

EMPLOYMENT LAND LOCAL PLAN
**Statement of Consultation and
Representations**
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

Statement of Consultation and Representations

1.0 Introduction

- 1.1 This statement is produced in support of the Submission version of the Employment Land Local Plan. It sets out the details of consultation undertaken on the Employment Land Local Plan under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulation 2012, in order to comply with the requirements for Revised Proposed Submission as set out in Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulation 2012.
- 1.2 This report identifies: which bodies and persons were invited to make representations under regulation 18; how those bodies and persons were invited to make representations; a summary of the main issues raised by those representations; and how those main issues have been addressed. It also identifies representations made on the soundness of the Proposed Submission and Revised Proposed Submission versions.

2.0 Background

- 2.1 In May 2012, the Eastbourne Core Strategy Local Plan was subject to Public Examination by a Planning Inspector. The Inspector expressed concerns over the evidence that supported Core Strategy Policy D2: Economic, particularly relating to the employment land supply. The Inspector concluded that the evidence lacked clarity and did not demonstrate that Policy D2 was the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne. Furthermore she considered that uncertainty about the viability of directing 30,000 m² of employment floorspace to Sovereign Harbour cast doubt on whether the strategy was deliverable during the Plan period. This raised the question of whether the quantum of office development proposed in the Plan was based on accurate and up to date evidence.
- 2.2 The Inspector considered that if the adoption of the Plan were to be delayed to allow for the Plan to be revised, Eastbourne would be left without an up-to-date local plan and the Council would be unable to take a proactive, plan led approach to delivering development. To avoid such a delay the Inspector recommended that Policy D2 be the subject of an early review, leading to its replacement with an additional Local Plan to deal specifically with employment land supply.

Purpose of the Employment Land Local Plan

- 2.3 The Employment Land Local Plan will guide 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.
- 2.4 The Employment Land Local Plan will form part of the Development Plan for Eastbourne, alongside other planning policy documents such as the Eastbourne Core Strategy Local Plan. The Employment Land Local Plan will replace Core Strategy Policy D2: Economy, but will otherwise have to conform to other policies set out in the Core Strategy Local Plan as well as national planning policy.

3.0 Summary of Consultation Arrangements

- 3.1 Consultation on the Employment Land Local Plan under regulation 18 was undertaken in two stages. Firstly, stakeholders were invited to make representations about what the Employment Land Local Plan ought to contain through a questionnaire, which was conducted in the pre-production stage in summer 2013. Secondly, a Draft Employment Land Local Plan was published for consultation over the winter of 2013/14 and stakeholders were invited to comment on the draft and answer specific questions about a range of issues, including the options considered.
- 3.2 A Proposed Submission version of the Employment Land Local Plan was published in December 2014 to receive representations on issues of soundness before submission to the Secretary of State for Examination. However, as a result of representations received, amendments were required, particularly to the Sustainability Appraisal, and a Revised Proposed Submission version was published for representations in December 2015.

Pre-production Engagement exercise

- 3.3 The stakeholder engagement took the form of a questionnaire. Stakeholders were invited to make representations about what the Employment Land Local Plan ought to contain by completing the questionnaire. Representations were accepted for a 6 week period between 21 June and 2 August 2013.
- 3.4 The purpose of the questionnaire was to ask for comments on the draft objectives and the identified issues that the Employment Land Local Plan should address. It also asked if there were any business-specific issues that they wanted to raise, and if there was anything else that the Employment Land Local Plan ought to contain.

3.5 The questionnaire outlined a number of draft objectives for the Employment Land Local Plan. The draft objectives of the Employment Land Local Plan identified were:

- To stimulate sustainable economic growth to meet the needs of the community within environmental constraints and create a new economic image to attract highly skilled talent to come to and stay in Eastbourne
- To deliver a wide range of new employment opportunities by providing an improved range, flexibility and quality of employment and mixed use business space for use by local firms and speculative investors
- To support job growth and economic development, and broaden the economic base to enable innovation and entrepreneurship to flourish

3.6 The questionnaire also identified a number of issues that it was considered that the Employment Land Local Plan should address. These issues were:

- The requirement for additional employment land up to 2027
- Identification of sites to assist in meeting the requirement for employment land
- Need for job creation and diversification
- Development that provides for start-up businesses
- Maximising the use of existing employment land in the town
- Requirements for office space in the Town Centre
- The suitability and viability of land at Sovereign Harbour for employment use
- Loss of employment land to residential use
- The suitability of current commercial premises
- High levels of travel to work by car
- Energy efficiency in commercial premises

3.7 The questions that the stakeholders were invited to answer were:

- Question 1: Do you agree with the draft objectives?
- Question 2: Are there any other general issues that you think the Employment Land Local Plan should address?
- Question 3: Are there any other issues specific to your business interest that we should be aware of?
- Question 4: Is there anything else that you think the Employment Land Local Plan ought to contain?

Draft Employment Land Local Plan

3.8 The Draft Employment Land Local Plan was published for a 12 week consultation period between 20 December 2013 and 14 March 2014 in order to obtain the public and stakeholder's views on what the ELLP ought to contain. As well as identifying the proposed strategy and approach to the employment land supply over the Core Strategy plan period up to 2027, it

also identified the other options that were considered in the formulation of the plan. The Draft Employment Land Local Plan took into account representations that were received through pre-production stakeholder engagement.

3.9 The Draft Employment Land Local Plan asked consultees to comment on the proposed approach, whether they consider that the correct option has been taken, and whether there are any other options that should have been considered in the formulation of the Plan. It was possible for consultees to comment on any part of the Draft Employment Land Local Plan, however the document identifies particular questions throughout that consultees are specifically asked to comment on.

3.10 The questions that were asked through the Draft Employment Land Local Plan were:

- Question 1: Are there any other issues that should be taken into account or should influence the Proposed Draft Employment Land Local Plan?
- Question 2: Do you agree with the Vision for the Employment Land Local Plan?
- Question 3: Do you agree with the Objectives for the Employment Land Local Plan?
- Question 4: Do you agree with the assessment of the scenarios for the employment land strategy and distribution?
- Question 5: Are there any other scenarios that have not been considered but should be?
- Question 6: Do you agree with the preferred option?
- Question 7: Do you agree with the proposed approach to the distribution of employment land?

Proposed Submission Version

3.11 The Proposed Submission Employment Land Local Plan was published for an 8 week period between 12 December 2014 and 6 February 2015 to receive representations on the soundness and legal compliance of the plan. They were also asked if they would like to take part in the Examination of the Employment Land Local Plan.

Revised Proposed Submission Version

3.12 Following a review and revision of the Sustainability Appraisal, a Revised Proposed Submission version of the Employment Land Local Plan was published for a 6 week period between 11 December 2015 and 22 January 2016 to receive additional representations on the soundness and legal compliance of the plan. These representations are additional to those received on the Proposed Submission version, which still stand.

4.0 Which stakeholders were invited to make representations?

- 4.1 Eastbourne Borough Council maintains a mailing list of all bodies, organisations and individuals that have previously asked to be kept informed about the preparation of planning policy documents. All stakeholders on the mailing list were notified by email or letter of the pre-production questionnaire and the consultation on the Draft Employment Land Local Plan.
- 4.2 In addition, selected stakeholders who it was considered would have a specific interest in the production of the Employment Land Local Plan were notified of the consultations. This included some stakeholders who were not on the mailing list but it was considered may have an interest in the production of the Plan.
- 4.3 The stakeholders who were notified included: all statutory consultees, large employers located on industrial estates, landowners and agents, enterprise-related agencies, the Chamber of Commerce, and the Federation of Small Businesses. In addition, all properties located on the town's industrial estates were sent a letter informing them of the consultation on the Draft Employment Land Local Plan. A full list of stakeholders who were notified of the consultations is included in Appendix 1.

5.0 How stakeholder were invited to make representations

- 5.1 Questionnaire was made available on-line via the Eastbourne Borough Council Consultation Portal or by returning a paper copy via post. The questionnaire was available for a six week period between 21 June and 2 August 2013. A copy of the questionnaire is contained within Appendix 2.
- 5.2 The Draft Employment Land Local Plan was made available on-line and in paper form via a number of deposit points for a 12 week period. The Eastbourne Borough Council website was updated so that the consultation was listed on the Home page.
- 5.3 A summary leaflet was produced and sent out with the letters notifying stakeholders of the consultation. The summary leaflet outlined the background to the Employment Land Local Plan, set out the requirement for employment land and identified the six different options for how employment land could be delivered. It directed stakeholders to the on-line consultation portal in order to make representations. A copy of the summary leaflet is contained in Appendix 3.
- 5.4 Stakeholders were invited to a stakeholder event that was arranged for Wednesday 29 January 2014, and asked to confirm if they would like to attend. Only one stakeholder confirmed that they would like to attend, so the

event was cancelled and a separate meeting was arranged with the stakeholder to discuss the Employment Land Local Plan.

- 5.5 A static unmanned exhibition was put on display in the Eastbourne Central Library during the consultation period. This explained the background to the Employment Land Local Plan, why it is being produced, and what it contained. It also directed the public on how they could make a representation.
- 5.6 In addition, a Drop-in session was held on Wednesday 5 February 2014 at the Kings Centre, 27 Edison Road, Eastbourne, BN23 6PT, which allowed the community and local businesses to drop in between 1pm and 5pm to speak to an officer and find out more about the Employment Land Local Plan. The venue was chosen due to its location within an industrial estate (Highfield South), and close proximity to other main industrial estates in the town.
- 5.7 The Proposed Submission version of the Employment Land Local Plan was made available on-line and paper form via a number of deposit points for the 8 week period. Stakeholders were informed about the representation period via letter and email.
- 5.8 The Revised Proposed Submission version of the Employment Land Local Plan was made available on-line and paper form via the deposit points for the 6 week period. Stakeholders were informed about the representation period via letter and email.

6.0 Main Issues

Pre-production Engagement

- 6.1 A total of 22 questionnaire responses were received during the pre-production representation period from residents, business, landowners and other organisations.
- 6.2 There was general agreement on the draft objectives, although it was suggested that they should be more closely linked to the issues. In addition, it was suggested that 'a range of sites' should be referenced.
- 6.3 In terms of issues that the Employment Land Local Plan should address, comments were made relating to providing attractive, flexible and affordable business accommodation for all business sizes, particularly small, micro and start-up businesses. In addition, it was suggested that the issues be grouped into demand issues and supply issues.
- 6.4 Comments were made relating to the importance of retaining young and intelligent people in Eastbourne, provision of infrastructure for local businesses, particularly IT and communications infrastructure, maintaining

consistency with the Core Strategy and Town Centre Local Plan. In addition, issues relating to sustainability and energy efficiency were raised.

- 6.5 A table containing the responses to the representations received during the pre-production engagement is contained within Appendix 4.

Draft Employment Land Local Plan

- 6.6 A total of 33 representations were received from 10 organisations and individuals during the consultation on the Draft Employment Land Local Plan. A summary of the main issues raised is provided below.
- 6.7 A table containing the responses to the representations received on the Draft Employment Land Local Plan is contained within Appendix 5, and a Schedule of Changes made as a result of these representations is contained in Appendix 6.

Sovereign Harbour Limited (SHL)

- 6.8 Sovereign Harbour Limited (SHL) own land at Sovereign Harbour. SHL's representation to the Draft ELLP and Initial SA/SEA Report were in relation to the amount of office space allocated for the Town Centre.
- 6.9 SHL stated that the provision of 3,000sqm of office space in the Town Centre was not objectively assessed. It is stated that as a 'Town Centre use', office space should firstly be directed toward the Town Centre rather than out of centre locations such as Sovereign Harbour. It is maintained that the ELLP does not consider all reasonable alternatives in relation to the amount of provision of office space in the Town Centre, and that there is capacity in the Town Centre for the amount of office space to be significantly increased. Therefore the requirement for office space should be rebalanced away from Sovereign Harbour and towards the Town Centre.
- 6.10 It is also claimed that the proposed allocation at Sovereign Harbour is unviable in commercial terms because the longstanding viability constraints on Site 7 will be exacerbated further by subsidised provision on Site 6, against which Sites 4 and 7 will be unable to compete in financial terms.
- 6.11 In addition, it is claimed that the density assumptions used in the ELLP of 12 sqm per office job is too high, and should be 8-10 sqm per office job in line with the development of the Innovation Mall.

ALDI Stores Ltd

- 6.12 ALDI have an interest in the former Cosmetica site on the Brampton Road Industrial Estate. ALDI object to the Plan in relation to the proposed

protection of sites within Industrial Estates from redevelopment to non-industrial uses. It is maintained that the site is genuinely redundant for Industrial uses, and policies in the ELLP would result in the site remaining vacant in the long term. They state that this approach is contrary to the National Planning Policy Framework.

Richard Maile

- 6.13 Richard Maile owns land in Eastbourne Park off Lottbridge Drove adjoining the Hammonds Drive Police Custody Centre. Mr Maile's representation provides an analysis on all of the options considered, including comments on the advantages and disadvantages, and concludes that Option 2: Extensions to Industrial Estates should be included in the ELLP, on the basis that there is developer interest in the land off Hammonds Drive and it could provide benefits such as improved access, enhanced visual and environmental benefits and the possibility of immediate development. In addition, it could also bring with it highway benefits in providing part of the access for the St Anthony's Link, which in itself could bring benefits in terms of the viability of the Sovereign Harbour sites.

Sussex Police

- 6.14 Sussex Police own land within the Hammonds Drive Industrial Estate. Sussex Police welcome the overall approach to employment development in Eastbourne, but object to the restriction of only allowing Industrial development within the Industrial Estates as this would prohibit further expansion of the Police Custody Centre if the need arose over the Plan period.

East Sussex County Council

- 6.15 East Sussex County Council request a number of minor additions and points of clarification. These include links to other strategies including the South East Local Economic Partnership, reference to inward investment and clarification on points of evidence.

Gardners Books

- 6.16 Gardners Books own land on the Highfield (South) Industrial Estate. Gardners Books support the proposed approach to employment land in the ELLP, and would not support development in Eastbourne Park. In addition, it is felt that there is a shortage of large office/industrial units and these sites should not be lost to other types of development such as retail.

Southern Water

- 6.17 Southern Water request amendments to policies to require employment development design and layout avoids building over Southern Water infrastructure.
- 6.18 Other representations were received from Natural England, the Highways Agency and the Marine Management Organisation. None of these responders had any specific comments.

Proposed Submission Version

- 6.19 A total of 38 representations on the soundness of the ELLP were received from 13 individuals or organisations and individuals following the publication of the Proposed Submission version of the ELLP. A summary of the main issues raised is provided below.
- 6.20 A table containing the responses to the representations received on the Proposed Submission Employment Land Local Plan is contained within Appendix 7, and a Schedule of Changes made as a result of these representations is contained in Appendix 8.

Sovereign Harbour Limited (SHL)

- 6.21 The SHL representation on the Proposed Submission ELLP can be summarised into five main points:
1. The calculation of the amount of office space required is not transparent and has been overestimated
 2. The ELLP does not provide a full understanding of the local office market
 3. Offices, as a town centre use, should firstly be directed to the town centre. The proposed strategy will further downgrading of the quantity, quality and choice of office space in the town centre.
 4. The sites identified at Sovereign Harbour are not viable for the full allocation of office space
 5. The Sustainability Appraisal applies inconsistent scoring, does not take account of relevant evidence and market indicators and fails to appraise all relevant alternative options.
- 6.22 SHL proposed a new scenario for the allocation of office space in Eastbourne, based upon restricting office provision at Sovereign Harbour to 11,100 sqm, increasing the Town Centre office allocation to 8,900 sqm, and providing 3,000 sqm of office space within the Eastbourne-Hailsham corridor.
- 6.23 In addition, SHL state that the 'Changes to the Policies Map' document does not reflect the land available for development on the sites at Sovereign Harbour.

Richard Maile

6.24 Mr Maile states that the Council has failed to meet the requirements of the NPPF to meet the economic needs of the town, and the reliance upon the intensification of industrial estates is totally without merit. In addition, the allocation at Sovereign Harbour has not come forward for a considerable period and is a poor location for employment use.

East Sussex County Council

6.25 East Sussex County Council supports the plan and agrees with the strategy, although recommends that the amount of new space occupied should be included as an indicator in the monitoring framework.

Seachange Sussex

6.26 Seachange Sussex are providing economic regeneration in Eastbourne through the development of a site at Sovereign Harbour, and supports the full development of the employment land allocation at Sovereign Harbour and the Employment Land Local Plan proposals as a minimum.

Derek Godfrey

6.27 Derek Godfrey would like to take part in the examination due to his position as a Board member of the Local Enterprise Partnership and Portfolio Holder for Economic Development for the Eastbourne and District Chamber of Commerce.

John & Helen Roe

6.28 Mrs and Mrs Roe state that there is no mention of Hyde Gardens as a central, prime office location in the Town Centre, and that there is an emphasis on high-salaried employment at the expense of lower-paid industrial and distribution trades.

Laurence Keeley

6.29 Mr Keeley proposes an Employment Land Community Trust to provide affordable employment space and help businesses survive.

Environment Agency

6.30 The Environment Agency have not identified any issues with the soundness of the plan, and have identified no flood risk aspects that would affect their deliverability.

Natural England

6.31 Natural England support the strategy, but note that Eastbourne falls within the buffer zone of several SSSI's, including the Pevensey Levels, and the intensification of the Industrial Estates may create significant run-off or discharge into ditches need to be carefully considered and include appropriate measures to protect water courses. In addition, care should also be taken that development at Sovereign Harbour does not impact on the nearby areas of vegetated shingle.

South East Water

6.32 South East Water note that there is no mention of water in the plan, and encourage the implementation of BREEAM standards in new commercial premises to ensure that water demands are kept to a minimum.

Other

6.33 Representations received from the Highways Agency, the Marine Management Organisation and the Health & Safety Executive confirm that they have no further comment.

Revised Proposed Submission

6.34 A total of 43 representations on the soundness of the Revised Proposed Submission version of the ELLP were received from 16 individuals or organisations. A summary of the main issues raised is provided below.

6.35 A table containing the responses to the representations received on the Revised Proposed Submission Employment Land Local Plan is contained within Appendix 9.

Sovereign Harbour Ltd

6.36 The Revised Proposed Submission representation by Sovereign Harbour Limited (SHL) maintains their previous objections to the Employment Land Local Plan on the basis that the allocation of office space should be changed in order to provide 8,900 sqm in the Town Centre, 11,100sqm at Sovereign Harbour, and 3,000sqm within existing industrial estates. This will mean a reduction in the allocation at Sovereign Harbour, providing the opportunity for other higher value employment generating uses to be developed.

Richard Maile

- 6.37 Richard Maile maintains his previous objection to the Employment Land Local Plan on the basis that land to the north of Hammonds Drive should be identified for development. He maintains that there are limited opportunities for densification within the existing industrial estates, and with significant construction costs, whilst a unit is occupied and financially viable it is unlikely to be redeveloped. Therefore there is a need for his site for employment uses.

Seachange Sussex

- 6.38 Seachange Sussex submitted a representation supporting the provision of 20,000 sqm of employment space at Sovereign Harbour as the only location available to accommodate a critical mass of business space. In addition, Pacific House is letting at a satisfactory rate and infrastructure provision is being made for the development of the rest of Site 6. Seachange Sussex identify that Site 7a can add a single user site to the Sovereign Harbour Innovation Park, which would extend the offer to medium to large employers bringing quantum economic uplift and delivering a powerful marketing message of Sovereign Harbour as a business location.

Locate East Sussex

- 6.39 Locate East Sussex have identified a general scarcity of commercial space and development opportunities in the borough, and demand has outstripped supply which will lead to hikes in rent and sale prices. They are concerned with the amount of commercial space being converted for residential use, and that there are no current opportunities for growth for town centre based companies because of the lack of availability of larger premises in the borough. They also have concerns about Pacific House due to the relative cost premium, distance from town centre, broadband/fibre connectivity and limited public transport access.

Willingdon & Jevington Parish Council

- 6.40 Willingdon & Jevington Parish Council are concerned that there will be an increase in traffic on all road accesses to Eastbourne, including already congested A2270 at Willingdon and Polegate, and that employment land proposals must be considered alongside development proposals in south Wealden and improved local road infrastructure provided.

South Downs National Park Authority

- 6.41 The South Downs National Park Authority support the protection of the existing industrial estates and focusing development in the sustainable centres, and support measures to protect the office stock in the town centre as a gateway to the South Downs National Park and 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. They also support the fact that the quantum of employment development proposed does not create a requirement for additional highway infrastructure measures beyond those already proposed.

Health & Safety Executive

6.42 The Health & Safety Executive identified that there is the potential for land allocated to encroach on consultations zones.

Southern Gas Networks

6.43 Southern Gas Networks identified that sites at Sovereign Harbour lie on the extremity of the Medium Pressure Network and could require some localized reinforcement, and that Eastbourne Holder Station located within a Designated Industrial Estates, which would need to be relocated if the site were to be redeveloped.

Sustrans

6.44 Sustrans would like more emphasis on sustainable transport infrastructure, and the provision of taller buildings rather than development on greenfield sites.

Bespoke

6.45 Bespoke are a local cycling lobby group who would also like improvements in sustainable transport infrastructure, and would also like additional consideration of the links between Eastbourne and South Wealden.

Alison Price

6.46 Local resident Alison Price does not believe that there should be any additional office development in Sovereign Harbour as it could cause parking problems.

Other

6.47 Local resident Anne Schauerte, Highways England, Natural England, Historic England and the National Grid have no specific comments.

7.0 How issues have been addressed

Pre-production Engagement

- 7.1 The main issues raised during the pre-production questionnaire consultation were addressed through amendments made to the identified issues and objectives that were contained within the ELLP.
- 7.2 As suggested, the issues were separated into supply issues and demand issues. In addition, an additional issue relating to the cross boundary issues of demand and supply of employment land in Eastbourne and South Wealden was included.
- 7.3 The objectives were fully reviewed and re-written as a result of the questionnaire responses, particularly to ensure that they were more closely linked with the issues. The objectives were also amended to reference to identification of strategic locations for new employment floorspace, providing a range of employment sites, and that employment development should be directed towards sustainable locations.
- 7.4 As this consultation was pre-production, the issues raised were taken into account in the preparation of the Draft Employment Land Local Plan.

Draft Employment Land Local Plan

- 7.5 The main issues raised during the Draft Employment Land Local Plan have been addressed through amendments and changes to the Proposed Submission version of the Employment Land Local Plan. A table containing responses to the representations received during the consultation on the Draft Employment Land Local Plan is contained within Appendix 5.
- 7.6 The issue of increased office provision in the Town Centre raised by SHL has been addressed through the testing of an additional option for increased provision in the Sustainability Appraisal. Although it was considered a sustainable option, it was not considered to be as sustainable as the original option for 3,000sqm of office space in the Town Centre. Therefore, as it would not be possible to take forward both options, the original option was retained.
- 7.7 Additional evidence was sought on employment densities, and it was considered that given average densities in the South East, plus average densities of the sectors most prominent in Eastbourne, the existing density of 12sqm per employee was reasonable and appropriate.
- 7.8 In terms of viability at Sovereign Harbour, additional evidence suggested that the development is likely to become viable in the future, and the

development of the Innovation Mall to more likely to increase viability of development than compromise it.

- 7.9 The issues raised by Aldi has resulted in some amendments to Policy EL2: Industrial Estates to only allow that sites within industrial estates that are not needed in terms of the employment land supply and that cannot be upgraded to meet modern business standards to be redevelopment for alternative uses.
- 7.10 The allocation of land off Hammonds Drive was considered through the option of extending existing industrial estates. The Sustainability Appraisal did not consider this to be a sustainable option and therefore it was not taken forward in the Employment Land Local Plan.
- 7.11 A full schedule of changes to the Draft Employment Land Local Plan is contained within Appendix 6.

Proposed Submission version

- 7.12 The main issues raised during the Proposed Submission Employment Land Local Plan have been addressed through amendments and changes to the Revised Proposed Submission version of the Employment Land Local Plan. A table containing responses to the representations received during the consultation on the Proposed Submission version is contained within Appendix 7.
- 7.13 SHL's alternative proposals for office space allocations at Sovereign Harbour, the Town Centre and the Polegate-Hailsham Corridor were considered as part of a Revised Sustainability Appraisal. This concluded that the proposed alternatives put forward by SHL are not as sustainable as the Preferred Option because the Preferred Option provides a better balance of uses within the Borough offering greater choice and flexibility to the market. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region, can be addressed and more choice can be provided to investors and businesses. Also, any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential purposes in order to meet the established housing need.

- 7.14 The Revised Sustainability Appraisal addresses SHL's concerns about inconsistent scoring, taking account of relevant evidence and market indicators and appraising all relevant alternative options.
- 7.15 In order to address the concern that the ELLP does not provide a full understanding of the local office market, an Eastbourne Office Deliverability Assessment (BGVA, 2015) has been prepared. This identifies that there is a strategic need to diversify the office portfolio within Eastbourne, and that long term nature of office demand indicates that office floorspace will be delivered over the full plan period rather than the short term. It also recognises physical limitations to the level of floorspace that can be accommodated within the town centre given competition for land from other uses.
- 7.16 The assessment considers that a failure to protect employment land at Sovereign Harbour and deliver new space here would potentially 'waste' a major opportunity within the Borough to make a 'step change' in the market positioning of the borough. On its own the Innovation Mall will have a positive benefit on the Eastbourne economy however it is unlikely to be transformative or have significant impacts on other locations. Co-locating new floorspace alongside the Innovation Mall will potentially make much better use of the investment already made. The impacts of the Town Centre office allocations were assessed through the Revised Sustainability Appraisal.
- 7.17 In response to SHL's concern that offices should firstly be directed to the Town Centre, the proposal to increase the amount of office in Town Centre to 8,900sqm was tested as part of the Revised Sustainability Appraisal. This concluded that this provision would overall be less sustainable than the Preferred Option provision of 3,000 sqm because increasing the allocation in the Town Centre would reinforce the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region and does not fully reflect or respond to market signals. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential purposes in order to meet the established housing need.
- 7.18 The viability issues relating to the allocation at Sovereign Harbour, which was raised again by the SHL representation, have already been addressed through the preparation of the Employment Land Supplementary Evidence Report (GVA, 2014). This suggested that the development is likely to become viable in the future, and the development of the Innovation Mall (now known as Pacific House) is more likely to increase viability of development than compromise it.
- 7.19 The proposal to reduce the amount of office space at Sovereign Harbour to 11,100sqm has been tested as part of the Revised Sustainability Appraisal.

This concludes that the original position of 20,000sqm is the most sustainable position because any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre.

- 7.20 In response to Mr Maile's concerns that industrial estates could not accommodate 20,00 sqm of floorspace, the completion figures for the industrial estates over the plan period were recalculated. This showed that the intensification of the Industrial Estates has provided 5,049 sqm of industrial and warehouse space between 2012/13 and 2014/15, and it is considered that the delivery of the remaining 14,951 sqm (of which 3,722sqm is committed) is realistic over the remainder of the plan period.

Revised Proposed Submission

- 7.21 The main issues raised during the Revised Proposed Submission Employment Land Local Plan will be investigated through the Examination in Public. Some minor modifications have been proposed to address issues of clarity.
- 7.22 A table containing the Council's initial responses to the representations received during the consultation on the Revised Proposed Submission version is contained within Appendix 9.

8.0 Conclusion

- 8.1 This Statement of Consultation and Representations sets out who was consulted and how on the Employment Land Local Plan, and what was said and how this influenced the production of the plan.
- 8.2 Consultation on the Employment Land Local Plan took place in four parts. A pre-production questionnaire was published, asking stakeholders their opinions on the issues and objectives for the plan in summer 2013, and in winter 2013/14 a Draft Employment Land Local Plan was published for a 12 week consultation. This included specific questions about particular sections of the document. Following this, a Proposed Submission version was published for representations on issues of soundness, and following a revised Sustainability Appraisal, a Revised Proposed Submission version was published in 2015.
- 8.3 Representations received at all stages were considered and this has resulted in some amendments to the Employment Land Local Plan, which will now be submitted to the Secretary of State for public examination.

Appendices:

Appendix 1 – List of stakeholders consulted

Appendix 2 – Pre-production questionnaire

Appendix 3 – Summary leaflet

Appendix 4 – Table of Responses to Questionnaire

Appendix 5 – Table of Responses to Draft Employment Land Local Plan Representations

Appendix 6 – Schedule of Changes – Draft Employment Land Local Plan to Proposed Submission version

Appendix 7 – Table of Responses to Proposed Submission Employment Land Local Plan Representations

Appendix 8 – Schedule of Changes – Proposed Submission to Revised Proposed Submission

Appendix 9 – Table of Responses to Revised Proposed Submission Employment Land Local Plan Representations

Appendix 1 – List of stakeholders who were consulted

Specific Consultation Bodies

Name	Organisation
Rachel Bust	The Coal Authority
Stuart Stone	British Telecom
Andrew Murray	Department for Transport
Andrew Keer	East Sussex County Council
John Wheeler	East Sussex County Council
Simon Gwynne	East Sussex Hospitals NHS Trust
David Philliskirk	East Sussex Hospitals NHS Trust
Alan Byrne	English Heritage
Mark Luker	Environment Agency
N R Marsh	Health and Safety Executive
Garry Frostick	Highways Agency
Nawal Laazrak	Highways Agency
Steve Peggs	Network Rail
Lee Dance	South East Water PLC
David Sims	Southern Water
Damen Funnel	Sussex Police
Robin Smith	Sussex Police
Dennis Donovan	Sussex Police Community Safety Branch
Nick Wilkinson	Sussex Police Community Safety Branch
David Phillips	Wealden District Council

Name	Organisation
Carolyn Wilson	Mobile Operators Association
Lara Southam	South Downs National Park Authority
Sarah Harrison	Southern Water
Susan Solbra	Southern Water
Allison Coode	Westham Parish Council
Lin Baxter	Willingdon & Jevington Parish Council
	Marine Management Organisation
	O2 PLC
	MOD Safeguarding Defence Infrastructure Organisation
	The Crown Estate
	South East LEP Secretariat
	Home and Communities Agency
	Eastbourne, Hailsham and Seaford Clinical Commissioning Group
Stefan Preuss	National Grid
David Simpson	Scotia Gas Networks
Ian Brenkley	Renewable UK
Stuart Forrest	Southern Gas Networks
	EDF

General Consultation Bodies

Name	Organisation
	Old Town Tenants Association
I E Murray	T.A. Centre
Dawn Shearn	The Salvation Army Old Town
Tony Seabrook	
Andy Watkins	
R D Newton M.B.E.	Army Benevolent Fund
A Goldman	Eastbourne Seniors Club
Martin Writer	Park Practice
Ian R White	Victoria Baptist Church
Nigel Fergusson	
Brian Steer	
John Watson	
Anthony Charles Westlake	
Steven Jones	
Gary Ancell	British Transport Police

Name	Organisation
Stuart Dicker	The Salvation Army
Emma-Lisa Shiells	G L Hearn
Alana Murphy	Royal Yachting Association
W Bishop	St. Andrew's School
Emma Gladstone-Thompson	Strutt and Parker
Jenny Hennah	Holly Lodge
Rose Freeman	The Theatres Trust
Claire Ashdown	
Kerry Band	
S Isted	
Jocelyn McCarthy	
Flora Richards	
Emma Richards	
Clare Angela Wells	

Name	Organisation
Olive Woodall	
Adam Chugg	3VA
Andy Blaxland	Adams Hendry Consulting
John Trainor	Age Concern Eastbourne
Tom Casey	Amicus-Horizon
Philip Walmsley	Anchor Housing Association
Martyn Fletcher	Ansvar Insurance Co. Ltd.
Andy Stevens	ASP
A T H Beadle	Bannertown Group Ltd
Simon Barker	Barker Shorten Architects
J Bartle	Bartle Associates Ltd
Nicholas Ide	Batcheller Thacker
John Brindley	Bellway Homes
Frank Sims	Bexhill Hopsital
T S Boatwright	Bishop Bell CE Mathematics& Computing Specialist School
Sacha Winfield-Ferreira	BNP Paribas Real Estate
Vic Redman	BOC Edwards
Roger French	Brighton & Hove Bus and Coach Company
R A E Dobbs	C. Brewer & Sons Ltd.
Aaron Smith	Caldecotte Consultants
David Norwood	Camerons
M Orris	Carillon
M Dawkins	Cavendish School
W Plumridge	Centre Management Office
Roy Peacock	Chair Meads Neighbourhood Panel
Lee Watson	Challinor Hall Associates
Matt Holmes	Chichetser Diocesan Housing Association
Martyn Relf	Churches Together for Eastbourne
Colin Humphrey (ARIBA)	Colin Humphrey Chartered Architect, Surveyor
Philip West-Kelsey	Conservation Area Advisory Group
G J Hibbert R.I.B.A	Co-ordinated Design & Construction Ltd.
J Howes	Cornfield Law LLP
H Courtley	Courtley Consultants Ltd.
John Hurwood	CPRE Sussex, Wealden South Group
Kevin Scott	Cuerden Leisure
Michael Crook	Cushman & Wakefield; Healey & Baker
Graham Lade	Cyclists Touring Club
W Carter	D. Carter Builder & Decorator
David Foster	David Foster Associates
David Green	David Green & Co. Ltd.
Neil Brealey	Debenhams Department Store

Name	Organisation
Neil Wathen	Dental Practice Board
Sebastian Hanley	Dialogue
John Edgerton	Director, Enterprise Centre
Geoff Smith	DMH Stallard
Simon Hodges	DPS Architectural
Derek Tonkinson	East Dean Preservation Society
Nick Tapp	East Sussex Disability Association
David Lowe	East Sussex Downs & Weald PCT
Adrian Brown	East Sussex Fire & Rescue Service
Tim Whitmore	East Sussex Learning Partnership
Derrick Coffee	East Sussex Transport 2000
Ray Groves	Eastbourne & District Chamber of Commerce Ltd
Christina Ewbank	Eastbourne & District Chamber of Commerce Ltd.
Finbar O'Shea	Eastbourne & District Mind Association
Ian Watling	Eastbourne & District Scout Association
R Cripps	Eastbourne Astronomical Society
Chris Whitwell	Eastbourne Citizens Advice Bureau
M R H Lower	Eastbourne College
Kim Ramakrishnan	Eastbourne Cultural Communities Network
A B Moody	Eastbourne District General Hospital
Clive Gross	Eastbourne Green Party
Taleb Durgahee	Eastbourne Islamic Cultural Centre
John Crawshaw	Eastbourne Music & Arts Festival
Robin Reffell	Eastbourne Natural History & Archaeological Society
P J Bailey	Eastbourne R.F.C.
Graham Thompson	Eastbourne Rambling Club
Steve Thornett	Eastbourne Seniors Forum
Owen Boydell	Eastbourne Society
Peter Gray	Eastbourne Sovereign Sailing Club
Simon Pratt	Ethical Property Company
F J Malcolm Mair	F.J. Malcolm Mair
Martin Searle	Federation of Small Businesses
Chris Hookham	Friends of Hampden Park
Dave Dean	Frontier Community Project
C Kyriacou	Greek Orthodox Church
Greg Laye	Greg Laye Ltd.
Steve Rose	H.M.D. Sealess Pumps Ltd.
Howard Coote	Haine & Son
S Davies	Headmaster Eastbourne College
Jon Orrell	Hemsley Orrell Partnership

Name	Organisation
M D Rolfe	Hillman Smart & Spicer
Julian Peacock	Home Group (South)
Giles Wooley	Hotchkiss Ltd.
Bartholomew Wren	House Builders Federation
S Franks	Innerdale Hudson Architects
Mike Burgess	JobCentre Plus
R Crook	John D. Clarke & Partners
Gavin J Whippy	John F. Whippy & Company Limited
Roger Morehen	Kingston Morehen Chartered Surveyors
M Wellock	Lancashire Digital Technology Centre
Graeme Sanderson	Leisure Parks Ltd.
Paul Hoppen	Lewes District Council
T Carter	MAG/BMF Liason
Jeremy Fooks	Mason Property
Michael Chesson	Michael Chesson & Associates
Warren Finney	National Housing Federation South East
Tony Richards	NLA
Colin Mackenzie	Objective Corporation
Terry Monan	Osel Architecture
Chris Thomas	Outdoor Advertising Consultants
Mike Dixon	Park College Sussex Downs
Chris Wojtulanski	Parker Dann
Allen Anthony	Parsons Brinckerhoff
Paul Sharpe	Paul Sharpe Associates
	Peacock and Smith
Peter Moore	People Matters Charity
Phil Hull	Persimmon
Alex King	Planning Issues
Jonathon Stoddart	Premier Marinas
Alan W Atkinson	Probus Club of Eastbourne
Paul T Smith F.R.I.C.S	PTS Land Chartered Surveyors
Tim Jeffrey	Queens Estate Residents Association
J Sherwood	R.M.A. Eastbourne
R. Birtles	R.P.S.
Rob Bailey	Raglan Housing Association
John Walker	Raglan Housing Association Ltd.
Ivor Hueting	Railfuture Coastway Division
T Cropper	Rapleys
Malcolm Rasala	Real Creatives Global
M Lockhart-Smith	Rich Investments Eastbourne Ltd.
A Iriwn	Rodmill Residents Association

Name	Organisation
Kevin Barry	Rodney Warren & Co.
David Marlow	Rother District Council
Rupert Kirby	Royal Bank of Scotland
Dave Wright	Shinewater Sports & Community Centre
C J Smith	Smith & Ouzman Ltd.
G Amy	South Downs Badger Protection Group
Steve McGovern	Southern Housing Group
Mike Gibson	Southern Railway
Derek Legg	St. Johns Guild For The Blind
A Campbell	St. Richard's Catholic College
Lindsay Paris	Stagecoach
Mark McFadden	Stiles Harold Williams
Robert Stiles	Stiles Harold Williams
Bob Mayfield	Stonham
M Courtnage	Stredder Pearce
Patrick Griffin	Strutt & Parker
Craig Noel	Strutt & Parker
Tom Richardson	Strutt & Parker
Henri Brocklebank	Sussex Biodiversity Record Centre
Graham P Thompson	Sussex County Playing Fields Association
Andy Beatty	Sussex Downs Conservation Board
Mark Froud	Sussex Enterprise
Tony James	TCMI
Martin Miller	Terence O'Rourke
Joseph McDonald	Tetlow King Planning
John W Cornwell	The Bell Cornwell Partnership
Howard Wardle	The Bridgemere Centre
G.W Payne	The Causeway School
Richard Crook	The Eastbourne Society
Bill Watkins	The Entertainers Variety Group
C Davies-Gilbert	The Gilbert Estate
Jonathan Light	The National Trust
Alexander Bateman	The Planning Bureau
Nigel Pugsley	The Planning Bureau Ltd.
Ian Muldoon	The RSPB Eastbourne and District Local Group
Richard Holder	The Victorian Society
Mike Tingley	Tingley Commercial
O Machan	TRANSCO Asset Planning
Neil McGuire	Transport and Environment, East Sussex County Council
Trevor J Hall	Trevor J. Hall Ltd.
T S Richardson	Trustees of the Chatsworth Settlement
Chris Deeks	Turley Associates

Name	Organisation
Barry Cansfield	Turley Associates
Steven Goss-Turner	University of Brighton
Rod Malinder	University of Brighton
Simon Lovell	Warden Housing Association
Matthew Ashton	Westwaddy ADP
Andrew Steen	White & Sons
Simon Metcalf	White Young Green Planning
Gary Morris	White Young Green Planning
Bill Morle	Wilks Head & Eve
Ian Jungius	Willingdon Community School
David McGowan	WTR & TA
M P Staniland	Yorkshire Building Society
Colin Akers	
D Atkinson	
Patrick Douglas Attenborough	
J D Austen	
Peter Austin	Eastbourne Society
Peter Barker	
N G Barnardiston	
H Bell	
David Bond	
Gerald Bonnick	
John Boyle	
Iain Brogden	
R & P Bunn	
Anthony Burnham	
Graham Cameron	
Christopher Cave	
Dilip Chudasama	
S Claxton	
Douglas Clowes	
Glen Coates	
David Coates	
K Commins	
Trevor Coomber	
Martin Cooper	
Robert Cooper	
John Cooper	
Ian Coupland	
Bruno Di Lieto	
Mark Dickman	
James Dingwall	
Simon Christopher Draper	

Name	Organisation
J Driver	
Jonas Elsen-Carter	
Kevin Feakins	
A Forman	
Robert Fountain	
Brian Freeland	
Robin Gardner	
G Gatling	
Frank Glyn-Jones	
Leonard Greene	
Stuart Greenway	
John Greenwood	
J Haffenden	
David Hall	
P Harffey	
Norman Harris	
Brian Harrison	
Michael Haselip	
Judd Hinchliffe	
Damien Holdstock	
T Hollobone OBE	
Nick Jordan	
Lawrence Keeley	
Moiz Khanbhai	
Roger Kiernan	
John Knowles	
Heinz Kumposcht	
Bob Lacey	
Rod Langridge	
Derek Ley	
Adrian Ley	
M Littlemore	
Peter Lloyd	
Basil Lynch	
Richard Maile	
Jaffer Manek	
Tim Martin	
John Patrick Massey	
Dick McMahon	
Anthony Meier	
Kevin Mitchell	
David Mitchell	
Peter Moore	
Howard Moore	
Ben Moore	

Name	Organisation
Michael Morgan	
Graham Northcott	
Subarna Pandey	
Rogati Pandey Thepa	
M Paylor	
G Pearson	
Adrian Peckham	
John Pleydell	
Paul Quanstrom	
Keith Ramesar	
D Rayner	
D Read	
H Richards	
Hugh Riddick	
Brian Roberts	
Andrew Roff	
Mr Runyaker	
Reginald Russell	
D A Scott	
Mark Smith	
Nigel Stringfellow	
M Telford	
John Terry	
R Thwaites	
G Towne	
D Turley	
Brian Turton	
Robert Valentine	
D A Vine	
Steven Wallis	
Michael Wardroper	
Mike Watkin	
Alan Wenham	
I Whellams	
Robert Whiteman	
Terry Wilding	
J A Williams	
Mr Williams	
Barry Winn	
Roy Wood	
Stephen Woods	
Chris Wooller	
W & A Lennon	
Ian Weeks	Sovereign Harbour Residents Association

Name	Organisation
R W Gausden	
I Hodgson	
K Hutchinson	
J H Lee	
Edward & Patricia McClung	
Roger & Elizabeth McGregor	
Mr Moore	
R Moxon	
N Neter	
C Norris	
H Novis	
J Roe	
Vic Schulze	
C Sneath	
John Walker	
Bob Watts	
Chris Wilkinson	
Valerie and Geoffrey Eggleton	
Jo Newman	Abbeyfield (Eastbourne) Society Ltd
Dorinda Walters	Action For Change
Scarlett McNally	Bespoke
S Relf	Community Wise
Diana Vickery	District Valuer Services - Valuation Office Agency
Ellen Reith	East Sussex County Council
Jill McKay	Eastbourne & District MENCAP
W A Dean	Eastbourne Allotments & Gardens Society
Pat Newton	Eastbourne Disability Involvement Group
Mary Beaney	Eastbourne Group of Artists
L. Taylor	Eastbourne Hebrew Congregation
Tim Harris	Eastbourne Homes Ltd
Alison Lloyd	Eastbourne Hospitality Association
Sandy Boyce-Sharpe	Friends of Hampden Park
Janet Matthews	Heatherdene Ltd.
Lisa Russell	Rapleys LLP
H E Wagstaff	Ravenscroft Eastbourne Residents Co.Ltd.
P Kuhn	Royal Hippodrome Friends
Ann Maureen Sarah Little	Sea Point
Loreta Lock	Shinies, Eastbourne Home Education Club
C.P. Pyemont	St Bede's School

Name	Organisation
Barbara Smith	Sunbury Farm Residents Association
Melanie Hunt	Sussex Downs College
Julie Akers	
G Basford	
Elaine Batchelor	
Mr Breswaite	
Gillian Byrne	
Lynne Chiswick	
Rebecca Clayton-Harding	
Elaine De Bairacli Levy	
Susan East	
Yvonne M Farmer	
Margaret Greenwood	
M Hamilton	
Mr Hart	
M King-Fleming	
Lynda Lindfield	
D Marsden	
Andrea McHugh	
J Murray	
Christina Pyemont	
Gillian Hood Rogers	
H M Skardhamar	
Irene Lesley Stonestreet	
Carol Teasdale	
Janice Vango	
L Graham	Alliance Environment & Planning Ltd
Nicola Traverse-Healey	Barton Willmore LLP
Adele Hancock	Boots The Chemist
Christine Purkess	Chamber of Commerce
Rachel Patterson	Devplan UK
Claire Davies	DTZ
Irene Souliotis	Duvocourt Ltd.
Julie Gilbert-King	East Sussex Fire and Rescue
Lucy Shreval	East Sussex Strategic Partnership
Jan Murphy	East Sussex Youth Development Service
Pat Ashby	Eastbourne and Wealden YMCA
Emma Winchester	Environment Agency
Emma Pate	Hanover
Caroline Proverbs	Hastoe Housing Association Limited

Name	Organisation
Anne Vickers	Health & Safety Executive
Nicola Black	Healthy Weights Team
Cassie Philip	Hon Secretary, Eastbourne Sea Cadets
Teresa Evans	Housing 21
Lynnete Cleary	Jephson Homes
Angela Turner	Jones Day
Liz Weaver	Levvel
Amanda Sayer	Lighthouse Medical Practice
Jill Goodman	Nathaniel Litchfield & Partners
Catherine Widdowson	Nathaniel Litchfield & Partners
Susanne Dyke	National Council of Women
L Pattenden	Old Town Community Association
Yvonne Burrell	Pevensey Road Residents Association
Helen McCabe	Project Manager Catalyst Arts
Jackie Wickes	Rapleys
Rachel Lewis	Sound Architect
Rosalind Mynott	St. John's Lunch Club, The Parish Hall Meads
Laura Ross	Stewart Ross Associates
Janyis Hyatt	Sussex Wildlife Trust
Janet Watson	Sussex Wildlife Trust
Marie Nagy	Teal Planning
Sarah Beale	Terence O'Rourke
Jane Arnott	The National Trust
Annick Ajanaku	United Women's Homes Association Ltd
Caroline Adcock	Wealden Strategic Partnership
Louisa Cusdin	Framptons
Alison Attwood	
Elizabeth Burchett	
J Calverley	
Irene Chalk-Runayker	
J Norris	
Denise Dunning	
Rosemary Field	
Pam Freeman	
Madeleine Gorman	
Elaine Grenfell	
Pat Hearn	
Patricia Hughes	
Gillian Georgina Johnston	
Louise Kemp	
Joyce Kemp	
Jenny Lloyd	

Name	Organisation
Margaret Lonsdale	
Jill Lucas	
Deborah Message	
Mr Papworth	
Anita Pelling	
Deborah Sharpe	
Linda Sherlock	
Jean Tusley	
S West	
Christine Woodward	
John Pick	City University. London
D J M Caffyn	B.C.U.
Robin Tree	St. Mary's Church
Phil Mears	Hastings Police Station
Oliver Mitchell	Planware Ltd
	Amnesty
	Ancient Monuments Society
	Brimble Lea & Partners
	Carr Gomm
	Compassion in World Farming
	East Sussex Drugs and Alcohol Team
	Eastbourne Angling Association
	Eastbourne Crime Reduction Coordinator
	Eastbourne Fishermans Club
	Eastbourne Friends of the Earth
	Eastbourne Housing Aid and Legal Centre

Name	Organisation
	Eastbourne Wildlife Rescue
	ESRI UK Ltd
Natalie Chapman	Freight Transport Association
	Greenpeace (Eastbourne Group)
	King Sturge
	Kites Family Information Service
	Meads Community Association
	NPower
	Polegate Town Council
Clive Grumett	Ramblers Association
	Ramblers Association Eastbourne
	SITA
	SITA Uk Ltd
	South Downs Society
	Stagecoach Buses
	Terrence Higgins Trust
	The Cooperative Group
	The Council for British Archaeology
	The Devonshire Club
	The Georgian Group
	The Society for the Protection of Ancient Buildings
	The Twentieth Century Society
	Town and Country Housing Group
	Town Centre Community Forum
	Watsons
Derek Godfrey	Ellis Building Contractors Ltd
Philip Johnson	Locate East Sussex

Owner/Occupiers of the following properties on Industrial Estates:

PAON	SAON	STREET
Suncoast Church		Courtlands Road
Unit 1	3	Courtlands Road
Unit 2	3	Courtlands Road
Unit 3	3	Courtlands Road
Unit 4	3	Courtlands Road
Unit 1-4	5	Courtlands Road
Unit 5-6	5	Courtlands Road
Unit 7	5	Courtlands Road
9		Courtlands Road
Unit 3	3a	Courtlands Road
Units 1 and 2	3a	Courtlands Road
3b		Courtlands Road

PAON	SAON	STREET
Unit 2	Southbourne Business Park	Courtlands Road
Unit 3a	Southbourne Business Park	Courtlands Road
Unit 3b	Southbourne Business Park	Courtlands Road
Unit 3c	Southbourne Business Park	Courtlands Road
Unit 3d	Southbourne Business Park	Courtlands Road
Unit 3e	Southbourne Business Park	Courtlands Road
Unit 3f	Southbourne Business Park	Courtlands Road
Unit 3g	Southbourne Business Park	Courtlands Road
Unit 4	Southbourne	Courtlands Road

PAON	SAON	STREET
	Business Park	
Unit 4b	Southbourne Business Park	Courtlands Road
Unit 5a	Southbourne Business Park	Courtlands Road
Unit 5b	Southbourne Business Park	Courtlands Road
Unit 5c	Southbourne Business Park	Courtlands Road
Unit 5d	Southbourne Business Park	Courtlands Road
Unit 5e	Southbourne Business Park	Courtlands Road
Unit 5f	Southbourne Business Park	Courtlands Road
Unit 6a	Southbourne Business Park	Courtlands Road
Unit 6b	Southbourne Business Park	Courtlands Road
Unit 6c	Southbourne Business Park	Courtlands Road
Unit 6d	Southbourne Business Park	Courtlands Road
Unit 6e	Southbourne Business Park	Courtlands Road
Unit 6f	Southbourne Business Park	Courtlands Road
Unit 6g	Southbourne Business Park	Courtlands Road
Unit 6h	Southbourne Business Park	Courtlands Road
Unit 7b	Southbourne Business Park	Courtlands Road
Unit 7c	Southbourne Business Park	Courtlands Road
Unit 7d	Southbourne Business Park	Courtlands Road
Unit 8	Southbourne Business Park	Courtlands Road
Unit 8a	Southbourne Business Park	Courtlands Road
Units 7a And 7c	Southbourne Business Park	Courtlands Road
Unit 8	Stamco	Courtlands Road
Reception	Charter House	Courtlands Road
Suites 1-2	Charter House	Courtlands Road
Suite 3	Charter House	Courtlands Road
Suite 4-7	Charter House	Courtlands Road
Suite 8	Charter House	Courtlands Road
Suite 9	Charter House	Courtlands Road
Suite 10	Charter House	Courtlands Road
Suite 11-12	Charter House	Courtlands Road
Suite 13	Charter House	Courtlands Road
Suite 14	Charter House	Courtlands Road
Suite 15	Charter House	Courtlands Road
Suite 16	Charter House	Courtlands Road

PAON	SAON	STREET
3		Moy Avenue
Unit 1	Technology Business Park	Moy Avenue
Unit 10	Technology Business Park	Moy Avenue
Unit 2	Technology Business Park	Moy Avenue
Unit 3	Technology Business Park	Moy Avenue
Unit 4	Technology Business Park	Moy Avenue
Unit 5	Technology Business Park	Moy Avenue
Unit 6	Technology Business Park	Moy Avenue
Unit 7	Technology Business Park	Moy Avenue
Unit 8	Technology Business Park	Moy Avenue
Unit 9	Technology Business Park	Moy Avenue
Dairy Crest		Stansted Road
G Bainbridge And Son Ltd		Waterworks Road
Gate Court Dairy		Waterworks Road
Gosdens Removals		Waterworks Road
4		Hammonds Drive
40		Hammonds Drive
42-44		Hammonds Drive
46		Hammonds Drive
48		Hammonds Drive
50-52		Hammonds Drive
54		Hammonds Drive
56		Hammonds Drive
58		Hammonds Drive
60		Hammonds Drive
62		Hammonds Drive
64		Hammonds Drive
66		Hammonds Drive
68		Hammonds Drive
70		Hammonds Drive
72		Hammonds Drive
74		Hammonds Drive
Austins Cradles		Hammonds Drive
Brewers Transport		Hammonds Drive
Caffyns (Eastbourne) Ltd		Hammonds Drive
Graham Builders		Hammonds Drive

PAON	SAON	STREET
Merchants Ltd		
Lockinex Works		Hammonds Drive
Police Custody Centre		Hammonds Drive
Police Patrol Centre		Hammonds Drive
Ready Mix Concrete Se Ltd		Hammonds Drive
Unit 1	Redwood Business Park	Hammonds Drive
Units 2 and 4	Redwood Business Park	Hammonds Drive
Unit 3	Redwood Business Park	Hammonds Drive
Unit 5	Redwood Business Park	Hammonds Drive
Unit 6	Redwood Business Park	Hammonds Drive
Schools Library Service		Hammonds Drive
Unit 2		Hammonds Drive
Unit 3		Hammonds Drive
Unit 4		Hammonds Drive
White Knight Laundry		Hammonds Drive
Unit 1		Lottbridge Drove
2		Edward Road
3		Edward Road
4		Edward Road
5		Edward Road
6		Edward Road
7		Edward Road
Unit 1	1a Martello House	Edward Road
Unit 2	1a Martello House	Edward Road
Unit 3	1a Martello House	Edward Road
Unit 4	1a Martello House	Edward Road
Unit 1	1b Redoubt House	Edward Road
Unit 1	1c Wish Tower House	Edward Road
Unit 2	1c Wish Tower House	Edward Road
5a		Edward Road
2		Hargreaves Road
3		Hargreaves Road
11a	Hargreaves Business Park	Hargreaves Road

PAON	SAON	STREET
11b	Hargreaves Business Park	Hargreaves Road
Unit 2	Hargreaves Business Park	Hargreaves Road
Unit 3	Hargreaves Business Park	Hargreaves Road
Unit 1	Hargreaves Business Park	Hargreaves Road
Unit 4	Hargreaves Business Park	Hargreaves Road
Unit 5	Hargreaves Business Park	Hargreaves Road
Unit 6	Hargreaves Business Park	Hargreaves Road
Unit 7	Hargreaves Business Park	Hargreaves Road
Unit 8	Hargreaves Business Park	Hargreaves Road
Unit 9	Hargreaves Business Park	Hargreaves Road
Unit 10	Hargreaves Business Park	Hargreaves Road
1-3		Edison Road
5		Edison Road
7		Edison Road
9		Edison Road
15		Edison Road
17		Edison Road
19		Edison Road
25		Edison Road
11-13		Edison Road
21-23		Edison Road
The Kings Centre	27	Edison Road
2		Lister Road
4		Lister Road
6		Lister Road
8		Lister Road
10-12		Lister Road
14		Lister Road
16-18		Lister Road
1		Whittle Drive
2		Whittle Drive
1		Alder Close
3		Alder Close
5		Alder Close
6		Alder Close
7		Alder Close
9		Alder Close
14		Alder Close
15		Alder Close
1		Birch Close

PAON	SAON	STREET
Unit 1 And Unit 2	3	Birch Close
Unit 3	3	Birch Close
5		Birch Close
4a		Birch Close
4b		Birch Close
Stagecoach	2	Birch Road
7		Birch Road
Alsford Timber	19-20	Birch Road
Sturdy Joinery	21	Birch Road
22		Birch Road
23		Birch Road
22a		Birch Road
22b		Birch Road
Alfa Laval Pumps Ltd		Birch Road
C Brewer and Sons Ltd		Birch Road
20		Hawthorn Road
Unit 1		Hawthorn Road
Unit 10		Hawthorn Road
Unit 10a		Hawthorn Road
Unit 11		Hawthorn Road
Unit 12		Hawthorn Road
Unit 13		Hawthorn Road
Unit 14		Hawthorn Road
Unit 15		Hawthorn Road
Unit 16		Hawthorn Road
Unit 17		Hawthorn Road
Unit 18		Hawthorn Road
Unit 19		Hawthorn Road
Unit 2		Hawthorn Road
Unit 20		Hawthorn Road
Unit 21		Hawthorn Road
Unit 22b		Hawthorn Road
Unit 23		Hawthorn Road
Unit 24		Hawthorn Road
Unit 26		Hawthorn Road
Unit 27		Hawthorn Road
Unit 28		Hawthorn Road
Unit 29		Hawthorn Road
Unit 3		Hawthorn Road
Unit 30		Hawthorn Road
Unit 4 and 4a		Hawthorn Road
Unit 6		Hawthorn Road
Unit 7		Hawthorn Road

PAON	SAON	STREET
Units 22 and 22a		Hawthorn Road
Units 5 to 10		Hawthorn Road
18		Lottbridge Drove
24		Lottbridge Drove
30		Lottbridge Drove
46		Lottbridge Drove
26-28		Lottbridge Drove
Birchwood Ford		Lottbridge Drove
Lottbridge Motoring Centre		Lottbridge Drove
14		Maple Road
15a		Maple Road
15b		Maple Road
Unit 1	16a	Maple Road
Unit 2	16a	Maple Road
Unit 3	16a	Maple Road
Units 4 and 5	16a	Maple Road
16b		Maple Road
17-18		Maple Road
Unit 1		Park View
Unit 2		Park View
Unit 3		Park View
Unit 4-5		Park View
Unit 6		Park View
Unit 7		Park View
Unit 1		The Birch Estate
Unit 10-11		The Birch Estate
Unit 12		The Birch Estate
Unit 13		The Birch Estate
Unit 14-15		The Birch Estate
Unit 16		The Birch Estate
Unit 17		The Birch Estate
Unit 18		The Birch Estate
Unit 2		The Birch Estate
Unit 3		The Birch Estate
Unit 4		The Birch Estate
Unit 5		The Birch Estate
Unit 6		The Birch Estate
Unit 7		The Birch Estate
Unit 8		The Birch Estate
Unit 9		The Birch Estate
41		Brampton Road
45		Brampton Road
51		Brampton Road

PAON	SAON	STREET
53		Brampton Road
Unit 1	55	Brampton Road
Unit 10	55	Brampton Road
Unit 11	55	Brampton Road
Unit 12	55	Brampton Road
Unit 14	55	Brampton Road
Unit 15	55	Brampton Road
Unit 2	55	Brampton Road
Unit 3	55	Brampton Road
Unit 4	55	Brampton Road
Unit 5	55	Brampton Road
Unit 6	55	Brampton Road
Unit 7	55	Brampton Road
Unit 8	55	Brampton Road
Unit 9	55	Brampton Road
46		Brampton Road
46a		Brampton Road
46b		Brampton Road
Unit 1	54 Harvington Business Park	Brampton Road
Unit 10	54 Harvington Business Park	Brampton Road
Unit 2	54 Harvington Business Park	Brampton Road
Unit 3	54 Harvington Business Park	Brampton Road
Unit 4	54 Harvington Business Park	Brampton Road
Unit 5	54 Harvington Business Park	Brampton Road
Unit 6	54 Harvington Business Park	Brampton Road
Unit 7	54 Harvington Business Park	Brampton Road
Units 8-9	54 Harvington Business Park	Brampton Road
49		Brampton Road

PAON	SAON	STREET
1		Faraday Close
3		Faraday Close
5		Faraday Close
9		Faraday Close
4		Marshall Road
6		Marshall Road
7		Marshall Road
19		Marshall Road
23		Marshall Road
10-12		Marshall Road
4a		Marshall Road
9-15		Marshall Road
1		Britland Estate
Unit A	2	Britland Estate
Unit B	2	Britland Estate
Unit A	3	Britland Estate
Unit B	3	Britland Estate
4	Archer House	Britland Estate
5	The Gatehouse	Britland Estate
Unit 4	1	Finmere Close
Units 1-3	1	Finmere Close
3		Finmere Close
5		Finmere Close
13		Finmere Road
15		Finmere Road
16-20		Finmere Road
17-19		Finmere Road
Unit A	7-9	Finmere Road
Unit B	7-9	Finmere Road
Units C & D	7-9	Finmere Road
14		Finmere Road
	Gas Storage Station	Finmere Road

Appendix 2 – Pre-production questionnaire**EASTBOURNE BOROUGH COUNCIL - EMPLOYMENT LAND LOCAL PLAN****Questionnaire – June 2013**

The Employment Land Local Plan will guide job growth and economic development in Eastbourne up to 2027 as well as 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 will specifically relate to land and buildings within the B1 (Offices and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) Use Classes.

The draft objectives of the Employment Land Local Plan are:

- To stimulate sustainable economic growth to meet the needs of the community within environmental constraints and create a new economic image to attract highly skilled talent to come to and stay in Eastbourne
- To deliver a wide range of new employment opportunities by providing an improved range, flexibility and quality of employment and mixed use business space for use by local firms and speculative investors
- To support job growth and economic development, and broaden the economic base to enable innovation and entrepreneurship to flourish

1. *Do you agree with the draft objectives?*

We consider that the Employment Land Local Plan should address the following issues:

- The requirement for additional employment land up to 2027
- Identification of sites to assist in meeting the requirement for employment land
- Need for job creation and diversification
- Development that provides for start-up businesses
- Maximising the use of existing employment land in the town
- Requirements for office space in the Town Centre
- The suitability and viability of land at Sovereign Harbour for employment use
- Loss of employment land to residential use
- The suitability of current commercial premises
- High levels of travel to work by car
- Energy efficiency in commercial premises

2. *Are there any other general issues that you think the Employment Land Local Plan should address?*

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3. *Are there any other issues specific to your business interest that we should be aware of?*

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4. *Is there anything else that you think the Employment Land Local Plan ought to contain?*

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Title	Mr / Mrs / Miss / Ms / Dr	First Name(s)	
Surname			



Organisation	
Position	

Address	

		Post Code	
Phone Number		Fax Number	
E-Mail Address			

Please return completed questionnaires to Eastbourne Borough Council, 1 Grove Road, Eastbourne, BN21 1TW. Alternatively, the questionnaire can be completed and submitted on-line at <http://eastbourne-consult.limehouse.co.uk>. All representations should be received by 5pm on **Friday 2 August 2013**.

Appendix 3 – Draft Employment Land Local Plan Summary leaflet

<p>As the majority of economic activity in Eastbourne is undertaken by small businesses, the Employment Land Local Plan will promote development that provides units for new start-up businesses and small enterprises to help grow indigenous businesses. The Employment Land Local Plan will encourage 'clusters' of specialisms in Eastbourne that will allow key local businesses and their supply chains to grow.</p>  <p>In order to create more and different job opportunities in Eastbourne, the Employment Land Local Plan will help to secure employment and training for local people as part of development proposals. In addition, it will support the training and education section via a flexible approach to expansion proposals in order to encourage growth and increase the skill level of the local workforce.</p> <p>How to comment</p> <p>The community and other stakeholders are invited to have their say on the Employment Land Local Plan. The plan can be accessed on-line via www.eastbourne.gov.uk/ellp, where the Plan and supporting documentation can be viewed and commented upon.</p> <p>Comments can also be made via email and sent to planning.policy@eastbourne.gov.uk, or posted to:</p> <p>Specialist Advisory Team, Customer First, Eastbourne Borough Council, 1 Grove Road, Eastbourne, BN21 4TW.</p> <p>The consultation is open for a 12 week period between 20 December 2013 and 14 March 2014. Any comments must be received by 5pm on Friday 14 March 2014.</p> <p>For further information, please contact the Specialist Advisory team on 01323 410000.</p>	 <p>Eastbourne Borough Council is preparing a new plan to deal with the development of employment space in Eastbourne over the period up to 2027. This plan is known as the Employment Land Local Plan. It involves making the provision of additional office, industrial and warehousing space within the town to meet the employment needs of the local community.</p> <p>An early draft of the Employment Land Local Plan has been published for consultation with the community and other stakeholders between 20 December 2013 and 14 March 2014. Anyone can make a comment on the Employment Land Local Plan by visiting our website (www.eastbourne.gov.uk/ellp) or via email or post (details are provided on the back of this leaflet).</p> <p>The Employment Land Local Plan is needed to address concerns about the amount of employment space needed in Eastbourne and where it should be located. It will also aim to help to stimulate economic growth, encourage small businesses, diversify the local economy, and support existing businesses.</p>
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A requirement for additional employment land has been identified by forecasting how the workforce in Eastbourne will change and how business sectors in Eastbourne are likely to grow. This identifies that **1,263 jobs** need to be created in businesses that occupy offices, industrial space and warehouses.



This forecast is then applied to assumptions about how much floorspace is required per employee in order to calculate the amount of floorspace required to accommodate those jobs.

Type	Floorspace
Offices	c. 22,000 sqm
Industrial	c. 13,000 sqm
Warehouses	c. 8,000 sqm
Total	43,000 sqm

Additional floorspace is added to this to take into account the expected losses of existing space to other uses, and to provide an allowance for 'churn', which is additional space that allows businesses to move to alternative sites.

This results in a requirement for 43,000 sqm of additional employment floorspace up to 2027.

Six different options for where additional employment land could be accommodated have been considered:

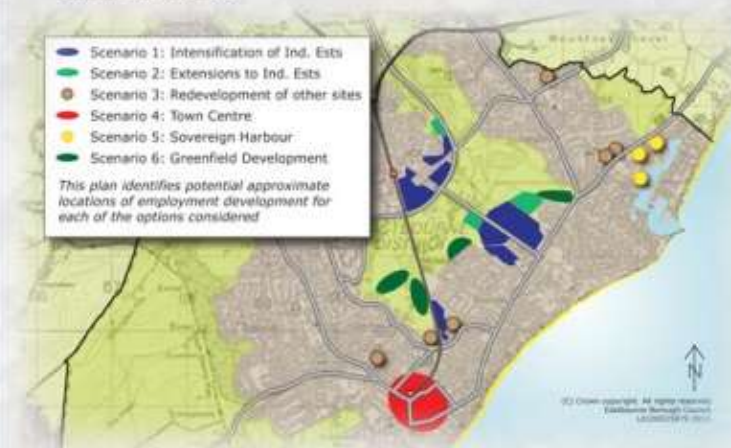
- Scenario 1: Intensification of Industrial Estates** –

 - redevelopment of sites located within existing Industrial Estates
- Scenario 2: Extensions to Industrial Estates** –

 - developing land on the edge of existing Industrial Estates
- Scenario 3: Redevelopment of sites outside Industrial Estates** –

 - redevelopment of sites that are located in other areas of the town

- **Scenario 4: Town Centre** – development of employment space as part of the town centre regeneration
- **Scenario 5: Sovereign Harbour** – development of sites at Sovereign Harbour that have previously been identified for employment development
- **Scenario 6: Greenfield Development** – the development of previously undeveloped Greenfield land located within Eastbourne Park



Our analysis of the options considers that the most appropriate way of accommodating the additional employment land that needed is to combine three of the different scenarios:

- 20,000 sqm of Industrial and Warehouse space within existing Industrial Estates
- 3,000 sqm of Office space within the Town Centre
- 20,000 sqm of Office and Light Industrial space at Sovereign Harbour

Residents and other stakeholders are invited to comment on which they think is the most appropriate option(s) through the consultation.

Appendix 4 – Table of Responses to Questionnaire

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
1	Mr Jeffrey Spence	Yes	Use of land for leisure purposes for those employed	no	no
2	Mr Ian Weeks (Sovereign Harbour Residents Association)	These are aims, not objectives. There is no standards by which they can be measured, Even if achieved, the aims will not bring in large scale, high quality employment. There should be an objective such as: To create an environment, and provide incentives, that will encourage large scale, high quality employers to the town, so as to create xxxx new jobs by 20xx.	Development that provides attractive and affordable accommodation for businesses of all sizes	No	Improvements to public transport, including land for park and ride to minimise car use within the town centre
3	Mr Robert Ashley	Yes	Provision of small secure offices for micro businesses and small workshops for small engineering and technology businesses. More premises for start-up businesses with simple rental and council tax arrangements and short term free lets. Exceptional hands-off encouragement for entrepreneurial businesses should be given. Publicise better the land and premises that are available for start-ups and small businesses	The local maritime industry should be encouraged more with a launching slip for small boats that can be made from vehicle and trailer.	A national class playing field suitable for Union and League Rugby, and also American Football Junior and Senior games
4	Mr Stewart Mitchell	Yes	no	no	Ensure action quickly
5	Mr Bob Greenhead	In today's economic climate how will the Council create worthwhile	No	Jobs for older people a priority	No

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
		jobs? So no!			
6	Dr Hilary Orrom	Pretty much, yes	If the words 'job creation' and 'diversification' are to be meaningful then the Local plan should be truly local. This means the opposite of 'protectionist' in respect of the town centre. The Sovereign Retail Park and the Langney Shopping Centre have been treated shamefully, and jobs and opportunities for entrepreneurs have been squandered. This attitude must change.	n/a	
7	Mrs Dianne Chadderton	In principle, but without taking into account existing facilities (such as doctors, schools , open spaces, etc, etc)- of which the town is really struggling to manage , no increase in job opportunities will help the To have a good job, it will count for nothing if people do not have good living conditions. The town is very overcrowded, with dwindling facilities for the population as it is. The council should be more aware, and ACT ON the general public wants and needs. (i.e. withdrawal of leisure and shopping facilities in a certain part of town because of 'infighting and disagreement') town.	This is all very well and obviously has been considered with good intentions, BUT the concept of all the plans never seems to materialise with little or no thought that the outcome should reflect the issue. Time and time again in the time I have lived here, any consultation such as the above never benefits the general local population ; large amounts of the tax payers money is spent on Consultation without being realised--- plans are changed to unacceptable levels. In my own view, the issues above (although good) will all be either ignored or changed to the absolute detriment of the local people and their needs. Before any of the above, the council needs to show credibility by actually doing what people wanted and also finishing projects in town to show that any future plans will be viable!!!	n/a	Please refer to answer to question 2

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
8	Mrs Judith Kewley	Yes	There is a need for space that can be rented on a daily basis for people who do not need space on a full time rental basis	No	No
9	Mr Angus Bannerman	Yes but ensuring the infrastructure will cope & rail links are given a priority to achieve this vision & attract business to Eastbourne	Specific reference to Sovereign Harbour North on site 7. The current plan can be improved on without impinging on the residential area of Pacific Drive by simply ensuring all business premises are built running PARALLEL to Pevensey Bay Rd with min 1 or possible 2 access roads to the business parks off Pevensey Bay Rd. This would: - Alleviate anticipated heavier traffic (currently already impinging on North Harbour with the new Medical Centre & additional housing already built). The current plan to build on site 7 & further access to the proposed Community Centre, will severely choke traffic to domestic housing in the area. The plan for housing & the green area could run PARALLEL alongside Pacific Drive to keep the residential area separated from the business area which would be more aesthetically presented to both prospective home owners & more accessible to business prospectors.	No. All is commented above	No
10	Mr David Hitchcock	Yes	No	No	No
11	Mr Robert Stanborough	Yes I agree with objectives, but, there should not be excessive influences by local developers for	Ensuring that existing vacant shops and business premises are either redeveloped quickly or let the	Certainly on Sovereign harbour, the council has held several consultations regarding the	Clear objectives. Plans for vacant land frequently changes, which is not only confusing but causes

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
		the purpose of increasing their profit margins as there has been in the past, rather than the true needs and benefits of local industry businesses and residents	avoid dereliction and run down appearance, as is the case in Hastings	remaining sites for development, but these consultations are often clearly "weighted" in favour of either the council or the developer. The council shouldn't believe the sovereign harbour residents are so easily fooled.	frustration to residents and delays development.
12	Ms Angela Atkinson (Marine Management Organisation)	I can confirm the MMO has no specific comments to make on this document.			
13	Mr Basset (The BE Group)	Yes, we agree with the draft objectives	We employ circa 150 people locally and it is clear to use that there seems to be a large part of commercial Eastbourne that is not occupied by tenants or owners. The development of further capacity in the area does not seem to us to be the right answer. Presumably you have consulted with local commercial agents as to the demand for properties of varying types. The town centre is poor and feels run down and the creation of business parks outside of the town feels a poor choice. Should the planners feel that this remains an option that they wish to pursue, then they need to allow conversion of existing retail stores and commercial sites into residential	As a business that relies heavily on technology, the IT infrastructure is more important than allocating sites for commercial development. The town will grow with better road and rail links	We attract young intelligent people to our business and the key for us is to try and retain them as their skills grow
14	Mr Adrian Ley	Yes	No	No	No
15	Mr Keith Jacobs (Highways)	Yes. We support economy through the provision of a safe and reliable	Having reviewed the South Wealden and Eastbourne Transport Study	Although there are no trunk roads in Eastbourne, development in the	Consistency between the Core Strategy and the vision outlined in

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
	Agency)	SRN, which allows for the efficient movement of people and goods. The Network plays a key part in sustaining economic prosperity and productivity , while also helping support environmental and social aims	(SWETS) as part of the core strategy we are content that the impact of development in the town centre is unlikely to have a material impact on the SRN. We are keen to ensure that future development in Eastbourne does not have a detrimental impact on the SRN outside of the Eastbourne boundary.	borough could have an impact on the A27 to the north and more specifically the Cophall roundabout and A27/A2270 junction. The A27 currently experiences congestion to the West of Polegate and stress is expected to increase throughout the Plan period. We will therefore be looking for the Plan to be promoting sustainable access to help reduce the impact of development trips on the SRN	the TCLP is important and as development sites applications come forward that the site specific criteria is taken into account to allow the correct quantum of development to be permitted.
16	Mr T Richardson (Trustees of the Chatsworth Settlement)	Thank you for your letter of the 20 th June inviting consultation on the Borough Local Plan Employment Strategy. Firstly, I am sure everyone will welcome the idea of generating jobs in Eastbourne ad the necessary property developing that goes with it and please take it that the Estates supports everything you do. In terms of identification of sites, however can I urge a certain caution against allocating great areas of Eastbourne Park for employment uses, which has been the custom in the past Local Plans. For the past 15 years we have looked closely at the current employment land allocation and the associated works around land raising in a flood plain and providing adequate road access. We have concluded that the existing allocations are not viable for development. This mainly covers the areas of St Anthony's and Tutts Barn. These areas could only come forward if there was some substantial element of infrastructure support from the Government but in the current financial climate that will not be forthcoming. My last point concerns energy efficiency on commercial premises. I have spoken to Jefferson Collard about this before as it is a dilemma most owners of industrial buildings are concerned about and the Estate owns a few at Birch Close and Alder Close. While, at its simplest, putting solar panels on the roof would appear to be an answer, the majority of the buildings in Eastbourne do not have a rook with a strong enough structure to accommodate solar panels, which brings us back to wind power in Eastbourne Park. Politically this is very sensitive and would probably therefore not et supported but practically it appears to be the only viable solution with current technology.			
17	Mr Malcolm Haith	Yes, How are you going to do these things?	Which businesses would benefit Eastbourne and which would benefit form being there? What are most attractive features and least attractive features of the town? Can new business help improve the areas seen as poor? How does the council maintain this plan? How does it find these ideas?	No	A cost benefit for any new business and any business that increases its employee base.
18	Mrs Judy Colbran	Yes	No	No	No

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
	(Colbran & Wingrove Ltd)				
19	Mr Richard Maile	Amend Bullet point 2 as follows: "To deliver a wide range of new employment opportunities by providing a range of employment and mixed use business space and sites."	Amend Bullet point 2: "Identification of a wide range of sites to assist in meeting the requirement for employment land."	The need for enhanced infrastructure, particularly highway improvements to kick-start the economy.	Possibility of enhancement to existing business area at Lottbridge Drove by means of bunding and landscaping.
20	Mr John Lister (Natural England)	We welcome in particular the recognition of environmental constraints, although the word constraint is perhaps overly negative. Part of drawing economic investment is about working with the natural environment to create an attractive place for people to work and to live, and enjoy a high quality of life, as well as meeting government aims to halt the decline in biodiversity.	No comment	No comment	The plan presents the opportunity to secure outstanding development in an attractive bio-diverse, landscaped setting, with opportunities for walking and cycling to work. It also provides opportunities reduce energy and water use through measures such as green roofs and Sustainable Urban Drainage Systems.
21	Ms Marie Nagy (Teal Planning) on behalf of Sovereign Harbour Ltd	Background to SHL Interest - The following comments are made on behalf of Sovereign Harbour Ltd, who retain the freehold interest of a number of sites at Sovereign Harbour including those known as Sites 4, 6 and 7 which are (part) allocated for employment generating uses within the Sovereign Harbour SPD. Reference is also made in the Core Strategy Local Plan (CSLP) to 30,000 sq.m of B1a space being provided at the Harbour during the Plan Period. This figure is now redundant as confirmed by: (1) the requirement	The list is broadly appropriate insofar as it currently goes. We do however suggest: (1) EBC places these in a more logical ordering that reflects core matters for consideration. This will also help order EBC's thinking on the logical and most sustainable directions of growth for new employment development within the town. This is indeed a matter that the Council has been charged with reconsidering following the CSLP Inspector's recommendation on the balance of where new development should be directed to. (2) The issue of	n/a	We consider that the objectives and list of issues do need to be reconsidered. We request the opportunity to comment on these further once EBC has collated its responses and refined its intentions on how to take this document forward.

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
		<p>to provide the ELLP (2) the definition of appropriate uses and land allocations for the Sovereign Harbour sites as set out in EBC's adopted SPD for the Harbour which means that 30,000sq.m of B1a offices cannot be achieved and (3) EBC's position in relation to the linked draft Town Centre Local Plan (TCLP) and the proposed removal of references in that document to a specified office floorspace allocation of 3,000sq.m within the centre pending the ELLP. The ELLP process will therefore establish whether the nominated sites at the Harbour are to be retained for Class B1a employment uses and, if so, up to what level of floorspace should be allocated here. We welcome this process. We also consider this opportunity to comment on the proposed purpose of the ELLP is useful; we however refer EBC again to the representations that were submitted on behalf of SHL in respect of both the CSLP and TCLP. These set out our review of the previous work undertaken by and for EBC in relation to employment land requirements, EBC's Plan Inspector's response in turn to that work, the issues this has raised and the approach and general planning assumptions that should now be taken in settling the level and location of new employment space requirements</p>	<p>cooperation with neighbouring authorities and of how the local economy of Eastbourne must be planned within the context of and alongside that of Wealden District and in particular in terms of how the relationship with Polegate and Stone Cross must be planned for in strategic planning terms; taking advantage of this transport corridor and the sustainable bus and train lines that already exist between these areas, Eastbourne town centre and the industrial and commercial areas between them. (3) The issue of development viability and the impact of developer obligations on deliverability must also be addressed. (4) The issue of need must be expressed on the basis of what (1) is required and (2) will be designed to achieve increasingly more efficient space planning practices. We assume that this is contained under the heading of 'maximising the use of existing employment land.' The application of appropriate employment to floorspace density assumptions however must also be expressed explicitly to assess new space requirements. We accordingly suggest that the issues are reordered, grouped, extended and qualified as follows: Assessment of Need - The requirement for additional employment land up to 2027 differentiated by the Class B (sub) categories / Need for</p>		

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
		<p>for the town. The Objectives The three draft objectives each focus on aspirational elements of economic development for Eastbourne. They are also somewhat overlapping and repetitive and omit references to general planning objectives that must still underpin this document. The objectives should be redrafted to: (1) ensure that the primary purpose of the ELLP is to meet the core assessed requirements for new employment space based on a robust understanding of the Eastbourne employment and property markets and of development viability. (2) ensure that the setting of any aspirational goals are realistic and deliverable to ensure that aspirational development is viable, the most likely to be achieved and maintained over the long term and, in accordance with the requirements of the NPPF (para 22), will not have the potential consequence of sterilising land for a long period of time which could otherwise be put to alternative acceptable uses.(3) provide a coherent and clear link with other associated plan documents, namely the NPPF, CSLP and TCLP, to help fully achieve a sustainable plan for the town. We take this to be not only apply to ensuring the longevity of existing and new employment opportunities but also for these to be located</p>	<p>sustainable job creation and diversification assessed on the basis of robust and realistic growth assumptions / Assessment of job to floorspace densities to underpin assessed space requirements taking into account trends in design and space planning as well as business organisation and technology / Development that provides for start-up businesses. Assessment of Supply - The suitability of current commercial premises / Loss of employment land to residential use / Requirements for the maintenance and enhancement of office space in the Town Centre / Maximising the use of existing employment land in the town that is still required to meet future employment space requirements and that can deliver viable and sustainable development / Taking into account how the wider local employment development and jobs market operates and can be enhanced together with neighbouring Wealden District to take advantage of existing transport, property supply and business linkages / Identification of new additional sites within the most appropriate and sustainable locations to meet the assessed requirement for employment land / The suitability and viability of land at Sovereign Harbour for employment use, taking also into consideration its location relative to the existing high levels of connectivity of the</p>		

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
		<p>where: - they are the most accessible for the greatest number of local residents - commuters to Eastbourne can most readily travel to work by the most sustainable means possible (i.e. by cycling, bus and train) and - businesses are the most appropriately grouped in order to benefit from business linkages and their associated service providers as well as general transport links. We therefore suggest the objectives of the ELLP are redrafted as follows: To meet the assessed requirements for existing and realistic and achievable forecast growth in employment within the town through to the end of the Plan Period; To establish realistic growth objectives to help broaden the town's economic base through viable open market development that will ensure the long term establishment of new employment opportunities for the town's residents; To identify the strategic locations to which new employment floorspace will be directed, ensuring that these meet the objectives of sustainable design and development, directing development to where it can be accessed by the greatest number of employees and visitors by sustainable means of transport.</p>	<p>town centre and the Eastbourne - Hailsham Corridor and the established objective of delivering a high quality environment with clean uses that respect the established residential and commercial development within the Harbour. Other Matters - Energy efficiency in commercial premises</p>		
22	Andrew Thompson	The draft objectives are encouraging and are generally	A number of the terms used within the "issues" identified appear to be	One of the fundamental weaknesses of the HMA/TTWA is	Clearly the strategy will need to take into account the objectives of

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
	(Wealden District Council)	<p>supported. However to be more effective they should be clearly defined and crucially should be linked through the "issues" and specific policies later in the Plan. Delivering the objectives will require constructive partnership working and this aspect of the strategy would benefit from being strengthened. Eastbourne forms part of the Eastbourne-South Wealden Housing Market Area (HMA)/Travel to Work Area (TTWA) and the economies of the two areas are well integrated. A significant number of Wealden's residents already work in Eastbourne and the District's population is forecast to increase as significant growth is planned, particularly in the south of the District. In order to demonstrate a clear commitment to cross-boundary working and in line with the Duty to Cooperate, it should be clear that the "community" the plan will serve lies beyond as well as within EBC's administrative boundaries. It is queried how measureable the "new economic image" objective is and whether the type of image EBC is seeking to create should be more clearly defined up front. In doing so this might provide a clearer framework for policies within the Employment Land Local Plan (ELLP) to deliver this objective. The range of new employment opportunities to be delivered should be based on</p>	<p>somewhat inconsistent and require clear definition. For instance, the differences between employment, business and commercial space are not identified and consequently it is not clear as to the extent to which retail and tourism land requirements might overlap with any of these issues. Further, it is not shown how the ELLP will interact with the Town Centre AAP. Identification of the types of businesses which the ELLP will target should enable the determination of the level of new floorspace required within each specific use class. Whilst the EBC's Inspector's remarks regarding Sovereign Harbour are noted it is equally important that the suitability, viability and deliverability of prospective allocations elsewhere within the Borough are also fully considered, together with updated information on existing sites, so that a comprehensive picture can be established. This information is considered to be critical to the development of a strategy that will be deliverable and effective. When considering potential allocations a range of alternative sites and solutions should be considered in order to maximise the potential for flexibility throughout the plan period. This assessment should also take into account how improvements to infrastructure within the HMA/TTWA could (or, where they are already identified, will) affect the</p>	<p>the low level of skills and it is an opportunity for the ELLP to take this into account as part of the overall strategy and potentially identify measures to address the issue. It is anticipated that investment in areas such as broadband, bus services, car parking and other infrastructure are likely to be of crucial importance to local businesses.</p>	<p>the LEP and the SE7 together with the ESCC Economic Development Strategy and, where appropriate align with these. However, given the fluid nature of economic development (as well as planning) policies it is suggested that a strong but flexible strategy is pursued. For instance if, despite a positive appraisal of the suitability and viability of Sovereign Harbour for offices as part of the review, development of the site for offices is not delivered early within the plan period, the allocation should not preclude the delivery of alternative employment uses at the site. Indeed, given the forecast demographic changes it might be necessary to incorporate provision for a further review of the strategy, potentially around 2020. The ELLP should also identify the infrastructure aspects and requirements of proposed allocations, including highways and transport and broadband.</p>

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
		<p>up-to-date information taking into account historical and baseline data. Critically, the provision of new employment floorspace should enable flexibility throughout the plan period, particularly given the turbulent economic climate in recent years, and the lack of certainty in respect of the level of new housing provision in the wider region at present. The type of floorspace sought should also take into account the allocations in the WDC Core Strategy (CS) for significant new employment floorspace in the south of the District. In order to support job growth and economic development in the Borough a multi-agency approach will be required. Although this is largely beyond the remit of planning, to be a deliverable objective the Plan would be made more robust if the approach is outlined so that specific policies can be identified to support it throughout the plan period.</p>	<p>suitability and viability of sites. The Wealden Core Strategy (CS) is now adopted and makes provision for around 25,540 sqm of employment floorspace within South Wealden. Planning permission is also in place for the provision of around 15,000 sqm of employment floorspace at Hackhurst Lane Industrial Estate in Lower Dicker which lies towards the northern boundary of the HMA/TTWA. Given the integrated nature of the Eastbourne and South Wealden area the delivery of this level of new employment floorspace within South Wealden is likely to have significant implications for the local market. The provision of new floorspace in South Wealden could impact on the turnover, rent and vacancy rates of premises in Eastbourne and potentially therefore the viability of some estates and/or prospective allocations. These implications are particularly acute given the current quality of existing stock in the HMA/TTWA. Additionally, around 5,000 new homes are either allocated or committed in South Wealden through the Wealden CS which is also subject to review in 2015. Whilst this increase in population will undoubtedly generate demand for jobs in the HMA/TTWA, policies in the Wealden CS and Strategic Sites Local Plan also promote a reduction in out-commuting from the District and, in particular, the location of</p>		

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
			<p>new employment floorspace within mixed use sites and adjacent to key centres of population within South Wealden should support this approach. Indeed the EBC Inspector noted that "it cannot be assumed that an increase in the population in South Wealden will necessarily lead to an increase in commuting into Eastbourne." The enhanced sustainability of key settlements in the District may also impact upon demand for business premises in Eastbourne and this should be investigated further. The EBC strategy should therefore take account of the implications of Wealden's Local Plan to ensure a complimentary approach to jobs and employment in the HMA/TTWA. Updated statistical analysis should be provided in respect of the previously forecast reduction in working age population post 2016. Text accompanying the existing Policy D2 suggests that after this time "it is not expected that jobs will decline but that they will need to be filled by workers from outside the district". It may also be necessary to consider even longer term forecasts, in light of the recent high birth rates in the Borough, to help determine whether or not this trend is likely to slow or reverse in the future. Employment floorspace "requirements" or demand might therefore also be considered in terms of the timescales for delivery</p>		

Ref	Respondent	Question 1	Question 2	Question 3	Question 4
			<p>as the adopted EBC CS suggests that demographic changes within the plan period may create two distinct phases for employment development within the Borough during this time. The Plan should in particular give careful consideration to the likely impacts of providing further employment floorspace within the Borough during a period where the working age population is declining, particularly in light of WDC's policy objectives for South Wealden. Notwithstanding that however, consideration of forecast long term demographic change might indicate a different scenario beyond the plan period which could demonstrate an increase in the supply of labour and the demand for floorspace may arise in the future. To deliver the "new economic image" set out in the objectives the Plan might identify specific sectors or businesses to be targeted and detail how planning policies will support the approach to deliver this objective. This aspect of the ELLP will be crucial to ensure the right businesses are attracted to the Borough and therefore it will need to be closely aligned with policies and objectives for Sovereign Harbour. Crucially the ELLP will need to outline a strategy for partnership working with other agencies to deliver aspects of the objectives.</p>		

Appendix 5 – Table of Responses to Draft Employment Land Local Plan Representations

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
PD-ELLP/02	Marine Management Organisation (Angela Atkinson)	General	No comments	No comment	No change to ELLP
PD-ELLP/03	Richard Maile	Employment Land Strategy and Distribution Scenario 1	<p>All of the industrial sites have the same flood risk from tidal flooding as the whole of Eastbourne. Therefore, there is no advantage in terms of flood risk.</p> <p>The major disadvantage is the uncertainty arising from what is basically a windfall site scenario. This is totally contrary to Government policy that seeks certainty in the planning system, particularly in terms of the provision of sites for employment.</p> <p>The figure of 20,000m² based upon the intensification of existing sites is totally unrealistic. Furthermore, it represents almost half of the total allocation of 43,000m².</p> <p>The disadvantages in Table 3 fail to highlight the enormous problems that are likely to be caused by increased traffic in heavily used areas, loss of car parking and other open spaces and, in particular, the fact that such intensification may well rely upon existing businesses having to move out to facilitate redevelopment.</p>	<p>The industrial estates are in tidal flood zone 3a, so reference will be included as a disadvantage. However, they are sites that have already been developed, and flooding infrastructure is already in place, which would still need to be provided on greenfield sites.</p> <p>It is considered that the Industrial Estates can accommodate 20,000sqm through the redevelopment and intensification of existing sites. Evidence of windfall delivery over recent years shows that the requirement can be delivered within the Industrial Estates. In addition, the Inspector at the Core Strategy examination accepted that a higher amount of floorspace than proposed in the ELLP could be provided within the industrial estates through intensification.</p> <p>The requirement includes an</p>	<p>No change to ELLP.</p> <p>Include reference to 'flooding' in disadvantages in the Employment Land Strategy and Distributions Options Report</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				allowance for churn, to facilitate existing businesses moving out to allow redevelopment.	
		Scenario 2	<p><u>Scenario 2: Extensions to Industrial Estates</u></p> <p>This scenario has been rejected as a preferred option. However, it is still an option and I would ask the appointed Inspector to consider it as such.</p> <p>A number of individual sites are involved, certain of which may have some of the disadvantages set out in Table 3. It is necessary to incorporate a policy within the Employment Land Local Plan to allow for the possibility of some extensions to industrial estates where these would produce benefits such as improved access, relationship with existing adjacent employment areas, enhanced visual and environmental benefits and the possibility of immediate development.</p> <p>In particular, I have had numerous approaches from developers; a fact that will be borne out by my agents, Messrs Ross & Co, together also with Sussex Police Authority who wishes to expand onto the site, their Custody Suite being located next door.</p> <p>Development of this site could also bring with it highway benefits in providing part of the access for the St Anthony's Link and environmental benefits in terms of bunding and landscaping to enhance the visual entry southeast along Lottbridge Drove, which is the main A22.</p> <p>The provision of the St Anthony's Link could also bring with it benefits in terms of the viability in the longer term of the sites at Sovereign Harbour.</p> <p>Although nominally part of Eastbourne Park, this land has for some 40 years been allocated as the Southbourne Link into town. Accordingly, it has never during that time been available as part of the open areas of the Park.</p>	<p>The site in question was assessed during the examination on the Core Strategy as an omission site. In her report, the Inspector was satisfied that none of the omission sites were suitable for housing or employment development.</p> <p>The site is a greenfield site within the boundary of Eastbourne Park, and any development within this area would be contrary to Core Strategy Policy D11: Eastbourne Park. Being in Eastbourne Park, the site has considerable biodiversity and the development of this site could have significant environmental impacts.</p> <p>It is considered that the requirement for industrial and warehouse development can be met through redevelopment and intensification within the existing industrial estates, and therefore there is no need to allocate additional greenfield sites for development, especially considering that</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				development of this site would be contrary to existing policy in the Core Strategy.	
		Scenario 3	<p><u>Scenario 3: Redevelopment of Sites Outside Industrial Estates</u></p> <p>I agree that redevelopment of sites outside industrial estates located in other areas of the town could bring about the disadvantages set out in the document. Furthermore, such redevelopment would possibly only be suitable for B1 uses. It is also a fact that many of the smaller industrial estates have in recent years been lost to employment in terms of their redevelopment for residential purposes or for A1 retail.</p>	Comments noted.	No change to ELLP
		Scenario 4	<p><u>Scenario 4: Town Centre</u></p> <p>This allocation represents only 3,000m². Furthermore, it is not suitable for other non-office B class uses. Therefore it is of a very restricted application, again contrary to the need set out in the NPPF for a variety of allocations.</p>	There is a requirement for office space as part of the overall requirement for employment land. The Town Centre is an option as a location for employment development in the form of offices, and is part of the preferred option which does provide a variety of allocations for employment development.	No change to ELLP
		Scenario 5	<p><u>Scenario 5: Sovereign Harbour</u></p> <p>These sites are liable to the same flooding constraints as the land at Lottbridge Drove, a factor not mentioned in the disadvantages.</p> <p>Furthermore, this site, amounting again to almost half the allocation, has been on the market for over 20 years I understand with no takers. It is in a very peripheral location. Access to it is likely to increase the existing congestion in Lottbridge Drove and it cannot sensibly be considered as a short term provider of employment opportunities given the</p>	<p>Sovereign Harbour is within tidal flood zone 3a, so reference will be included as a disadvantage.</p> <p>There have been recent applications approved for the development of employment uses on the Sovereign Harbour sites, including the development of an Innovation Mall, which is</p>	<p>No change to ELLP.</p> <p>Include reference to 'flooding' in disadvantages in the Employment Land Strategy and Distributions Options Report</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>need to provide the St Anthony's Link, which I note is shown as a low priority. Furthermore, in terms of sustainability it is almost certainly subject to access by private car given its isolated location.</p> <p>My understanding is that there have been recent planning applications submitted, which if approved may well render this particular allocation obsolete in terms of the overall floor area of 20,000m². I would also mention that a number of companies interested in developing on my site in Lottbridge Drove have totally rejected going to Sovereign Harbour given its isolation and lack of other business uses.</p>	<p>currently under construction. This would not compromise the ability of the sites at Sovereign Harbour to meet the requirement for 20,000sqm of employment floorspace.</p> <p>Therefore this option should continue to form part of the preferred option for location of employment development in the town.</p>	
		Scenario 6	<p><u>Scenario 6: Greenfield Development</u></p> <p>I agree that the development of previously undeveloped greenfield land located away from the existing industrial estates is not a good option and should only follow if all else fails. However, my comments in respect of Scenario 6 should not be seen as precluding development of the site adjacent to Hammonds Drive, which falls to be considered under Scenario 2.</p>	Comments noted.	No change to ELLP
PD-ELLP/04	Gardners Books Ltd (Andrew Little)	Employment Land Strategy and Distribution	<p>Support for the Preferred Option for distribution of employment land.</p> <p>Against any development of Eastbourne Park (Scenario 6) as building on this land would be detrimental to the character of the town and it contributes to making Eastbourne a desirable and unique location to live.</p> <p>Need to cater for larger office/industrial units as there is a shortage of this type of accommodation. Disappointed that industrial land had previously been released for retail development.</p>	<p>Comments noted.</p> <p>Scenario 6 has not been taken forward and there will not be any development proposals in Eastbourne Park as part of the Employment Land Local Plan.</p> <p>It is understood that there is a shortage of larger accommodation, and it is anticipated that this can be provided as part of the development of the Sovereign Harbour sites. In addition, the protection of</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>sites in industrial estates will encourage redevelopment to provide better quality industrial floorspace.</p> <p>The loss of industrial floorspace to other uses including retail is an identified issue. The Employment Land Local Plan includes policies for the protection and safeguarding of existing employment space within the Industrial Estates.</p>	
PD-ELLP/05	Highways Agency (Keith Jacobs)	General	<p>The cumulative effect of development in the borough could have an impact on the A259 to the east, A27 to the north and more specifically the Cophall roundabout and A27/A2270 junction. It is important that, wherever possible, policies which encourage sustainable development will help reduce the likely impact on the SRN.</p> <p>No comment other than that described above and as stated in our consultation responses to the Core Strategy.</p>	<p>Comments noted.</p> <p>The Employment Land Local Plan proposes a lower quantum of development that previously proposed in the Core Strategy, and therefore it is not expected that there will be additional adverse impact on the Strategic Road Network.</p>	No change to ELLP
PD-ELLP/06	Sussex Police (Samantha Prior)	Employment Land Strategy and Distribution	Support for Scenario 1 as this option makes best use of existing Brownfield land, and includes the area of Hammonds Drive in which Sussex Police have a particular interest due to the existing premises operated and land owned.	Support noted.	No change to ELLP
		Policy EL2	<p>Inclusion of Sussex Police site in proposed Policy EL2 is welcomed.</p> <p>Concern that Policy EL2 only allows for the intensification, redevelopment or new build for Class B Use only (or appropriate uses that cannot be located elsewhere due to their un-neighbourliness), as Sussex Police operations fall</p>	It is necessary to protect the Industrial Estates from other uses in order to protect their integrity and so that they remain locations where there is an expectation that businesses would be located.	No change to ELLP

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			<p>within Class C2A and Policy EL2 may prohibit future police developments. Although there are no plans to increase this facility on site, some flexibility may be required over the thirteen year plan period.</p> <p>The ELR identifies that one of the weaknesses of Hammonds Drive is access. Policy EL2 does not take the opportunity available for improving the approach, parking demarcation and public realm within the Estate.</p>	<p>However, Policy EL2 does allow appropriate uses that cannot be located elsewhere due to its un-neighbourliness and it is considered that a Police Custody Centre would be such a use due to the fact that it is used 24 hours a day, which could cause disturbance in a residential area.</p> <p>The Core Strategy Neighbourhood Policy C13 addresses the issue of public realm in the Industrial Estates by 'promoting the upgrading public realm in the Industrial Estates to make it more attractive for potential and existing businesses'. It is not considered necessary for this to be repeated in the ELLP.</p>	
PD-ELLP/08	Natural England (John Lister)	General	<p>The designated Industrial Sites shown in Figure 1 - lie to the north and south of part of Eastbourne Park. This is Coastal & Floodplain Grazing Marsh and a significant part of this area is supported by Environmental Stewardship funded through NE. The Park is a key component in the habitat network and an amenity for the town. The Plan (as a whole) should ensure that intensification of the Industrial Sites does not have a detrimental impact this important asset.</p>	<p>Comment noted.</p> <p>The Core Strategy contains policies for the protection of Eastbourne Park, and the Employment Land Local Plan does not identify development in Eastbourne Park on this basis. It is not expected that intensification of the industrial estates will have an adverse impact on Eastbourne Park, as development would not be accepted outside of the</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				industrial estate boundary.	
PD-ELLP/09	East Sussex County Council (Ellen Reith)	Introduction - Relationship with other plans and strategies	There is no reference to the EU Structural Investment Fund or the draft SELEP Strategic Economic Plan, although it is likely that Eastbourne would seek some of the funding for activities identified through these routes. Identifying the link in this strategy would also strengthen the case when making project applications.	Reference to the EU Structural Investment Fund and the SELEP Strategic Economic Plan will be made.	<p>Add two new paras after para 1.14 to read:</p> <p><i>The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government's Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been awarded for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the 'Hailsham, Polegate and Eastbourne Sustainable Corridor' and an Eastbourne and South Wealden walking and cycling package.</i></p> <p><i>EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support,</i></p>

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					<i>innovation, export and new technologies.</i>
PD-ELLP/10	East Sussex County Council (Ellen Reith)	2.3	Where claims are made e.g. There is a strong concentration of employment within key parts of the 'media' sector, there should be a footnote reference to the source of the data. The document includes a number of claims about clusters and sectors in the county, but there are often few data references to back them up. It would be very helpful for cross-referral and also to identify sources of data.	The data is sourced from the Employment Land Review (GVA, 2013), and this will be referenced in the footnotes.	Include footnote references to data sources.
		2.14	Is there evidence of the need for additional business space of this type? If this type of investment is to be made, there should be some reference to how the need has been identified, or there is a risk of new-build standing empty.	The Employment Land Review (GVA, 2013) identifies that the lack of 'mixed' units is one of the weaknesses of the employment land supply in Eastbourne. It goes on to state that this stock is likely to be in demand by businesses in advanced manufacturing, media/creative and technology based sectors. The recent application for an Innovation Centre, which is currently under construction, is just this type of flexible, mixed accommodation and provides an indication that there could be further demand for this type of space in the future.	No change to ELLP
PD-ELLP/11	East Sussex County Council (Ellen Reith)	2.21	This should specify what specialisms and clusters are to be encouraged to grow and to build their supply chains. This will help a wider audience identify opportunities and can give a focus to others working on this agenda elsewhere.	The Employment Land Review (GVA, 2013) identifies strength in a number of manufacturing activities, particularly relate	Amend the final sentence of para 2.21 to state: <i>Also, by encouraging existing key businesses and</i>

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				to mechanical products, and in parts of the 'media' sector in terms of film and TV production and production of recorded media.	<i>their supply chains, there is an opportunity to grow existing specialisms and 'clusters'. This might include manufacturing activities, particularly related to mechanical products, and parts of the 'media' sector, such as film and TV production and production of recorded media, which are sectors that have been identified as being particularly strong in Eastbourne.</i>
		2.22	It is very unhelpful to put the statement ' ... Should no longer rely on attracting significant inward investment.' It sends the signal that Eastbourne is closing the door to inward investment, or at best will put little effort into it if an opportunity arises, focusing instead on home-grown business. It is also at odds with the fact that Eastbourne contributes to the funding for Locate East Sussex. Even if recently there has not been inward investment it does not automatically mean it will remain that way. As the economy edges out of recession, there should be more growth and opportunities for business mobility, so Eastbourne should be prepared for this and invite it in.	<p>It was not the intention for the ELLP to close the door on inward investment, but to recognise that future demand is more likely to be driven from local business requirements.</p> <p>Increasing economic growth will require focusing on the strengths of existing businesses and attracting like-minded new activities to the area. This will need to be done through the provision of new, higher quality floorspace, which will be key to providing choice and attracting inward investment.</p> <p>Para 2.22 will be amended to reflect this.</p>	<p>Amend para 2.22 to read:</p> <p><i>The nature of economic growth has changed over recent years and Eastbourne has seen lower levels of inward investment, mainly due to the age and quality of existing stock, and has instead been more reliant on local investment from indigenous businesses.</i></p> <p><i>Future demand and growth in the market is still likely to be driven from local investment, either through expansion, changing space requirements or new business start ups. However, as the economy grows, it is important to encourage inward investment by making provision for</i></p>

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					<p><i>attracting like-minded new activities to the area.</i></p> <p><i>The Employment Land Local Plan needs to ensure it provides the right space in the right locations for inward investment but also provide the range of sites and premises required to ensure existing businesses are retained and can grow. This will also include the provision of a range of sites, including new, high quality floorspace alongside sites and premises to help increase the business start-up and survival rate and ensure indigenous businesses are retained and can grow.</i></p>
PD-ELLP/12	East Sussex County Council (Ellen Reith)	Key Issues	The improvements underway, both commercially and through the East Sussex investments in super-fast broadband should be included. Increasingly, premises with super-fast broadband connectivity are a requirement by businesses, (even if 'not mandatory for the delivery of employment land' - 5.4) aiming to grow and expand their markets, and should be highlighted here as well as later in the document.	Agreed. Broadband connectivity could influence demand for employment land and will be referenced as a demand issue.	<p>Add additional sentence to end of para 2.20:</p> <p><i>In addition, premises with super-fast broadband connectivity are a requirement for businesses aiming to grow and expand their markets, and improvements in broadband connectivity may influence the requirement for additional employment land in the area.</i></p>
PD-ELLP/13	East Sussex County Council	2.30	The Employment Land Review should be footnoted with a link to ensure ease of access.	Comments noted.	Include link to ELR within footnote

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	(Ellen Reith)	2.32	It would be helpful to give examples of the densities mentioned in the text - not all of the audience will be clear what these densities look like in practice, so a recognisable example for each one cited would aid understanding.	The density assumptions are derived from the HCA Density Guide Second Edition 2010. This is national good practice guidance. In addition, it would be very difficult to find examples that everyone would be familiar with.	No change to ELLP
PD-ELLP/14	East Sussex County Council (Ellen Reith)	Vision and Objectives	'Eastbourne will be making a strong contribution to the economy of Eastbourne and South Wealden' is confusing - it is making a contribution to itself. It is suggested that this is changes to 'The Eastbourne economy will be stronger and more sustainable. It will also contribute to the wider economy in South Wealden by	Agreed. The Vision could be re-worded to be less confusing.	Amend the Vision to read: <i>"By 2027, Eastbourne will be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work"</i>
PD-ELLP/15	East Sussex County Council (Ellen Reith)	Vision and Objectives	<p>ELLP1 seems at odds with the comment about inward investment in paragraph 2.22. It is also unclear how attracting increased investment and new and innovative businesses encourages economic competitiveness. Generally, that would be more a result of efficiencies and comparative advantage.</p> <p>ELLP2 says largely the same as ELLP3. The title suggests start-up support, whereas the paragraph refers to both start-up and established businesses. It is suggested that the objective just says something about providing flexible employment spaces that meet the needs of and are attractive to small and start-up businesses.</p> <p>ELLP4 maybe be a bit more positive about what the new</p>	<p>As described in the response to PD-ELLP/11, economic growth will rely on indigenous businesses as well as inward investment.</p> <p>Inward investment through attracting like-minded business activities will encourage the economic competitiveness of the local economy.</p> <p>Whilst there is an element of similarity between ELLP2</p>	<p>ELLP2 delete: <i>'To diversity the local economy...'</i></p> <p>Amend ELLP4 to read: <i>'ELLP4 - Support Existing Businesses - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.</i></p>

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			premises will enable, such as staying in the town and flourishing.	and ELLP3, the objectives are different. In order to reduce similarities, ELLP2 will be amended to removed reference to diversity. ELLP4 will be amended to refer to staying in the town and flourishing.	
PD-ELLP/16	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with assessment of the scenarios for the strategy and distribution.	Comments noted.	No change to ELLP
PD-ELLP/17	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with the preferred option.	Comments noted.	No change to ELLP
PD-ELLP/18	East Sussex County Council (Ellen Reith)	Page 19	The narrative on this page repeats what was set out clearly in the tables and does not add anything qualitative, so could be taken out to make the document more succinct.	The section on 'Options considered for employment land strategy and distribution' was only intended to aid understanding in the Proposed Draft version and will not be included in the Proposed Submission version.	No change to ELLP
		3.7	Clarify why occupiers are seeking to vacate: is it to relocate within the area, fold, or leave the area altogether?	There are a number of instances where the current premises do not meet the needs of the business. However, there is no indication as to where they will move to. It is important for the ELLP to recognise	No change to ELLP

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				that there will be movement within industrial estates.	
PD-ELLP/19	East Sussex County Council (Ellen Reith)	Employment Land Strategy and Distribution	Yes, agree with the proposed approach to the distribution of employment land.	Comments noted.	No change to ELLP
PD-ELLP/20	East Sussex County Council (Ellen Reith)	Policy EL1, bullet point 4	It would be helpful to specify specialisms.	Para 2.21 has been amended to refer to specific specialisms. It is not considered appropriate to include this reference in the policy, however the supporting text will be amended to specify the specialisms.	No change to ELLP
		3.11	Examples of similar successful schemes elsewhere in East Sussex should be given.	Agreed. Examples of other successful developments in East Sussex will be referenced.	Add sentence at end of para 3.11 to read: <i>Examples of this type of development in other parts of East Sussex include the Priory Quarter and North Queensway Innovation Park in Hastings, and the Basepoint Enterprise Centre in Newhaven.</i>
		3.12	Specify which sectors key businesses are in.	Instead of referring to specific specialisms in the Policy, it is more appropriate to do this in the support text, and para 3.12 will be amended to make this reference.	Amend 3.12 to read: <i>Eastbourne should further the development of 'clusters', including but not limited to mechanical manufacturing and film and TV production, by using existing key businesses and their supply chains as an</i>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
					<i>opportunity to grow existing specialisms through promotion and provision of appropriate space. The role of these clusters should be enhanced in the Borough both as a 'selling point' to attract occupiers and through the development of links to suppliers locally.</i>
		3.15	Where it says 'Working with and enhancing', it should identify clearly what this means. Is it Eastbourne Borough Council or others as well?	Eastbourne Borough Council will work with education providers in order to enhance skills provision. Para 3.15 will be re-worded to make it clearer.	Amend final sentence of para 3.15 to read: <i>Eastbourne Borough Council will work with the existing education and skills institutions to enhance provision, in order to address skill shortages, increase the working age population and improve the 'economic catchment' of the Borough.</i>
PD-ELLP/21	East Sussex County Council (Ellen Reith)	4.7	Are any bespoke builds intended here to help existing businesses grow with minimum relocation?	The ELLP does not specify the type of redevelopment that should take place in the industrial estates, but it is envisaged that it will be a mix of bespoke and speculative developments.	No change to ELLP
PD-ELLP/22	East Sussex County Council (Ellen Reith)	4.20	Clarify what sort of 'support will be given'. Does it mean planning permission, lobbying or funding, or something else?	'Support' refers to planning permission. The sentence will be re-worded for clarification.	Amend final sentence of 4.20 to read: <i>Therefore, proposals for the refurbishment of existing office stock within the Town Centre will be supported, to</i>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
					<i>meet modern occupier demands where they come forward.</i>
PD-ELLP/23	East Sussex County Council (Ellen Reith)	Monitoring Framework	Information should be gathered not only on floor space completed, but also how much of it is occupied after 1 year, 3 years, 5 years, and how much remains vacant, to evaluate the success and value for money of the investments.	<p>Whilst it is agreed that this information would help to evaluate success of development schemes, the occupation of the business units are not in the control of the planning system, and therefore it would not help with monitoring the effectiveness of the Employment Land Local Plan.</p> <p>In addition, Eastbourne Borough Council does not have the resources to monitor of occupation as part of the monitoring of the Employment Land Local Plan.</p>	No change to ELLP
PD-ELLP/24	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)	Evidence (<i>Employment Land Review</i>)	<p>The ELR presents much of the technical assessment data in summary form only. It would benefit from the addition of primary and analytical data tables within an appendix to trace the steps taken through to the recommended level of floorspace to be provided.</p> <p>Some inconsistencies appear within some of the ELR's summary tables and text (e.g. ELR Tables 3 and 4). The document should be reviewed to ensure these are corrected.</p>	The Employment Land Review (ELR) will be reviewed and amended to ensure consistency between data tables and commentary text. Where relevant we will provide supporting data tables in an appendix to the main report.	No change to ELLP The ELR will be reviewed and amended to include technical data and ensure consistency between text and tables.
			Reference is made within various of the ELLP documents to the proposed Innovation Mall at Sovereign Harbour providing 3,000sq.m. of B1 space. The detailed planning application for the Mall is for 2,300sq.m. accommodating c.300 jobs. This	The density of 12 sqm is in line with the nationally recognised HCA's Density Guide Second Edition	No change to ELLP

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			<p>equates to a density of c.8sq.m. per job, which accords with HCA published guidance on floorspace to job densities for serviced space. The ELR's application of 12sq.m. per office job across town centre and business park sites represents an over-specification of any such allocated space at Sovereign Harbour, as already demonstrated by the Mall. This should be reduced to 8-10sq.m. for assessment purposes.</p>	<p>(2010). The average office density across the South East region is 12.7 sqm per office job. Only within Central London are densities of 8-10 sqm per office job regularly achieved. Average densities for the sectors most relevant to Eastbourne indicate that 12 sqm is appropriate, and therefore 12 sqm per office job will continue to be used as occupier density.</p>	
			<p>The ELR refers to the TCLP envisaging that 3,000sq.m. of new office space will be allocated to Eastbourne town centre (ELR para 4.88). The TCLP does not envisage this. The requirement for the early review of the CSLP and the examination of the TCLP both emphasised the purpose of the ELLP is to independently determine the level of new floorspace requirements and how these can be most appropriately met across the town.</p> <p>The linked SA/SEA (para 6.10) repeats this error and has not considered all reasonable alternative spatial options for the distribution of new employment space. It demonstrates the consideration of just one strategic option for office space within the town centre: this being the continued allocation of just 3,000sq.m. A higher allocation within the town centre is a reasonable, market-led and NPPF policy compliant alternative.</p> <p>The allocation of just 3,000sqm. to the town centre will not replace the ELR's assessed windfall loss of 4,000sq.m. of office space to other uses, which will predominately take place within the town centre. The proposed allocation of new office space to the town centre thereby represents a planned for net loss of office space within the centre when both forecast losses and allocated new space are accounted for.</p>	<p>90% of the office stock in Eastbourne is located in the Town Centre. Office occupiers have different requirements, and currently Eastbourne does not provide sufficient choice with the majority of office space provided in the town centre. A more balanced provision of town centre and out of town locations is required to secure economic growth.</p> <p>It is considered that the provision of 3,000 sqm of new office space in the town centre will allow the replacement of some of the old stock that no longer meets the needs of occupiers, whilst also allowing the rebalancing of the portfolio.</p>	<p>No change to the ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>Capacity exists for the office allocation within the town centre to be significantly increased without compromising other spatial objectives, including the provision of new housing. This includes within the two sites that are specifically identified in the ELLP to accommodate the 3,000sq.m. of allocated space. Whilst the EBC documents do not appraise the total upper floorspace capacity of these sites, it is nonetheless acknowledged through ELLP Policy EL3 that they can individually as well as together accommodate more than 3,000sq.m. of office accommodation.</p> <p>The ELLP acknowledges the strength and strategic benefits of the Eastbourne/Polegate/Hailsham corridor but does not propose any further formal allocation of office space within the Eastbourne area of the corridor beyond just 3,000sq.m. in the town centre. The corridor is a key establish commercial hub and in connectivity terms benefits from existing infrastructure including rail connections. Potential exists to capitalise on this further including for office space. This must be recognised in policy.</p> <p>The assessed requirement of just under 21,000sq.m. of Class B1a/b space must be rebalanced to require the majority of this to be provided within the town centre alongside (1) opportunities for additional provision within the town's other centre and along the strategic corridor to Polegate, and (2) the possibility of grant supported space at the Harbour.</p> <p>This distribution will ensure office accommodation is replaced and enhanced within the town centre and will follow the logical pattern of established growth and connectivity within Eastbourne and adjoining Wealden.</p> <p>The SA/SEA's appraisal of the Council's preferred spatial options exaggerates the sustainability benefits of the ELLP's proposed balance of office space allocations. The reassessment of these and of the alternative option to allocate a higher amount of space to the town centre, accounting for potential subsidised new space at the Harbour,</p>	<p>It is not agreed that there is capacity in the Town Centre for significantly increased office provision without compromising other objectives for the Town Centre. The Town Centre Local Plan identifies five development sites, two of which already have permission. The remaining three sites will be required to deliver the office space requirement, 450 residential units, along with additional retail and community uses. It is not considered that an increased provision of office space could be appropriated provided alongside the other requirements on these sites.</p> <p>However, an increase level of provision of office space in the Town Centre will be tested as part of the Sustainability Appraisal.</p> <p>It is not considered appropriate that the majority of the office space requirement should be provided in the town centre.</p>	

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			demonstrates this to be by far the more beneficial option. This is in overall delivery and sustainability terms and in terms of being able to achieve the objectives and vision of the ELLP overall. This alternative option is also SEA regulation and NPPF compliant.		
			<p>The ELR acknowledges the longstanding viability constraints for Class B1 space at the Harbour. It however goes on to recommend that no less than 96% of the town's total assessed office floorspace requirement (20,766sq.m) and 100% of the assessed net new floorspace requirement (15,977sq.m.) should be allocated here. This does not represent an appropriate balance in the distribution of new and replacement office space and will not achieve the vision or the core objectives of the NPPF, CSLP or of the ELLP.</p> <p>Critically, the ELR/ELLP's proposed allocation at the Harbour is also unviable in commercial terms. The ELR acknowledges the need for grant funding support to overcome viability constraints for high quality office development at the Harbour. The Site 6 B1 proposals that are progressing through planning at the time of writing are only proposed with the support of grant aid. That support will not apply to all of the proposed employment land. Acknowledged longstanding viability constraints that have sterilised the employment sites at the Harbour will therefore not only remain on Sites 4 and 7 but will be exacerbated further by the presence of adjoining subsidised provision, against which Sites 4 and 7 will be unable to compete in financial terms. A continuing policy allocation for further substantial open market B1 space at the Harbour will, in short, be undeliverable.</p>	<p>It is established practice for public funded employment space to 'lead' or support new commercial districts as it allows for future delivery on 'market terms', provides proof that there is a market for such development and helps establish new sectors.</p> <p>The Innovation Mall can play an important role in demonstrating the potential of Sovereign Harbour as a new economic hub. The provision of publicly subsidised space has been a key tool in a number of locations to support wider, private sector, employment development. Examples of this are locations such as Silverstone and the Medway Innovation Centre. It is not considered that the subsidised provision on Site 6 will have any negative impact of the viability of the remaining sites.</p>	No change to ELLP
PD-ELLP/25	Teal Planning Ltd (Marie Nagy)	Demand Issues	<i>Requirement for additional employment land:</i> the summary explanation on this matter is supported, in particular the need to provide for an appropriate and realistic employment	The ELR provides a full justification for the employment land requirements, including the	No change to ELLP

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	On behalf of Sovereign Harbour Limited (Mark Orriss)		<p>land requirement, differentiated by B Use Classes.</p> <p>The assessment of floorspace and resulting land requirements, must accordingly take into account the nature of Eastbourne's employment market, including its small scale and local origin of demand for space.</p> <p>Having reviewed the new ELR, however, we do not consider the resulting recommended requirements for the level and distribution of new office space have been fully substantiated.</p>	<p>forecast for the number of jobs that need to be provided by use class, and appropriate densities to turn the job requirements into floorspace requirements.</p>	
			<p><i>Need for sustainable job creation and diversification:</i> The need to diversify local employment and to ensure that new local job creation is sustainable is supported.</p> <p>The definition of sustainable employment must be clearly defined if this is to appropriately and objectively inform employment land allocation options and choices. We consider the definition in relation to Class B1a/b space should be new employment that:</p> <ul style="list-style-type: none"> • becomes established and continues to provide job opportunities for local people over the long term; and • is located where it is most accessible by the greatest number of people without their need to travel by private car. <p>This second requirement underpins significant elements of nationally accepted strategic and sustainable planning objectives but does not sufficiently underpin the draft ELLP and its linked SA/SEA. This follows from weaknesses within the ELLP and its supporting documents in the weighing up of the respective location benefits of the town centre and Sovereign Harbour.</p> <p>The Response Statement includes a reassessment of the ELLP's proposed distribution of new office space based upon the SA/SEA assessment criteria.</p> <p>An alternative allocation option, with more office space directed to the town centre, has also been appraised and is</p>	<p>The ELLP does not reference the term 'sustainable employment' and therefore there is no need to provide a definition for it.</p> <p>Within the Initial Sustainability Appraisal Report, Sustainability Objective EL-SA13 relates to providing employment opportunities that are in accessible locations for local people and commuters, Sustainability Objective CS7 mentions accessibility by sustainable modes of transport, and Sustainability Objective CS20 references reducing the need to travel by car.</p> <p>It is considered that this adequate deals with the assessment of sustainability in terms of accessibility.</p>	No change to ELLP

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			<p>shown to score more highly in sustainability terms.</p> <p><i>Development that provides for start-up businesses:</i> This is also supported. The proposed Innovation Mall at Sovereign Harbour will help to meet this objective.</p> <p>The Innovation Mall will however provide 2,300sq.m. of space not 3,000sq.m. as referenced in the ELLP (para 4.36). The planning application for the Mall has also specified that it envisages it will accommodate 300 jobs. This equates to a floorspace to job density of 7.7sq.m.; a density that is in line with the HCA's 2010 guidance on serviced office space, but significantly lower than the 12sq.m. used within the ELLP's accompanying ELR to appraise floorspace requirements.</p> <p>As outlined within the Response Statement, the ELR's applied job density results in an over-allocation of office space. A density of 8 to 10sq.m. per job is appropriate for such space at the Harbour.</p>	<p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm NIA</p> <p>The density of 12 sqm is in line with the nationally recognised HCA's Density Guide Second Edition (2010). The average office density across the South East region is 12.7 sqm per office job. Only within Central London are densities of 8-10 sqm per office job regularly achieved. Average densities for the sectors most relevant to Eastbourne indicate that 12 sqm is appropriate, and therefore 12 sqm per office job will continue to be used as occupier density.</p>	<p>No change to ELLP</p> <p>Reference to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm NIA.</p>
		Supply Issues	<p><i>Suitability of Current Commercial Premises:</i> The draft ELLP on this matter refers only to examples of the town's Industrial Estates as providing opportunities to be upgraded or replaced to provide more appropriate modern accommodation.</p> <p>The town's existing office stock presents the same challenges but also opportunities. This must also be acknowledged and addressed more positively by the ELLP if the necessary links are to be made between:</p> <p>(1) the nature of the town's office market; and</p> <p>(2) a need to ensure employers have an on-going and increased opportunity to locate in the town centre as</p>	<p>The 'Suitability of Current Commercial Premises' will be amended to include reference to office stock. The ELR identifies that much of the office stock is no longer fit for purpose and does not provide an attractive offer to new occupiers. This is evidenced by the persistent high vacancy rates in a number of buildings and increasing demand for</p>	<p>Add additional text at end of para 2.23:</p> <p>Similarly, a significant amount of the office stock, especially in the town centre, is dated and does not tend to meet the needs of modern office occupiers. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to allow</p>

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			Eastbourne's established and most sustainable office location.	conversion to other uses.	modern servicing and infrastructure to be incorporated.
			<p><i>Loss of Employment Land to Other Uses:</i> The acknowledgement of this issue is supported. At present however the ELLP appears to too readily accept the loss of employment space within the town centre because higher value use options may be available. Planning policy allocations and linked planning controls must seek to maintain existing employment based accommodation where it is already appropriately located to help meet space requirements.</p> <p>This requires a more positive policy response towards the retention and provision of office space, across a greater number of sites and to a higher level of floorspace capacity within the town centre than is currently proposed within the draft ELLP.</p>	It is appropriate to consider the loss of employment land to other uses, especially in the town centre, because of permitted development rights that allow conversion of office space to residential (subject to prior approval), and para 51 of the NPPF, which sets the principle of allowing change of use from B space to residential use. The most appropriate employment space for conversion to residential is located within the town centre. Policy EL2 has been included in the ELLP to maintain existing employment based accommodation in the most appropriate locations.	No change to ELLP
			<p><i>Identification of Sites:</i> The ELLP's stated need to ensure that additional employment development is provided in the most appropriate and sustainable locations is supported.</p> <p>The draft ELLP however is too negative in its assessment of development constraints and its options for new office space within the town centre and too readily dismisses this option in favour of other potentially higher value uses.</p> <p>The need to ensure an appropriate supply of office space within the town centre must take greater precedence than is currently expressed within the draft ELLP.</p> <p>The ELLP additionally assumes in space allocation terms that</p>	<p>Support for the identification of sites is noted.</p> <p>It is not considered that the draft ELLP is too negative in the assessment of the town centre, and it does take into account occupier needs for a more balance provision of office stock.</p> <p>However, an increase level of provision of office space in</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>no new office space will be provided within the town’s existing employment estates. New office accommodation has been provided in these locations and opportunities to provide further such accommodation should not be dismissed.</p>	<p>the Town Centre will be tested as part of the Sustainability Appraisal.</p>	
			<p><i>Requirements for Office Space in the Town Centre:</i> The ELLP refers to both the EBC TCLP (2013) and the SA/SEA as stating that the ELLP is to determine the appropriate amount of office space to be provided in the town centre. The ELLP’s summary of this issue also states that a balance must be struck which must take into account the maintenance of the town centre as an office location as well as the broadening of choice within the town’s overall office stock.</p> <p>At para 4.88 of the supporting ELR however GVA states: Across a range of Development Opportunity Sites, Transition Areas and Potential Areas of Change B1a floorspace is deemed an acceptable use.</p> <p>It is within these areas that the TCLP envisages the delivery of 3,000sq.m. of new floorspace within come forward.</p> <p>The TCLP does not envisage this; the TCLP requires the ELLP, supported by a sound evidence base (i.e. the new ELR), to establish an appropriate allocation of net additional new space for the town centre. At no point does the ELR explain how the allocation of this amount of space has been re-arrived at or why it is limited to just 3,000sq.m.</p> <p>At page 8 within the Executive Summary of the ELR, GVA states: To avoid any adverse impact on the town centre we would continue to support the 3,000sq.m. allocation within the Core Strategy with a primary focus for delivery on the sites Development Opportunity Site 2 and Development Opportunity Site 3.</p> <p>Whilst the ELR at its Table 15 (pages 49 to 52) appraises the TCLP Development Opportunity Sites (DOS) and town centre Transition Areas for their suitability for new office accommodation, as explained within the Response Statement, elements of this assessment are flawed and the link between the capacity of these sites and the allocation of</p>	<p>The NPPF sets the direction for LPAs to identify strategic sites (or set criteria to identify them) for local and inward investment to meet “anticipated needs over the plan period”. In line with paras 7 and 17 the distribution of development land for business should have the right types of land available in the right places at the right time to meet occupier requirements, it should also respond to market signals.</p> <p>The review of Development Opportunity Sites within the ELR identifies the ‘hierarchy’ of potential sites in the town centre for office use based on a market orientated view of their attractiveness. None of the sites are ruled out, but it suggest those that are likely to be most appropriate and attractive to the market. In line with the direction of the NPPF, office proposals, should they come forward on any site, will be assessed in the usual development control manner for acceptable town centre uses.</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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			<p>3,000sqm is again not explained.</p> <p>An allocation of 3,000sq.m. equates to just one building within one block of DOS Three.</p> <p>The ELLP at para 4.26 also acknowledges that DOSs Two and Three have capacity to accommodate more than 3,000sq.m. both individually as well as together, It states that: If one site comes forward without sufficient provision of office space, the balance should be provided on the other.</p> <p>Following from this, the ELR fails to appropriately appraise the overall market risks and threats that arise from proposing such a limited amount of office space within the town centre and does not fully consider the sustainability issues arising from the balance of allocations proposed within the centre and at Sovereign Harbour.</p> <p>As outlined within the accompanying Response Statement, the SA/SEA's appraisal of the ELLP's single option for the town centre of 3,000sq.m. of B1 space is flawed. The Statement accordingly reappraises the distribution of space options:</p> <ul style="list-style-type: none"> • first based upon what we consider a more appropriate scoring of EBC's proposed option against the ELLP's sustainability objectives; and • second based upon an alternative option which demonstrates that a higher office allocation for the town centre presents a more favourable approach in sustainable planning terms, one that is deliverable in space capacity terms within the town centre and that will not prejudice other strategic development objectives for the centre. 	<p>The identification of the DOS 2 and 3 is intended to provide a strategic direction for promotion of town centre opportunities. The availability of other development sites does not evidence a reduction in the need for other types of site across the Borough to meet local economic needs.</p> <p>The majority of the office stock in Eastbourne is located in the Town Centre. This does not meet occupier needs, and therefore it is necessary to rebalance the portfolio to include provision in out of town locations. Provision in the town centre will be high quality replacement for some of the older provision that does not meet occupier needs.</p> <p>As previously mentioned, increased provision of office space may compromise the ability of the town centre to meet other objectives, particularly those related to housing delivery.</p> <p>An increase level of provision of office space in the Town Centre will be tested as part of the Sustainability Appraisal.</p>	

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			<p><i>Suitability and Viability of Land at Sovereign Harbour:</i> The draft ELLP's summary of this issue correctly outlines (1) the long standing Council priority for employment development to be delivered at the Harbour, (2) that this has not occurred (3) that the ELLP is to consider the suitability and viability of land here for office development.</p> <p>The ELR identifies an overall B1a requirement for the town of 20,766 sq.m. allowing for losses and churn within the town's office stock. This is translated into a proposed allocation of 20,000sq.m. at the Harbour: i.e. effectively the total amount of office space assessed to be required within the town overall through to 2027.</p> <p>EBC's proposed allocation takes into account the Innovation Mall which has been applied for, albeit this will total just 2,300sq.m. not 3,000sq.m. as referenced within the ELR (para 4.75).</p> <p>Based upon EBC's proposed allocation of 20,000.sq.m, once the Innovation Mall is delivered this will leave a remaining allocation of 17,700sq.m. to still be delivered at the Harbour.</p> <p>This allocation may represent a reduction of 10,000sq.m. on the CSLP allocation for the Harbour (i.e. 30,000sq.m. of B1 space), but again this amount is not substantiated in terms of how this meets with market demand, market trends and strategic planning and sustainability objectives.</p> <p>The ELR at its para 4.79 to 4.82 itself outlines the significant viability constraints at the Harbour. At its paras 4.84 and 4.85 the ELR states that: However the availability of public sector funding via the Growing Places Fund is likely to help overcome some of these challenges. It will help to establish Sovereign Harbour as an employment location and by providing on site servicing reduces some of the prohibitive barriers to entry. Both will help to attract future demand as the economy recovers and potentially enable that demand to be realised.</p> <p>If these barriers can be overcome with public sector support then the vacant land at Sovereign Harbour could have an</p>	<p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm</p> <p>The allocation of 20,000 sqm of office space at Sovereign Harbour is an attempt to rebalance the office stock portfolio in order to provide occupier choice and support economic growth. Currently, 90% of office stock is located in the town centre and this does not offer the choice that the market requires. Providing a balanced portfolio of office provision will help meet market demand and provides sustainability benefits in relation to economic growth.</p> <p>It is established practice for public funded employment space to 'lead' or support new commercial districts as it allows for future delivery on 'market terms', provides proof that there is a market for such development and helps establish new sectors.</p> <p>The Innovation Mall can play an important role in demonstrating the potential of Sovereign Harbour as a new economic hub. The provision of publicly</p>	<p>No change to ELLP</p> <p>Reference within background documents to 3,000 sqm at the Innovation Mall will be amended to 2,300 sqm</p>

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			<p>important role to play in accommodating future economic growth by providing a new, high quality location that is considerably different to current employment areas and the town centre and provides additional capacity for growth.</p> <p>Receipt of a public subsidy may unlock some of the infrastructure servicing constraints on part of the land at the Harbour and may provide accommodation that can in turn be offered at subsidised (lower) rentals in support of small / start-up businesses. This subsidy will bring occupancy costs of new high quality space at the Harbour more in line with town centre costs and as such the Harbour will be more likely to attract occupiers.</p> <p>This benefit however only addresses (part of) Site 6 and in time occupancy charges for the subsidised space will no doubt have to increase to reflect open market values.</p> <p>The fact that Site 6 will benefit from being heavily subsidised even in the short to medium term will however significantly impact on the ability to deliver equivalent space on neighbouring non-subsidised sites.</p> <p>The development costs of Sites 4 and 7 will be unchanged and will reflect the longstanding viability constraints of these sites in terms of their additional servicing costs. The open market rent or sale prices that will be required to recover those costs and provide a development profit unaided by grant support will be at a further significant premium compared with the supported space on Site 6.</p> <p>The development of Sites 4 and 7 for offices will thereby not only be unviable based on general development cost considerations but will have the additional constraint of having to compete against the advantages of the subsidised accommodation on Site 6.</p> <p>By acknowledging the viability issues at the Harbour and the need for grant subsidy to deliver new space here, demonstrates awareness of the reasons why the Harbour has not delivered office space to date. The failure of the ELR and the ELLP to acknowledge the implications of this as a</p>	<p>subsidised space has been a key tool in a number of locations to support wider, private sector, employment development. Examples of this are locations such as Silverstone and the Medway Innovation Centre.</p> <p>It is not considered that the subsidised provision on Site 6 will have any negative impact of the viability of the remaining sites.</p>	

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			<p>constraint to the delivery of additional unsubsidised space however is a major flaw.</p> <p>By going on to recommend that the most substantial share of the town's allocated office space should be directed to the Harbour in spite of these viability issues is flawed and is unsound.</p>		
			<p><i>Eastbourne and South Wealden area:</i> The ELLP's summary of this matter refers to the relationship between these two neighbouring areas and in particular between Eastbourne, Polegate and Hailsham. It also refers to the 2008 masterplan that was produced for this area.</p> <p>The representations submitted on behalf of SHL at that time also emphasised the primary focus for growth between the two authorities was along the north-south corridor and at the core hub at Polegate / Stone Cross.</p> <p>The ELLP stakeholder event held in June 2013 focused quite significantly on the strength of this north-south corridor and on the opportunities to build further upon it. Sovereign Harbour remains very much peripheral to this area. There is scope to develop further employment space within and along the corridor without the need to rely upon new space at Sovereign Harbour. The ELR / ELLP ignores this, representing a further flaw in the range of alternative allocation options that should be considered.</p>	<p>In order to ensure economic growth in the area, a balanced provision of office space should be provided. This means provision in town centre and out of centre locations. Sovereign Harbour is not considered to be peripheral to the Eastbourne and South Wealden area as a whole as it can provide something that is not present in the rest of the area.</p>	<p>No change to ELLP</p>
PD-ELLP/26	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>		<p>The vision, and the emphasis placed within it on sustainability measures and objectives, are supported.</p> <p>The setting out of the alternative options for the distribution of new office space and the scoring of these options within the ELLP's accompanying documents however are not sufficiently appraised to ensure that the ELLP's vision will be achieved to its fullest possible extent.</p> <p>This includes a failure to identify and appraise all reasonable alternative office space allocation options.</p>	<p>An increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

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PD-ELLP/27	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>		<p>The draft ELLP identifies the Key Spatial Objectives (KSO) of the CSLP that are considered to be of most relevance to the ELLP and which set a template for the appraisal of options for growth within and across the town.</p> <p>Whilst KSO3 focuses upon the shopping and leisure role of Eastbourne town centre, this does link to wider considerations of how to help sustain the centre as a vibrant, high quality destination.</p> <p>EBC's policy approach for the town centre recognises the benefit of supporting new residential development within the centre, which will contribute to meeting housing requirements and provide additional footfall and patronage for service providers within the centre.</p> <p>The vitality and sustainability of service provision however is also dependent upon a wider commercial and employment base that provides important weekday and evening footfall.</p> <p>The ELLP's proposed allocation of just 3,000sq.m. of new office space to be provided within the centre fails to make this important link and will represent a net loss in the town centre's office stock, once forecast net losses are also taken into account. This undermines the ELLP's ability to meet CSLP KSO3 and the vision set out for the ELLP itself.</p> <p>CSLP KS08 and KS010 emphasise the need for development to be appropriately located to help reduce car-based travel and to ensure that development is of an appropriate scale to achieve sustainability of each of the town's neighbourhoods in terms of their infrastructure capacity and opportunities to meet identified requirements. These considerations are also relevant to the achievement of the ELLP's overall vision and to the sustainability appraisal of development options.</p> <p>Leading from the consideration of the CSLP objectives, the five objectives identified for the ELLP itself are supported.</p> <p>The definition and explanation of ELLP5 (To promote sustainable employment locations) however should be expanded to capture the wider understanding of what</p>	<p>90% of Eastbourne's office stock is already located in the town centre. The proposed approach would result in an increased provision of higher quality office provision as the losses of stock are likely to be poor quality and condition that does not meet occupier needs. A balanced provision of office space across the town, including the replacement of old stock in the town centre with new high quality provision, will help meet the Spatial Objectives.</p> <p>The proposal to rebalance the office provision in the town will still result in the majority of the office space being located in the town centre. This means that the majority will still be appropriately located to help reduce car-based travel, but will also provide choice for occupiers who would prefer an out of centre location.</p> <p>It is not considered necessary to expand the definition of Objective ELLP5 as these are explained elsewhere, including through the Sustainability Appraisal.</p>	No change to ELLP

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			contributes to sustainable employment locations; namely locations that are sustainable in transport terms and where businesses are supported and sustainable through established business linkages: i.e. the considerations addressed through CSLP KSO 3, 8 and 10 as outlined above.		
PD-ELLP/28	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)	Scenario 1: Industrial Estates	<ul style="list-style-type: none"> Disadvantages. Included is a consideration that the existing estates are Unsuitable for high quality office development. Some such space has been provided on existing estates and additional new provision should not automatically be ruled out. Advantages. The ELLP's summary conclusion states that the existing estates are suitable for B1 space. This includes potential office space. The ELLP however again makes no account for this in its proposed allocation of new space. 	It is unlikely that high quality office development will locate within industrial estates because the industrial environment is unlikely to meet their requirements. However, Policy EL2 does not prevent the development of office space within the Industrial Estates.	No change to ELLP
		Scenario 4: Town Centre	<ul style="list-style-type: none"> The town centre is appraised as being unsuitable for other non office B uses. Some sites, for instance TCLP DOSs Two and Three could be appropriate for Class B1b use, in view of their size, their setting and fact that they are assessed as appropriate for mixed use schemes. Class B1b by definition is appropriate as a neighbour to residential uses and can occupy space of a very similar specification to B1a space. Other forms of development [within the town centre] may be more viable. This can be applied to all sites across the town. It should therefore be struck through as a disadvantage to be taken into account only in relation to the town centre. the allocation of employment space will have an adverse impact on the delivery of housing. The CSLP has appraised the delivery of housing sites within the town centre and has identified employment opportunity sites and transition areas. The ELLP must strike the right balance between commercial, residential and other uses that can and should be directed to the centre. The ELLP 	<p>Office provision includes class B1a and B1b uses, and therefore it is considered that B1b uses would be appropriate in the town centre.</p> <p>It is accepted that other forms of development being more viable is an issue across the whole town, and therefore it will be removed as a disadvantage for the town centre.</p> <p>It is considered that the provision of office space may impact on housing delivery. There are three remaining development sites identified in the TCLP, and these will be required to accommodate</p>	No change to ELLP Amendments to be made to the Employment Land Strategy and Distributions Options Report

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>however places too significant emphasis on new residential space at the cost of office development. As such, the ELLP’s assessment of the DOSs has underestimated the potential of these sites to accommodate sizeable new office spaces without undermining the delivery of new homes. The two aims are not mutually exclusive.</p> <ul style="list-style-type: none"> Land within the town centre has not been assembled. This goes against the evidence put forward in support of the TCLP which sets out a delivery programme for each of the DOSs and a policy framework for reviewing additional site options should further opportunities be required to meet development needs. Part of the role of planning is to facilitate land assembly and this should not be so readily dismissed as an option for town centre sites where the economic linkage benefits from new investment are the strongest. 	<p>the office provision and 450 residential units, as well as retail and community uses. A significant increase in office provision will affect the capacity of the remaining sites to deliver the housing requirement. This, coupled with the fact that the majority of office space is already located in the town centre, means that there is no reason to increase the amount of office provision at the expense of residential development.</p> <p>There are limited opportunities in the Town Centre to deliver office space. The ELR identifies that Development Opportunity Sites 2 and 3 would be the most attractive sites for office development. There are issues associated with bringing these sites forward as both sites are in multiple ownership. This is a disadvantage when compared to other locations that are currently in single ownership.</p>	
		Scenario 5: Sovereign Harbour	<p>Advantages</p> <ul style="list-style-type: none"> Fewer design and layout constraints: the sites at Sovereign Harbour are subject to prescriptive design parameters set out within the Harbour SPD which include building heights and in the case of Site 4 	Sites 6 and 7 are currently vacant sites with limited design constraints and are essentially a blank canvas. The Sovereign Harbour SPD provides guidelines for	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>building footprint. Development here will also need to be supported by appropriate on-site car parking which will take up development capacity. In contrast, the larger town centre sites may be less restricted in particular where reliance on public transport and public car parks can be significant benefits and greater flexibility may be applied to building heights, working with changes in site levels and existing neighbouring tall buildings.</p> <ul style="list-style-type: none"> • Increases distribution of employment opportunities and employment within a Sustainable Centre. These are agreed but this does not justify such a significant proposed quantum of new office floorspace being allocated here, relative to the town centre. • High Quality Environment. This equally applies to the town centre which provides more significant linked service benefits and attractions, in contrast with a business park setting. • Could attract a mixture of business sizes. This again equally applies to (1) the town centre in view of the mix and size of development sites available and (2) to potential development opportunities within the existing employment estates across the town which have demonstrated the ability to accommodate new campus developments. • Sites ready to develop. The sites may be less constrained in terms of their being undeveloped with clear access arrangements compared with some town centre sites. They however do require servicing upgrades and are required to deliver a high quality environment and stock of accommodation which, given the scale and nature of the Eastbourne market have resulted in no viable open market office development being secured. The sites may be ready to develop but this does not mean they are deliverable in market terms for a large amount of space. <p>Disadvantages</p>	<p>design but not to the extent that they would constraint development. In addition, the SPD was subject to public consultation and SHL made extensive representations. It is considered that the Sovereign Harbour sites have fewer design and layout constraints than other locations.</p> <p>The provision of employment space within a Sustainable Centre is an advantage.</p> <p>Sovereign Harbour provides an attractive offer that is different to the town centre that will appeal to occupiers with different needs.</p> <p>Sovereign Harbour has greater potential to attract a mixture of business sizes due to fewer constraints on design and layout. This means that there are less constraints on the types of employment space that can be provided. This does not apply equally to the town centre or other industrial locations as there are more constraints on design and layout in these locations.</p> <p>It is likely that any development site will require servicing upgrades. It is not</p>	

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<ul style="list-style-type: none"> Potential noise issues on residential amenity. Class B1 use is by definition compatible with residential development. Class B1c may raise more issues, however this is envisaged only to potentially comprise a small amount of space on Site 6 at the Harbour. This lack of constraint however again does not deem the Harbour appropriate for a significant B1a/B1b allocation; other wider considerations of economic and environmental based sustainability must be taken into account. 	<p>considered that this has any effect on the advantage of the sites at Sovereign Harbour being ready to develop. It is considered that the Innovation Mail currently being built on Site 6 will be a catalyst for further provision of B space in the location.</p> <p>As Sovereign Harbour contains a significant amount of residential development, there is potential that any type of employment development may cause some form of noise disturbance. It is recognised that B1 uses are compatible with residential uses. However, it is appropriate to identify this as a potential disadvantage.</p>	
PD-ELLP/29	<p>Teal Planning Ltd (Marie Nagy)</p> <p>On behalf of Sovereign Harbour Limited (Mark Orriss)</p>		<p>Yes. The Draft ELLP and its supporting documents fail to consider all reasonable alternatives and as such are not SEA compliant.</p> <p>The accompanying Response Statement reappraises the ELLP’s proposed distribution of new office space taking more fully into account sustainable location and accessibility issues.</p> <p>It also appraises the option of providing a higher allocation of office space in the town centre, alongside a lower amount of subsidised space at the Harbour. This shows a still higher sustainability score for both locations compared with EBC’s preferred option.</p>	<p>An increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.</p>	<p>No change to ELLP</p> <p>Increased office provision to be tested as part of the Sustainability Appraisal</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
PD-ELLP/30	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)		No. The broad preferred locations comprising: intensification of existing estates (Scenario 1), the town centre (Scenario 3) and Sovereign Harbour (Scenario 4) are supported in principle. The specification of Scenarios 3 and 4 however are not supported and are not NPPF compliant. They must be redefined based upon a greater priority weighting of new office floorspace to the town centre.	As previously mentioned, the evidence suggest that a more balanced portfolio of office space in Eastbourne is required, which means directly some away from the town centre. However, an increased amount of office provision in the Town Centre will be tested through the Sustainability Appraisal.	No change to ELLP Increased office provision to be tested as part of the Sustainability Appraisal
PD-ELLP/31	Teal Planning Ltd (Marie Nagy) On behalf of Sovereign Harbour Limited (Mark Orriss)		No. EBC's preferred option is based upon an unsubstantiated weighting of new Class B1 space at Sovereign Harbour which does not best meet sound or sustainable strategic planning objectives for Eastbourne town overall and raises issues of viability and deliverability in respect of the amount of space that is proposed to be allocated at the Harbour. The distribution of Class B1 space must be rebalanced. The ELLP must also recognise the potential for further office campus development within the town's other existing employment areas.	As previously described, the majority of office provision in Eastbourne is located in the town centre, and provision in other locations is required in order to rebalance the portfolio and provide occupier choice to encourage economic growth. Whilst there may be some office development on industrial estates, it is unlikely to be campus developments.	No change to ELLP
PD-ELLP/32	Southern Water (Sarah Harrison)	Policy EL2	Southern Water sewerage infrastructure crosses the designated Industrial Estates. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. Proposed additional text to be included in Policy EL2: <i>Development proposals must ensure future access to the</i>	It is not considered that this is an issue that needs to be referenced in a strategic planning document. This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<i>existing Southern Water infrastructure for maintenance and upsizing purposes.</i>	could be addressed as part of an informative as part of any planning application.	
PD-ELLP/33	Southern Water (Sarah Harrison)	Policy EL3	<p>Southern Water sewerage infrastructure crosses Development Opportunity Site 2: Land adjoining the Railway Station and the Enterprise Centre and Development Opportunity Site 3: Land between Upperton Road and Southfields Road. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing.</p> <p>Proposed additional text to be included in Policy EL3:</p> <p><i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i></p>	<p>It is not considered that this is an issue that needs to be referenced in a strategic planning document.</p> <p>This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It could be addressed as part of an informative as part of any planning application.</p>	No change to ELLP
PD-ELLP/34	Southern Water (Sarah Harrison)	Policy EL4	<p>Southern Water sewerage infrastructure crosses Site 4 Land of Harbour Quay and Site 7 Land fronting Pevensey Bay Road and Pacific Drive. It is requested that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing.</p> <p>Proposed additional text to be included in Policy EL4:</p> <p><i>Development proposals must ensure future access to the existing Southern Water infrastructure for maintenance and upsizing purposes.</i></p>	<p>It is not considered that this is an issue that needs to be referenced in a strategic planning document.</p> <p>This is a matter to be dealt with at the planning application stage, where consideration will be given to these detailed issues. It addressed as part of an informative as part of any planning application.</p>	No change to ELLP
PD-ELLP/35	Planning Potential (Leigh Thomas)	<i>Evidence supporting the ELLP</i>	<p>The ELR forms part of the evidence base to inform the emerging ELLP. Specifically in respect of the Cosmetics site, the ELR suggests that the site " ...could be redeveloped to provide more modern floorspace"</p> <p>The ELR does not include specific reference to the NPPF tests and requirements in respect of employment sites allocations,</p>	<p>The ELR will be reviewed and amended to include reference to the NPPF.</p> <p>The ELR was prepared in consultation with land owners and promoters where these were identified</p>	No change to ELLP

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>including para. 21 referred to above.</p> <p>The ELR was not subject of consultation with either third parties or landowners during its preparation and certainly we can confirm that at no time were ARCa contacted in respect of the former Cosmetica site. This is perhaps unfortunate and again is surprising given their previous discussions with the Council, the local prominence of this site and the genuine difficulties that had been expressed in respect of trying to secure a B Use Class at the site, including having applied for planning permission for smaller units by the previous owner to ARCa.</p> <p>The fact that the previous owner TAM had gone as far as trying to secure a more attractive planning position for B Use demonstrates the attempts made to move forward. That this has not happened is further evidence of the genuine difficulties experienced to date that have been overlooked in the conclusions reached by the ELR.</p>	<p>both via workshop and one to one meetings. This approach was in line with guidance at the time of ELR preparation. The ELR will be revised to highlight the consultation approach.</p>	
		<p>Vision and Objectives</p>	<p>Given both our experience, knowledge and concerns expressed above, we are equally concerned with the weight to be attached to the PDELLP, particularly in respect of the former Cosmetica site.</p> <p>In this context we again reiterate our concerns that to continue to protect sites such as the former Cosmetica for B Use Classes, where there is clear evidence that, "...there is no reasonable prospect of a site being used for that purpose" is contrary to the requirements of the NPPF para. 21. It is our clear position that this genuine issue, as recognised in national policy must be taken into account in the emerging ELLP.</p>	<p>NPPF para 21 sets the direction for Local Planning Authorities to identify strategic sites (or set criteria to identify them) for local and inward investment to meet "anticipated needs over the plan period".</p> <p>Therefore, Employment land designations must be considered in the context of demand over the plan period, rather than reflecting short-term market fluctuations.</p> <p>Given the constrained nature of the town, lack of land availability and the relatively high requirement for</p>	<p>No change to ELLP</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>residential development, it is important to protect sites already providing an employment use within a predominantly industrial location. Although the site may have been vacant over recent years, the demand for employment land over the plan period will increase.</p> <p>Although certain buildings will not meet future needs, this does not mean that land itself is redundant over the life of the plan.</p> <p>The loss of identified employment land will constrain future economic growth and compromises the ability of the town to meet future employment needs.</p>	
		Policy EL2	<p>Object to the former Cosmetica site be subject to the same policy protection as the remainder of Brampton Road Industrial Estate. The site has been vacant for over 4 years and remains so despite marketing and attempts through a planning application to make it more attractive for B Use Classes. There is no justification for it to remain protected for such uses and to do so will simply lead to the site continuing to be vacant and would be contrary to both evidence and the NPPF.</p> <p>Policy EL2 is considered to be overly restrictive and does not allow for redevelopment, especially in instances where it is demonstrated that there is no reasonable prospect of continued B use class.</p> <p>Policy EL2 creates ambiguity suggesting that non-B uses would only be acceptable in respect of change of use rather</p>	<p>The Cosmetica site is part of the Brampton Road Industrial Estate. It is accessed via the main estate road and it is surrounded by similar uses.</p> <p>Being within the Brampton Road Industrial Estate, it is considered appropriate that it is given the same policy protection as the rest of the Industrial Estate.</p> <p>It is not considered that Policy EL2 is overly restrictive. Policy EL2 aims</p>	<p>Delete the final two paras of Policy EL2 and replace with:</p> <p>Proposals for redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</p> <ul style="list-style-type: none"> The proposed alternative use is an appropriate use to the industrial estate that

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
			<p>than redevelopment. This is unreasonable and does not account for instances where a premises is no longer fit for purpose. As such, it is suggested that the final paragraph is amended to read:</p> <p><i>"Within designated Industrial Estates, change of use or redevelopment of units in class B use to other employment generating non-B uses may be acceptable subject to genuine redundancy of the unit being demonstrated"</i></p> <p>Further, it is noted that in order to demonstrate genuine redundancy, applications would be tested against saved policy BI1 of the Eastbourne Borough Local Plan 2001 - 2011. This policy is now considerably out-of-date, and has been superseded by the NPPF. As such, it is respectfully submitted that a more up-to-date test, that has been subject of public consultation and is shown to be in accordance with the NPPF is necessary.</p>	<p>to ensure that the redevelopment of sites within Industrial Estate must be within class B use.</p> <p>However, it is considered that Policy EL2 could be expanded to include reference to allowing redevelopment in instances where it can be demonstrated that the loss of the site would not impact upon the long term supply of employment land and the site cannot be upgraded to meet current or long term needs.</p> <p>The ELLP recognises that a number of units are part of a sub-divided larger unit, and there may be situations where there is no 'B use' demand for an older unit that is part of a larger building, although the other units may still be occupied. In these situations, it would not be beneficial for that unit to sit empty until the whole site is available for redevelopment, and therefore, subject to it being demonstrated that the unit will not be used for B use again, these units should be allowed to change use to remain in occupation until full redevelopment can take</p>	<p>cannot be located elsewhere due to its un-neighbourliness; or</p> <ul style="list-style-type: none"> • 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. <p>Within the designated Industrial Estates, change of use of units in class B 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.</p>

Rep ID	Respondent	Section	Summary of Representation	Officer Response	Recommended Change
				<p>place.</p> <p>The NPPF is clear that just because a policy was adopted prior to the publication of the NPPF, it does not automatically mean that the policy is out of date. Although it is not considered that Borough Plan Policy BI1 and the related Supplementary Planning Guidance are out of date, in order to be consistent with the NPPF, reference to genuine redundancy will be replaced with 'no reasonable prospect'.</p>	

Appendix 6 – Schedule of Changes - Draft Employment Land Local Plan to Proposed Submission version

Ref	Rep ID	Section	Modification	Reason
PS-C1	n/a	Introduction - What is the Employment Land Local Plan	Delete final sentence of para 1.2	To provide consistency for Proposed Submission Version
PS-C2	n/a	Introduction - What is the Employment Land Local Plan	Add additional para after 1.3 to read: It should be noted that although the National Planning Policy Framework (NPPF) defines economic development as being development within the B Use Classes, public and community uses and main town centre uses, employment land in the context of the Employment Land Local Plan only relates to development of Class B Uses. Other uses are dealt with through the Eastbourne Core Strategy Local Plan 2006-2027 (adopted 2013).	To provide clarification on what is meant by 'employment land'.
PS-C3	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Replace para 1.4: The Proposed Submission Employment Land Local Plan has been published for an eight week period in order to receive representations on matters of soundness in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012. The Proposed Submission version presents the proposed strategy and policies relating to the employment land supply over the Core Strategy plan period up to 2027.	To provide consistency for Proposed Submission Version
PS-C4	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Delete para 1.5	To provide consistency for Proposed Submission Version
PS-C5	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Replace para 1.6: The Proposed Submission Employment Land Local Plan takes into account representations that were received through pre-production stakeholder engagement, and via consultation on the Proposed Draft Employment Land Local Plan that took place between December 2013 and March 2014.	To provide consistency for Proposed Submission Version
PS-C6	n/a	Introduction - Format of the Proposed Draft Employment Land Local Plan	Add additional bullets: <ul style="list-style-type: none"> • Supplementary Employment Land Evidence (GVA, 2014) 	To provide consistency for Proposed Submission Version

Ref	Rep ID	Section	Modification	Reason								
			<ul style="list-style-type: none"> Employment Land Review Viability Briefing Note (GVA, 2014) 									
PS-C7	PD-ELLP/09	Introduction – Relationship with Other Plans and Strategies	<p>Add two new paras after para 1.14 to read:</p> <p><i>The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government’s Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been award for the development of an Innovation Mall at Sovereign Harbour (via the Growing Places Fund), and transport schemes with committed funds from the Growth Deal for the ‘Hailsham, Polegate and Eastbourne Sustainable Corridor’ and an Eastbourne and South Wealden walking and cycling package.</i></p> <p><i>EU Structural Investment Funds 2014-20 will enable the SELEP to combine resources from both Europe and national government to deliver economic growth in the South East. Funding themes include improving employability, enterprise growth, business support, innovation, export and new technologies.</i></p>	To add reference and a link to the South East Local Enterprise Partnership, the Strategic Economic Plan, and the EU Structural Investment Funds.								
PS-C8	n/a	Introduction - Stages in the Production of the Plan	<p>Replace para 1.15 with:</p> <p>The timetable for the preparation of the Employment Land Local Plan is outlined in Table 1.</p>	To provide consistency for Proposed Submission Version								
PS-C9	n/a	Introduction - Stages in the Production of the Plan	Delete para 1.16	To provide consistency for Proposed Submission Version								
PS-C10	n/a	Introduction - Stages in the Production of the Plan	<p>In Table 1, replace:</p> <table border="1"> <tbody> <tr> <td>Publication of Proposed Submission Version for representation period</td> <td>December 2014 – January 2015</td> </tr> <tr> <td>Submission to Secretary of State</td> <td>February 2015</td> </tr> <tr> <td>Examination in Public</td> <td>June 2015</td> </tr> <tr> <td>Adoption</td> <td>October 2015</td> </tr> </tbody> </table>	Publication of Proposed Submission Version for representation period	December 2014 – January 2015	Submission to Secretary of State	February 2015	Examination in Public	June 2015	Adoption	October 2015	To provide consistency for Proposed Submission Version
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PS-C11	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	Replace Para 1.17 with: The eight week representation period on the Proposed Submission Employment Land Local Plan commenced on 12 December 2014 and finishes on 6 February 2015. The Proposed Submission Employment Land Local Plan is accompanied by a Sustainability Appraisal Report, which is also available for comment.	To provide consistency for Proposed Submission Version
PS-C12	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	In Para 1.18, replace reference to Proposed Draft to Proposed Submission	To provide consistency for Proposed Submission Version
PS-C13	n/a	Introduction – How to comment on the Proposed Submission Employment Land Local Plan	In Para 1.18, replace Friday 14 March 2014 with Friday 6 February 2015	To provide consistency for Proposed Submission Version
PS-C14	PD-ELLP/10	Context – Existing Situation	In Para 2.3, include footnote references to data sources.	For clarification purposes
PS-C15	n/a	Context – Recent Developments and Future Projects	Amend par 2.18 to read: <i>In addition, the Council is intending to prepare a draft Economic Development and Tourism Strategy by the end of 2015 to help direct the current economy and build on this to determine a vision and destination for Eastbourne's economic future.</i>	To update the schedule for the Economic Development and Tourism Strategy
PS-C16	PD-ELLP/12	Context – Key Issues	Add additional sentence to end of para 2.20: <i>In addition, premises with super-fast broadband connectivity are a requirement for businesses aiming to grow and expand their markets, and improvements in broadband connectivity may influence the requirement for additional employment land in the area.</i>	To provide reference to broadband as an issue for employment space in Eastbourne
PS-C17	PD-ELLP/11	Context – Key Issues	Amend the final sentence of para 2.21 to state: <i>Also, by encouraging existing key businesses and their supply chains, there is an opportunity to grow existing specialisms and 'clusters'. This might include manufacturing activities, particularly related to mechanical products, and parts of the 'media' sector, such as film and TV production and production of recorded media, which are sectors</i>	To provide examples to aid understanding

Ref	Rep ID	Section	Modification	Reason
			<i>that have been identified as being particularly strong in Eastbourne.</i>	
PS-C18	PD-ELLP/11	Context – Key Issues	<p>Amend para 2.22 to read:</p> <p><i>The nature of economic growth has changed over recent years and Eastbourne has seen lower levels of inward investment, mainly due to the age and quality of existing stock, and has instead been more reliant on local investment from indigenous businesses.</i></p> <p><i>Future demand and growth in the market is still likely to be driven from local investment, either through expansion, changing space requirements or new business start-ups. However, as the economy grows, it is important to encourage inward investment by making provision for attracting like-minded new activities to the area. The Employment Land Local Plan needs to ensure it provides the right space in the right locations for inward investment but also provide the range of sites and premises required to ensure existing businesses are retained and can grow. This will also include the provision of a range of sites, including new, high quality floorspace alongside sites and premises to help increase the business start-up and survival rate and ensure indigenous businesses are retained and can grow.</i></p>	In order to clarify that Eastbourne is not 'closing the door' on inward investment, but to recognise that future demand is likely to be driven by local business
PS-C19	PD-ELLP/25	Context – Key Issues	<p>Add additional text at end of para 2.23:</p> <p><i>Similarly, a significant amount of the office stock, especially in the town centre, is dated and does not tend to meet the needs of modern office occupiers. In many cases refurbishment is not possible to create "Grade A" space as floor to ceiling heights are not sufficient to allow modern servicing and infrastructure to be incorporated.</i></p>	
PS-C20	n/a	Context – Key Issues	At para 2.29, Delete Question 1 box	No requirement for this question as part of the Proposed Submission version
PS-C21	PD-ELLP/13	Context – Employment Land Requirements	At para 2.30, include link to ELR within footnote	For clarification purposes
PS-C22	n/a	Context – Employment Land Requirements	<p>At para 2.32, amend bullet points to read:</p> <ul style="list-style-type: none"> • <i>Office (B1a/B1b) – 12 sqm per employee (NIA)</i> • <i>Industrial (B1c/B2) – 36 sqm per employee (GEA)</i> 	To clarify that the requirement for office space is based on net internal area, whilst the

Ref	Rep ID	Section	Modification	Reason
			<ul style="list-style-type: none"> Warehouse (B8) – 70 sqm per employee (GEA) 	requirement for industrial and warehouse space is based on gross external area.
PS-C23	PD-ELLP/14	Context – Vision and Objectives	Amend the Vision to read: <i>"By 2027, Eastbourne will be making a strong contribution to the sustainability of the local economy, not just in the town but also in south Wealden, by providing a range of business premises in sustainable locations and offering a range of job opportunities, making the town a place where people want to live and work"</i>	For clarification purposes
PS-C24	PD-ELLP/15	Context – Vision and Objectives	ELLP2 delete: <i>'diversity the local economy and...'</i>	To emphasise the difference between ELLP2 and ELLP4
PS-C25	PD-ELLP/15	Context – Vision and Objectives	Amend ELLP4 to read: <i>'ELLP4 - Support Existing Businesses - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish'.</i>	To emphasise the difference between ELLP2 and ELLP4
PS-C26	n/a	Context – Vision and Objectives	At para 2.42, delete Question 2 and Question 3 box	No requirement for this question as part of the Proposed Submission version
PS-C27	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.1, delete 'Options considered for employment land strategy and distribution' box	No requirement for this question as part of the Proposed Submission version
PS-C28	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.1, delete Question 4, Question 5 and Question 6 box	No requirement for this question as part of the Proposed Submission version
PS-C29	n/a	Strategy – Employment Land Strategy and Distribution	At para 3.7, delete Question 7 box	No requirement for this question as part of the Proposed Submission version
PS-C30	PD-ELLP/20	Strategy – Economy and Employment	Add sentence at end of para 3.11 to read:	To provide examples to aid

Ref	Rep ID	Section	Modification	Reason
		Land	<i>Examples of this type of development in other parts of East Sussex include the Priory Quarter and North Queensway Innovation Park in Hastings, and the Basepoint Enterprise Centre in Newhaven.</i>	understanding
PS-C31	PD-ELLP/20	Strategy – Economy and Employment Land	Amend 3.12 to read: <i>Eastbourne should further the development of 'clusters', including but not limited to mechanical manufacturing and film and TV production, by using existing key businesses and their supply chains as an opportunity to grow existing specialisms through promotion and provision of appropriate space. The role of these clusters should be enhanced in the Borough both as a 'selling point' to attract occupiers and through the development of links to suppliers locally.</i>	To provide examples to aid understanding
PS-C32	PD-ELLP/20	Strategy – Economy and Employment Land	Amend final sentence of para 3.15 to read: <i>Eastbourne Borough Council will work with the existing education and skills institutions to enhance provision, in order to address skill shortages, increase the working age population and improve the 'economic catchment' of the Borough.</i>	For clarification purposes
PS-C33	PD-ELLP/35	Policies – Policy EL2: Industrial Estates	Delete the final two paras of Policy EL2 and replace with: <i>Proposals for redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the satisfaction of the Council that:</i> <ul style="list-style-type: none"> • <i>The proposed alternative use is an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or</i> • <i>The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and</i> • <i>The site does not meet the current or long term needs of modern business, and could not be upgraded to do so.</i> <i>Within the designated Industrial Estates, change of use of units in class B 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.</i>	To expand Policy EL2 to include reference to allowing redevelopment in instances where it can be demonstrated that the loss of the site would not impact upon the long term supply of employment land and the site cannot be upgraded to meet current or long term needs. To provide consistency with the NPPF

Ref	Rep ID	Section	Modification	Reason
PS-C34	n/a	Policies – Industrial Estates	Replace the final sentence of para 4.14 with: ... subject to it being demonstrated to the satisfaction of the Council that there is no reasonable prospect of the premises continuing to be used for class B use.	To provide consistency with Policy EL2
PS-C35	PD-ELLP/22	Policies – Town Centre	Amend final sentence of 4.20 to read: <i>Therefore, proposals for the refurbishment of existing office stock within the Town Centre will be supported, to meet modern occupier demands where they come forward.</i>	For clarification purposes
PS-C36	n/a	Policies – Sovereign Harbour	In para 4.36, change reference to 3,000sqm to 2,300 sqm NIA	To provide floorspace in NIA
PS-C37	n/a	Appendix 1: Glossary	Delete Development Management Local Plan and description	The Development Management Local Plan is no longer being taken forward
PS-C38	n/a	Appendix 1: Glossary	Add: Gross External Area (GEA) - The total floor area contained within the building measured to the external face of the external walls	Provide explanation for GEA, which is referenced in the document
PS-C39	n/a	Appendix 1: Glossary	Add: Gross Internal Area (GIA) - The floor area contained within the building measured to the internal face of the external walls	Provide explanation for GIA, which is referenced in the document
PS-C40	n/a	Appendix 1: Glossary	Add: Net Internal Area (NIA) - The usable floor area, which is the Gross Internal Area (GIA) less the floor areas taken up by lobbies, enclosed machinery rooms on the roof, stairs and escalators, mechanical and electrical services, lifts, columns, toilet areas, ducts, and risers.	Provide explanation for NIA, which is referenced in the document
PS-C41	n/a	Appendix 2: Designated Industrial Estates	Replace plan of Highfield (South) Industrial Estate with updated version	To extend the boundary in recognition of the fact that the extension to the Gardners Books development is outside of the previous boundary

Ref	Rep ID	Section	Modification	Reason
PS-C42	n/a	Appendix 2: Designated Industrial Estates	Replace plan of Highfield (North) Industrial Estate and Highfield Park with updated version	To reflect changes in the basemap that now show the Morrisons development

Appendix 7 – Table of Responses to Proposed Submission Employment Land Local Plan Representations

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
PS-ELLP/01	East Sussex County Council (Ellen Reith)	Yes	Yes	No	Employment Land Strategy & Distribution	East Sussex County Council supports the plan and agrees with the strategy and the proposed approach for the distribution of employment land.	Comments noted.
PS-ELLP/02	East Sussex County Council (Ellen Reith)	Yes	Yes	No	Monitoring Framework	To improve the clarity of the plan and effective implementation it is recommended, as previously suggested, that the amount of new space occupied should also be used as an indicator. This will provide a reality check on whether forecasts were reasonable.	<p>Whilst it is agreed that this information would help to evaluate success of development schemes, the occupation of the business units are not in the control of the planning system, and therefore it would not help with monitoring the effectiveness of the Employment Land Local Plan.</p> <p>In addition, Eastbourne Borough Council does not have the resources to monitor of occupation as part of the monitoring of the Employment Land Local Plan.</p>
PS-ELLP/03	John and Helen Roe	n/a	n/a	n/a	General	<p>1. There seems to be little mention of Hyde Gardens and the immediate area, though older buildings are dismissed as unsuited for modern office use. John has spent virtually all of his working life (1950 - 1999, apart from 2 years in wooden huts in the RAF, plus seven years part-time at Eastbourne CAB) in buildings over 100 years old with no ill-effects, and no difficulties in using modern office machinery and the internet. Hyde Gardens and the immediate neighbourhood are the central, prime, office and professional/medical/dental area of Eastbourne and a prestige address.</p> <p>2. The emphasis for employment seems to be</p>	<p>It is acknowledged that Hyde Gardens is a central office location. The ELLP proposes new office space in the Town Centre, and there are no ELLP policies that would prevent the continuing use of Hyde Gardens as an office location.</p> <p>The ELLP identifies the need for industrial and warehouse space in Eastbourne as well as office space.</p>

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						upon high-salaried employment. This is commendable, but there is a large core of Eastbourne residents seeking work in lower-paid employment in industrial or distributive trades, or similar.	
PS-ELLP/04	Highways Agency (Keith Jacobs)	n/a	n/a	n/a	General	The Agency was consulted previously on the Employment Land Local Plan in June 2013 and a copy of our response at that stage is attached. We have no further comment on the Proposed Submission version of the document and will not be making any representation on the soundness of the plan.	Comments noted.
PS-ELLP/05	South East Water (Gemma Frisby)	n/a	n/a	n/a	General	There is no mention of water in the plan. I notice that energy and renewable sources are briefly mentioned. We would encourage you to ensure that all new commercial premises are built to excellent BREEAM standards to ensure water demands are kept to a minimum.	The issue of water is addressed in the Core Strategy. The Core Strategy Policy D2: Sustainable Development requires that commercial development over 1,000m ² meet BREEAM very good standard.
PS-ELLP/06	Marine Management Organisation (Angela Gemmill)	n/a	n/a	n/a	General	Thank you for inviting the Marine Management Organisation (MMO) to comment on the above consultation. I can confirm that the MMO has no comments to submit in relation to this consultation.	Comments noted.
PS-ELLP/7	Natural England (Catherine Tonge)	n/a	n/a	n/a	General	Thank you for giving Natural England the opportunity to comment on your Employment Land Local Plan. We note that this plan will replace section D2 of the Eastbourne Core Strategy Local Plan but that, otherwise, it will conform to the policies set out in that document. We support the policy to use the existing	Comments noted. The Habitats Regulation Assessment Screening Report identifies that Eastbourne is within the buffer zones of some important environment sites. The potential impact on water quality can be addressed through the provision of

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						<p>industrial estates, town centre and available space within Sovereign Harbour. We also welcome the commitment to maintain Eastbourne Park as a "green heart" of the town.</p> <p>Eastbourne falls within the buffer zones of several SSSI, including the internationally important site of Pevensey Levels. The industrial estates mostly border the Eastbourne, Langney and Willingdon Levels which link hydrologically to Pevensey so industrial uses which may create significant run-off or discharge into ditches need to be carefully considered and include appropriate measures to protect water courses. Care should also be taken that development at Sovereign Harbour does not impact on the nearby areas of vegetated shingle. Eastbourne also falls within buffer zones for the South Downs National Park and any significant landscape impact, such as wind turbines, also needs to be assessed. The Plan does not anticipate the need for any widespread increases in infrastructure provision; however, any local proposals will need to be assessed on an individual basis.</p>	<p>avoidance and mitigation measures.</p> <p>Outline permission for office development at Sovereign Harbour has been granted (ref: 131002), and Natural England provided comments on this at the application stage.</p>
PS-ELLP/08	Richard Maile	No	No	Yes	2.25	<p>The Council has failed to meet the requirements of the NPPF to meet the economic needs of the town (see paragraph 7 of the Framework).</p> <p>Change suggested: Allocation of further greenfield sites on the fringes of the major industrial estates in Lottbridge Drove</p>	The ELLP meets the economic needs of the town by identifying policies to meet the requirement for 43,000sqm of employment land up to 2027.
PS-ELLP/09	Richard Maile	No	No	Yes	Policy EL4	There has been an allocation at Sovereign Harbour for 27 years, with no takers. It is a	The employment land at Sovereign Harbour has commenced with the

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						<p>poor location for employment use with inadequate access on the major routes and requires construction of the St Anthony's Link.</p> <p>The reliance upon the intensification of industrial estates is totally without merit. It depends upon redevelopment of existing Industrial estates that are already intensively developed, as shown by the appendices and a site visit. Evidence will be adduced to indicate that such reliance is totally misplaced.</p>	<p>completion of Pacific House as part of the Sovereign Harbour Innovation Park. The SWETS study does not identify the need to provide the St Anthony's Link for this provision to be made.</p> <p>Intensification of the Industrial Estates has provided 5,049 sqm of industrial and warehouse space between 2012/13 and 2014/15. It is considered that the delivery of the remaining 14,951 sqm (of which 3,722sqm is committed) is realistic over the remainder of the plan period.</p>
PS-ELLP/10	Laurence Keeley	n/a	n/a	n/a	General	<p>Please find enclosed my Housing document that would be with in a land Community Trust. Employment land should be the same, affordable is the word. Most of the problems with business units are greedy land lords getting the most from the units that usually result in businesses going broke after a short time. I am not sure who owns the land that is up for the units, but please consider the enclosed, if the owners won't accept this then compulsory purchases the land at agriculture value. Houses and work units would be under the same plan, that's to say pay the land owners on year one £5,000 per unit, then £1,000 per year ground rent per acre.</p> <p>If you were to grow wheat on acre of land for 100 years one would be unlikely to get £20,000 profit from the land, so that should be the template.</p>	This issue is considered to be outside of the scope of the ELLP.
PS-ELLP/11	Environment Agency (Mark Luker)	n/a	n/a	n/a		We have reviewed the plan proposals and supporting evidence base and have not identified any issues of soundness with the plan.	Comments noted.

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						<p>The sites identified in the Town Centre and Sovereign Harbour locations as well as the intensification (no expansion) of the existing industrial estates have no fluvial or tidal flood risk aspects which we consider would affect their deliverability.</p> <p>Business uses (B1,B2,B8) are considered as 'less vulnerable' development types and are compatible uses in flood zone 3 areas subject to sequential and exception test requirements as defined in the National Planning Policy Guidance.</p>	
PS-ELLP/12	Eastbourne & District Chamber of Commerce (Derek Godfrey)	Yes	Yes	Yes		I would like to take part in the examination due to my position as a Board member of the Local Enterprise Partnership and Portfolio Holder for Economic Development for the Eastbourne and District Chamber of Commerce	Comments noted.
PS-ELLP/13	Seachange Sussex (John Shaw)	Yes	Yes	Yes	General	<p>Seachange 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. Seachange Sussex supports the full development of the employment land allocation at Sovereign Harbour, Eastbourne and the wider East Sussex.</p> <p>Seachange 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</p>	Comments noted.

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						Enterprise Partnership (SELEP), East Sussex County Council (ESCC) and Eastbourne Borough Council (EBC) amongst others. In particular, we would be supporting the Employment Land Local Plan proposals as a minimum.	
PS-ELLP/14	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	1.3	Required Change – should be re-worded to read: The Employment Land Local Plan identifies the future requirements for employment land in Eastbourne and how the future needs for employment are to be met in order to best meet the vision and objectives of the Plan.'	Para 1.3 re-worded.
PS-ELLP/15	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	1.6	Required Change – Prior to the submission of the document for Examination and then prior to its adoption, this paragraph should be updated to list the additional consultation stages that have been undertaken subsequent to March 2014 that have also informed the document.	Para 1.6 re-worded.
PS-ELLP/16	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	1.7	Required Change – Reference must also be made to a further updated version of the Sustainability Appraisal and to how this has guided the selection of the ELLP's allocation policies.	Para 1.7 re-worded.
PS-ELLP/17	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	1.8 to 1.13	Required Change – Reference must be made to the adopted Eastbourne Town Centre Local Plan 2013 and to how this sets a context for additional opportunities to be realised for a range of development types through the proactive identification, promotion and support of new development proposals within	New paras added to refer to Sovereign Harbour SPD and Town Centre Local Plan

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						the centre. Reference should also be made to the Sovereign Harbour SPD and to the employment uses it identifies as appropriate for Sites 4 and 7a at the Harbour.	
PS-ELLP/18	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.8	Required Change – 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.	The latest information relating to past delivery of employment space in Eastbourne has been updated.
PS-ELLP/19	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.9	Required Change – 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.	The relationship between Eastbourne and South Wealden is acknowledged in para 2.28.
PS-ELLP/20	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.10 & 2.14-2.15	Required Change – EBC must revisit its understanding of the Eastbourne office market: <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> - deliver the type of Class B space that 	An Eastbourne Office Deliverability Assessment (BGVA, 2015) has been prepared to update the understanding of the office market in Eastbourne. This identifies that there is a strategic need to diversify the office portfolio within Eastbourne, and that long term nature of office demand indicates that office floorspace will be delivered over the full plan period rather than the short term. It also recognises physical limitations to the level of floorspace that can be accommodated within the town centre

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						<p>EBC stresses is required</p> <ul style="list-style-type: none"> - deliver more narrowly defined but viable Class B1a office space - meet sustainable planning objectives. 	<p>given competition for land from other uses.</p> <p>The assessment considers that a failure to protect employment land at Sovereign Harbour and deliver new space here would potentially 'waste' a major opportunity within the Borough to make a 'step change' in the market positioning of the borough. On its own the Innovation Mall will have a positive benefit on the Eastbourne economy however it is unlikely to be transformative or have significant impacts on other locations. Co-locating new floorspace alongside the Innovation Mall will potentially make much better use of the investment already made.</p> <p>The impacts of the Town Centre office allocations have been assessed through the Revised Sustainability Appraisal.</p>
PS-ELLP/21	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.22	Required Change – None in respect of the drafting of para 2.22. The matters raised are agreed but must be carried forward to and be reflected in the resulting allocations policy of the ELLP.	It is considered that the matters raised relating to start-up businesses are carried forward and reflected in the ELLP policies.
PS-ELLP/22	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.24	Required Change – Para 2.24 should be amended to reflect that a core objective of the ELLP 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.	The core objective of the ELLP is to provide an appropriate amount of office space across the town in the most appropriate and sustainable locations that would meet the needs of the market and respond to market signals. This should not be limited to the town centre.

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PS-ELLP/23	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.25	<p>Required Change – In order to ensure all locational issues are acknowledged and carried forward appropriately in the proposed ELLP allocations policies, Para 2.25 should be amended to:</p> <ul style="list-style-type: none"> - 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>The relationship between Eastbourne and South Wealden is acknowledged in para 2.28.</p> <p>Reference to the Sustainability Appraisal will be made through para 3.2.</p>
PS-ELLP/24	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.26	<p>Required Change – This sub-section must be revisited to more fully reflect the above issues and to ensure a thread is maintained through the ELLP: i.e. from the assessment of location issues through to an appropriate allocations policy that will best address the matters identified.</p>	<p>It is considered that this sub-section adequately reflects the situation relating to the provision of a balanced approach towards office space that reflects market demand and signals.</p>
PS-ELLP/25	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.27	<p>Required Change – This sub-section must be amended to read 30,000sqm GEA.</p>	<p>Change made to para 2.27</p>
PS-ELLP/26	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	2.28	<p>Required Change – 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>It is considered that this sub-section adequately reflects the close linkages between Eastbourne and South Wealden.</p>
PS-ELLP/27	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Employment Land Requirements	<p>The ELLP 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</p>	<p>The information relating to the Employment Land Requirements is informed by the Employment Land Review (GVA, 2013), and the translation</p>

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						floorspace requirements and back into the number of jobs that could be accommodated based upon the contingencies that are proposed.	between floorspace requirements and job numbers is provided there.
PS-ELLP/28	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Vision and Objectives	<p>Required Change – CSLP Key Spatial Objectives 3, 8 and 10 must also be acknowledged as relevant for the setting of ELLP policies.</p> <p>The ELLP Objectives are all supported but must be redrafted to include a more detailed and appropriate summary of the objectives to be aimed for and to thereby provide a more appropriate spatial strategy and set of allocations policies.</p>	<p>CSLP Key Spatial Objectives 3, 8 and 10 added.</p> <p>It is considered that the ELLP Objectives provide sufficient detail to guide the spatial strategy and allocations policies.</p>
PS-ELLP/29	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Economy & Employment Land	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.	Para 3.2 has been redrafted to better reflect that the choice of options was considered via the Sustainability Appraisal.
PS-ELLP/30	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Policy EL1	<p>The space requirements at Para 3.10 must state if these are GEA or NIA.</p> <p>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.</p> <p>The office space allocation within the town centre at Para 3.10 must be increased to a minimum of 8,900sqm NIA.</p> <p>The identification of the Eastbourne section of the Polegate-Hailsham Corridor should also be identified as a location within which new office development will be actively promoted and encouraged.</p> <p>A minimum allocation of 3,000sqm NIA of</p>	<p>Para 3.10 has been amended to state GEA/ NIA as appropriate.</p> <p>The alternative proposals for office space allocations at Sovereign Harbour, the Town Centre and the Polegate-Hailsham Corridor have been considered as part of a Revised Sustainability Appraisal. This concluded that the proposed alternatives put forward by SHL are not as sustainable as the original position because it provides a better balance of uses within the Borough offering greater choice and flexibility to the market. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour the</p>

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						Class B1a/b space elsewhere outside of the town centre and of Sovereign Harbour will ensure that the 23,000sq.m. of 'required' space is identified in policy allocation terms, but split now between the town centre, the Harbour, the corridor and potentially other centres. This should accordingly be reflected within Key Diagram.	imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region, can be addressed and more choice can be provided to investors and businesses. Also, any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential purposes in order to meet the established housing need.
PS-ELLP/31	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Policy EL2: Industrial Estates	<p>Required Change:</p> <p>Policy EL2: Industrial Estates, the Eastbourne-Polegate Corridor and Local Centres</p> <p>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. (NIA/GEA – TBC by EBC) of B1c, B2 and B8 floorspace over the plan period.</p> <p>The development of new Class B1a/b floorspace will be supported as part of redevelopment schemes within the existing</p>	The proposal to accommodate 3,000sqm of office space within the Industrial Estates has been rejected because no other out of town sites can be identified that could accommodate the additional 3,000 sqm.

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						<p>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.</p> <p>Proposals for the refurbishment of existing class B floorspace will also be supported.</p> <p>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:</p> <ul style="list-style-type: none"> - 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. <p>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 there is no reasonable prospect of the site continuing to be used for class B use.</p>	

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PS-ELLP/32	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Policy EL3: Town Centre	<p>Required Change:</p> <p>Policy EL3: Town Centre</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.</p>	The proposal to increase the amount of office in Town Centre to 8,900sqm has been tested as part of the Revised Sustainability Appraisal. This concludes that the original position of 3,000sqm is the most sustainable position because increasing the allocation in the Town Centre would reinforce the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region and does not fully reflect or respond to market signals. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential purposes in order to meet the established housing need.
PS-ELLP/33	Sovereign Harbour	Yes	No	Yes	Policy EL4: Sovereign	Required Change – The supporting text within Paras 4.32 to 4.47 should be updated to	The proposal to reduce the amount of office space at Sovereign Harbour to

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
	Limited (Marie Nagy)				Harbour	<p>reflect a true and objective appraisal of employment use prospects at the Harbour.</p> <p>Policy EL4 should be amended as follows:</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>Figure 3 must also be updated to reflect the above changes and the actual availability within Site 7a to accommodate employment generating uses.</p>	<p>11,100sqm has been tested as part of the Revised Sustainability Appraisal. This concludes that the original position of 20,000sqm is the most sustainable position because any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre.</p> <p>Figure 3 has been amended to show the extend of Site 7a.</p>
PS- ELLP/34	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Monitoring Framework	Required Change – This must also be updated to reflect the allocations amendments required in order to make the ELLP sound.	No allocation amendments have been made.
PS- ELLP/35	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Appendix 1 - Glossary	Required Change – In the interest of completeness, the Glossary should also include reference to the Sovereign Harbour SPD, 2013 and the Sustainable	Sovereign Harbour SPD and Sustainable Neighbourhood Assessment added to Glossary.

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
						Neighbourhood Assessment, 2011.	
PS-ELLP/36	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	1.14	<p>Required Change - Para 1.14 on adoption of the ELLP should read:</p> <p>'The Employment Land Local Plan has been prepared having regard to the National Planning Policy Framework (NPPF) and specifically the presumption in favour of sustainable development and town centre first policies. The Employment Land Local Land is in conformity with the NPPF.'</p>	It is not considered necessary to make an amendment to specifically mention town centre first policies as these are considered as part of the NPPF as a whole.
PS-ELLP/37	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Sustainability Appraisal	<p>Inconsistencies have been applied to the scoring of the different development options, the failure to take account of relevant evidence and market indicators, and the failure to appraise all relevant alternative options mean that the SA has not been positively prepared; and that the proposed allocations policy that it concludes should be adopted has not been justified and will not be effective in sustainability or in sound planning terms.</p> <p>The Proposed Submission Sustainability Appraisal Report is therefore Unsound.</p> <p>A reassessment of the SA/SEA indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC. A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here and that shall have less transport impacts, also has more significant benefits for Eastbourne, the Harbour and its new occupiers.</p>	A Revised Sustainability Appraisal has been prepared. This concludes that the proposed alternatives put forward by SHL are not as sustainable as the original position because it provides a better balance of uses within the Borough offering greater choice and flexibility to the market. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region, can be addressed and more choice can be provided to investors and businesses. Also, any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre. In

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
						The SA must be reappraised on this basis.	addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential purposes in order to meet the established housing need.
PS-ELLP/38	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Changes to the Policies Map	<p>The current document is unsound. It has not been positively prepared, is not justified and is not effective.</p> <p>It contains a number of errors and typos and should be revisited to ensure that the details contained within it are factually correct.</p> <p>The site boundary details for Site 6 are incorrect and must be revisited to reflect the land that is available for development.</p> <p>The details for Sites 4 and 7 are incorrect and should be deleted from Map No.7 as their allocation for Class B1 use is not required, is inappropriate for their setting and is contrary to policies and objectives that promote sustainable development.</p> <p>The Proposals Map and Town Centre Inset Plan at Appendix B should be updated, made clearer and more legible.</p>	<p>The Changes to the Policies Map document has been amended address factually incorrect errors.</p> <p>The site boundary for Site 6 has been amended.</p> <p>It is not agreed that the site boundaries for Sites 4 and 7 are not required, and these have been retained, although amended to reflect the land available to develop on these sites.</p>

Appendix 8 – Schedule of Changes – Proposed Submission to Revised Proposed Submission

Ref	Rep ID	Section	Modification	Reason
RPS-C1	PS-ELLP/14	Introduction – What is the Employment Land Local Plan?	Amend para 1.3 to read: The Employment Land Local Plan identifies the future requirements for employment land in Eastbourne and how the future needs for employment are to be met.	To provide consistency for the Revised Proposed Submission version
RPS-C2	n/a	Introduction – Format of the Proposed Submission Employment Land Local Plan	Replace para 1.5 to read: The Revised Proposed Submission Employment Land Local Plan has been published for a six week period in order to receive representations on matters of soundness in accordance with Regulation 19 of the Town & Country Planning (Local Planning) (England) Regulations 2012. The Revised Proposed Submission version presents the proposed strategy and policies relating to the employment land supply over the Core Strategy plan period up to 2027.	To provide consistency for the Revised Proposed Submission version
RPS-C3	PS-ELLP/15	Introduction – Format of the Proposed Submission Employment Land Local Plan	Replace para 1.6 to read: The Revised Proposed Submission Employment Land Local Plan takes into account representations that were received through pre-production stakeholder engagement, via consultation on the Proposed Draft Employment Land Local Plan that took place between December 2013 and March 2014, and representations received between December 2014 and February 2015 following the publication of the Proposed Submission version. The Revised Proposed Submission version has been published to allow further representations following the preparation of a revised Sustainability Appraisal.	To provide consistency for the Revised Proposed Submission version
RPS-C4	PS-ELLP/16	Introduction – Format of the Proposed Submission Employment Land Local Plan	Amend para 1.7 to read: The Revised Proposed Submission Employment Land Local Plan has also been informed by: <ul style="list-style-type: none"> • Employment Land Review (GVA, 2013) • Employment Land Strategy and Distribution Options Report (EBC, 2013) • Supplementary Employment Land Evidence (GVA, 2014) 	To update para on stages that have occurred since Proposed Submission version

Ref	Rep ID	Section	Modification	Reason
			<ul style="list-style-type: none"> • Employment Land Review Viability Briefing Note (GVA, 2014) • Revised Sustainability Appraisal (JAM Consult, 2015) • Eastbourne Office Deliverability Assessment to Support the Sustainability Appraisal (GVA, 2015) 	
RPS-C5	PS-ELLP/17	Introduction – Relationship with Other Plans and Strategies	<p>Add new para after para 1.9:</p> <p><u>Sovereign Harbour Supplementary Planning Document (SPD)</u></p> <p>1.10 The Sovereign Harbour SPD, which was adopted in 2013, has been prepared to provide more detail on the implementation of Core Strategy Policy C14: Sovereign Harbour Neighbourhood Policy. The SPD identifies the issues that need to be addressed through future development in Sovereign Harbour. It identifies that the main uses of Sites 6 and 7 should be a Business/Office Park of a high quality design to provide a distinctive gateway into the town and Sovereign Harbour, and that office use could also be provided on Site 4.</p>	To provide further context and background to the preparation of the Employment Land Local Plan
RPS-C6	PS-ELLP/17	Introduction – Relationship with Other Plans and Strategies	<p>Add new paras after new para 1.10:</p> <p><u>Town Centre Local Plan</u></p> <p>1.11 The Town Centre Local Plan, adopted in 2013, set out a strategy and proposals for the regeneration of the Town Centre, in order to create a place that attracts more shoppers, workers, residents and visitors to increase investment in the town, which will bring wide-ranging benefits to Eastbourne.</p> <p>1.12 Alongside enhanced shopping and leisure facilities, the Town Centre Local Plan aims to deliver a minimum of 450 net residential units across five Development Opportunity Sites, along with a quantum of office development that will be determined through the Employment Land Local Plan.</p>	To provide further context and background to the preparation of the Employment Land Local Plan
RPS-C7	n/a	Introduction – Relationship with Other Plans and Strategies	<p>In para 1.14, amend first sentence to read:</p> <p>The Revised Proposed Submission Employment Land Local Plan has been prepared having regard to the National Planning Policy Framework (NPPF) and specifically the presumption in favour of sustainable development.</p>	To provide consistency for the Revised Proposed Submission version

Ref	Rep ID	Section	Modification	Reason										
RPS-C8	n/a	Introduction – Relationship with Other Plans and Strategies	Amend para 1.15 to read: The South East Local Enterprise Partnership (SELEP) Strategic Economic Plan sets out proposals to drive economic expansion over the next six years. The bid for the Government’s Local Growth Fund is supported by businesses, local authority and education leaders across the area. To date, funding has been awarded for the development of Pacific House at Sovereign Harbour (via the Growing Places Fund), and funds have been committed from the Growth Deal to deliver site infrastructure on the Sovereign Harbour Innovation Park site and transport schemes for the ‘Hailsham, Polegate and Eastbourne Sustainable Corridor’, ‘Town Centre access & improvements’ and an ‘Eastbourne and South Wealden walking and cycling package’.	To provide an update on the latest situation regarding SELEP and funding that has been committed.										
RPS-C9	n/a	Introduction – Stages in the production of the Plan	In Table 1 at para 1.17, replace: <table border="1" data-bbox="920 703 1682 1171"> <tbody> <tr> <td>Publication of Proposed Submission Version for representation period</td> <td>December 2014 – February 2015</td> </tr> <tr> <td>Publication of Revised Proposed Submission Version for representation period</td> <td>December 2015 – January 2016</td> </tr> <tr> <td>Submission to Secretary of State</td> <td>February 2016</td> </tr> <tr> <td>Examination in Public</td> <td>June 2016</td> </tr> <tr> <td>Adoption</td> <td>October 2016</td> </tr> </tbody> </table>	Publication of Proposed Submission Version for representation period	December 2014 – February 2015	Publication of Revised Proposed Submission Version for representation period	December 2015 – January 2016	Submission to Secretary of State	February 2016	Examination in Public	June 2016	Adoption	October 2016	To provide consistency for the Revised Proposed Submission version
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Examination in Public	June 2016													
Adoption	October 2016													
RPS-C10	n/a	Introduction – Stages in the production of the Plan	Amend para 1.18 to read: The six week representation period on the Revised Proposed Submission Employment Land Local Plan commenced on 11 December 2015 and finishes on 22 January 2016. The Revised Proposed Submission Employment Land Local Plan is accompanied by a Revised Sustainability Appraisal Report, which is also available for comment.	To provide consistency for the Revised Proposed Submission version										

Ref	Rep ID	Section	Modification	Reason
RPS-C11	n/a	Introduction – Stages in the production of the Plan	At para 1.19, amend final sentences to read: Regeneration and Planning Policy 1 Grove Road Eastbourne BN21 1TW All representations should be received by 5pm on Friday 22 January 2016.	To provide consistency for the Revised Proposed Submission version
RPS-C12	PS-ELLP/18	Context – Existing Situation	Replace para 2.8: Over the past 10 years, there has been an overall net increase in employment floorspace in Eastbourne of 4,569 sqm. A significant amount of this growth has been due to redevelopment of areas of the Courtlands Road and Brampton Road Industrial Estates to provide an increased amount of higher quality employment space. There has been an overall increase in the amount of class B8 (Storage and Distribution) uses, however there has been a net loss of all other employment use classes. There has been a significant loss in class B1a (Office) uses in the last two years, particularly to residential use due to the recent changes to Permitted Development rights.	To provide an update on employment development that has taken place since the Proposed Submission version.
RPS-C13	n/a	Context – Recent developments and future projects	Amend para 2.16 to read: There are a number of significant economic development projects that are being undertaken in Eastbourne. Recently, the South East Local Enterprise Partnership (SELEP) via the Growing Places Fund allocated £6m towards the development of a state of the art business park (Sovereign Harbour Innovation Park) at Sovereign Harbour. The first building, known as Pacific House, was completed in summer 2015 and has the potential to provide up to 300 new jobs.	To update the Revised Proposed Submission version with the latest position regarding the Sovereign Harbour Innovation Park.
RPS-C14	n/a	Context – Recent developments and future projects	Delete para 2.18.	The Council is no longer progressing an Economic Development and Tourism Strategy.
RPS-C15	PS-ELLP/22	Context – Key Issues	Amend the second sentence of para 2.27 to read: This allocation for 30,000 sqm (GEA) of office space across two sites	To provide clarity over the amount of floorspace

Ref	Rep ID	Section	Modification	Reason
			(known as Sites 6 and 7) was retained through the Eastbourne Borough Plan 2001-2011 (adopted 2003).	
RPS-C16	PS-ELLP/28	Context – Vision and Objectives	<p>Add additional bullet points to para 2.41:</p> <ul style="list-style-type: none"> • Key Spatial Objective 3: Town Centre Regeneration – To strengthen Eastbourne’s Town Centre as a leading sub-regional shopping and leisure destination. • Key Spatial Objective 8: Sustainable Travel – To reduce the growth in car-based travel by reducing the need to travel and by promoting alternative travel choices including walking, cycling and public transport. • Key Spatial Objective 10: Sustainable Neighbourhoods – To ensure that the diverse needs of local communities are delivered, having regard to the sustainability and capacity of each neighbourhood, the infrastructure needed and the opportunities to meet requirements. 	To include other relevant Spatial Objectives from the Core Strategy
RPS-C17	PS-ELLP/29	Strategy – Employment Land Strategy and Distribution	<p>Amend para 3.2 to read:</p> <p>The options for employment land were considered through the Sustainability Appraisal, and this determined that the most sustainable and effective way of meeting the employment land requirement is through intensifying development in existing employment locations and directing development toward the Sustainable Centres at the Town Centre and Sovereign Harbour that have been identified in the Eastbourne Core Strategy Local Plan 2006-2027.</p>	To provide an update and better explanation that the preferred option is the more sustainable option that was considered.
RPS-C18	n/a	Policy EL1 – Economy and Employment Land	<p>Add bullet point to Policy EL1 to read:</p> <ul style="list-style-type: none"> • Seeking Local Labour Agreements on all development of 1,000sqm or more, including change of use, to secure local employment and training measures as part of development proposals 	To provide a policy hook to seek Local Labour Agreements on developments.
RPS-C19	PS-ELLP/30	Strategy – Economy and Employment Land	<p>Amend the bullet points at para 3.10 to read:</p> <ul style="list-style-type: none"> • Intensification of Industrial Estates – 20,000 sqm GEA of 	To provide further clarity on the amount of floorspace to be provided.

Ref	Rep ID	Section	Modification	Reason
			<p>B1c/B2/B8 floorspace</p> <ul style="list-style-type: none"> Town Centre – 3,000 sqm NIA of B1a floorspace Sovereign Harbour – 20,000 sqm NIA of B1 floorspace 	
RPS-C20	n/a	Strategy – Economy and Employment Land	<p>Replace para 3.14 with:</p> <p>The level of development required in Eastbourne will create a significant number of jobs and there is opportunity to create local employment at both construction and operational stages of this development. Eastbourne Borough Council will seek to secure Local Labour Agreements and associated contributions on developments of 1,000sqm or more (including change of use) in order to secure local employment and training measures as part of development proposals, with the objective of improving training and skills in the town for the future economic development of the Borough. This will be achieved through Section 106 Agreements related to specific development proposals, which will secure contributions from development that will support and benefit the local labour market and economy, enabling employment growth, raising skills and giving local people opportunities generated by new developments. A Local Labour Agreement Supplementary Planning Document (SPD) will be prepared to guide the implementation of this policy.</p>	To provide further information and justification on the part of the policy relating to Local Labour Agreements.
RPS-C21	PS-ELLP/31	Policies – Industrial Estates	<p>In para 4.3, after 20,000 sqm, add:</p> <p>(GEA)</p>	To provide further clarity on the amount of floorspace to be provided.
RPS-C22	PS-ELLP/31	Policy EL2: Industrial Estates	<p>After 20,000sqm add:</p> <p>(GEA)</p>	To provide further clarity on the amount of floorspace to be provided.
RPS-C23	n/a	Policies – Industrial Estates	<p>Replace para 4.6 with:</p> <p>Since 2012/2013, a total of 5,049 sqm of class B floorspace has been delivered within the town's industrial estates (at 1 April 2015). This includes the redevelopment of an existing site that has been vacant for a considerable amount of time to provide new, high quality class B2 floorspace, and the intensification of an existing site to provide nine new class B1a and B8 units totalling 1,755 sqm. In addition,</p>	To provide an update on the current position in terms of the amount of employment floorspace that has already been developed within the Industrial Estates.

Ref	Rep ID	Section	Modification	Reason																
			<p>there is 3,722 sqm of employment floorspace within the Industrial Estates that has permission but development has yet to start. Table 3 shows the position at 1 April 2015 in terms of completed employment developments within the designated Industrial Estates.</p> <p>Table 3: Employment Land Delivery within Designated Industrial Estates</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Completed Floorspace (sqm)</th> </tr> </thead> <tbody> <tr> <td>2012/2013</td> <td>100</td> </tr> <tr> <td>2013/2014</td> <td>118</td> </tr> <tr> <td>2014/2015</td> <td>4,831</td> </tr> <tr> <td>Total</td> <td>5,049</td> </tr> <tr> <td>Target</td> <td>20,000</td> </tr> <tr> <td>Committed</td> <td>3,722</td> </tr> <tr> <td>Residual 2015-2027</td> <td>11,229</td> </tr> </tbody> </table>	Year	Completed Floorspace (sqm)	2012/2013	100	2013/2014	118	2014/2015	4,831	Total	5,049	Target	20,000	Committed	3,722	Residual 2015-2027	11,229	
Year	Completed Floorspace (sqm)																			
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Residual 2015-2027	11,229																			
RPS-C24	n/a	Policies – Sovereign Harbour	<p>Replace Para 4.36 to read:</p> <p>Eastbourne Borough Council has been active in promoting the delivery of business space in Sovereign Harbour. In 2013, the Growing Places Fund confirmed the allocation of £6 million to deliver a new “Innovation Mall” at Sovereign Harbour. Completed in 2015, Pacific House has provided 2,350 sqm NIA of serviced employment floorspace, and will help to establish Sovereign Harbour as a business location, which will help to attract future occupiers. The commitment from the Growing Place Fund highlights the potential for Sovereign Harbour to accommodate high quality employment space that is not available elsewhere in the area.</p>	To update the Revised Proposed Submission version with the latest position regarding the Sovereign Harbour Innovation Park.																
RPS-C25	PS-ELLP/33	Figure 3	Update Figure 3 to include demarcation of Site 7a, and the full extent of Site 7.	To clarify the extent of Site 7a upon which the office development should be provided.																
RPS-C26	n/a	Implementation and Monitoring – Infrastructure	<p>Amend second sentence of para 5.5 to read:</p> <p>In April 2015, Eastbourne Borough Council adopted a CIL Charging Schedule, which sets out a table of charges that calculates how much development is required to pay.</p>	To update the Revised Proposed Submission version with the latest position in terms of CIL																

Ref	Rep ID	Section	Modification	Reason
RPS-C27	PS- ELLP/35	Glossary	<p>Add new terms and definitions into Glossary:</p> <p>Sovereign Harbour Supplementary Planning Document (SPD) - The Sovereign Harbour SPD provides additional detail on the implementation of Core Strategy Policy C14: Sovereign Harbour Neighbourhood Policy, to guide the development of the remaining sites.</p> <p>Sustainable Neighbourhood Assessment - An evidence study produced in 2011 that analyses the sustainability of each of the Borough's 14 neighbourhoods against locally relevant sustainability criteria.</p>	To provide further clarification.

Appendix 9 – Table of Responses to Revised Proposed Submission Employment Land Local Plan Representations

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
RPS_ELL P/1	Anne Schauerte	Unknown	Unknown	Unknown	Content	How on earth is anyone on earth to know if this document is legally compliant - I am not a lawyer - these questions are futile.	A Guidance Note for Respondents on the Employment Land Local Plan was published alongside the Revised Proposed Submission version, which outlined what should be taken into account in the consideration of legal compliance.
RPS_ELL P/2	Alison Price	Unknown	Unknown	Unknown	Content	There is no need for more office at Sovereign Harbour as the roads are already overrun with commercial vehicles parking overnight and in residential areas. There are no retail outlets in the north harbour and the Innovation Park is not fitting with the overall look of the 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.	Evidence demonstrates that there is a need for additional office provision in Eastbourne over the plan period, and it is considered that Sovereign Harbour is the only location in Eastbourne where there is sufficient capacity to create a critical mass and allow Sovereign Harbour to become an established business location. Although parking is a detailed matter that will be evaluated through the development management process, it is expected that each office development will provide its own car parking provision.
RPS_ELL P/3	Bespoke (P Humphreys)	Yes	No	No	Content	There should be more consideration of the links between Eastbourne and South Wealden and the impact of additional housing, employment will have across the area as a whole. 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	The ELLP provides a revision of the current policy for the Core Strategy. The employment land requirement in the ELLP is lower than what should have been provided through the Core Strategy. EBC and WDC work closely on strategic planning matters. Infrastructure requirements are identified in the Infrastructure Delivery Plan.

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
						<p>ideally changing facilities.</p> <p>There are only general aspirations without real and track-able targets. The ELLP hopes that public transport will readjust the balance between cars and sustainable modes, however this is not considered realistic.</p> <p>The sustainability report should refer to the health of the population and what actions within "Public Health" need to be taken.</p>	Sustainability Objective CS2 is <i>To improve the health and wellbeing of the population and reduce inequalities in health.</i>
RPS_ELL P/4	Sustrans (Nathan Catt)	Yes	Yes	No	Content	<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.</p> <p>Improvements need to be made before major projects go ahead to enable a change in behaviour that will be long lasting.</p>	The provision of sustainable transport applies across the town and is not solely relevant to the provision of new employment space. This is considered through the Infrastructure Delivery Plan.
RPS_ELL P/5	Sustrans (Nathan Catt)	Yes	Yes	No	Content	<p>Yes, vital that a strategy is in place to support cycling and walking.</p> <p>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>	The provision of sustainable transport applies across the town and is not solely relevant to the provision of new employment space. This is considered through the Infrastructure Delivery Plan.
RPS_ELL P/6	Sustrans (Nathan Catt)	No	No	No	Content	The dates following the consultation have the wrong year.	A Minor Modification is proposed to amend dates
RPS_ELL	Sustrans (Nathan	Yes	Yes	No	Content	I'd strongly recommend the plans including a number of taller buildings	The Employment Land Local Plan provides a strategy whereby existing

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
P/7	Catt)					<p>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>	employment land in the industrial estates is intensified, rather than additional greenfield sites being developed in order to meet employment space needs. Building heights are a detailed matter that will be determined through the development management process.
RPS_ELL P/8	Highways England (Felicity Drewett)	Unknown	Unknown	Unknown	Introduction	No comments	Comments noted
RPS_ELL P/9	Richard Maile	No	No	Yes	Industrial Estates	<p>The Local Plan fails the test of soundness as it is not consistent with NPPF 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>The allocations provide solely for B1 (office) uses and a reliance upon windfall sites (densification). It does not provide</p>	<p>This site was considered in the ELLP process. However, the allocation of this site would be contrary to the Core Strategy policy for Eastbourne Park, and has been assessed as an unsustainable location for environmental reasons.</p> <p>Evidence suggests that there is sufficient capacity within the existing industrial estates to accommodate the requirement without the need to allocate additional greenfield sites.</p>

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
						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.	
RPS_ELL P/10	Natural England (Catherine Tonge)	Unknown	Unknown	Unknown	Introduction	No additional comments on Revised Proposed Submission version Agree with the conclusions in the Habitat Regulations Assessment Screening report that the Plan is unlikely to impact on International sites provided satisfactory measures are employed.	Comments noted.
RPS_ELL P/11	Southern Gas Networks (Stuart Forrest)	Unknown	Unknown	Unknown	Introduction	SGN do not envisage any immediate infrastructure concerns, in the areas highlighted within your Local Plan, regarding future employment development proposals. 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. 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.	The developments at Sovereign Harbour have been considered through the outline application (ref: 131002). There are no suggestions that the Eastbourne Holder Station will be redeveloped without the landowner taking forward a specific proposal.
RPS_ELL P/12	Willingdon & Jevington Parish Council (Stephen Keogh)	Unknown	Unknown	Unknown	Introduction	Proposals will provide increased employment opportunities to people living outside Eastbourne and will result in increased traffic on all road accesses	A South Wealden & Eastbourne Transport Study (SWETS) was prepared as evidence for the Core Strategy. This forecasts future highway demand and

Rep ID	Respondent	Legally Compliant?	Sound?	Participate in EIP?	Section	Summary of Comment	Officer Response
						<p>to Eastbourne, including already congested A2270 at Willingdon and Polegate.</p> <p>Parish Council believes that 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.</p>	<p>assessed the highways impacts of a range of development options for Eastbourne and South Wealden in order to advise on whether growth could be accommodated within the existing highways network.</p> <p>The Transport Study tested a higher quantum of employment land through the Core Strategy than is proposed in the Employment Land Local Plan, and concluded that a package of transport measures would be required in order to accommodate development. These transport measures have been taken into account through the Infrastructure Delivery Plan. This means that there is no additional requirement for additional highway infrastructure or transport measures in order to accommodate the quantum of employment land identified in the Employment Land Local Plan.</p>
RPS_ELL P/13	South Downs National Park Authority (Anna Ludford)	Unknown	Unknown	Unknown	Introduction	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).	A Minor Modification is proposed to amend dates
RPS_ELL P/14	South Downs National Park Authority (Anna Ludford)	Unknown	Unknown	Unknown	Industrial Estates	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	Comments noted.

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						employment sites, especially with regard to the effects of outdoor lighting.	
RPS_ELL P/15	South Downs National Park Authority (Anna Ludford)	Unknown	Unknown	Unknown	Town Centre (para4.31)	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.	Comments Noted
RPS_ELL P/16	South Downs National Park Authority (Anna Ludford)	Unknown	Unknown	Unknown	Infrastructure	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.	Comments Noted
RPS_ELL P/17	Locate East Sussex (Philip Johnson)	Unknown	Unknown	Unknown	Introduction	<p>There is a general scarcity of commercial space and development opportunities in the borough, and demand has outstripped supply which will lead to hikes in rent and sale prices.</p> <p>Concerned with the amount of commercial space being converted for residential use, especially in St Leonards Road in the town centre</p> <p>There are no current opportunities for growth for town centre based companies because of the lack of availability of larger premises in the borough</p> <p>There are minimal opportunities for</p>	<p>The ELLP allocates 3,000 sqm of office space to the town centre. It is anticipated that this will be Grade A office space that will provide a suitable replacement for the office space that is currently being converted to residential, which has mostly been vacant for a considerable time.</p> <p>Suggested issues relating to Pacific House will be overcome once a critical mass of office space is provided, allowing Sovereign Harbour to become an established business location.</p>

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						<p>entrepreneurial small businesses to grow because of limited availability of town centre premises within walking distance of rail and bus terminals</p> <p>Concerns about Pacific House have been expressed about the relative cost premium, distance from town centre, broadband/fibre connectivity and limited public transport access</p>	
RPS_ELL P/18	Historic England (Alan Byrne)	Unknown	Unknown	Unknown	Introduction	No comments	Comments noted.
RPS_ELL P/19	Seachange Sussex (John Shaw)	Yes	Yes	Yes	Introduction	<p>Eastbourne has lowest employment land supply in East Sussex, despite being largest conurbation</p> <p>There is an absence of Grade A office stock</p> <p>The office stock serving the dominant service sector has historically been principally located in the town centre, where there are few opportunities to bring forward any meaningful critical mass of office/business development.</p> <p>The only location available to accommodate a critical mass of business space has been Sovereign Harbour. However, 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,</p>	<p>The requirement for a total of 23,000 sqm of office space in Eastbourne has been calculated in line with both an updated understanding of future economic growth and also changing workspace requirements. It is expected that the majority of this will be Grade A stock.</p> <p>The ELLP allocates sites at Sovereign Harbour to provide 20,000 sqm of office space, which will help to create a critical mass and allow Sovereign Harbour to become an established business location.</p>

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						<p>retail and leisure uses.</p> <p>Site 6 at Sovereign harbour (now designated Sovereign Harbour Innovation Park) is able to accommodate 11,000 m² of B1 space, and the recent completion of Pacific House can accommodate small businesses through to medium sized occupiers with larger needs. Letting commenced in the autumn and is proceeding satisfactorily.</p> <p>Infrastructure provision on Site 6 is proceeding to shorten the timetable for development potential</p> <p>Site 7a can add a single user site to the Sovereign Harbour Innovation Park, which would extend the offer to medium to large employers bringing quantum economic uplift and delivering a powerful marketing message of Sovereign Harbour as a business location.</p>	
RPS_ELL P/20	National Grid (National Grid National Grid)	Unknown	Unknown	Unknown	Introduction	No comments	Comments noted.
RPS_ELL P/21	Health and Safety Executive (John Moran)	Unknown	Unknown	Unknown	Introduction	Potential for land allocated to encroach on consultations zones	Comments noted.
RPS_ELL P/22	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Relationship with Other Plans and Strategies	Required Change - Para 1.10 must be amended to reflect that within Site 7 only Site 7a is available employment generating uses.	A Minor Modification is proposed to amend dates
RPS_ELL	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Stages in the	Required Change - This table should be updated to refer to dates in 2016 / the	A Minor Modification is proposed to

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P/23	Nagy)				production of Plan	updated ELLP programme going forward	amend dates
RPS_ELL P/24	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Existing situation	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.	<p>An Eastbourne Office Deliverability Assessment (BGVA, 2015) has been prepared to update the understanding of the office market in Eastbourne. This identifies that there is a strategic need to diversify the office portfolio within Eastbourne, and that long term nature of office demand indicates that office floorspace will be delivered over the full plan period rather than the short term. It also recognises physical limitations to the level of floorspace that can be accommodated within the town centre given competition for land from other uses.</p> <p>The assessment considers that a failure to protect employment land at Sovereign Harbour and deliver new space here would potentially 'waste' a major opportunity within the Borough to make a 'step change' in the market positioning of the borough. On its own the Innovation Mall will have a positive benefit on the Eastbourne economy however it is unlikely to be transformative or have significant impacts on other locations. Co-locating new floorspace alongside the Innovation Mall will potentially make much better use of the investment already made.</p>
RPS_ELL P/25	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Existing situation	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	The relationship between Eastbourne and South Wealden is acknowledged in para 2.28.

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						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.	
RPS_ELL P/26	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Existing situation	<p>EBC must revisit its understanding of the Eastbourne office market:</p> <ul style="list-style-type: none"> - 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: <ul style="list-style-type: none"> • deliver the type of Class B space that EBC stresses is required • deliver more narrowly defined but viable Class B1a office space • meet sustainable planning objectives. 	<p>An Eastbourne Office Deliverability Assessment (BGVA, 2015) has been prepared to update the understanding of the office market in Eastbourne. This identifies that there is a strategic need to diversify the office portfolio within Eastbourne, and that long term nature of office demand indicates that office floorspace will be delivered over the full plan period rather than the short term. It also recognises physical limitations to the level of floorspace that can be accommodated within the town centre given competition for land from other uses.</p> <p>The assessment considers that a failure to protect employment land at Sovereign Harbour and deliver new space here would potentially 'waste' a major opportunity within the Borough to make a 'step change' in the market positioning of the borough. On its own the Innovation Mall will have a positive benefit on the Eastbourne economy however it is unlikely to be transformative or have significant impacts on other locations. Co-locating new floorspace alongside the Innovation</p>

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							<p>Mall will potentially make much better use of the investment already made.</p> <p>The impacts of the Town Centre office allocations have been assessed through the Revised Sustainability Appraisal.</p>
RPS_ELL P/27	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Recent developments and future projects	This sub-section should be updated to reflect further changes to recent developments and projects, as background to the ELLP policies.	A Minor Modification is proposed to reflect recent developments
RPS_ELL P/28	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Key Issues	Para 2.24 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.	The core objective of the ELLP is to provide an appropriate amount of office space across the town in the most appropriate and sustainable locations that would meet the needs of the market and respond to market signals. This should not be limited to the town centre.
RPS_ELL P/29	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Key Issues	<p>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> <ul style="list-style-type: none"> - 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>The relationship between Eastbourne and South Wealden is acknowledged in para 2.28.</p> <p>Reference to the Sustainability Appraisal is made through para 3.2.</p>
RPS_ELL P/30	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Key Issues	This sub-section must be revisited to more fully reflect the above issues and	It is considered that this sub-section adequately reflects the situation relating

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	Nagy)					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.	to the provision of a balanced approach towards office space that reflects market demand and signals.
RPS_ELL P/31	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Key Issues	This sub-section must be revisited to reflect the issues relating to land at Sovereign Harbour, including the outline permission for Site 6, the viability of Site 6, and Sites 4 and 7a providing other employment uses that would support and sustain a business park.	The ELLP allocates sites at Sovereign Harbour to provide 20,000 sqm of office space, which will help to create a critical mass and allow Sovereign Harbour to become an established business location. A Minor Modification is proposed to update the position in relation to the outline permission at Sovereign Harbour
RPS_ELL P/32	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Key Issues	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.	It is considered that this sub-section adequately reflects the close linkages between Eastbourne and South Wealden.
RPS_ELL P/33	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Employment Land Requirements	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.	The information relating to the Employment Land Requirements is informed by the Employment Land Review (GVA, 2013), and the translation between floorspace requirements and job numbers is provided there.
RPS_ELL P/34	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Vision and Objectives	The inclusion of SLP Objectives 3 (Town Centre Regeneration), 8 (Sustainable Travel) and 10 (Sustainable Neighbourhoods) is welcomed.	Comment noted.
RPS_ELL	Sovereign Harbour	Yes	No	Yes	Employment	Reference to the proposed distribution of	Comment noted

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P/35	Limited (Marie Nagy)				Land Strategy and Distribution	new floorspace having been informed by the new Sustainability Assessment which has been undertaken set against a new assessment framework is welcomed	
RPS_ELL P/36	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Economy and Employment Land	<p>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.</p> <p>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.</p> <p>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.</p> <p>The allocation of additional provision along the growth corridor can still be</p>	The alternative proposals for office space allocations at Sovereign Harbour, the Town Centre and the Polegate-Hailsham Corridor have been considered as part of a Revised Sustainability Appraisal. This concluded that the proposed alternatives put forward by SHL are not as sustainable as the original position because it provides a better balance of uses within the Borough offering greater choice and flexibility to the market. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region, can be addressed and more choice can be provided to investors and businesses. Also, any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as

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						<p>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.</p> <p>Key Diagram on Page 22 of the RELLP should accordingly also be amended to reflect this.</p>	<p>sites within the Town Centre can be used for residential purposes in order to meet the established housing need.</p>
RPS_ELL P/37	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Industrial Estates	<p>Required Change:</p> <p>Policy EL2: Industrial Estates, the Eastbourne-Polegate Corridor and Local Centres</p> <p>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. (NIA/GEA – TBC by EBC) of B1c, B2 and B8 floorspace over the plan period.</p> <p>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.</p> <p>Proposals for the refurbishment of</p>	<p>The proposal to accommodate 3,000sqm of office space within the Industrial Estates has been rejected because no other out of town sites can be identified that could accommodate the additional 3,000 sqm.</p>

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						<p>existing class B floorspace will also be supported.</p> <p>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:</p> <ul style="list-style-type: none"> - 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. <p>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 there is no reasonable prospect of the site continuing to be used for class B use.</p>	
RPS_ELL P/38	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Town Centre	<p>Required Change:</p> <p>Policy EL3: Town Centre</p> <p>The quantum of office space that should be provided in the Town Centre is a</p>	The proposal to increase the amount of office in Town Centre to 8,900sqm has been tested as part of the Revised Sustainability Appraisal. This concludes that the original position of 3,000sqm is

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						<p>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.</p> <p>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.</p> <p>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.</p> <p>Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.</p>	the most sustainable position because increasing the allocation in the Town Centre would reinforce the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region and does not fully reflect or respond to market signals. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential purposes in order to meet the established housing need.
RPS_ELL P/39	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Town Centre	Para 4.30 must be expanded to clarify the trigger that will be applied for the use of Article 4 directions.	Para 4.30 identifies that Article 4 directions could be used when losses impact upon occupied, higher quality office accommodation. The office stock that has been lost via permitted

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							development in the Town Centre has been under-occupied and low quality accommodation, that has often been on the market for a considerable period and does not meet needs of modern occupiers.
RPS_ELL P/40	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Sovereign Harbour	<p>Required Change – 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>Policy EL4 should be amended as follows:</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. 	The proposal to reduce the amount of office space at Sovereign Harbour to 11,100sqm has been tested as part of the Revised Sustainability Appraisal. This concludes that the original position of 20,000sqm is the most sustainable position because any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre.
RPS_ELL	Sovereign Harbour	Yes	No	Yes	Sovereign	We note that Figure 3 has been	Comments noted

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P/41	Limited (Marie Nagy)				Harbour	amended and this is supported.	
RPS_ELL P/42	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Monitoring Framework	Required Change – This must also be updated to reflect the allocations amendments required in order to make the ELLP sound.	No allocation amendments have been made.
RPS_ELL P/43	Sovereign Harbour Limited (Marie Nagy)	Yes	No	Yes	Sustainability Appraisal	<p>The Revised Sustainability Appraisal (RSA) remains based upon flawed assumptions that continue to underpin and remain threaded throughout EBC's ELLP documentation. As such the ELLP and its linked evidence and assessments:</p> <ul style="list-style-type: none"> - have not been positively prepared; and - that proposed allocations policy 3A has not been justified and will not be effective in sustainability or in sound planning terms. <p>The RSA is therefore unsound.</p> <p>A reassessment of the RSA, based upon EBC's own evidence base and the application of consistent and logical appraisal assumptions, indicates that a higher allocation for the town centre has clear benefits across the sustainability criteria adopted by EBC.</p> <p>A scenario that adopts a lower office accommodation within a mixed park at the Harbour and which can better support the new office users that do locate here still create more new jobs more quickly, in a more efficient and effective use of the land available and will result in less significant transport</p>	The Revised Sustainability concludes that the proposed alternatives put forward by SHL are not as sustainable as the original position because it provides a better balance of uses within the Borough offering greater choice and flexibility to the market. By limiting the amount of new development within the Town Centre and providing 20,000 sqm at Sovereign Harbour the imbalance between office provision in the Town Centre and in out of centre locations, which is noticeably different to market norms within the wider sub-region, can be addressed and more choice can be provided to investors and businesses. Also, any new out of town offer also needs to be of a sufficient scale to make a significant impact in the market and create a cluster of activity that can be self-sustaining, and the provision of 20,000 sqm of office space at Sovereign Harbour would enable such a cluster of activity to be achieved without having a negative impact upon the health of the town centre. In addition, the original position would mean that there is more opportunity for sustainable mixed use development as sites within the Town Centre can be used for residential

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						<p>and associated environmental impacts.</p> <p>Also as appraised on behalf of SHL previously, a higher office allocation for the town centre and mixed employment allocation for the Harbour also fits with:</p> <ol style="list-style-type: none"> 1. the physical capacity that exists within the town centre to accommodate more office accommodation. 2. a more realistic and deliverable market expectation of what the Harbour sites can accommodate in terms of new office space. 	<p>purposes in order to meet the established housing need.</p>