be increased.**
- 4.17 For the reasons also set out here, at **Annex A and within Submission Statement 2, Para 3.10s** proposed allocation of **20,000sq.m. NIA of B1 space at the Harbour** also fails to meet the soundness tests. Site 6 cannot accommodate such an amount of open B1 space and Sites 4 and 7a are appropriate only for Class B1a/b space

within the Class B space categories but are not required for that use to meet forecast employment growth in those sectors. An allocation for Sovereign Harbour must reflect:

- The policy directions of the adopted Sovereign Harbour SPD, which acknowledges the environmental settings of Sites 4, 6 and 7a and what type of employment uses are appropriate on each.
- The details of the approved outline planning permission that allows for a minimum of 11,100sq.m. NIA of Class B1 space on Site 6.
- An understanding now that SeaChange is marketing Site 6 overall to provide for up to 9,777sq.m. NIA of space but the need for EBC to require the most efficient and maximised density of development is achieved on this site.
- The inability of Sites 4 and 7a, which are even when taken together, smaller than Site 6, to make up for any shortfall in provision on Site 6 so that the proposed 20,000sq.m. NIA allocation cannot be met across the sites if Site 6 does not provide the amount of space expected through the outline permission.
- The review of the viability of Class B1 space at the Harbour, taking into account SHW's critique of the appraisals undertaken by B/GVA (see accompanying SHW Statement 2016).
- The reworking of the RSA based upon what we consider to be more appropriate core assumptions of how the town centre and Harbour should be assessed in sustainability terms and against EBC's sustainable policy objective (see **Submission Statement 2**).

4.18 **Para 3.11** refers to other SeaChange Sussex developments as examples of schemes that are considered to be good local examples of flexible accommodation for start-up and smaller businesses. Of the three examples quoted however, two are within central or edge of central locations: **Basepoint Enterprise Centre** in Newhaven and **Priory Quarter** in Hastings. The third example, the **North Queensway Innovation Park**, Hastings is an out of centre campus site but it has been very slow to develop and its marketing details are focused on large units for manufacturing firms (See **Annex A**). Each of the development has experienced significant viability issues and has ultimately been required to be let at significantly below forecast rents (see SHW previous representations to the Draft ELLP December 2014).

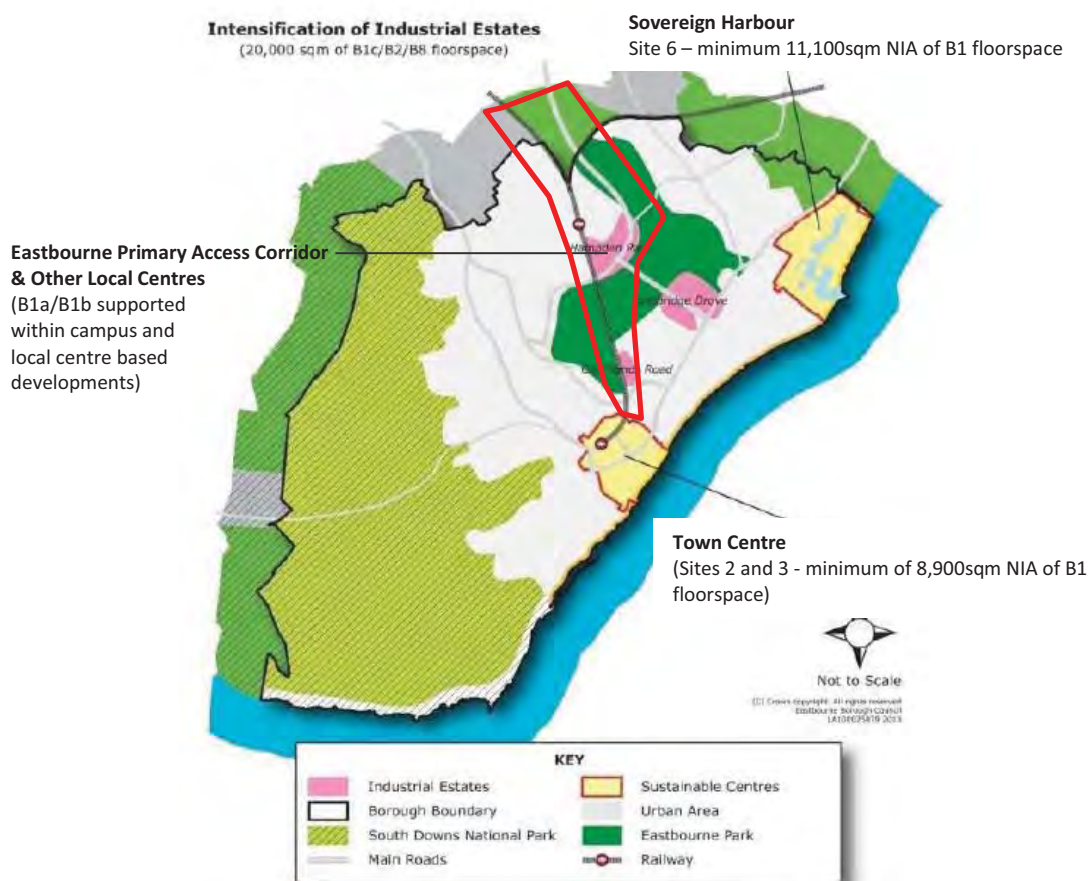
4.19 Taken individually and together these considerations all point to the need to:

- increase the allocation of space to the town centre,
- reduce the minimum requirement of B1 space at the Harbour to enable other employment uses to be provided here that will work better and together with an office focused campus on Site 6, and
- support additional space and choice of new accommodation along the Borough's core growth corridor.

OBJECT - Required Change

4.20 The **background summary sections of this Chapter at Para 3.1 to 3.7 must be redrafted** to better reflect sound deliverable objectives for the ELLP.

- 4.21 The **B1 allocation at the Harbour should be restricted to Site 6 only** and stated as equating to a **minimum of 11,100sq.m. NIA**. This follows the viability and sustainability rating of Sovereign Harbour and the requirements set out within the outline planning permission for the SH employment sites. It will again be for EBC to work with SeaChange to ensure the site is developed to this density, in the interest of ensuring the more efficient use of this site is secured.
- 4.22 This should be expressed as a minimum figure in order to provide the developer(s) of the site and EBC Council with the basis to strive for the most efficient development of this site. This again does not preclude additional Class B1a space being secured within Site 4 and 7a, the requirement for which however will be tested through the open market alongside marketing for other appropriate employment uses that will support, work with and help to promote the office campus on Site 6.
- 4.23 The allocation of **additional provision along the growth corridor** can still be expressed as a minimum requirement or as a generally supportive policy only. This however is needed to provide more choice for occupiers within the town's core growth hub.
- 4.24 **Key Diagram on Page 22** of the RELLP should accordingly also be amended to reflect this.



5.0 RELLP, Chapter 4.0 Policies

A. Industrial Estates Para 4.1. to 4.14 and Policy EL2

5.1 Policy EL2 and its sub-section should be extended as set out in our earlier representations to:

- protect existing Class B1a/b floorspace within the town outside of the town centre and
- to require new Class B1a/b opportunities within the industrial estates, the town's other centres, and within the Eastbourne section of the Polegate-Hailsham growth corridor.

5.2 This option has been too readily dismissed by EBC and is considered to be an even more important policy response now taking into account existing and pending new permitted development rights that allow conversion of premises to residential use.

5.3 The setting of a minimum B1a/b requirement for within the existing estates / growth corridor is considered beneficial but not paramount for strategic planning permission. The previous definition of a minimum requirement of 3,000sq.m. NIA of B1a/b space within the growth corridor equates to the B/GVA recommended contingency allowance for such new space, that we in any case contend represents a substantial proposed overprovision based on the Council's own assessment of new employment growth.

5.4 As set out previously, this will **not** prejudice other Class B development from coming forward but will add to the choice of new office space that is available within the town, **providing a better range of location options** for those wishing to remain or locate in Eastbourne.

OBJECT - Required Change

5.5 **Policy EL2** should be amended as follows:

Policy EL2: Industrial Estates, the Eastbourne-Polegate Corridor and Local Centres

Within the designated Industrial Estates, redevelopment and intensification of vacant and under-utilised sites to provide class B use development will be supported in order to meet the target of providing 20,000sq.m. GEA of B1c, B2 and B8 floorspace over the plan period.

The development of new Class B1a/b floorspace will be supported as part of redevelopment schemes within the existing Industrial Estates, where this does not prejudice the delivery of appropriately located Class B1c, B2 and B8 floorspace, within Eastbourne's section of the Eastbourne-Polegate-Hailsham Corridor and within the other district and local centres of Eastbourne. [Appropriate development within these locations will provide a minimum of 3,000sqm NIA of B1a /b floorspace].

Proposals for the refurbishment of existing class B floorspace will also be supported.

Proposals for the development of sites within a designated industrial estate in class B use ([including in class B1a and B1b use](#)) to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:

- The proposed alternative use an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or
- The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and
- The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.

Within the designated Industrial Estates, change of use of units in class B use ([including in class B1a and B1b use](#)) to other employment generating non-B class uses may be granted where it can be demonstrated to the satisfaction of the Council ~~that~~ that there is no reasonable prospect of the site continuing to be used for class B use.

B. Town Centre Para 4.15 to 4.31 and Policy EL3

- 5.6 **Para 4.18** acknowledges that the town centre remains an important location of office provision, whilst **Para 4.15** acknowledges that the centre's existing stock is mainly dated. As such **Para 4.19** states that this does not meet the demands of many occupiers. **Para 4.21** outlines that occupiers are increasingly polarised between those wishing to be in centre and those wishing to go out of centre.
- 5.7 The resulting continuing proposed allocation of 3,000sqm. NIA outlined at **Para 4.24** and in **Policy EL3**, together with the paragraphs that outline the potential of Sites 2 and 3 in the centre (**Para 4.26-4.28**), present a number of problems and highlight **significant flaws** in EBCs proposed policy centre for the centre.
- EBC has still not justified why an allocation for the centre must be 3,000sq.m. NIA only.
 - For the reasons set out in previous representations and repeated here, **an allocation of 3,000sq.m. NIA will not replace and will not enhance the town centre's office stock**. It will mean the further depletion of its stock in terms of the amount, quality and choice available, as has been evidenced by the continuing loss of office space within the centre following the submission of our last representations on the ELLP.
 - The **sustainability outcomes** of such a low allocation are appraised in our **Submission Statement 2**. This reassesses this proposed allocation using jam's alternative appraisal framework but against more appropriate background assumptions of how sustainability will best be achieved. This shows again that such a low allocation results in a significant number of minor and major negative outcomes when appraised against EBC's policy criteria.
 - As highlighted previously, this policy will **not** therefore fulfil the expectations of **Para 4.24** and the need to '*maintain a healthy office provision and avoid adverse impact on the vitality of the town centre*'.

- As demonstrated previously and re-attached as part of our Supporting Statement 2 document, the town centre has the potential to accommodate significantly more new office space without prejudicing new housing supply. It is for planning policy to provide a strong clear steer and requirement to ensure this is delivered by not providing an open door for developers to pursue residential and other commercial uses only.
- An allocation of at least 8,900sq.m. NIA of B1a/b space can still comfortably be accommodated within Sites 2 and 3. This should be expressed as a minimum requirement for Sites 2 and 3.
- Beyond this, Policy EL3 should again also make clear reference to a support for new office space throughout the centre and to an expectation that all mixed use developments will provide an element of new office space, and to the need to provide a clear justification where this is not proposed.

OBJECT - Required Change

5.8 **Policy EL3** should be amended as follows:

Policy EL3: Town Centre

The quantum of office space that should be provided in the Town Centre is a minimum of 8,900sqm NIA of floorspace. The requirement for office floorspace in the town centre should be provided across Development Opportunity Site 2 and Development Opportunity Site 3 as identified in the Town Centre Local Plan. Office development should be high quality class B1a floorspace that is flexible to meet multi-occupier needs.

Development opportunities for the provision of additional new office floorspace will also be supported elsewhere within the town centre including within the other Development Opportunity Sites, Transition Areas and Potential Areas of Change as defined within the Town Centre Local Plan.

Proposed redevelopment of sites that are within an existing office use and development proposals for new mixed use development schemes within the Town Centre will be required to include new office floorspace unless it can be demonstrated to the satisfaction of the Council that this is inappropriate in that location, is unviable or cannot be accommodated on design feasibility grounds.

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

C. Para 4.30 – Use of Article 4 Directions

- 5.9 This paragraph refers to the loss of office space within the town centre being monitored and Article 4 directions potentially being used to help prevent this.
- 5.10 As demonstrated by the Council's own Annual Monitoring Reports, the loss of office space has continued. In view of these continuing trends and to help ensure that an appropriate level and choice of office space is protected

within the centre, the Council must now indicate what level of floorspace loss it will take to be the trigger for considering using its Article 4 powers.

OBJECT - Required Change

- 5.11 [Para 4.30 must be expanded to clarify the trigger that will be applied for the use of Article 4 directions.](#)

D. Sovereign Harbour Para 4.32 to 4.47, Policy EL4

- 5.12 **Para 4.33** refers to the longstanding allocation of Sites 6 and 7 at the Harbour for office space, with reference to an outline planning consent for 30,000sq.m of office space across these sites. As outlined previously, **this should read**, 30,000sqm **GEA** of floorspace.
- 5.13 **Para 4.36** provides a summary of the funding that has been given to assist the development of the Innovation Mall on Site 6. B/GVA has appraised the viability of the Harbour previously and their Viability Briefing Note of September 2014 provides a further review in order to compare the viability of new office stock within the town centre and at Sovereign Harbour, i.e. in further support of the proposed allocation of 20,000sq.m. of B1 space at the Harbour.
- 5.14 SHW has critiqued B/GVA's previous assessments and their accompanying additional Statement reassesses their September 2014 review.
- 5.15 Sovereign Harbour does **not** provide a financially viable, open market proposition for high quality Grade A B1a/.b floorspace. The Mall has required funding support. It has **not** resulted in a rapid take-up of space even though office floorspace has continued to be lost within the town centre. Rentals have **not** reached the levels originally assumed for the building and the rents that are quoted as having been achieved and being sought **do not** take into account the incentives that have been offered and the extent of shared, break out space that is also available to tenants and directly reduces the £psf ratios achieved. Projected build costs will be substantially higher still for later phases of the development and rents **cannot** be expected to match these in order to retain a stable, let along an increase in net rental levels and resulting yields.
- 5.16 The town centre market is also challenging for new office space, but the B/GVA 2014 appraisal has greatly exaggerated the differences between the centre and SH. In planning terms the town centre remains the most sustainable location and the best connected in location, transport and business linkage terms.
- 5.17 Based on our previous representations and as summarised further in our linked Statement 2, **Sites 4 and 7a are not required to accommodate forecast growth in office employment.** They can still be marketed for this use but alongside other employment uses, so that they can be positioned to accommodate the most viable uses for which there is a clear and demonstrable demand and which will provide new employment more quickly for the Harbour.
- 5.18 EBC has not provided any evidence to change this assessment and conclusion of what form of development is required and most appropriate for the Harbour employment sites. **Our previous and longstanding objections still stand and form part of our on-going representations on the emerging ELLP.**

OBJECT - Required Change

5.19 The **supporting text within Paras 4.32 to 4.47 should be updated** to reflect a true and objective appraisal of employment use prospects at the Harbour.

5.20 **Policy EL4** should be amended as follows:

Policy EL4: Sovereign Harbour

Sovereign Harbour should accommodate **a minimum of 11,100sq.m. NIA of additional B1 floorspace. This should be delivered on Site 6 and should be provided within a flexible format that will allow businesses to adapt their operations depending on circumstances.**

Additional Class B1a floorspace will also be acceptable on Site 4 and Site 7a as indicated on the Proposals Map.

Other employment generating uses that are acceptable for Sites 4 and 7a must be compatible with the residential developments that adjoin the Sites and will include:

- **On Site 4 uses within Class A1 to A5, C1 and D1.**
- **On Site 7a uses within Class C1, C2 and D1.**

E. Figure 3

5.21 **Support** - We note that Figure 3 has been amended and this is supported.

6.0 Draft ELLP, Chapter 5.0 Implementation and Monitoring

6.1 **Table 3** sets out the summary of the ELLP policies and provides a linked framework for monitoring purposes.

OBJECT - Required Change

6.2 This must also be updated to reflect the allocations amendments required in order to make the ELLP sound.

7.0 Conclusion

- 7.1 The series of minor amendments that have been made within the draft ELLP are noted and welcomed.
- 7.2 These however do not address the substantive objections that we have set out previously to the earlier versions of the document and its related evidence base assessments.
- 7.3 The Council's new evidence and reassessed RSA do not address these matters or justify the policies presented in the RELLP.
- 7.4 The RELLP has **not been positively prepared, has not been justified, will not be effective and will be contrary to the NPPF**. It remains **unsound**.
- 7.5 **The RELLP must be redrafted as set out above.**

ANNEX A

**SeaChange Development
Examples Referenced at RELLP Para 3.11**

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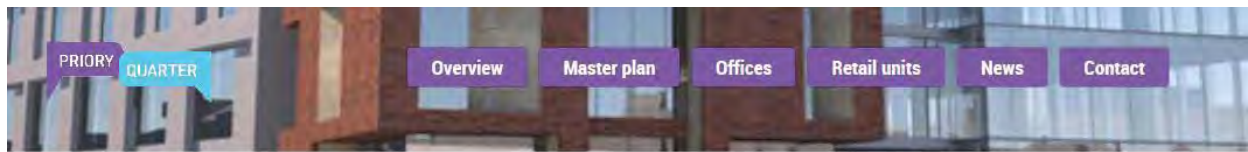
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Master plan

The Priority Quarter district already incorporates [Havelock Place](#), [Creative Media Centre](#), [One Priory Square](#) and Hastings' university buildings.

The long-term scheme (illustrated, right) includes:

- 338,000 sq ft of office & education space
- 58,000 sq ft of retail space
- a multi-screen cinema
- a multi-storey car park
- public squares and spaces
- a pedestrian bridge leading from the station

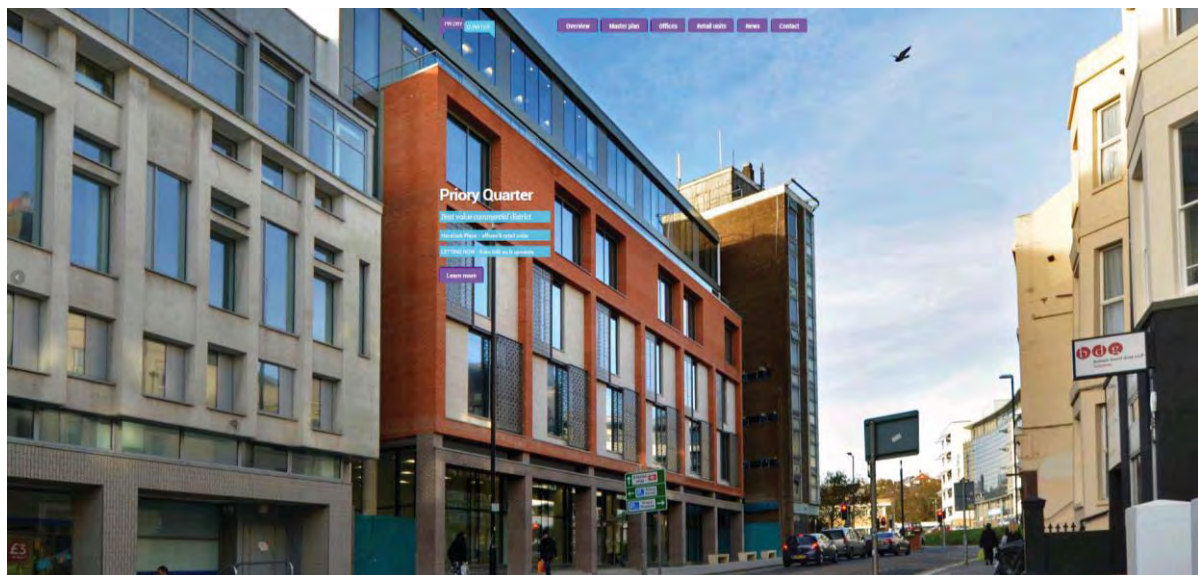
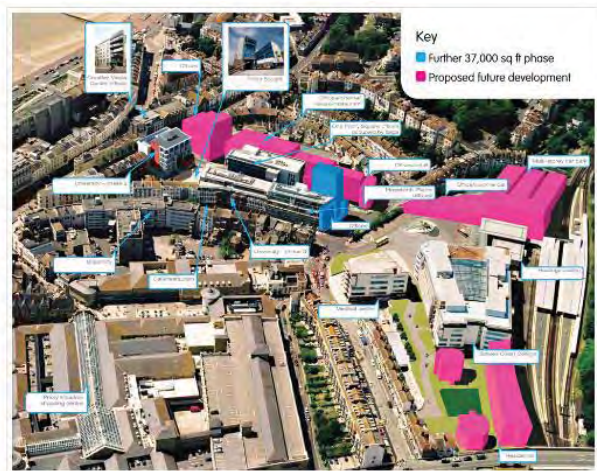
Find out more about the [office](#) and [retail](#) premises available now in Priority Quarter.

Other sites & premises:

For more information about Sea Change's broader development programme, please visit the [Sea Change web site](#).

For information about offices and sites in Eastbourne, visit the [Sovereign Harbour Innovation Park web site](#).

For offices and sites in Bexhill, visit the [Bexhill Enterprise Park web site](#).





North Queensway Innovation Park, Hastings

Sea Change is developing an approx 12-acre site in north-west Hastings – the largest in the area available for business use – into the North Queensway Innovation Park.

Our aim is to meet the growing demand for commercial space amongst local manufacturing companies wishing to expand, as well as companies from outside the area looking for a new base. We've developed a new road junction and entrance, we've cleared the site and are in discussions with several interested occupiers.

The Innovation Park is surrounded by attractive woodland, next to a thriving manufacturing zone, close to the A21 to London and just 4 miles from Hastings town centre and seafront.



North Queensway – indicative master plan

Plots are available to purchase or pre-let from 2 acres upwards. These can accommodate premises from 25,000 sq ft up to 120,000 sq ft with ample parking. A scheme on the site for a furniture manufacturing business is in planning.

With class B1 and B2 uses permitted, this is an opportunity for properties developed to companies' bespoke specifications.

If you're interested in finding out more, please contact us or download the North Queensway Innovation Park brochure.

ANNEX B

**Stiles Harold Williams Statement
Revised Proposed ELLP Commentary on Bilfinger/GVA Eastbourne Office
Deliverability Assessment to support the Sustainability Appraisal**



Sovereign Harbour
Revised Proposed Submission ELLP
Commentary on BiLFINGER/GVA Eastbourne Office
Deliverability Assessment to support the Sustainability
Appraisal

Prepared by:
Richard Stapleton FRICS

Date: 21 January 2016

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EASTBOURNE OFFICE DELIVERABILITY ASSESSMENT

1.00 INTRODUCTION

- 1.01 This report has been prepared by Stiles Harold Williams (“SHW”) on the instructions of Sovereign Harbour Ltd (“SHL”), part of Carillion plc. It provides a detailed and fully justified response to the BiLFINGER/GVA (“B/GVA”) report dated September 2015 on the deliverability of new offices in the Borough of Eastbourne. The reports are written to inform the Local Plan process and follow Employment Land Local Plan reports 2014 and 2015.
- 1.02 This report provides analysis and commentary on:
- The current B1(a) office market in Eastbourne and East Sussex and trends in that market.
 - Viability and deliverability of new offices in the Borough during the Plan period.
 - Whether or not the draft Local Plan Spatial Policy, as it relates to the provision of office and employment floor space for Sovereign Harbour, is correct.
 - The Office Deliverability Assessment dated September 2015 published by B/GVA in support of the Sustainability Appraisal.
- 1.03 Stiles Harold Williams is one of the leading firms of Chartered Surveyors and Commercial Estate Agents in the South East of England with principle offices in London, Croydon, Crawley and Brighton. We have 4 Sussex offices, including an Eastbourne office, which has been established for over 40 years. The Partnership has been and continues to be closely involved in the office market throughout East and West Sussex and has acted as agents and advisors on many office buildings in the County. A significant part of the firm’s business relates to the office market and advice on many development schemes.
- 1.04 Richard Stapleton FRICS, the author of this report, is Senior Partner of Stiles Harold Williams and has been directly involved in advising SHL on the development of Sovereign Harbour for the last 25 years. Throughout that period the Partnership has held instructions to market the vacant commercial sites at Sovereign Harbour.
- 1.05 This report should be read with SHW’s evidence based assessment report published in January 2015.

2.00 HISTORY OF THE ALLOCATION OF SITES 4, 6 AND 7 FOR EMPLOYMENT USE.

- 2.01 Following the original outline planning permission for the subject land to be developed for employment purposes in 1988, the land has remained allocated and available for employment and subject to promotion by Eastbourne Borough Council (“EBC”). This firm and the market generally have been well aware of the availability of the land for employment development for 27 years.
- 2.02 The two and half decades during which the land has been available have seen two complete cycles of the commercial property market and we are now enjoying what is arguably the peak of a third market cycle; the market for commercial property has been improving steadily over the last 3 years.
- 2.03 The only building constructed on the allocated employment land in Sovereign Harbour prior to 2015 is the medical centre on Site 7, on the corner of Pacific Drive and Atlantic Drive, which was completed in 2014.
- 2.04 Throughout this period of 27 years, there have been three principle reasons why no employment open market development has occurred:
- Sovereign Harbour is not accepted by the market as an office location.
 - Market rental levels for offices in Eastbourne and similar Sussex locations have remained in the range of £108 / £125 per sq.m (£10 / 11.60 per sq.ft), with headline rents of £156 per sq.m (£14.50 per sq.ft) making it inevitable that no open market development will be viable to a developer or an investor / owner occupier.
 - No developer has been prepared to buy land at Sovereign Harbour for office development in the expectation that an occupier could be found or development viability could be achieved.
- 2.05 EBC approached SHL in 2013 with a proposal to work with the regional economic development board, the South East Local Enterprise Partnership (“SE LEP”), to acquire Site 6 and develop the site with offices. The Borough Council and SE LEP entered into an agreement with SeaChange Ltd, a Sussex based not for profit economic development company to acquire and develop the land. Both EBC and the SE LEP undertook to make all the necessary funds available to SeaChange by way of loans totalling £6 million on the basis of a business plan. Terms were agreed and the land was acquired in April 2014 with the benefit of an allocation of a minimum 11,100 sq.m of B1 employment development.
- 2.06 In April 2014, detailed consent was granted for the first of 5 office buildings for Site 6, known as Pacific House. Site 6 is now known as Sovereign Harbour Innovation Park. SeaChange have been marketing Pacific House to let and the remaining land for sale or to let since early 2015.

- 2.07 In December 2014, outline consent granted for the development sites 1, 4, 5, 6, 7 and 8 Sovereign Harbour for a mix of residential employment uses. Under that outline consent:
- 2.07.1 Site 6 has consent for employment and office use up to 15,000 sq.m GIA.
- 2.07.2 Site 7 has consent for a mix of employment uses (B1, C1, C2 and D1 together with 70 dwellings and public open space).
- 2.08 Full details of Pacific House are given at Appendix A; including the marketing brochure and our analysis of the little that has been disclosed by Seachange about the outcome of marketing and the terms achieved. It will be noted that Pacific House enjoys a high specification, is designed to appeal to small space office occupiers looking for flexible, serviced offices with shared facilities. The amount of shared space is generous with a gross to net floor space of about 70% compared with typical office buildings which provide about 85% gross to net. After 12 months of full market knowledge of the Innovation Park Scheme and nearly 6 months since Pacific House has been ready for occupation, there is no evidence of the strong market demand forecast by SeaChange and their advisers or as predicted by B/GVA.
- 2.09 It is now very unlikely that the building will achieve the performance forecast in the business case presented to EBC and SE LEP in 2015.
- 2.10 In Para 1.5, B/GVA focus on the options for the delivery of new office floor space in either the Town Centre or Sovereign Harbour. It is suggested that Sovereign Harbour is the only out of town location with the “*credentials*” to become an out of town office location. It is a fundamental mistake to believe that Sovereign Harbour has the credentials to become an office location. The reasons for this conclusion are set out in this report and are based on market experience and relate to Sovereign Harbour’s poor location, poor road communications and lack of public transport.
- 2.11 The Eastbourne/Polegate/Hailsham corridor (A22 corridor) contains suitable locations for office development but they happen to be outside the Eastbourne Borough boundary.

3.00 MARKET COMMENTARY

3.01 In this section of our report, we comment on the office development market in the context of our first-hand experience compared with the B/GVA report. Where relevant, our report is cross referenced to the appropriate paragraph numbers in the B/GVA report.

3.02 The general assumptions and conclusions set out in the B/GVA report as they relate to the UK and Southeast office market overview and the UK business park market (sections 1.10 - 1.19) are accepted. However, having identified that the existing regional market for business parks is robust in rental and demand terms B/GVA go on to conclude, without any reasoned justification, that a business park style office development in Sovereign Harbour can be expected to enjoy similar strengths.

3.03 East Sussex Market Overview (sections 1.20 -1.27):

3.03.1 It will be noted that B/GVA's review omits any reference to the City of Brighton and Hove market. Thanks to its location and communications, that City is only now beginning to enjoy a viable office market. For the first time in over 15 years, new speculatively built office buildings are being constructed. Rents in Brighton for new Grade A buildings near the station and town centre are now in the region of £242 / £258/ sq.m (£22.50 / £24.00 per sq.ft). At that level, speculative construction of new offices is viable.

3.03.1 As to the East Sussex Market, the report on the strength of the Eastbourne/Polegate/Hailsham A22 corridor (para 1.21), the conclusions are not agreed:

- **Leasing demand** (Fig. 1). This chart shows that demand in East Sussex over a 5 year period, has been effectively flat at about 250,000 sq.ft. Leasing demand in the same period has notably increased in Brighton and the A23 Corridor. However, it is our experience that almost without exception, those looking for office space in the A23 Corridor would not contemplate space in or near Eastbourne. As admitted by B/GVA, Eastbourne is essentially a local office market.
- **Under construction** (Fig. 2). This figure relates to B1(a) offices under construction. The "*significant increase in construction activity*" reported relates almost entirely to B1(a) schemes at Polegate (Chaucer Business Park –see Appendix B) and of course, the state funded schemes at Pacific House, Sovereign Harbour and Glovers House, Bexhill.
- **Asking rent** (Fig.3). The graph shows that asking rents have fluctuated in a very narrow range over the last 5 years £144 / £160 per sq.m (£13.40 / £14.80 per sq.ft). Inevitably in a weak market, there is a significant difference between asking rents and reported headline rents achieved.

It is commonplace in the office market that reported headline rents are only achieved by the grant of significant incentives, particularly rent free periods. It is an established feature of the Eastbourne market that 1 year of rent free is agreed for a term of 5 years

certain. This effectively means that the rent actually achieved is 20% below the headline rent.

- **Occupancy and rental rates** (Fig.4). The story told by this figure omits entirely that numerous office buildings, particularly in Eastbourne Town Centre, have been vacated and sold for other uses, often redeveloped for residential purposes. This is apparent from the significant decline in the total office stock in Eastbourne Town Centre (see commentary at para 3.2 by Teal Planning in their submission statement the loss in the period 2012-2015 was 6,197 sq.m).

3.03.2 The office market in Eastbourne over the last 2 years has been dominated by the sale of Site 6 to SeaChange for the development of 11,100 sq.m of B1(a) space. The funding of the first building, Pacific House, by EBC, East Sussex County Council ("ESCC") and SE LEP allowed the speculative construction of the new building. This is only the second speculatively built building to be constructed in Eastbourne for over 30 years. The market's underwhelming response to the availability of this building is described later in this report.

4.00 EASTBOURNE OFFICE MARKET (B/GVA SECTION 1.28)

4.01 The 5 locations identified as employment clusters contain, apart from the Town Centre, only a few offices. The list omits Sovereign Harbour which although designated as an office centre, had until mid-2015 failed to provide new office buildings apart from those above the restaurant and retail units adjoining the Harbour.

4.02 It is not correct to say that operators are relocating outside the Borough in any significant numbers for the lack of suitable office space (para 1.33). Historically, major losses of occupied office space has been the result of companies locating to more central, regional locations which have better communications.

4.03 Eastbourne Sub-market trends (Table 1)

4.03.1 This table needs to be read in the context of the market experience at the Highfield Business Park, Edward Way, Hampden Park:

In 2005, three office buildings were constructed speculatively at Highfield Business Park by ROC, developers/builders. One of the buildings was constructed for their own use and the other two were built speculatively on the market at headline rents of £183 per sq.m (£17 per sq.ft). In the intervening period, the market rental values of the buildings have declined significantly and they are now marketed at headline rents of £156 per sq.m (£14.50 per sq.ft) (see Appendix C).

4.04 Market Summary and Conclusions

4.04.1 At para 1.33 reference is made to “*demand pushed outside the Borough to areas with more attractive offers*”. This implies that were offices available at Sovereign Harbour as opposed to Polegate, then businesses would not have moved out of Eastbourne. We disagree that this is the case. If it were, the marketing of Pacific House to date would have been far more successful and widely welcomed by occupiers needing space. It is inevitable that the market is choosy about the location it takes and in common with all regional office markets, businesses go to locations suited to their activity. It is the experience and view of this firm, that Sovereign Harbour will not meet that demand. Instead the market, such as it is, has and will continue to go to the A22 corridor and take space in Polegate (Chaucer Business Park) and similar locations.

5.00 VIABILITY

- 5.01 This practice, through its extensive involvement in the South East office market, is familiar with the challenge to achieve viability for new offices in towns outside the A23 Corridor. The cost of constructing an office building is broadly the same regardless of location. It is well established that to be viable in terms of achieving a market value on completion in excess of costs, the market rental value needs to be in excess of £237 per sq.m (£22 per sq.ft). There is no prospect of rental levels reaching the levels needed to achieve viability in any Sussex town or city apart from Brighton and Crawley. Thus Eastbourne’s position of being a town where new offices are not viable is far from unique. The open market’s solution is to provide small units with a more basic specification in a prime location, which is what is happening at Chaucer Business Park, Polegate, where the developer is able to provide small units suitable to let and for sale to owner/occupiers (see Appendix C).
- 5.02 In their report B/GVA have confined their commentary on viability to a “*high level assessment of town centre office development in comparison with out of town development*” (i.e. Sovereign Harbour) assuming the construction of similar buildings. Such an approach, presupposes that Sovereign Harbour can truly be regarded as an out of town office location and thus command sufficient demand to achieve the predicted rental levels.
- 5.03 B/GVA’s table 2, sets out various cost assumptions for town centre vs out of town. The assumptions are not accepted, as set out below:

Table 2a – Cost/Assumptions – Town Centre vs Out of Town Offices.

(Based on B/GVA’s table 2 with SHW’s commentary/amendments shown in red and italics).

		Town Centre		Out of Town	
	Item	Assumption	Explanation	Assumption	Explanation
Values					
1	Rent psm	£161 (£14.96/fs) <i>£124.80/sqm</i> <i>(£11.60/fs)</i>	Based on conversations with local agent and new build rents in comparable town (Hastings). <i>The established rental levels for Grade A offices in Eastbourne Town Centre for a term of 5 years certain is £124.80 / sq.m (£11.60/fs) after allowing for 1 year rent free, ie 20% discount. The headline rent is £156/sq.m (£14.50/fs).</i>	£161 (£14.96/fs) <i>£124.80/sqm</i> <i>(£11.60/fs)</i>	Based on business case for Harbour Innovation Mall, discounted to account for larger floorplates. <i>No analysis of the discount is offered. There is no reason to suppose that out of town offices are any more valuable than town centre offices. The 2012 Appraisal drew on historic (2005) lettings in Hargreaves Business Park. The original rent achieved when these buildings were let were at £183.00/sqm (£17.00/fs). These rental levels have not been maintained. Currently vacant floors in the scheme (2nd Floor Redoubt House, 1 Edward Rd) has been offered to let at a headline rent of £156/sq.m (£14.50/fs)</i>

		Town Centre		Out of Town	
	Item	Assumption	Explanation	Assumption	Explanation
2	Yield	7.5% <i>9%</i>	Assumed comparable to out of town yield. <i>The current market level for investment sales of multi-let Grade A office buildings in Eastbourne and similar town centres, is about 9%. To achieve this level of return, the purchaser will require the vendor to guarantee rental income for up to 2 years on any voids or vacant offices.</i>	7.5% <i>9%</i>	Based on Business Case for Harbour Innovation Mall. <i>There is no market justification for the 7.5% yield assumed. The 2012 Appraisal was based on an assumed value in 2020 / 2021. It does not apply to an appraisal based on present day values.</i>
Costs					
3	Basic Build (£ psm) (NB cost on GIA basis adjusted to NIA on a 85% net to gross assumption to be comparable with value NIA assumptions)	£1,700 <i>£1,500</i>	Based on BCIS cost range. Assumed higher than out of town to account for more complex build associated with town centre development (ie constrained site, higher storeys, undercroft parking). <i>There is no reason to suppose that town centre buildings are any more expensive to construct than out of town building. Taking the Opportunity Site adjoining the station, this is capable of being developed with 2/3 storey office buildings without undercroft parking. Thus the same construction rate as out of town should be adopted.</i>	£1,500	Based on BCIS costs range. Lower than town centre costs to account for more straight forward build associated with business park offices (simple design, lower storeys, surface parking, purpose-carved plots)
4	Professional Fees	10% <i>12%</i>	Assumed higher than out of town to account for greater complexity of town centre development (ie mixed use design, engineering for potential undercroft, legal/CPO fees associated with multiple ownerships). <i>It is not accepted that a town centre scheme is any more expensive in terms of fees than an out of town scheme. Land assembly costs would be set against the site acquisition costs.</i>	7% <i>12%</i>	Standard assumption. <i>Cost of all professional fees should be taken at a standard 12% and should be similar to town centre costs.</i>
5	Demolition (£ psm)	£30 <i>£0</i>	Based on assumption of £50 psm for existing buildings and £15 psm hardstanding, discounted to account for assumed increased density of new development. <i>Assuming the Opportunity Site adjoining the station, no</i>	n/a	n/a – no existing buildings

		Town Centre		Out of Town	
	Item	Assumption	Explanation	Assumption	Explanation
			<i>significant demolition costs will be incurred.</i>		
6	Site Servicing	n/a	n/a – brownfield development. Assumed all existing services	10% on build cost	Generic assumption based on previous experience. Exact extent of servicing required in Sovereign Harbour unknown.
7	Profit on Cost	20%	Standard industry assumption	20%	Standard industry assumption
8	Finance Rate	7%	Standard industry assumption	7%	Standard industry assumption

5.04 It is notable, notwithstanding B/GVA’s statement at para 1.34 that “value and cost assumptions are based on our previous appraisal experience together with data sources”, that their key assumptions of rental value and yield are not their figures at all but rather are “based on the business case for the innovation mall, discounted to account for larger floor plate.” The “business case” they refer to is not annexed to their report but is that presented to ESCC on 4th September 2014 by the Director of Communities, Economy and Transport. The Business Case is dated 30th November 2012 and was prepared by Bray Fox Smith on behalf of SeaChange. Also incorporated within the same document, is a later letter from the agents dated 14th May 2014 confirming a telephone conversation to the effect that “the contents” of their 2012 report “continue to be accurate in their entirety”.

5.05 It is most extraordinary that the two key valuation assumptions relied on by B/GVA are based on rental and capital values set out in a 2012 report as being the view of “the net income/rental value in December 2014” and an “opinion of the potential sale price in 2020 / 2021”. It is notable that B/GVA were not asked, or perhaps were not prepared, to use their own valuation figures. No explanation of this glaring omission is offered.

5.06 The B/GVA’s assumptions are agreed, with the following exceptions:

5.06.1 **Rent.** There is no basis offered for the rent of £161.00 per sq.m (£14.90 per sq.ft) adopted by B/GVA. Bray Fox Smith in their 2012 report use £183 per sq.m (£17.00 per sq.ft). B/GVA suggest that they have used £161 per sq.m to adjust for larger floor plates. They make no mention of discounting the rent receivable to allow for the established market practice of allowing 1 year rent free for a term certain of 5 years. Effectively reducing the headline rent by 20%.

We value the proposed offices for Sovereign Harbour at £125 per sq.m (£11.60 per sq.ft), having deducted 20% from the headline rent to assume 5 year term certain on the tenancies. A 5 year term certain is essential to achieve a 9% yield with a vendor guarantee on voids. We agree that there would be no difference in rental value between the two locations.

- 5.06.2 **Yield.** A 7.5% yield is not attainable for a multi-let short occupational term investment of this class. A market assessment of similar transactions in 2015/16 shows that the market value of a multi-let Grade A office building on largely short leases will be about 9%. On this basis the vendor will also be expected to guarantee any voids for a period of at least 2 years. Our analysis is based on current market information. The result, in valuation terms, is to significantly reduce the yield from a multiple of 13.33 to 11.1.

On the assumptions set out in this report, it is unlikely that a speculative building of this type at Sovereign Harbour, would be fully let for many years

- 5.06.3 **Basic Build.** The assumption of an 85% difference between GIA and NIA assumes that the building is intended for multi occupation with floors being capable of being sublet in part.

However, it is not agreed that town centre buildings would require an additional cost of undercroft car parking or are necessarily more complex. A lower car parking ratio is required in town centres and thus it is concluded that the same build costs should be applied. If the Opportunity Site adjoining the Railway Station were to be developed then they would be low-rise buildings and undercroft parking would not be necessary.

- 5.06.4 **Professional Fees.** The rate proposed of 7% is unrealistically low for the design and construction of a modern office building which would require a full professional team of architects, quantity surveyor, structural engineer and M&E consultant. The correct appraisal rate should be 12%. It is not agreed that a higher rate should be applied to town centre locations. Any cost associated with land acquisition would be reflected in the land price.

- 5.06.5 **Demolition.** These numbers would not be relevant to a development of the Opportunity Site adjoining the station.

- 5.07 For ease of comparison our Table 3a below, repeats the B/GVA numbers used in their Table 3 and shows the SHW equivalent numbers for town centre and out of town locations on the basis explained above.

Table 3a Town Centre and non-Town Centre Viability Comparison (B/GVA Table 3):

Cluster	Town Centre				Out of Town			
	GVA		SHW		GVA		SHW	
New workspace type	%	Value/Cost	%	Value/Cost	%	Value/Cost	%	Value/Cost
Development cost / sq.m								
Build cost per sq.m – GIA	n/a	£1,700	n/a	£1,500	n/a	£1,500	n/a	£1,500
Build cost per sq.m – NIA	85	£2,000	85	£1,765	85	£1,765	85	£1,765
Fees	12	£200	12	£211.80	12	£124	12	£212
Demolition	n/a	£30	n/a	n/a	n/a	£0	n/a	£0
Site Servicing	n/a	£0	n/a	£0	10	£176	10	£176
Contingency	5	£100	10	£176.50	5	£88	10	£177
Finance	7	£163	7	£163	7	£138	7	£138
Profit (% cost)	20	£499	20	£499	20	£423	20	£423
Total Cost per sq.m	n/a	£2,992	n/a	£2,815	n/a	£2,538	n/a	£2,890
Development Value / sq.m								
Rent / sq.m	n/a	£161	n/a	£125	n/a	£161	n/a	£125
Yield	n/a	£8	n/a	11	n/a	£0	n/a	£11
Total Value / sq.m	n/a	£2,153	n/a	£1,375	n/a	£2,153	n/a	£1,375
Development /sq.m								
Balance / sq.m	n/a	-£839	n/a	-£1,440	n/a	-£385	n/a	-£1,515

5.08 Conclusions on Viability.

It is clear from the extended Table 3a above that the following conclusions can be drawn:

- 5.08.1 Both town centre and out of town office schemes will not be viable by a wide margin. According to B/GVA's development appraisal, town centre sites will lose the equivalent of approximately 25% of their construction costs and out of town centres approximately 15%. In contrast, we conclude that both town centre and out of town developers can expect to lose the equivalent of approximately 50% of the cost of construction.
- 5.08.2 For the reasons set out above, we are satisfied that on any reasonable understanding of development costs, rental forecast and yields any new office building in either location will lose very substantial sums. In absolute terms, we conclude that the developer of a typical

2,000 sq.m (21,000 sq.ft) NIA office building in both town centre and out of town locations would expect to lose approximately £3 million excluding any costs of site acquisition. By their own figures, B/GVA conclude that the same office scheme would lose £1.7 million in the town centre, £770,000 out of town. All these costs and outcomes exclude the cost of acquiring the land.

6.00 DELIVERABILITY ASSESSMENT

6.01 At Paras 1.41 and 1.43 B/GVA confirm that:

“It is considered unlikely by local and national agents that Eastbourne will become a location that will attract large-scale “corporates”.

6.02 The Eastbourne offer (i.e. its attractiveness as a location for offices) is, in SHW’s experience, considered to be significantly weaker than the wider East Sussex market. The reason for this is the comparative remoteness of the town and poor transport network. As a result, few businesses see the town as a suitable office location unless they have established connections. This opinion is based on an understanding of the market and this firm’s experience over many years. The key factors counting against Eastbourne as an office location are:

- Drive time to motorway network.
- Rail time from London.
- Distance from airports and seaports.

6.03 Eastbourne as a whole is not and will never be an attractive sub-regional office location. Any consideration of the market for Eastbourne, has to distinguish between town centre and out of town locations. For the reasons described above, Sovereign Harbour is not an out of town office location.

6.04 The Need for Out of Centre Provision (B/GVA para 1.50 and following).

6.04.1 The argument for a mix of offers for the location of offices is agreed but because Sovereign Harbour is the only substantial area of land available within the Borough that could possibly be considered to be an office park does not mean that it will ever become one.

6.04.2 It is well-established that the key factors of poor transport links and distance from the A22 / A27 and rail networks, inevitably discount Sovereign Harbour as an out of town location in terms of the Eastbourne office market. There is no example elsewhere in the south east of a business park that has been successfully established in an out of town location similar to Sovereign Harbour.

6.04.3 In contrast, successful small scale office development has been established over the last 5 years in Polegate in a location, despite its distance from Eastbourne, that is acceptable because of the relatively good road and rail communications it enjoys.

6.04.4 If Sovereign Harbour had been a realistic location for offices, then the last 25 years would surely have produced at least one substantial business occupier but no such enquiry was ever received. This contrasts with the position at Polegate where small new office buildings in a business park (Appendix C – Chaucer Business Park) continue to be built successfully.

6.05 Catalytic impact of the Innovation Mall (B/GVA para 1.56 / 1.57).

6.05.1 There is no evidence offered to support the hypothesis advanced. It is suggested that by building one office building on state subsidised terms which are not available to the open market, that somehow rents and demand will eventually rise by over 50% to allow the open market to build further offices. There is simply no market evidence available to suggest that this might happen in any East Sussex office market, let alone Eastbourne.

6.05.2 The inevitable conclusion is that the argument that critical mass will be achieved at Sovereign Harbour is based on hope rather than a realistic analysis of the market or market experience. It is notable that B/GVA's conclusion opinion is based on the 2012 opinion of SeaChange's advisors and not their own.

6.06 Town Centre Capacity

6.06.1 For the reasons previously expressed by both Teal Planning and SHW, there are town centre sites available or likely to come available for office development which are capable of balancing the offer of town centre and out of town office developments and that EBC must secure these, by allocating the same for employment. Too many established town centre sites have been lost recently to other uses and the health of the town centre must depend on the remaining sites being developed when viability can be demonstrated. Because demand for town centre sites will always be significantly stronger than for Sovereign Harbour, there is a better prospect that they will achieve viability before Site 7A.

7.00 PROSPECTS FOR VIABLE B1(A) OFFICE DEVELOPMENT AT SOVEREIGN HARBOUR

- 7.01 Three substantial key barriers will have to be overcome before open market B1(a) development can start at Sovereign Harbour:
- A 50% rise in rents.
 - Tenants willing to locate to Sovereign Harbour.
 - Tenants able to afford viable rents for a sufficient term certain.
- 7.02 Alternatively, in the event that further state funding is provided by guaranteed loans, grants etc. in the manner that has supported the purchase of Site 6 and the construction of Pacific House, further buildings might be built.
- 7.03 As to the availability of further state funds from SE LEP, EBC and ESCC, it is understood that although no additional funds would be available to build new buildings as opposed to providing infrastructure, it is hoped that once substantially let, Pacific House will be sold and the proceeds used to fund the next building.
- 7.04 We estimate that the current value of Pacific House in market terms is approximately 50% of the funds invested. We see no reason why that value will change significantly for many years. In the meantime the building will be unsaleable except at a deeply discounted rate compared to construction costs. The history of the subsidised buildings, recently constructed in Hastings and St Leonards, do not support an optimistic view of the outcome.
- 7.05 As to the open market, the key factors that need to be overcome are:
- 7.05.1 **Rent.** It is established in the Southeast office market that speculatively built new offices are now under construction in Croydon, Crawley and Brighton. Rental levels need to have achieved at least £238 per sq.m (£22 per sq.ft). With headline rents in Eastbourne at £156 per sq.m (£14.50 per sq.ft), a 50% improvement in market rents is required. This seems unlikely to be achievable.
- 7.05.2 **Construction Costs.** Construction costs will continue to rise. They increased at a rate of about 5% per annum over the last 5 years and they are now forecast to increase by about a further 20% in the next 5 years (see Appendix D: extract from BCIS).
- 7.06 It is our inevitable conclusion that the gap between market value and viability is ever widening, not narrowing. This must make it increasingly unlikely that open market offices will ever be built in Sovereign Harbour, either speculatively or for owner occupiers, to achieve the critical mass envisaged. Owner occupiers of course, find it impossible to fund buildings for their own occupation unless site plus construction costs at least equal market value.

8.00 CONCLUSIONS

- 8.01 Jam and B/GVA support the policy of retaining Site 7A at Sovereign Harbour for B1 office use for the following reasons:
- *“The office provision at Sovereign Harbour should encourage economic growth, increase jobs and provide opportunities for existing businesses to expand or relocate to more appropriate premises. The catalytic impact of the Innovation Park will help establish the area as an economic hub allowing a larger cluster to be developed in the first phase”*. (jam para 11.17).
 - *“Based on the current market conditions, the nature of the long-run demand forecast, the existing and emerging demand drivers and our understanding of site availability of sites we would anticipate the following pattern of demand:*
 - *Short-term - Innovation Mall and potential next sub-phase of Sovereign Harbour the end of the period as the Innovation Mall begins to establish the market in this location.*
 - *Medium Term – further phase at Sovereign Harbour as the market becomes more aware of the opportunity as this is established as an office location.*
 - *Medium/Long Term – a more significant quantum of development within the town centre”* (B/GVA para 1.64).
 - *“Financial viability is only one consideration of the Sustainability Appraisal but we also need to consider wider deliverability of any proposed policy...”* (B/GVA para 1.38).
 - *“Deliverability in this context needs to focus on market factors outside the financial considerations...”* (B/GVA para 1.39).
- 8.02 Both B/GVA and jam acknowledge that there is no short or medium term prospect of financial viability being achieved at Sovereign Harbour although the degree of non-viability differs. In effect, they both expect a period of state subsidised schemes on the Innovation Park, to precede the eventual market viability of office development at Sovereign Harbour because of the critical mass that has been achieved.
- 8.03 For the reasons set out in our report, we can find no justification for this conclusion. On any reading of the market and its future, it is not difficult to conclude that, as the open market has proved for the last 25 years:
- Sovereign Harbour is not and will never be, an acceptable or viable out of town office location.

- The gap between cost and value can only be expected to widen when taking into account the large gap currently, the modest rise in market rents that can at best be assumed and the inevitable and ever-increasing cost of construction.
- There is no precedent in the Southeast for an office location such as Sovereign Harbour being established in the way predicted by jam and B/GVA. The office market, which comprises occupiers and developers as well as those seeking to fund development in the short or long term, simply will never accept locations such as Sovereign Harbour as being acceptable.
- The market is and will continue to demonstrate, as it has for the last quarter of a century, that office occupiers needing offices in or near Eastbourne, will only look at town centre or A22 locations. There is neither the critical mass of demand nor sufficient state funding available to finance the expectations set out in the Sustainability Appraisal.
- The absence of concrete evidence or a properly argued viability case demonstrates that in reality, our argument is accepted by B/GVA who instead are left to rely on unsupported expectations.

8.04 We are satisfied that the supply of employment land now reserved to B1(a) office use on Site 6 is more than enough to satisfy the predictable demand throughout the Plan period and beyond. Thus we conclude that no useful purpose will be served by retaining Site 7A for B1(a) offices. It will be far better if that land were released now for general employment use.

8.05 The fact that undeveloped employment land on Site 6 is very likely to overhang the market well beyond the Plan period will inevitably mean Site 7A will continue to remain derelict. The permitted capacity for employment development on Site 6 is 15,000 sq.m. Given the take-up to date of 350 sq.m (GIA) at Pacific House in Year 1, this equates to a 43 year supply.

APPENDIX A

PACIFIC HOUSE

PACIFIC HOUSE, INNOVATION PARK, PACIFIC DRIVE, SOVEREIGN HARBOUR, EASTBOURNE.

Analysis of the scheme:

- (Notes: I. The analysis below is based on published information and enquiries. SeaChange have declined a written request submitted through their agent to confirm the market lettings and the outcome to date of marketing generally.
- II. Unless stated otherwise all areas are expressed as NIA (net internal floor area).

1. History

- 2013** Public knowledge of proposed office scheme.
- 2014** March - Planning Consent granted
April - Land acquired by SeaChange and scheme announced
September - Construction commenced
- 2015** August – building completed

2. The Scheme

The Innovation Park is planned to comprise a total of 11,100 sq.m NIA of B1(a) space:

- Pacific house – 2,346 sq.m (25,235 sq.ft) grade A offices designed to attract small space users.
- Further buildings to provide a further 9,787 sq.m (106,286 sq.ft) of offices.
- To date, investment in site infrastructure only comprises an access road from Pacific Drive to the entrance of the Pacific House car park.

3. Pacific House.

In summary the building comprises a 3-storey office building providing quality Grade A offices with modern energy efficient features. The building is designed with office suites on either side of a wide central atrium giving occupiers generous shared space and facilities.

The building has a very low gross to net space of about 70% [GIA of 3,300 sq m., and NIA of 2,345 sq.m] compared with an industry norm of about 85%.

4. Construction Costs

The reported estimated cost of the building, excluding land was £5.6m. This equates to £1,700 sq.m GIA. The actual construction costs have not been reported.

5. Outcome of Marketing to January 2016

- Lettings achieved - 4 suites let (1, 3, 10 and 11) = 293 sq m ((3,158 fs)
- A further 4 suites are reported to be “under offer”.
- Rent achieved not reported. Asking rents: £177.50 / sq m (£16.50/ fs). No details available of rent free periods or other incentives agreed.

- Lease term – from 6 months to 5 years certain. (Suite 11 has been let on 3 year lease)
- Tenancy subject to a Service Charge of approximately £5:00 / fs pa for insurance, reception, repairs and heating.
- No interest to date in the larger suites.
- Agents report that they are instructed not to quote terms or provide any information for the remainder of the land or the proposed buildings.

6. Analysis of the market for out of centre offices in the light of marketing Pacific House to date.

The lettings achieved to date represent 12% of the available space after 1 year of marketing. This is disappointing in the light of B/GVA's analysis of market demand:

- Market demand anticipated to be strong because of occupiers' requirements for "*access, security, parking, building specification*" (B/GVA para 1.47).
- The interest from occupiers predicted to be seeking "*to locate within an out of centre business park*" (B/GVA para 1.46) clearly does not exist in any significant volume.

Current marketing experience of offices in Polegate demonstrate that the market's demand for out of town centre offices is stronger for Polegate than Sovereign Harbour.

The rents sought for Pacific House, after adjustment for variations in facilities provided, lease terms and incentives, are in line with rents currently achievable in the town centre for refurbished Grade A space.



Sovereign Harbour

innovation park

Eastbourne

Pacific House – offices
from 627 to 25,235 sq ft

Sites for up to a further
80,000 sq ft

Prestigious coastal setting



Artist's impression

Pacific House – letting now

High quality business centre
 Completing summer 2015

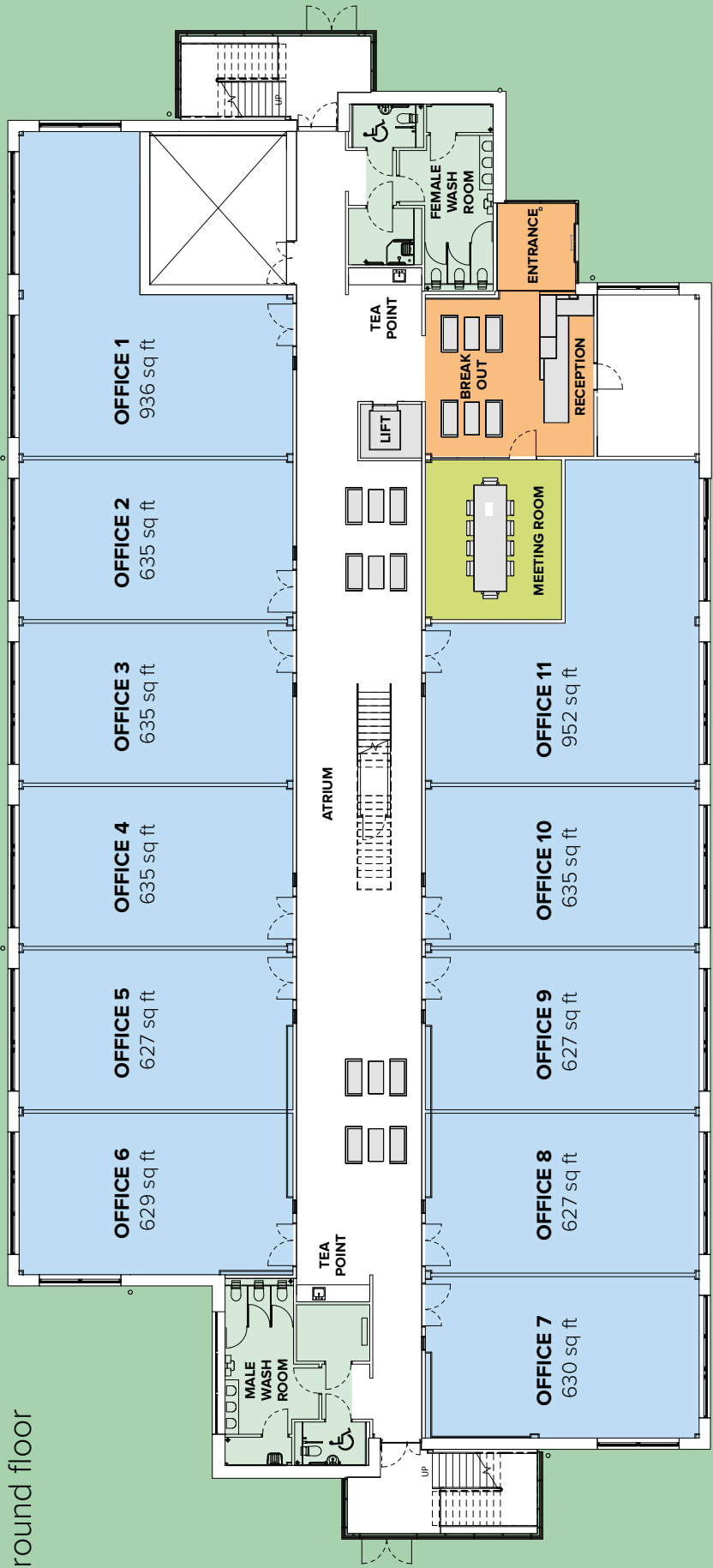
Offices from 627 sq ft to the full
 25,235 sq ft building

Central atrium & shared spaces
 Low energy building

130 parking spaces (1:195 sq ft)

Level	Sq ft (NIA)
Ground	7,568 sq ft
1	8,853 sq ft
2	8,814 sq ft
Total	25,235 sq ft

Ground floor



Pacific House – floor plan

Flexible accommodation for small, medium and large occupiers

Ground floor suites can be combined – and upper floors sub-divided – to suit

An economic development project from



For the latest on the Sovereign Harbour Innovation Park, visit www.seachangesussex.co.uk/our-programme/eastbourne

Location

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

Road

The A22 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.

MISREPRESENTATION ACT IMPORTANT. These particulars do not constitute either the whole or any part of an invitation, offer or contract in relation to the property described. No employee of Dyer & Hobbis, Cluttons or Bray Fox Smith has authority to make or give any representation or warranty, express or implied, on behalf of any party in relation to the property. Whilst the particulars are given in good faith, intending purchasers or tenants must satisfy themselves independently as to the accuracy of all matters on which they intend to rely. All negotiations are subject to contract.

March 2015



Richard Harding
020 7629 5456
richardharding@brayfoxsmith.com



Chris Broome
01273 738 383
christopher.broome@cluttons.com



Alex Hobbis
01424 423 626
ahobbis@doyerandhobbis.com

Offices within a new high quality Business Centre completing Summer 2015

Unit 2 Pacific House Sovereign Harbour Innovation Park Eastbourne East Sussex BN23 6DW
 To Let at £10,478 per annum



Accommodation

	sq ft	sq m
Ground floor office	635	59

Rateable Value

To be confirmed.

Terms

The property is available To Let via a new lease at a rent of £10,478 per annum plus VAT and Service Charge.

Features

- New Grade A Business Centre
- Competing Summer 2015
- Offices from 627sqft (58.2sqm) to 25,297sqft (2,350.1sqm)
- Central Atrium and shared facilities
- 3 car parking spaces
- EPC to be confirmed

Location

The property is located in this new high quality Business Centre within the Sovereign Harbour Innovation Park fronting directly the main A259 to Eastbourne town centre to the West with a connection to the A27 towards Brighton. Hastings is to the East with connections to Ashford, The Channel Tunnel and ferry ports.

Viewing

For further information or to arrange a viewing please contact sole agents

Alex Hobbis
 ahobbis@dyerandhobbis.com

2PHSHE/12/AH/3/DH/15



Pacific House, Sovereign Harbour Innovation Park

Floor	Unit	Size		Car parking spaces	Rent pax	Estimated RV pa	Budget service charge pa
		Sq.ft	Sq.m				
Ground	1	936	86.91	4	£15,444	£11,750	£4,897
	2	635	58.99	3	£10,478	£8,100	£3,322
	3	635	58.99	3	£10,478	£8,100	£3,322
	4	635	58.99	3	£10,478	£8,100	£3,322
	5	627	58.28	3	£10,346	£8,000	£3,280
	6	629	58.42	3	£10,379	£8,000	£3,291
	7	630	58.54	3	£10,395	£8,100	£3,296
	8	627	58.26	3	£10,346	£8,000	£3,280
	9	627	58.26	3	£10,346	£8,000	£3,280
	10	635	58.99	3	LET		
	11	952	88.47	4	£15,708	£12,000	£4,980
First	12	1,897	176.24	7	£32,249	£22,500	£9,923
	13	1,268	117.80	6	£21,556	£15,000	£6,633
	14	1,258	116.83	6	£21,386	£14,750	£6,581
	15	1,893	175.89	7	£32,181	£22,500	£9,902
	16	1,268	117.78	6	£21,556	£15,000	£6,633
	17	1,269	117.93	6	£21,573	£15,000	£6,638
	Second	18	4,402	408.96	21	£74,834	£52,000
19		4,412	409.88	21	£75,004	£52,500	£23,079

Please Note:

1. Units can be combined to suit occupiers’ size requirements. All the above floor areas are on a net internal basis and have been taken from current plans. These may be liable to alterations during the construction works. All potential tenants must satisfy themselves as to the actual floor areas by on-site measurements upon completion of the building works.
2. An additional 15 parking spaces will be designated for visitors and blue badge holders.
3. All rents are exclusive of business rates, VAT, service charge and all other outgoings and are to be paid quarterly in advance by direct debit or electronic transfer.
4. Service charge is payable by each tenant towards the cost of the day to day management and maintenance of the building, common parts and external areas. Includes central heating costs for each unit.
5. VAT will be payable upon rent and service charge.
6. Tenants pay direct to suppliers for all utilities used within the unit (except central heating) and for telecoms/broadband.
7. Tenants to provide a deposit equal to a minimum of 3 months rent, to be held for the whole term.
8. Each unit to be separately assessed for business rates and tenant pays direct to local authority

APPENDIX B

**CHAUCER BUSINESS PARK,
POLEGATE**

Chaucer Business Park
Dittons Road
Polegate
East Sussex
BN26 6JF

New Quality Grade 'A' Offices with
Parking

A+ Energy Efficiency Rating

1,250 sq ft – 19,200 sq ft

To Let

Anticipated Completion –
2016

Pre-lets available now

February 2016

Representations on Revised Proposed Submission Version

**STILES
HAROLD
WILLIAMS**
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making property work

Page 241

Location

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

Travel times/distances by car (Approx)		Travel times by train (to Polegate)	
Polegate	3.2 miles	Eastbourne	6 mins
Eastbourne	5.0 miles	Hastings	37 mins
Hastings	15.24 miles	Brighton	24 mins
Brighton	19.5 miles	Gatwick	45 mins
Gatwick	45.62 miles	London Victoria	78 mins
London	69.2 miles		

Terms

On Application

Legal Costs

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

Description

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

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

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

Amenities

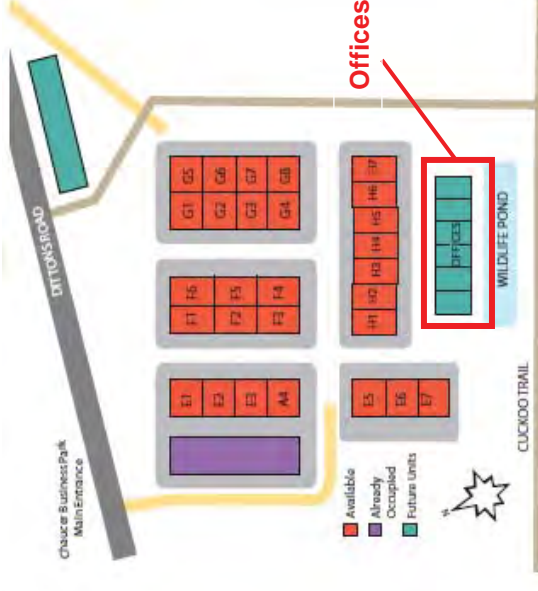
- Suspended ceiling with integrated lighting.
- Personnel doors.
- Allocated car parking.
- Fully carpeted throughout.
- Double glazed.
- Air conditioned.
- Raised floors.
- Male, female and disabled WCs.
- Ultra fast Broadband capabilities.

Rates

To be assessed

VAT

VAT will be chargeable on terms quoted



APPENDIX C

REDOUBT HOUSE, EDWARD WAY EASTBOURNE



Redoubt House, 1 Edward Road, Eastbourne, East Sussex, BN23 8AS | To Let

£14.50 per square foot

Details

Description

Redoubt House is a 3 storey purpose built detached office building constructed in approximately 2005 to a high standard with a steel frame and a combination of brick and curtain wall elevations under a pitched roof. The accommodation is located on the second floor with stairs and passenger lift providing access from a communal entrance. The office specification is considered Grade 'A' quality and benefits from an 8 person passenger lift, private male and female W.C.'s and kitchen.

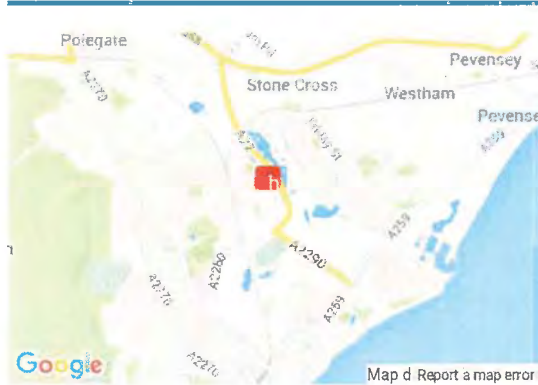


Click image to enlarge

Location

Eastbourne is situated some 62 miles south of London, 21 miles east of Brighton and 17 miles west of Hastings. The town benefits from good transport links to London via the A22 and Brighton and Hastings via the A27. There are regular train services to London Victoria (1 hr 30 mins), Gatwick Airport (50 mins) and Ashford International (1 hr 9 mins). The nearest mainline train station is Hampden Park approximately 5 minutes walk from the premises.

Map



Situation

Redoubt House is located approximately 3 miles to the north of the town centre in a busy commercial area. Nearby occupiers include HSBC Commercial Banking, Travelodge, Caffyns Audi Car Dealership, Morrisons Supermarket, Bannatyne Gym and numerous other car retailers and retail warehouse occupiers on the nearby Lottbridge Drove retail parks.

Lease

Available on a new standard Full Repairing and Insuring lease with terms to be agreed.

Rent

£14.50 per sq ft

Rates

According to the Valuation Office website the premises are described as follows:

Offices and Premises

Rateable Value: To be assessed

VAT

VAT is not applicable.

Legal Costs

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

Amenities

- Raised floors
- 8 person passenger lift
- Suspended ceilings
- Air conditioning

Employment Land Local Plan Representations on Revised Proposed Submission Version

- Kitchen area
- Private male & female W.C.'s

Contact

Hunt Commercial Property Ltd
 Suite 8
 5 Hyde Gardens
 Eastbourne
 East Sussex, BN21 4PN
 Tel: +44 (0)1323 700100

Sectors

Agency
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Locations

East Sussex
 Bexhill
 Eastbourne
 Hailsham
 Hastings
 Herstmonceux
 Horam
 Newhaven
 Peacehaven
 Pevensey Bay
 Polegate
 Seaford
 St Leonards
 Uckfield
 Westham

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APPENDIX D

**EXTRACTS FROM
BCIS CONSTRUCTION
COSTS/FORECASTS**

Part 1 · Forecasts

Summary

- ▷ Tender prices rose by 0.8% in 1st quarter 2015 compared with the final quarter of 2014, and by 4.5% compared with the same quarter in 2014.

	2Q2013	3Q2013	4Q2013	1Q2014	2Q2014	3Q2014	4Q2014	1Q2015
Percentage change on previous quarter	+0.9	-0.8	+2.1	+2.9	+4.9	-2.3	+1.2	+0.8

Source: OE (Jul 2015)

- ▷ The General Building Cost Index fell by 0.3% in 1st quarter 2015 compared with the final quarter of 2014, but rose by 0.6% compared with 1st quarter 2014.
- ▷ Materials prices remained unchanged in 1st quarter 2015 and nationally agreed wage rates rose by 2.5%. General inflation rose by 1.1% over this period.
- ▷ Little movement is expected in materials prices in the remainder of 2015, with domestic and Eurozone inflation very low. However, it is anticipated that prices will start to rise again in 2016, with an increase in the year to 2nd quarter 2016 of 2.3%; the increase being exaggerated by a fall in prices in 2nd quarter 2015. Over the following years, as both the construction and wider economies improve, upward pressure on materials prices will take increases from 2.6% in the year to 2nd quarter 2017 to 4.1% in the year to 2nd quarter 2019.
- ▷ Wage awards are expected to be settled at progressively higher rates during the forecast period, as stronger construction demand gives trade bodies a better wage bargaining position. As a result, it is anticipated that wage awards will rise from 3.0% over the first year of the forecast period to 3.9% over the final two years.
- ▷ New orders for construction work in Great Britain remained unchanged in 1st quarter 2015 compared with the previous quarter, but rose by 8% compared with a year earlier.
- ▷ It is anticipated that strong growth in new work output will continue into 2015 and 2016, with increases of 5% in both years. Growth is expected to moderate in 2017 to 3%, rising at a faster rate of 4% in 2018 and 2019.
- ▷ Following the strong increases in annual tender prices in the last three quarters of 2014, it is anticipated that annual tender price increases will moderate in 2015, as contractors start to cope with the increasing workload. Over the first year of the forecast period, tender prices are expected to rise by 4.2%, with relatively moderate increases in input costs. Moving forward, with workload continuing to grow, and with rising pressure from input cost increases, tender prices are expected to rise between an annual 4.5% and 6% over the remainder of the forecast period. By the end of the forecast period, it is anticipated that tender prices will be in the order of 33% higher than the pre-recession peak in 4th quarter 2007.

Summary of forecasts

Annual % change	2Q2013 to 2Q2014	2Q2014 to 2Q2015	2Q2015 to 2Q2016	2Q2016 to 2Q2017	2Q2017 to 2Q2018	2Q2018 to 2Q2019	2Q2019 to 2Q2020
Tender Prices	+9.3%	+1.2%	+4.2%	+5.9%	+4.9%	+5.3%	+4.7%
Building Costs	+0.6%	+0.9%	+2.5%	+3.4%	+3.6%	+3.7%	+4.1%
Nationally Agreed Wage Awards	+2.1%	+2.5%	+3.0%	+3.5%	+3.8%	+3.9%	+3.9%
Materials Prices	+0.4%	-0.8%	+2.3%	+2.6%	+2.9%	+3.9%	+4.1%
Retail Prices	+2.3%	+1.1%	+2.6%	+2.5%	+2.8%	+3.4%	+3.3%
Construction New Work Output*	+0.7%	+10.1%	+5.1%	+4.5%	+2.8%	+3.8%	+3.8%

* Year on Year (2Q13 to 2Q14 = 2012 to 2013)

24 Month forecast of indices

The forecasts of the Tender Price Index and the General Building Cost Index are based on the assumptions given below.

Assumptions

INFLATION.

The rate of general inflation will be around 1.5% in 2015, 2.5% in 2016, 2.8% in 2017, 3.1% in 2018, and 3.0% in 2019.

DEMAND.

New work output will rise by around 5.4% in 2015, by 4.4% in 2016, by 2.8% in 2017, by 3.6% in 2018, and by 4.2% in 2019.

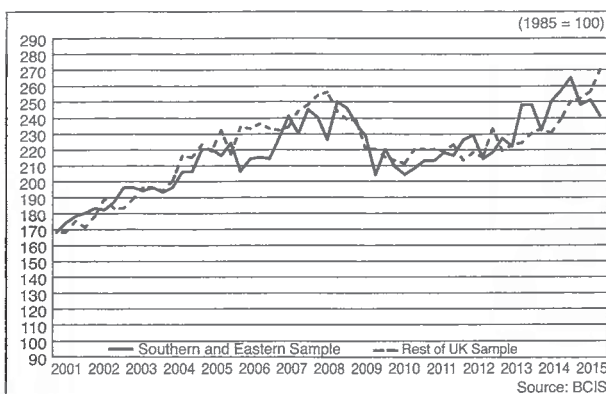
LABOUR.

Wage awards will be around 3% in 2015, and around 4% per annum in 2016 to 2019.

MATERIALS.

The annual rate of change in materials prices will be around a 1% fall in 2015 then rises of 2% in 2016, 3% in 2017 and 2018, and 4% in 2019.

Broad regional trends



Southern and Eastern, and Rest of UK Sample Indices

Note: Southern and Eastern Sample is defined as the areas enclosed by and including the counties of Norfolk, Cambridgeshire, Bedfordshire, Buckinghamshire, Oxfordshire, Wiltshire, Avon and Hampshire. Rest of UK Sample includes schemes in the Channel Islands.

Table 1.1 Forecasts Base 1985 mean = 100

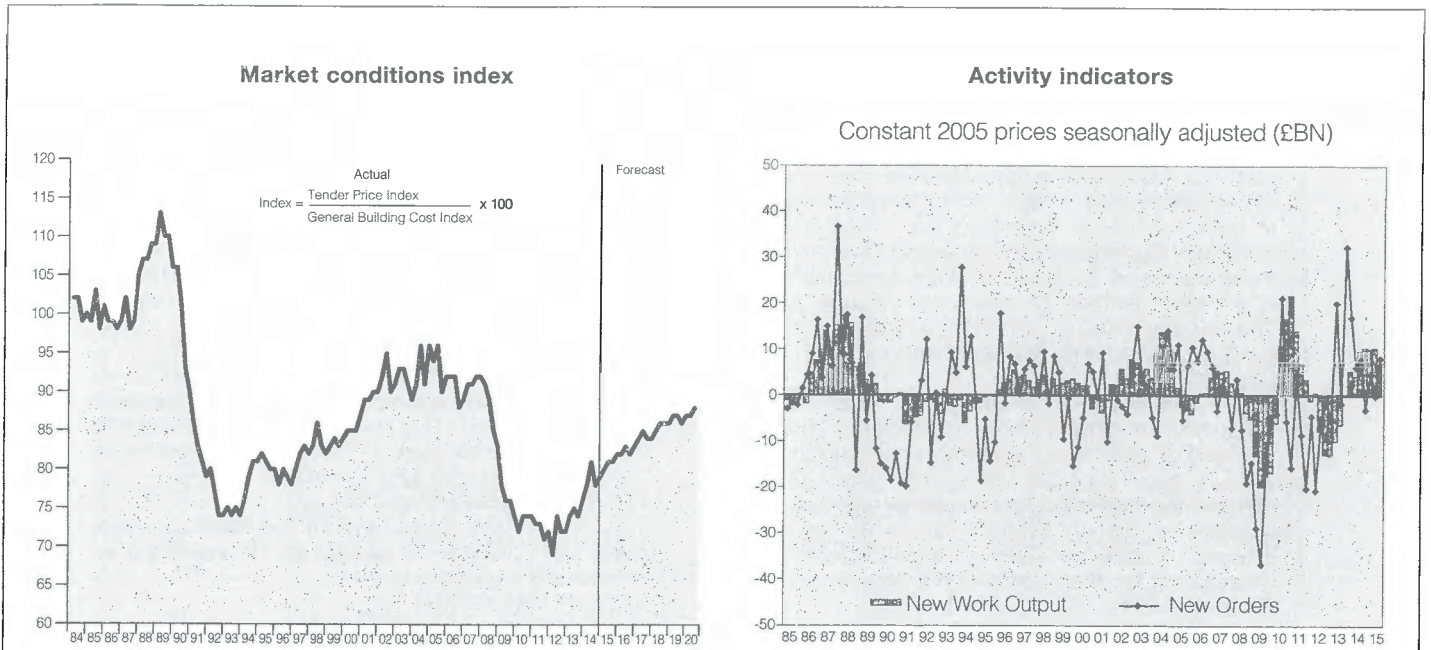
		BCIS All-in TPI*	General Building Cost Index
2007	i	239	262
	ii	241	265
	iii	248	270
	iv	251	271
2008	i	249	274
	ii	247	278
	iii	246	288
	iv	240	288
2009	i	223	285
	ii	216	284
	iii	216	285
	iv	212	287
2010	i	209	289
	ii	218	295
	iii	219	298
	iv	220	299
2011	i	219	302
	ii	223	305
	iii	220	308
	iv	223	309
2012	i	215	310
	ii	230	310
	iii	223	310
	iv	224	310
2013	i	234	314
	ii	236	314
	iii	234	313
	iv	239	314
2014	i	246	316
	ii	258	316
	iii	252	319
	iv	255	319
2015	i	257	318
	Forecast		
	ii	261	319(P)
	iii	264	322
2016	iv	266	323
	i	268	325
	ii	272	327
	iii	275	332
2017	iv	279	333
	i	283	335
	ii	288	338
	iii	290	343
2018	iv	293	344
	i	297	347
	ii	302	350
	iii	306	355
2019	iv	309	357
	i	314	360
	ii	318	363
	iii	321	369
2020	iv	324	371
	i	329	375
	ii	333	378

P = Provisional (Est) = Estimate
*See pages 8 and 9 for sample size and notes on indices.

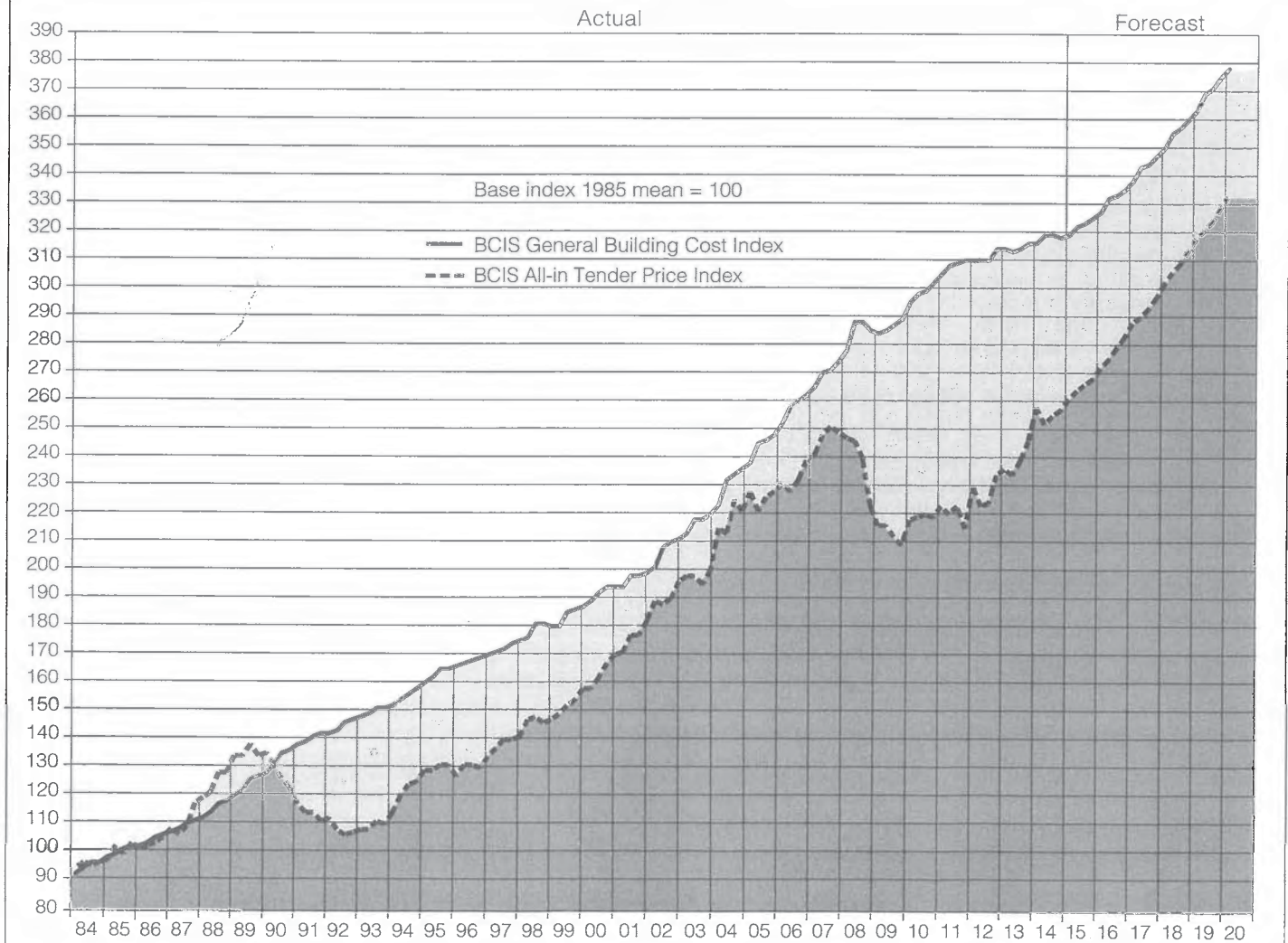
Table 1.2 Regional tender price index

Quarter	Southern & Eastern		Rest of UK		
	Index	Sample	Index	Sample	
2001	i	169	34	169	48
	ii	175	21	169	43
	iii	179	18	176	42
	iv	181	30	172	43
2002	i	184	18	179	38
	ii	183	22	190	37
	iii	188	22	184	29
	iv	197	22	184	41
2003	i	197	29	190	35
	ii	195	28	197	47
	iii	197	24	197	41
	iv	194	21	195	45
2004	i	197	22	201	51
	ii	207	26	217	42
	iii	207	21	216	44
	iv	221	33	224	47
2005	i	221	20	220	47
	ii	217	21	233	45
	iii	225	21	218	44
	iv	207	20	235	43
2006	i	215	20	234	56
	ii	216	30	237	55
	iii	215	30	234	45
	iv	228	23	233	38
2007	i	242	25	235	48
	ii	231	21	245	45
	iii	246	20	249	49
	iv	241	13	255	52
2008	i	227	16	257	50
	ii	251	19	245	49
	iii	247	24	240	30
	iv	237	19	239	31
2009	i	229	17	221	47
	ii	205	17	221	36
	iii	221	15	216	47
	iv	210	15	214	49
2010	i	205	13	212	50
	ii	209	17	221	28
	iii	214	13	221	29
	iv	214	19	221	30
2011	i	219	9	220	36
	ii	217	14	224	19
	iii	227	12	214	21
	iv	230	12	219	26
2012	i	215	11	216	31
	ii	219	5	234	25
	iii	228	10	220	23
	iv	223	11	224	25
2013	i	249	13	225	23
	ii	249	6	231	25
	iii	233	11	234	21
	iv	251	14	231	23
2014	i	258	11	240	23
	ii	266	12	251	17
	iii	249	9	253	14
	iv	252	12	257	11
2015	i	242	6	271	7

Building cost trends



Building cost trends



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