EMPLOYMENT LAND LOCAL PLAN

To be adopted by Full Council on Wednesday 16 November 2016

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1.0 Introduction

What is the Employment Land Local Plan?

1.1 The Eastbourne Employment Land Local Plan (ELLP) is a planning policy document that 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.

1.2 The need to produce an Employment Land Local Plan results from concerns raised by the Planning Inspector during the Public Examination of the Eastbourne Core Strategy Local Plan, which was adopted in February 2013. The Inspector concluded that the evidence on the employment land supply does not demonstrate that the Core Strategy policy relating to employment land (Policy D2: Economy) is the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne. In order to address this issue without delaying the adoption of the Core Strategy, the Inspector recommended that Core Strategy Policy D2 should be the subject of an early review, leading to its replacement with an additional Local Plan to deal specifically with employment land supply.

1.3 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. It will also be used alongside the Core Strategy and saved policies from the Eastbourne Borough Plan 2001-2011 (adopted 2003) to determine planning applications relating to employment development.

1.4 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).
Format of the Employment Land Local Plan

1.5 The Employment Land Local Plan presents the strategy and policies relating to the employment land supply over the Core Strategy plan period up to 2027.

1.6 The 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, and December 2015 and January 2016 following the publication of the Proposed Submission and Revised Proposed Submission versions.

1.7 The Employment Land Local Plan has also been informed by:
- Employment Land Review (GVA, 2013)
- Employment Land Strategy and Distribution Options Report (EBC, 2013)
- Supplementary Employment Land Evidence (GVA, 2014)
- Employment Land Review Viability Briefing Note (GVA, 2014)
- Revised Sustainability Appraisal (JAM Consult, 2015)
- Eastbourne Office Deliverability Assessment (GVA, 2015)
- Eastbourne Office Market Report (GVA, 2016)
- Eastbourne Town Centre Viability Report (Cushman & Wakefield, 2016)

Relationship with Other Plans and Strategies

Eastbourne Core Strategy Local Plan

1.8 The Eastbourne Core Strategy Local Plan was adopted in February 2013 following Public Examination in May 2012. It sets out the key planning policies for the future development of Eastbourne up to 2027 and overall spatial development strategy, including the level of housing development required and the broad locations where it will be developed. It also sets out a vision and policy for each of the 14 neighbourhoods in the town, and contains a number of policies for topic areas, including sustainable development, tourism, shopping, natural environment and historic environment.

1.9 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, and is therefore a plan with the same timeframe as the Core Strategy. It will also replace some of the existing saved policies in the Eastbourne Borough Plan 2001-2011.

Sovereign Harbour Supplementary Planning Document (SPD)

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 7a 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.

Town Centre Local Plan

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.

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.

Sustainable Community Strategy and Corporate Plan

1.13 The East Sussex Integrated Sustainable Community Strategy was adopted in 2008. Eastbourne has a dedicated chapter within the strategy, which sets objectives to meet the developing needs of the community up to 2026.

1.14 The Regeneration and Economy priorities for Eastbourne within the Sustainable Community Strategy include:

- Providing high quality and sustainable economic infrastructure by unlocking and assembling strategic sites to support inward investment, support and retain local businesses and encourage provision of high quality well paid jobs;
- Nurturing a Culture of Entrepreneurship by promoting and increasing the number of start-up and micro businesses; and
Introduction

- Supporting Smart, Sustainable Enterprises by encouraging competitiveness, creativity and enterprise, particularly amongst small and medium sized enterprises, and modernising the local economy to enable diversification into new growth areas.

1.15 The Council’s Corporate Plan is prepared annually and it identifies priority themes for the five year period to 2015. It is intrinsically linked with the Sustainable Community Strategy and aims to translate the Community Strategy Vision into corporate action. The Employment Land Local Plan should contribute to the achievement of the key themes of the 2010-2015 Corporate Plan, particularly: Prosperous Economy; Quality Environment, and Thriving Communities.

1.16 Some of the key priorities that the Employment Land Local Plan should assist with include:
- Regeneration of the Town Centre
- Development of a Business Park at Sovereign Harbour

National Planning Policy Framework

1.17 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. The Employment Land Local Plan is in conformity with the NPPF. The Employment Land Local Plan has also been prepared having regards to the National Park purposes (under Section 62 of the Environment Act 1995).

South East Local Enterprise Partnership – Strategic Economic Plan

1.18 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, transport schemes for the ‘Hailsham, Polegate and Eastbourne Sustainable Corridor’, ‘Town Centre access and improvements’, and an Eastbourne and South Wealden walking and cycling package.

1.19 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.

Stages in the production of Plan

1.20 The timetable for the preparation of the Employment Land Local Plan is outlined in Table 1.

Table 1 - Timescale for the production of the Employment Land Local Plan

<table>
<thead>
<tr>
<th>Stage</th>
<th>Timescale</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pre-production engagement</td>
<td>June 2013 – August 2013</td>
</tr>
<tr>
<td>Proposed Draft ELLP (Regulation 18 consultation)</td>
<td>December 2013 – March 2014</td>
</tr>
<tr>
<td>Publication of Proposed Submission Version for representation period</td>
<td>December 2014 – February 2015</td>
</tr>
<tr>
<td>Submission to Secretary of State</td>
<td>February 2016</td>
</tr>
<tr>
<td>Examination</td>
<td>May – October 2016</td>
</tr>
<tr>
<td>Adoption</td>
<td>November 2016</td>
</tr>
</tbody>
</table>
2.0 Context

Existing situation

2.1 Eastbourne is a large town and tourist resort located on the south coast in East Sussex between the South Downs National Park and the Pevensey Levels, approximately 20 miles from Brighton and 50 miles from London. As a seaside town, Eastbourne’s economy has relied heavily on tourism and the town continues to compete as a premier seaside destination in the United Kingdom.

2.2 Eastbourne has a population of 99,412 (2011 Census) and approximately 60% of the population is of working age. 80% of the working age population is economically active, and the latest unemployment estimates (April 2012-March 2013) indicate that 7.8% of economically active people are unemployed, which is similar to the average for East Sussex.

2.3 Eastbourne residents are mainly employed within ‘professional occupations’, ‘elementary occupations’ and ‘sales and customer service activities’, which reflects the strong presence of public administration and retail/visitor economy related employers. However, there is some strength in manufacturing activities, particularly related to particular mechanical products. There is also a strong concentration of employment within key parts of the ‘media’ sector in terms film and TV production and production of recorded media.

2.4 Eastbourne’s economic output is below average when measured by Gross Value Added (GVA) per capita, however Eastbourne has seemed to cope well with the recession and performed well in terms of the short term change in number of employees compared to national average, and has experienced an overall increase in GVA per capita since 2001.

2.5 Eastbourne has a business stock of approximately 3,100 business enterprises although the overall number has declined in recent years. Business stock is dominated by micro-businesses, and the most common industry for business enterprises is the Professional, Scientific and Technical sector.

2.6 There are approximately 2,900 commercial premises in Eastbourne, and it is estimated that there is approximately 404,000 sqm of class-B use floorspace.

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1 Employment Land Review (GVA, 2013)
in the town. There were a total of 43,000 jobs across all sectors in Eastbourne in 2011, including retail, tourism and healthcare.

2.7 Eastbourne has seven Industrial Estates located in three broad areas (Hampden Park, Lottbridge Drove and Courtlands Road). The Industrial Estates cover a total of approximately 72 hectares. The Town Centre also contains a number of office developments and other employment uses, and there are a number of smaller estates scattered around the town.

2.8 Over recent years, there has been an overall net increase in employment floorspace in Eastbourne. 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.

**Strengths and Weaknesses of Economy**

2.9 Eastbourne’s position on the A22-A27 corridor means that it plays a key role in the wider sub-regional property market, and values compare favourably with East Sussex averages, reflecting Eastbourne’s competitive position as one of the largest markets in the county.

2.10 Eastbourne has a relatively diverse economy with representation across a range of sectors, and this diverse base has helped protect the Borough from some of the major impacts of the recession in recent years. Eastbourne’s stock of commercial space comprises a range of sizes, ages and types, which offers a degree of choice for occupiers both in terms of the stock itself and the potential rent levels. Low reported vacancy levels and a consistent level of activity outside the Town Centre are healthy signs for the market.
2.11 There are some strong businesses located in Eastbourne that trade nationally and internationally, including major employers such as Gardners Books, Veritek, Brewers, TEVA, HMD Kontro, Alpha Laval and West End Studios.

2.12 The resident population accommodates a significant proportion of highly skilled workers, and the ‘quality of life’ factor has potential to attract workers as the town combines economic opportunities with a high quality environment providing a desirable place to live as well as work.

2.13 However, Eastbourne’s economy does experience some challenges. There are some underlying socio-economic issues, and there are parts of the town where levels of economic activity and the proportion of unskilled residents are high, which is an issue for a number of coastal towns. In addition, many of the higher skilled workers commute out of the Borough for work, meaning the town loses valuable skills that could be harnessed by businesses locally.

2.14 Despite the presence of a range of commercial space, much of the large scale office stock provided in Eastbourne is no longer fit for purpose and does not provide an attractive offer to new occupiers. Eastbourne has a lack of flexible, ‘mixed’ units that allow businesses to have combined office, workshop and production space within one building. Future provision should encourage flexibility within buildings to enable businesses to adapt their operations as technology develops or processes/products change.

2.15 In addition, Eastbourne is relatively peripheral within the wider South East economy, and it is over-shadowed by better connected locations. Eastbourne suffers from its distance from the major economic hubs of the South East and the poor quality of the road and rail network. Broadband connectivity is also weak, although improvements are being prioritised.

Recent developments and future projects

2.16 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.

2.17 Other important planned projects include:

- £70m extension and transformation of the Arndale Centre;
Context

- £35m Devonshire Park Project to create a cultural destination, including new conferencing facilities, major renovation of 3 listed leisure buildings and extensive upgrade of international tennis facilities; and
- £1.5m purchase of 3.5ha of strategic land for the Council to take direct action in delivering new employment space

Key Issues

2.18 There are a number of key issues affecting Eastbourne that the Employment Land Local Plan should seek to address through the employment land strategy and policies for its implementation. The key issues are separated between demand issues and supply issues, and are set out below:

Demand Issues

2.19 **Requirement for additional employment land** - The Employment Land Local Plan needs to provide an appropriate and realistic requirement for additional employment land over the Core Strategy Plan Period up to 2027, differentiated by B-class. These requirements need to take into account changes and flexibility in work practices and particularly changes to more efficient job to floorspace densities. This trend is exemplified by Eastbourne Borough Council’s Agile Working scheme, which enables staff to occupy less floorspace. 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.

2.20 **Need for sustainable job creation and diversification** - There is a need to create sufficient jobs for the changing population, based on robust and realistic growth assumptions and allowing for expected shifts in age profiles, economic activity rates and the impact of changes to the ‘statutory’ retirement age. Although Eastbourne is represented across a range of employment sectors and activities, the Town’s economy is still heavily reliant on tourism, and employment diversification will increase choice for local jobseekers and reduce reliance on the service industry sector. Expanding skills and education provision could help attract younger, skilled workers to the area. 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 that have been identified as being particularly strong in Eastbourne.

2.21 Development that provides for start-up businesses – 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. 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.

Supply Issues

2.22 Suitability of current commercial premises – The majority of the buildings on the Industrial Estates were built during the 1960s and 1970s, and they do not necessarily meet the needs of existing and future businesses. Much of the existing building stock on Industrial Estates will come to the end of their life over the plan period, and this offers the opportunity for redevelopment to provide higher quality and more suitable stock at higher densities, similar to redevelopments that have already occurred at Brampton Road and Courtlands Road. 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.

2.23 Loss of employment land to other uses – Employment land is coming under increasing pressure for redevelopment to alternative, higher value, uses across the UK, particularly residential use. This pressure is particularly high in Eastbourne due to the constrained nature of the Borough and the requirement to provide 3,428 net additional residential units between 2012 and 2027 to meet Core Strategy targets. There is also pressure from retail development within Industrial Estates. If losses of key sites continue within existing employment locations they have the potential to undermine the B class nature of these sites.
2.24 **Identification of sites** - Eastbourne suffers from some considerable constraints and there is a very limited supply of developable land. The urban area is tightly confined by the South Downs National Park, the sea and the Pevensey Levels. In addition, a significant area of the Borough is subject to flood risk and there is a strong commitment to retain Eastbourne Park as a ‘green heart’ to the town. This means that there is limited opportunity for development of employment land. Sites for additional employment development should be in the most appropriate and sustainable locations.

2.25 **Requirements for Office space in the Town Centre** - The Town Centre Local Plan identifies the Employment Land Local Plan as the mechanism for determining the appropriate amount of office space to be provided in the Town Centre. Some businesses would prefer town centre locations, whilst other would prefer out of centre locations. A balance needs to be struck between in town and out of town provision to maintain the role of offices as a key town centre use but also broaden the stock types available within the Borough to offer choice and accommodate and attract greater levels of demand over the plan period.

2.26 **Suitability and Viability of land at Sovereign Harbour** - Land at Sovereign Harbour was identified in an outline application for the development of Sovereign Harbour in 1988. This allocation for 30,000 sqm (GEA) of office space across two sites (known as Sites 6 and 7) was retained through the Eastbourne Borough Plan 2001-2011 (adopted 2003). Despite being a Council priority, the sites have not been developed for this quantum of office space and the Employment Land Local Plan should consider the suitability and viability of land at Sovereign Harbour for office development. An outline planning application for land at Sovereign Harbour (ref: 131002) was approved in December 2014. This grants outline permission for employment uses on Sites 4, 6 and 7a, with the quantum to be determined by the Employment Land Local Plan.
2.27 **Eastbourne and South Wealden area** - Eastbourne has close linkages with the south of the Wealden District, particularly Polegate and Hailsham. A masterplan for the area was prepared in 2008 by the South East England Development Agency (SEEDA), in conjunction with East Sussex County Council, Wealden District Council and Eastbourne Borough. The area is identified as a key strategic location on the Sussex Coast with considerable potential for economic and sustainable development. The future commercial challenge will therefore be to broaden the economic base of the Eastbourne and South Wealden area, and to enable innovation and entrepreneurship to flourish.

2.28 The Wealden Core Strategy was adopted in February 2013 and makes provision for 25,540 sqm of employment floorspace in South Wealden. In addition, around 5,000 new homes are allocated or committed in the South Wealden area. This will have implications for the local markets and demand for employment floorspace across the Eastbourne and South Wealden area.

**Employment Land Requirements**

2.29 An Employment Land Review\(^2\) was prepared in 2013 to review, assess and update the Borough’s position in relation to the future supply and demand for employment floorspace, in order to inform the preparation of the Employment Land Local Plan.

2.30 The Employment Land Review forecasts the need for additional employment floorspace up to 2031. It is based on the key sectors within the Borough forming the basis of future growth that leads the Borough out of the recession, and increases in employment participation rates as economic activity rates and the working age population grows. This forecast would create an additional 1,263 jobs within the class-B uses up to 2031.

2.31 The job creation forecast is translated into additional floorspace requirements using employment density assumptions. The following densities assumptions have been used:

- B1a/b – 12 sqm per employee (NIA)
- B1c/B2 – 36 sqm per employee (GEA)
- B8 – 70 sqm per employee (GEA)

\(^2\) Eastbourne Employment Land Review (GVA, 2013)
2.32 In order to ensure that the employment forecasts are based on more than economic growth 'predictions', additional allowances have been made.

2.33 An allowance for windfall losses has been made to take into account unexpected losses of employment land to other uses. This takes into consideration the loss of existing employment land to residential and other uses, particularly considering the extension of Permitted Development rights to allow change of use from office to residential, and the fact that employment land may be used for other land uses that are not compatible with residential areas, such as recycling, waste management and transport depots.

2.34 An allowance has also been made for ‘churn’. This is made for the fact that locational and premises needs of businesses change over time, which may require businesses to move. For this to happen smoothly there is a need for certain level of available vacant land. This ‘churn’ also helps to free up sites for redevelopment, and sufficient floorspace provision should be made to allow this to happen.

2.35 The forecast over the plan period to 2027 shows little difference to 2031. The employment floorspace requirements over the plan period that the Employment Land Local Plan should meet are shown in Table 2.

### Table 2 - Employment Land Requirements

<table>
<thead>
<tr>
<th>Type</th>
<th>Floorspace Demand 2012-2027 (m²)</th>
<th>Allowance for windfall losses (m²)</th>
<th>Allowance for Churn (m²)</th>
<th>Change in floorspace (m²)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Office (B1a/b)</td>
<td>15,977</td>
<td>4,095</td>
<td>694</td>
<td>20,766</td>
</tr>
<tr>
<td>Industrial (B1c/B2)</td>
<td>-5,478</td>
<td>14,085</td>
<td>2,860</td>
<td>11,467</td>
</tr>
<tr>
<td>Warehouse (B8)</td>
<td>5,890</td>
<td>900</td>
<td>549</td>
<td>7,339</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>16,389</strong></td>
<td><strong>19,080</strong></td>
<td><strong>4,103</strong></td>
<td><strong>39,572</strong></td>
</tr>
</tbody>
</table>

2.36 In addition to the requirement, a contingency reserve of floorspace should be added to ensure that, should sites not come forward for redevelopment, there will still be an appropriate supply and mix of sites to meet needs. This is known as ‘Headroom’.
2.37 The Employment Land Review recommends a 6% headroom capacity for Industrial and Warehouse uses, and a 10% headroom capacity for Office uses.

2.38 In order to allow for employment floorspace requirements to be consistent, the office requirement has been converted from a Net Internal Area (NIA) figure to a Gross External Area (GEA) figure, using a conversion rate of 80%. This means that the total employment land requirement for Eastbourne over the plan period to 2027 is 48,750 sqm (GEA).

Vision and Objectives

2.39 The vision for the Core Strategy is closely aligned to the vision from the Sustainable Community Strategy. The Core Strategy vision is:

"By 2027 Eastbourne will be a premier coastal and seaside destination within an enhanced green setting. To meet everyone’s needs Eastbourne will be a safe, thriving, healthy and vibrant community with excellent housing, education and employment choices, actively responding to the effects of climate change".

2.40 A vision for the Employment Land in Eastbourne should be more specific and relevant to the economy and employment land within the class-B uses. The Employment Land Local Plan vision is:

"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".

2.41 The Core Strategy identifies a series of spatial objectives in order to address the issues identified in the Core Strategy and achieve the Core Strategy vision. The Core Strategy spatial objectives that are most relevant to the Employment Land Local Plan are:

- **Key Spatial Objective 2: Sustainable Growth** - To deliver new housing, employment and shopping opportunities by planning positively and proactively to meet the needs of all sections of the local community and sustainable growth within environmental constraints.
• **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 4: Local Economy** - To give support to a strong and growing local economy built on innovation, creativity and entrepreneurship.

• **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.

2.42 In addition to the relevant Core Strategy Spatial objectives, the Employment Land Local Plan sets out a new series of objectives that the Local Plan should achieve. The Employment Land Local Plan Objectives are:

• **ELLP1 - Stimulate Economic Growth** - To stimulate sustainable economic growth to meet the needs of the community within environmental constraints and encourage economic competitiveness through attracting increased investment and new and innovative businesses

• **ELLP2 - Encourage Small and Start-up Businesses** - To deliver a variety of new employment opportunities by providing a range of flexible employment spaces that can be used by existing businesses and new start-up businesses

• **ELLP3 - Diversify the Local Economy** - To diversify the local economy and support job growth, and broadening the economic base to enable innovation and entrepreneurship to flourish

• **ELLP4 - Support Existing Businesses** - To support existing businesses in staying in the town by allowing them to relocate to premises in the town that better meet their needs and help them to flourish’.

• **ELLP5 - Promote Sustainable Employment Locations** - To promote the delivery of employment space in sustainable locations to accommodate an appropriate amount of additional employment floorspace by 2027.
3.0 Strategy

Employment Land Strategy and Distribution

3.1 The Employment Land Local Plan vision and objectives seek to ensure that the requirement for employment land in Eastbourne over the plan period is delivered in sustainable locations. A number of different strategic options for the distribution of employment land within the town were considered as part of the production of the Proposed Draft Employment Land Local Plan.

3.2 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 Town Centre and Sovereign Harbour that have been identified in the Eastbourne Core Strategy Local Plan 2006-2027.

3.3 This approach will allow all sites within the Borough to ‘work together’ to meet future requirements, providing a functioning supply of sites that are deliverable and provide sufficient choice to support indigenous businesses and inward investment.

Sustainable Centres

3.4 The ‘Sustainable Centres’ are neighbourhoods in which housing growth will be balanced by significant improvements in the provision of employment opportunities and community services and facilities. The designated Sustainable Centres are the Town Centre and Sovereign Harbour. They are identified through Policy B1: Spatial Development Strategy and Distribution in the Core Strategy.

3.5 Directing employment development to the Sustainable Centres will allow the Town Centre to sustain its projected high level of housing growth and will improve the Sovereign Harbour neighbourhood by addressing issues such as site access, linkages and contributions to additional community infrastructure.

Intensification of Industrial Estates

3.6 There are 7 Industrial Estates in Eastbourne, located within three broad areas (Hampden Park, Lottbridge Drove and Courtlands Road) and covering approximately 72 hectares. The Industrial Estates contain a number of uses
that would be incompatible with residential use, and their location on the periphery of the built up area makes them an ideal location for such uses.

3.7 Within these Industrial Estates, there are a number of existing vacant sites, sites that are currently under-utilised or sites where the occupier is seeking to vacate or contract activities. In addition to this, many of the buildings on the Industrial Estates were built 30-40 years ago and are likely to come to the end of their economic life during the plan period. These provide the opportunity to deliver new floorspace through redevelopment at higher density, intensifying and diversifying the offer of employment space provision within the existing Industrial Estates.

Economy and Employment Land

Policy EL1 – Economy and Employment Land

Job growth and economic prosperity in Eastbourne will be supported in order to enable the achievement of a sustainable economy and make Eastbourne a town where people want to live and work. This will be achieved by:

• Taking a positive approach that reflects a presumption in favour of sustainable economic development;

• Meeting the requirement for 48,750 sqm (GEA) of additional employment floorspace over the plan period through employment development within the Sustainable Centres (Town Centre and Sovereign Harbour) and through maximising the use of land in existing employment locations;

• Promoting development which provides units for new start-up businesses and small enterprises;

• Encouraging key businesses and their supply chains to grow existing specialisms;

• Encouraging development which supports improvements in the local jobs market through creation of additional jobs and employment diversification;

• 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; and

• Supporting the Education and Training sector of the Eastbourne economy through a flexible approach to expansion proposals.
3.8 When considering proposals for employment development, the Council will take a positive approach that reflects the “presumption in favour of sustainable development” set out in paras 14 and 15 of the NPPF. It will work with applicants to find solutions that address concerns raised by local residents and community groups, which mean that proposals that accord with policies in the ELLP can be approved wherever possible, and to secure development that improves the social, economic and environmental conditions of the area.

3.9 The requirement for 48,750 sqm of employment land will be delivered through intensification of Industrial Estates and development within the Sustainable Centres. However, each location identified is not necessarily capable or suitable to accommodate each of the identified B-class uses. The delivery of B2 or B8 space would not be appropriate in residential areas or locations where the environment is high quality, and provision of high quality office space is unlikely to be attractive to occupiers if it is located in older employment locations where the quality of the environment is poorer. Therefore, different types of employment development needs to be located in a location that is appropriate to its use, which means the more industrial uses being located within the Industrial Estates, and office development being located in high quality environments.

3.10 Taking this into account, the employment requirement will be distributed in the following way:
- Intensification of Industrial Estates – 20,000 sqm (GEA) of B1c/B2/B8 floorspace and 1,875 sqm (GEA) of B1a/B1b floorspace
- Town Centre – 3,750 sqm (GEA) of B1a/b floorspace
- Sovereign Harbour – 23,125 sqm (GEA) of B1 floorspace

3.11 The majority of economic activity in Eastbourne is undertaken by small businesses within a broad range of sectors. In order to encourage such businesses and encourage local ‘home grown’ employment growth, it is important to provide new units suitable for small and start-up businesses. This could be in the form of good quality managed

Picture 3 - Small units at Southbourne Business Park, Courtlands Road
workspace and ‘hybrid units’ that cater for a range of innovative business activities, and have proved highly successful and driven economic and business growth in other parts of East Sussex. 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.

3.12 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.

3.13 Although Eastbourne’s economy is relatively diverse, a significant amount of employment opportunities are still provided by tourism and other service related activities. Employment diversification will increase choice for local jobseekers and reduce reliance on the service industry sector. Growth in skilled jobs will be sought as part of the change identified in the Eastbourne-Hailsham Triangle study. This also provides an opportunity to reduce out-commuting and engage local highly skilled people into local employment rather than losing skills to neighbouring areas.

3.14 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 Employment and Training Supplementary Planning Document (SPD) has been prepared to guide the implementation of this policy.

3.15 The University of Brighton and Sussex Downs College both have campuses in Eastbourne, and the introduction of new further and higher education courses could help attract and retain younger residents within the area. 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.
Key Diagram

Intensification of Industrial Estates
(20,000 sqm GEA of B1c/B2/B8 floorspace and 1,875 sqm GEA of B1a and B1b floorspace)

Sovereign Harbour
(23,125 sqm GEA of B1 floorspace)

Hampden Park
Lattridge Drove
Courtlands Road

Town Centre
(3,750 sqm GEA of B1a and B1b floorspace)

KEY
- Industrial Estates
- Borough Boundary
- South Downs National Park
- Main Roads
- Sustainable Centres
- Urban Area
- Eastbourne Park
- Railway

Not to Scale

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4.0 Policies

These Policies are designed to help with the implementation and delivery of the Policy EL1: Economy and Employment Land.

Industrial Estates

4.1 Industrial Estates are key locations for class-B use and are significant employment locations. They are also important locations to accommodate other non B uses that are incompatible with other uses.

4.2 There are seven designated Industrial Estates within three areas of the town, which are identified in Figure 1, and plans of each designated Industrial Estate are provided in Appendix 2. The designated Industrial Estates are:

- Brampton Road Industrial Estate
- Highfield South Industrial Estate
- Highfield North Industrial Estate and Highfield Park
- Birch Road, Hawthorns and Compton Industrial Estates
- Hammonds Drive Industrial Estate
- Finmere and Britland Industrial Estates
- Courtlands Road Industrial Estate

4.3 The Industrial Estates are identified as locations for the provision of 20,000 sqm (GEA) of additional B1c (Light Industry), B2 (General Industry) and B8 (Storage & Distribution) use floorspace, as well as 1,875 sqm (GEA) of additional B1a (Office) and B1b (Research & Development) floorspace, over the plan period through the intensification of existing sites.

Picture 4 - Birch Road and Hawthorns Estates
4.4 Due to the physical constraints within the Borough, it is of critical importance to the future economy that class B uses are retained within the Industrial Estates as they can be incompatible with other uses and cannot be located elsewhere. In addition, as there is little opportunity to deliver new sites, existing sites should maximise their capacity and contribution to the economy. Therefore, key sites in B use should be retained and redeveloped to provide additional class B floorspace.

**Figure 1 - Designated Industrial Estates**
Policy EL2: Industrial Estates

Within the designated Industrial Estates, redevelopment and intensification of vacant and under-utilised sites to provide class B use floorspace will be supported in order to meet the target of providing a net additional 20,000 sqm (GEA) of B1c, B2 and B8 floorspace and a net additional 1,875 sqm (GEA) of B1a and B1b floorspace over the plan period. Where development proposals require the demolition or extension of existing class B floorspace, only the uplift in provision within the site will be considered to contribute towards the target. Proposals for the refurbishment of existing class B floorspace will also be supported.

Industrial and warehouse uses are the key priorities for the designated Industrial Estates. However, the provision of new class B1a and B1b (office) floorspace within the designated Industrial Estate will be supported, where it can be demonstrated that:

- The amount of non-ancillary office space provided within the Industrial Estates over the plan period does not exceed a maximum of 1,875 sqm (GEA).

The redevelopment or change of use of sites and premises within the designated Industrial Estate from class B use to alternate non-B class employment generating uses will only be supported where:

a) the proposed alternative use is an employment generating use that cannot be located elsewhere due to its un-neighbourliness and, by being located within a designated industrial estate, will not have a significant adverse impact on adjacent land uses; or

b) the applicant can demonstrate:

- Why the existing site/premises are no longer considered fit for purpose, drawing on evidence of marketing of the site in its current form and analysis of its relationship to neighbouring activities;
- That there is evidenced demand and need for the proposed alternate employment generating use(s);
- Why the site/premises is suitable for the proposed use(s)
- That the development accords with the policies set out in the adopted Core Strategy, including the sequential test for main town centre uses; and
- That, once delivered, the proposed use would not compromise the wider functioning of the Industrial Estate for B class uses.
4.5 Significant potential has been identified for intensification and redevelopment on existing sites within Industrial Estates where the land use is already established and a more efficient and sustainable use of land can be provided. In order to achieve the target of 20,000 sqm of additional B use floorspace within the Industrial Estates, the redevelopment and intensification of sites within Industrial Estates to provide additional class B use floorspace at higher densities will be encouraged.

4.6 The policy requires the delivery of 20,000 sqm (GEA) of net additional industrial and warehouse floorspace and 1,875 sqm (GEA) of office floorspace over the plan period, meaning an increase in provision over and above what is currently provided within the industrial estates. Where a development proposal includes the redevelopment of an existing class B site, the amount of existing floorspace will be deducted from the proposed floorspace with the difference between the two contributing towards the target. For example, if a development requires the demolition of 1,000 sqm of floorspace and results in the delivery of 1,500 sqm a contribution of 500 sqm is made towards the target (1,500 sqm [new floorspace] minus 1,000 sqm [existing floorspace]).


Picture 5 - White Knight Laundry site, Hammonds Drive

4.7 Since 2012/2013, a total of 6,900 sqm of class B floorspace has been delivered within the town’s industrial estates (at 1 April 2016). 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 (Picture 5). In addition, there is 1,102 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 2016 in terms of completed employment developments within the designated Industrial Estates.
### Table 3 - Employment Land Delivery within Designated Industrial Estates

<table>
<thead>
<tr>
<th></th>
<th>Net additional industrial and warehouse floorspace (sqm)</th>
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<tr>
<td>Completed 2012-2016</td>
<td>6,900</td>
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<tr>
<td>Average Annual Delivery</td>
<td>1,725</td>
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<tr>
<td>Residual Requirement</td>
<td>11,998</td>
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<td>Years of Plan Remaining</td>
<td>11</td>
</tr>
<tr>
<td>Expected Windfall Delivery</td>
<td>18,975</td>
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<tr>
<td>Committed</td>
<td>1,102</td>
</tr>
</tbody>
</table>

4.8 In addition, over the plan period a number of buildings on the Industrial Estates are expected to reach the end of their economic life and these will offer opportunities for redevelopment. This will enable the intensification of B uses within these sites, enabling them to use space more efficiently and accommodate greater levels of activity.

4.9 Any redevelopment within the Industrial Estates should seek to maximise the amount of B use floorspace provided. A comprehensive approach to redevelopment should be taken to provide a choice of stock that can accommodate a greater number of businesses and enhance quality of floorspace to meet occupier demands. This will have wider positive impacts by raising the quality of the environment in the Industrial Estates so they are able to successfully attract new occupiers. This is consistent with and supported by the Core Strategy policies for the neighbourhoods in which the Industrial Estates are located.

4.10 In addition, the refurbishment of existing B class space to meet occupier needs will be supported, as long as it does not result in a net loss of class B floorspace. This will ensure that the quality of employment floorspace within the Industrial Estates is enhanced and that floorspace in these locations continues to meet occupier market demands to support economic growth. It is recognised that the arrangement of floorspace may need be altered to enhance the quality and efficiency of the site overall. Redevelopments and refurbishments should meet sustainability and renewable energy requirements that are set out in the Core Strategy Policy D1: Sustainable Development and the associated Sustainable Building Design Supplementary Planning Document.
4.11 The existing industrial estates are the most appropriate locations to make provision for the requirement for industrial and warehouse floorspace, and therefore industrial and warehouse uses should be the main priority in these locations. However, it is considered that there is scope for a limited amount of new office provision to be accommodated within the industrial estates. The provision of new office space within the Industrial Estates will be supported where the new provision does not prejudice the future delivery of industrial and warehouse floorspace. To that end, the provision of non-ancillary office floorspace is limited to 1,875 sqm (GEA). It is recognised that existing employment sites in industrial and warehouse use may require the provision of some ancillary office space to support their existing operation, and these proposals will be supported.

4.12 ‘B-class’ employment floorspace is coming under increasing pressure for redevelopment to alternative uses. A large collection of non-B uses can erode the business nature of a location, which will have an adverse effect on occupier and investor perceptions of the Industrial Estates. The continued removal of key sites from B uses will undermine capacity and functionality and limit the long term potential for employment and economic growth. This could have an adverse effect on the integrity of the Industrial Estates by undermining the B class nature of the Industrial Estates.

4.13 In order to protect the integrity of the Industrial Estates as locations for B use and to deliver the requirement for 20,000 sqm of additional class B use floorspace within the Industrial Estates, it is necessary to prevent large sites with redevelopment potential from being redeveloped for non-B uses. It is important that Industrial Estates can accommodate class B uses that are incompatible with other uses and the loss of key sites within Industrial Estates to non-B uses will compromise the ability to meet the employment land requirement. The loss of B class uses on key sites within Industrial Estates will be resisted in order to help to protect the integrity of the Industrial Estates.

4.14 Therefore, it is necessary to protect large, key sites that have redevelopment potential by restricting any redevelopment or new build within the Industrial Estates to class B uses only. However, the redevelopment or change of use of sites and premises to alternative non-B class employment generating uses will be supported in exceptional circumstances where the proposed use cannot be located elsewhere due to its un-neighbourliness, such as a waste facility or recycling processing plant, or where it is demonstrated that the site and/or premises is genuinely redundant and the proposed use is compatible with the industrial estate. In demonstrating the compatibility of the proposed
non-B Class use with the primary industrial and warehouse functions of the designated industrial estates the Council will expect consideration to be given to:

- The impact of the proposed use on neighbouring properties and businesses in terms of bad neighbour effects and operational hours;
- The impact of changes/increases in vehicle movements, parking and wider accessibility on the ability for existing businesses to continue to function efficiently and their premises to be adequately serviced;
- The impact of the proposed development on the visibility and prominence of the B class uses within the Industrial Estate, ensuring non-B class uses do not dominate key gateway locations at entrance points to the estates or on sites highly visible from the highway or rail network; and
- The impact that the proposed development will have on enhancing the image and quality of the Industrial Estate in terms of its built form and in providing complementary amenities.

Town Centre

4.15 Traditionally Eastbourne town centre has been the main focus for office floorspace provision within the Borough. The existing stock consists of a mix between purpose-built office blocks, predominantly built in the 1960s, 1970s and 1980s, and late-Victorian residential properties that have been converted to office use.

4.16 The Town Centre has been identified as a Sustainable Centre in the Core Strategy. It benefits from good public transport accessibility, and current areas of office stock are located in close proximity to the railway station.

4.17 A Town Centre Local Plan (TCLP) was adopted in November 2013 to set out a strategy and proposals for the regeneration of the Town Centre. The TCLP requires that the quantum of office space that should be provided within the Town Centre should be specified in the Employment Land Local Plan.

4.18 The Town Centre remains an important location for office provision, Office use is defined as a main town centre use in the National Planning Policy Framework and therefore it is appropriate for additional office development to be located there. Other types of B floorspace are likely to be inappropriate within a town centre location due to amenity issues.
Policy EL3: Town Centre

Within the Town Centre, a total of 3,750 sqm (GEA) of office (class B1a and B1b) floorspace shall be provided on Development Opportunity Site 2 as identified in the Town Centre Local Plan. This mandatory requirement for office development on Development Opportunity Site 2 supersedes the optional requirement in Policy TC19 of the Town Centre Local Plan. Office development should be high quality class B1a/b floorspace that is flexible to meet multi-occupier needs.

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

4.19 The office market within Eastbourne is relatively static and is dominated by older, outmoded stock within the town centre. In its current state, much of the office stock in Eastbourne does not meet occupier demand as it would be difficult to accommodate the IT and servicing infrastructure needed by office occupiers, and is expensive to refurbish to meet modern standards.

4.20 Businesses are seeking higher quality office accommodation that is unlikely to be met by the existing stock, which means that new office floorspace will need to be provided. However, there are some instances where older stock has been refurbished to meet occupier needs, such as Ivy House in Ivy Terrace, which demonstrates that good quality conversion of properties already within the town centre can be viable. 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.

4.21 Demand for new office space has become increasingly polarised, with occupiers either preferring ‘in town’ locations due to the vibrancy and wider amenity offered by a town centre location, or ‘out of town’ locations due to the perceived lower costs, fewer traffic and parking restrictions, and better security. These different locations are likely to attract different types of development and occupier interest, and in order for Eastbourne to maximise its attractiveness to investors and retain businesses within the town, a choice of office locations needs to be provided.

4.22 A balance needs to be struck between the amount of ‘in town’ and ‘out of town’ office provision in order to maintain the role of offices as a key town centre use and sustain the vibrancy and vitality of the town centre, but also to broaden the stock types available and attract greater levels of demand over the plan period.
4.23 As a main town centre use, sufficient provision of office space should be made within the town centre to provide new, high quality accommodation. However, it would be undesirable to direct all office development to the town centre as this would not provide choice or flexibility.

4.24 The provision of 3,750 sqm of office space in town centre will help to maintain a healthy office provision and avoid adverse impact on the vitality of the town centre. It should be provided as additional modern space and should complement the existing and refurbished stock. It should provide smaller, flexible, multi-occupier floorspace in the form of good quality managed workspace that is suitable for small and start-up businesses, and is closely aligned to the nature of demand in the Borough. It is recognised that commercial office development is unlikely to be viable on its own. Therefore the delivery of office space in the Town Centre will require cross subsidy from other higher value uses as part of a mixed use development.

4.25 The Town Centre Local Plan identifies that the office development could be capable of being provided on the following sites in the Town Centre:

- Development Opportunity Site 2: Land adjoining the Railway Station and the Enterprise Centre
- Development Opportunity Site 3: Land between Upperton Road and Southfields Road
- Development Opportunity Site 4: Land South East of the Arndale Centre
- Transition Area 1: Seaside Road and Terminus Road East
- Transition Area 2: Station Street and Mark Lane
- Potential Area of Change 2: Land at Langney Road and Pevensey Road

4.26 The 3,750 sqm (GEA) of office space shall be provided on one site in order to create a critical mass of office floorspace. Development Opportunity Site 2 has the best potential to create a critical mass of offices in a position close to and with good visibility from the railway station, making provision more attractive for office occupiers. Therefore, 3,750 sqm (GEA) of office floorspace is a mandatory requirement for development on Development Opportunity Site 2, which is identified in Figure 2. This supersedes Town Centre Local Plan Policy TC19 where it states that B1(a) offices are acceptable additional uses above ground floor level. However, office provision will also be acceptable on other sites identified in the Town Centre Local Plan as being suitable for office development.
4.27 Office development on Development Opportunity Site 2 should be provided to the south of the site as part of a mix of uses to maximise frontage potential and links to the Station.

4.28 Although Policy TC19 of the Town Centre Local Plan requires that the development of Development Opportunity Site 2 provides retail uses on the ground floors of development and residential and office uses are only provided above ground floor, it is considered that this could unreasonably restrict the development potential of the site. The Employment Land Local Plan encourages the mixed use development of Development Opportunity Site 2 in order to secure the mandatory provision of 3,750 sqm GEA of office floorspace, which is likely to be delivered through cross-subsidy. In order to achieve this, it is accepted that additional flexibility in design and layout would be required than allowed by the Town Centre Local Plan, in order to allow uses such as office or residential to occupy ground floor areas and retail uses to be provided on upper floors. Therefore it is considered that the Employment Land Local Plan supersedes Town Centre Local Plan Policy TC19 in this respect.
4.29 As the delivery of office space in the Town Centre is likely to be reliant on cross-subsidy from other forms of development as part of a mixed use site, planning applications on Development Opportunity Site 2 that do not provide the full allocation of office development or the full affordable housing provision required by policy should be supported by a viability assessment, carried out in accordance with the National Planning Policy Framework and RICS guidance.

4.30 Existing office stock in the town centre is coming under increasing pressure for conversion to other uses, particularly due to the extension of permitted development rights that allow a change of use from office to residential without the need to apply for permission. This may result in the loss of some of the office stock within the Town Centre.

4.31 The loss of office stock within the Town Centre will be monitored closely. If significant losses occur and it begins to impact upon occupied, higher quality office accommodation, approaches to mitigate the losses will be considered. This could be in the form of Article 4 directions to remove permitted development rights, or through increasing the amount of office floorspace that should be provided in the Town Centre. The situation and need for action will be monitored in the Local Monitoring Report using the Employment Land Local Plan Monitoring Framework.

4.32 Contingency options in the case that the employment space requirements for the Town Centre are not delivered are set out in the Town Centre Local Plan.

Sovereign Harbour

4.33 The development of employment space at Sovereign Harbour has been a long standing ambition for Eastbourne.

4.34 Over the last 20 years, Sovereign Harbour has provided high quality residential and leisure development for Eastbourne. Two sites in Sovereign Harbour (known as Sites 6 and 7a) were identified in an outline application in 1988 for the provision of 30,000 sqm of office space. However this has not been delivered and the viability of this quantum of B1a floorspace has been questioned.
4.35 Sovereign Harbour has been identified as a Sustainable Centre in the Core Strategy. The Core Strategy also contains a vision and policy for the Sovereign Harbour neighbourhood, which is supported by a Supplementary Planning Document (SPD) that provides additional detail to guide development and ensure that new and improved community facilities are at the heart of future building plans.

4.36 The sites at Sovereign Harbour offer a significant opportunity to deliver high quality employment space within an existing high quality environment. These sites provide an available and deliverable opportunity that can be achieved over the short term. This will offer something different for occupiers, and should encourage a range of business activities and building types.

4.37 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.
Policy EL4: Sovereign Harbour

Within Sovereign Harbour, a total of 23,125 sqm (GEA) of B1 floorspace shall be provided. This shall be delivered predominantly on Site 6 and Site 7a, although office floorspace delivered in other locations within Sovereign Harbour will count towards the target. Site 6 is suitable for all types of class B1 development, whilst Site 7a is suitable for class B1a and B1b development. Site 7a shall also include a site of at least 1,500 sqm in order to accommodate a community centre.

The B1 floorspace should be provided in a flexible format that will allow businesses to adapt their operations depending on circumstances.

Other employment generating uses that are compatible with the residential area (with the exception of class A1, A3 and A5 uses) will be acceptable on any remaining land on Sites 6 and 7 following the delivery of the 23,125 sqm (GEA) of B1 floorspace.

4.38 Given the high quality environment and the surrounding housing, any employment development in Sovereign Harbour would need to be compatible with residential use.

4.39 In order to accommodate the changing requirements of business and the need to undertaken a number of different activities in one unit, employment floorspace should be provided through the development of modern ‘hybrid’ units that incorporate elements of office, research and light manufacturing workshops within the B1 use classes. This is exactly the type of space that will be provided by the Innovation Mall. This flexibility will enable businesses to adapt their operations as technology develops or processes change.

4.40 Sovereign Harbour also provides an opportunity to deliver office provision in an ‘out of town’ location that broadens the type of space available to provide choice to occupiers and investors. By delivering a mix of B1 space and flexible units, Sovereign Harbour will complement the office space delivered in the town centre, and any light industrial space delivered in the Industrial Estates.

4.41 The quantum of B1 space that should be provided in Sovereign Harbour is 23,125 sqm (GEA), with a focus on delivery of high quality space that is in keeping with the overall design standards of the area. The requirement for 23,125 sqm (GEA) is considered to equate to 18,500 sqm (NIA) based on an 80% conversion factor.
4.42 This is a reduction from the previous allocation of 30,000 sqm, and reflects the changing demand for flexible floorspace that can provide for a higher number of employees within a smaller area.

4.43 The Employment Land Review considers that there is sufficient evidence of demand within the Eastbourne market to indicate that the development of 23,125 sqm (GEA) of B1 space at Sovereign Harbour is deliverable. The delivery of the Innovation Mall will help establish Sovereign Harbour as an employment location and will assist further development by providing some on-site servicing, improving the attractiveness and desirability of the sites.

4.44 Additional employment land in this location will provide alternative locations for indigenous businesses that are constrained on their current sites, and prevents them from re-locating outside of the Borough. It would also provide more choice within the market that would help attract new businesses.

**Figure 3 - Sovereign Harbour sites**

4.45 Site 6 (Land alongside Pevensey Bay Road) and Site 7 (Land fronting Pevensey Bay Road and Pacific Drive) have been identified as the locations for where the majority of the B1 development should be delivered. These
sites provide a ‘gateway’ into the town and are at the entrance to the Harbour. Therefore it is important that development should be of a high quality design. The sites are identified in Figure 3.

4.46 The employment development on Site 7 should be provided on the south-western part of the site (to be known as Site 7a), with other uses including open space and residential to be provided on the north-eastern parts of the site (Sites 7b and 7c) in line with the Sovereign Harbour SPD.

4.47 Site 7a is required to accommodate a new Community Centre with a site area of at least 1,500 sqm. In accordance with the Section 106 agreement for the Sovereign Harbour Outline Permission (Planning ref: 131002), the overall floorspace allocation at Sovereign Harbour has been reduced from 25,000 sqm GEA (20,000 sqm NIA) to 23,125 sqm GEA (18,500 sqm NIA) in order to accommodate the Community Centre. The Community Centre will share parking provision with the B1 development on Site 7a. As the community centre is a local facility that will mainly be used by local residents, and the peak hours of use of the community centre and office development will be complementary, it is considered that this parking arrangement would be acceptable and would allow for the best use to be made of the site.

4.48 In order to support the creation of a Sustainable Centre at Sovereign Harbour, any remaining space on Sites 6 and 7a that is not used to deliver the 23,125 sqm (GEA) of B1 floorspace could be developed for other employment generating uses that are compatible with the residential area, with the exception of A1 (Retail), A3 (Restaurants & Cafes) and A5 (Hot Foot Takeaway) uses. It is not considered that these Class A uses would be appropriate outside the defined Sovereign Harbour District Centre.

4.49 A small amount of office development could also be accommodated on Site 4 (Land off Harbour Quay). The design and layout considerations that should be taken into account in any B1 development are set out in the Sovereign Harbour SPD.
5.0 Implementation and Monitoring

Infrastructure

5.1 The provision of strategic infrastructure is important in helping to deliver development and implement the Employment Land Local Plan. Core Strategy Policy E1: Infrastructure sets out the different mechanisms through which the Council will ensure the necessary social and physical infrastructure is provided alongside new development. The policy should be read in conjunction with the Infrastructure Delivery Plan, which identifies the key infrastructure priorities needed to support development.

5.2 There is no significant strategic infrastructure required to support development identified within the Employment Land Local Plan, although there may be site-specific infrastructure required in order to deliver development in certain locations.

5.3 A South Wealden and Eastbourne Transport Study was undertaken to test the transport impacts of the proposed development within the Core Strategy. 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.

5.4 Whilst not mandatory for the delivery of employment development, improvements to electronic communication infrastructure could assist businesses. The Infrastructure Delivery Plan identifies that broadband improvements are being prioritised to improve the level of connectivity, ensuring that existing and future areas for business and residential premises have adequate access to broadband connections, especially within the Sustainable Centres.

5.5 The Community Infrastructure Levy (CIL) allows local authorities to raise funds for infrastructure to support an area’s development by way of a charge per square metre of development. 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.
5.6 Employment development is identified as ‘zero rated’ in the CIL Charging Schedule, which means that it is not liable for a CIL charge as it is considered that it would make development financially unviable. However this may change in the future as the Charging Schedule will be reviewed regularly.

Monitoring Framework

5.7 The Monitoring Framework is used to assess the performance of the Employment Land Local Plan over the course of the plan period up to 2027. It will provide the key mechanism for ensuring that the objectives and policies stemming from it are successfully delivered.

5.8 The effectiveness of the Employment Land Local Plan will be monitored annually through the Local Monitoring Report using the Monitoring Framework. The Monitoring Framework sets out a series of key targets, which will be used to measure the Employment Land Local Plan's performance. They have related indicators in order to assess whether policies are working effectively or whether they need to be reviewed or replaced. Where it becomes evident that policies not performing as initially envisaged or intended, the Local Monitoring Report will identify the actions that need to be taken to address the issues. Contingency arrangements are outlined in the Core Strategy.

5.9 The Monitoring Framework is set out in Table 4 below.
### Table 4 - Employment Land Local Plan Monitoring Framework

<table>
<thead>
<tr>
<th>Policy</th>
<th>Objective</th>
<th>Targets</th>
<th>Indicators</th>
<th>Sources</th>
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<td>EL1: Employment Land Strategy</td>
<td>ELLP1: Stimulate Economic Growth</td>
<td>Meet the requirement for additional employment land</td>
<td>Total amount of employment floorspace provided against requirement</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td></td>
<td>ELLP2: Encourage Small and Start-up Businesses</td>
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<td>ELLP3: Diversify the Local Economy</td>
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<td></td>
<td>ELLP4: Support Existing Businesses</td>
<td>Increase the number of businesses in Eastbourne</td>
<td>Change in the number of businesses over the year</td>
<td>East Sussex in Figures (Business Demography)</td>
</tr>
<tr>
<td></td>
<td>ELLP5: Promote Sustainable Employment Locations</td>
<td>Increase the number of business start-ups</td>
<td>Change in the number of business start-ups over the year</td>
<td>East Sussex in Figures (Business Demography)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Increase job creation for local people</td>
<td>Number of people employed via Local Employment and Training SPD</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Increase job diversification</td>
<td>Change in numbers of people employed by sector over the year</td>
<td>East Sussex in Figures (Employment by Industry)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Enhance the existing education and skills provision</td>
<td>Change in participation and achievement rates in Further Education</td>
<td>East Sussex in Figures (Further Education: learners, skills and achievements)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ensure amount of office space lost does not exceed the allowance in the ELLP forecast</td>
<td>Total amount of office (class B1a and B1b) floorspace lost to non-B uses compared to allowances in ELLP forecast</td>
<td>Commercial Monitoring (EBC)</td>
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<td></td>
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<td>Ensure amount of industrial</td>
<td>Total amount of industrial (class</td>
<td>Commercial Monitoring (EBC)</td>
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<tr>
<td>Policy</td>
<td>Objective</td>
<td>Targets</td>
<td>Indicators</td>
<td>Sources</td>
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<tr>
<td>EL2:</td>
<td>ELLP2: Encourage Small and Start-up Businesses</td>
<td>Space lost does not exceed the allowances in ELLP forecast</td>
<td>B1c and B2) floorspace lost to non-B uses compared to allowances in ELLP forecast</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td></td>
<td>ELLP4: Support Existing Businesses</td>
<td>Ensure amount of warehouse space lost does not exceed the allowances in ELLP forecast</td>
<td>Total amount of warehouse (class B8) floorspace lost to non-B uses compared to allowances in ELLP forecast</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td>EL: Industrial Estates</td>
<td>Delivery of 20,000 sqm of Industrial (class B1c and B2) and Warehouse (class B8) floorspace and 1,875 sqm of Office (class B1a and B1b) floorspace in Industrial Estates</td>
<td>Total amount of net additional class B floorspace completed in Industrial Estates in sqm</td>
<td>Commercial Monitoring (EBC)</td>
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<td></td>
<td></td>
<td>Total amount of net additional office (class B1a and B1b) floorspace completed in Industrial Estates in sqm</td>
<td>Commercial Monitoring (EBC)</td>
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<td></td>
<td></td>
<td>Total amount of net additional industrial (class B1c and B2) floorspace completed in Industrial Estates in sqm</td>
<td>Commercial Monitoring (EBC)</td>
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<td></td>
<td></td>
<td>Total amount of warehouse (class B8) floorspace completed in Industrial Estates</td>
<td>Commercial Monitoring (EBC)</td>
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<tr>
<td>Policy</td>
<td>Objective</td>
<td>Targets</td>
<td>Indicators</td>
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<td>in sqm</td>
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<tr>
<td>Resist the loss of B floorspace within Industrial Estates</td>
<td>Amount of class B floorspace lost to non-B uses in sqm within each industrial estate</td>
<td>Commercial Monitoring (EBC)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EL3: Town Centre</td>
<td>ELLP1 - Stimulate Economic Growth ELLP5 - Promote Sustainable Employment Locations</td>
<td>Delivery of 3,750 sqm of office (class B1a/B1b) floorspace in the Town Centre</td>
<td>Total amount of office (class B1a/B1b) floorspace completed in the Town Centre</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td>Resist the loss of office (class B1a/B1b) floorspace to other uses</td>
<td>Amount of office (class B1a/B1b) floorspace lost to other uses in the Town Centre</td>
<td>Commercial Monitoring (EBC)</td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Amount of office (class B1a/B1b) floorspace lost to residential use in the Town Centre</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Amount of office (class B1a/B1b) floorspace lost to residential through ‘Permitted Development’.</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
<tr>
<td>EL4: Sovereign Harbour</td>
<td>ELLP1 - Stimulate Economic Growth ELLP5 - Promote Sustainable Employment Locations</td>
<td>Delivery of 23,125 sqm of B1 floorspace in Sovereign Harbour</td>
<td>Total amount of class B1 floorspace completed at Sovereign Harbour</td>
<td>Commercial Monitoring (EBC)</td>
</tr>
</tbody>
</table>
### Appends

**Appendix 1: Glossary**

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>B-use</strong></td>
<td>Land and buildings in the B use class, which includes B1a (offices), B1b (research &amp; development), B1c (light industry), B2 (heavy industry) and B8 (storage and distribution).</td>
</tr>
<tr>
<td><strong>Biodiversity Assessment</strong></td>
<td>The Eastbourne Biodiversity Assessment is an evidence document that was produced by the Ash Partnership in 2008. It establishes a comprehensive database on biodiversity and geological interests within the Borough, to enable the impact of development to be assessed.</td>
</tr>
<tr>
<td><strong>Churn</strong></td>
<td>Churn is the movement of businesses within the market and sufficient floorspace provision should be made to allow that. An allowance for churn is made for the fact that locational and premises needs of businesses change over time, which may require businesses to move. For this to happen smoothly there is a need for certain level of available vacant land. This type of demand has been called ‘churn’ demand or ‘frictional vacancy’.</td>
</tr>
<tr>
<td><strong>Cluster</strong></td>
<td>A geographic concentration of interconnected businesses, suppliers, and associated institutions in a particular field. Sometimes known as an agglomeration economy.</td>
</tr>
<tr>
<td><strong>Commitment</strong></td>
<td>A site that already has planning permission for development.</td>
</tr>
<tr>
<td><strong>Community Infrastructure Levy (CIL)</strong></td>
<td>The Community Infrastructure Levy will be a new charge which local authorities in England and Wales will be empowered to charge on new development in their area. The proceeds of the levy will be spent on local and sub-regional infrastructure to support the development of the area.</td>
</tr>
<tr>
<td><strong>Core Strategy</strong></td>
<td>The Eastbourne Core Strategy Local Plan was adopted in February 2013. It sets out the key direction and planning framework for Eastbourne, and provides the strategic policies which are be used to determine planning applications.</td>
</tr>
<tr>
<td>Term</td>
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<tr>
<td>Corporate Plan</td>
<td>The Corporate Plan is a 5 year plan that summarises the Council’s vision, objectives, values and improvement priorities. It sets the direction for services and brings together key actions and performance indicators to measure progress against priority projects.</td>
</tr>
<tr>
<td>Development Plan</td>
<td>A set of documents that set out the local authority's policies and proposals for the development and use of land in their area. This includes adopted Local Plans and neighbourhood plans, and is defined in section 38 of the Planning and Compulsory Purchase Act 2004.</td>
</tr>
<tr>
<td>Eastbourne Borough Plan</td>
<td>The Eastbourne Borough Plan 2001-2011 was adopted in 2003 and selected policies were ‘saved’ in 2007. These policies form part of the Development Plan for Eastbourne and are used in the determination of planning applications. Borough Plan policies will eventually be replaced as new Local Plans are adopted.</td>
</tr>
<tr>
<td>Eastbourne and South Wealden area</td>
<td>An overlapping area covering Eastbourne, Polegate and Hailsham. The Triangle is recognised as a key strategic location along the Sussex coast, which offers considerable potential for additional economic and sustainable development; but at the same time is an area of economic need and opportunity.</td>
</tr>
<tr>
<td>Eastbourne Strategic Partnership (ESP)</td>
<td>A non statutory body made up of a wide range of representatives from the public, private and voluntary sector. The ESP is responsible for producing, monitoring and reviewing the Eastbourne Community Strategy, reducing duplication in the provision of services and developing joint projects.</td>
</tr>
<tr>
<td>Employment Land</td>
<td>Employment land in the context of the Employment Land Local Plan means land and buildings that are in the B use classes.</td>
</tr>
<tr>
<td>Employment Land Review (ELR)</td>
<td>An evidence document produced by consultants GVA on behalf of Eastbourne Borough Council in 2013. The purpose of the ELR is to review, assess and update the Borough’s position in relation to the future supply and demand for</td>
</tr>
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<td>Term</td>
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<tr>
<td>Employment floorspace, the role of employment sites and their suitability to support economic growth objectives.</td>
<td></td>
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<tr>
<td><strong>Examination in Public (EIP)</strong></td>
<td>The process for the independent assessment of the soundness of Local Plans. All Local Plans must be examined before an independent Planning Inspector, who will consider all representations made in writing or at a public inquiry. Following the examination the Inspector will report his/her findings to the Council.</td>
</tr>
<tr>
<td><strong>Gross External Area (GEA)</strong></td>
<td>The total floor area contained within the building measured to the external face of the external walls</td>
</tr>
<tr>
<td><strong>Gross Internal Area (GIA)</strong></td>
<td>The floor area contained within the building measured to the internal face of the external walls</td>
</tr>
<tr>
<td><strong>Gross Value Added (GVA)</strong></td>
<td>A measure of the value of goods and services produced in an area, industry or sector of an economy.</td>
</tr>
<tr>
<td><strong>Headroom</strong></td>
<td>A contingency reserve of floorspace to ensure that, should sites not come forward for redevelopment, there will still be an appropriate supply and mix of sites to meet needs.</td>
</tr>
<tr>
<td><strong>Industrial use</strong></td>
<td>Uses that fall within B1c (Light Industry) and B2 (General Industry) classes within the Use Class Order.</td>
</tr>
<tr>
<td><strong>Infrastructure Delivery Plan (IDP)</strong></td>
<td>Detailed assessment of the infrastructure required to deliver the spatial development strategy and how this will be delivered.</td>
</tr>
<tr>
<td><strong>Local Development Document (LDD)</strong></td>
<td>A generic term for documents prepared by local planning authorities for the use and development of land or containing environmental, social and economic objectives relevant to the development and use of land which are intended to guide the determination of applications for planning permission.</td>
</tr>
<tr>
<td><strong>Local Enterprise Partnership (LEP)</strong></td>
<td>A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area. For Eastbourne the LEP is the South East Local Enterprise Partnership, which covers East Sussex, Essex, Kent, Medway, Thurrock and Southend.</td>
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<tr>
<td>Term</td>
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<tr>
<td>Local Monitoring Report (LMR)</td>
<td>Authorities are required to produce LMRs to assess the implementation of the Local Development Scheme and the extent to which policies in the Local Development Documents are being achieved</td>
</tr>
<tr>
<td>Local Plan (LP)</td>
<td>The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. This can be one single Local Plan or a collective of Local Plans such as Core Strategies etc.</td>
</tr>
<tr>
<td>Monitoring Framework</td>
<td>A list of indicators to monitor the effects of the Employment Land Local Plan policies</td>
</tr>
<tr>
<td>National Planning Policy Framework (NPPF)</td>
<td>The NPPF sets out the Government’s planning policies and how these are expected to be applied. It was published on 27 March 2012.</td>
</tr>
<tr>
<td>Neighbourhood</td>
<td>The Core Strategy divides Eastbourne into 14 neighbourhoods, based on resident’s perceptions and an analysis of the built environment. The Core Strategy sets a policy for future development in each of the neighbourhoods.</td>
</tr>
<tr>
<td>Net Internal Area (NIA)</td>
<td>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</td>
</tr>
<tr>
<td>Office use</td>
<td>Uses that fall within B1a (Office) and B1b (Research &amp; Development) classes within the Use Class Order.</td>
</tr>
<tr>
<td>Planning &amp; Compulsory Purchase Act 2004</td>
<td>The legislation that introduced a new development planning system, with the aim of speeding up the planning system. The provisions also introduce powers which allow for the reform and speeding up of the plans system and an increase in the predictability of planning decisions, the speeding up of the handling of major infrastructure projects and the need for simplified planning zones to be identified in the strategic plan for a region. The Act commenced 28th September 2004.</td>
</tr>
</tbody>
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| Previously                                | Land which is or was occupied by a permanent structure,
<table>
<thead>
<tr>
<th>Term</th>
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</thead>
<tbody>
<tr>
<td>developed land</td>
<td>including the curtilage of the developed land (except gardens) and any associated fixed surface infrastructure.</td>
</tr>
<tr>
<td>South Downs National Park (SDNP)</td>
<td>England’s newest National Park, covering the South Downs and Western Weald, situated in the counties of Hampshire, and West and East Sussex. Planning responsibility within this area falls to the South Downs National Park Authority.</td>
</tr>
<tr>
<td>South Wealden &amp; Eastbourne Transport Study (SWETS)</td>
<td>A transport study carried out in 2010, commissioned by East Sussex County Council, which looked at the travel implications of development proposals in the Eastbourne and South Wealden area.</td>
</tr>
<tr>
<td>Sovereign Harbour Supplementary Planning Document (SPD)</td>
<td>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.</td>
</tr>
<tr>
<td>Strategic Environmental Assessment (SEA)</td>
<td>The term used internationally to describe the environmental integration of policies, plans and programmes. The SEA Directive (2001/42/EC) requires a formal ‘environmental assessment’ of plans and programmes that are to be adopted by a public authority including those in spatial planning. This assessment is often combined with the Sustainability Appraisal.</td>
</tr>
<tr>
<td>Sustainability Appraisal (SA)</td>
<td>Assessment of the social, economic and environmental impacts of proposals in Local development documents.</td>
</tr>
<tr>
<td>Sustainable Centre</td>
<td>A neighbourhood designated in the Core Strategy where housing growth will be balanced by significant improvements to the provision of employment and community services and facilities. The Town Centre and Sovereign Harbour are both designated as Sustainable Centres.</td>
</tr>
<tr>
<td>Sustainable Community Strategy</td>
<td>A sustainable community strategy is a long-term plan which sets out the priorities for an area, and how local organisations will work towards them. 'Pride of Place' is the sustainable community strategy for East Sussex, setting out the key tasks needed to improve the quality of life in East Sussex by 2026.</td>
</tr>
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<tr>
<td>Sustainable Neighbourhood Assessment</td>
<td>An evidence study produced in 2011 that analyses the sustainability of each of the Borough’s 14 neighbourhoods against locally relevant sustainability criteria.</td>
</tr>
<tr>
<td>Town &amp; Country Planning (Local Planning) (England) Regulations 2012</td>
<td>Regulations made in 2012 following the publication of the Localism Act that make provision for the system for local development planning, established by Part 2 of the Planning &amp; Compulsory Purchase Act 2004.</td>
</tr>
<tr>
<td>Town Centre Local Plan</td>
<td>A LDD providing a framework for the future development and regeneration of Eastbourne Town Centre.</td>
</tr>
<tr>
<td>Use Class</td>
<td>The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes'. A change of use of a building or land does not need planning permission when it falls within the same class.</td>
</tr>
<tr>
<td>Warehouse use</td>
<td>Uses that fall within the B8 (Storage &amp; Distribution) class within the Use Class Order.</td>
</tr>
<tr>
<td>Windfall</td>
<td>Windfall sites are those which have not been specifically identified as available in the local plan process. They comprise previously-developed sites that have unexpectedly become available.</td>
</tr>
</tbody>
</table>
Appendix 2: Designated Industrial Estates
Appendices
Appendix 3: Policies Proposed for Deletion

Existing policies that are proposed to be deleted on adoption of the Employment Land Local Plan are:

Eastbourne Core Strategy Local Plan 2006-2027

- Core Strategy Policy D2: Economy

Eastbourne Borough Plan 2001-2011 (Saved Policies)

- Borough Plan Policy BI2: Designated Industrial Areas
- Borough Plan Policy BI4: Retention of Employment Commitments