
Report to Eastbourne Borough Council

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an Inspector appointed by the Secretary of State for Communities and Local Government

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Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Eastbourne Employment Land Local Plan

The Plan was submitted for examination on 22 February 2016

The examination hearings were held between 12 May 2016 and 30 June 2016

File Ref: PINS/T1410/429/7

Abbreviations used in this report

AA	Appropriate Assessment
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
EBC	Eastbourne Borough Council
EELLP	Eastbourne Employment Land Local Plan
ESCC	East Sussex County Council
ETCLP	Eastbourne Town Centre Local Plan
GEA	Gross External Area
HRA	Habitats Regulations Assessment
LDS	Local Development Scheme
LP	Local Plan
MM	Main Modification
NIA	Net Internal Area
NPPF	National Planning Policy Framework
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
WDC	Wealden District Council
WLP	Wealden Local Plan

Non-Technical Summary

This report concludes that the Eastbourne Employment Land Local Plan provides an appropriate basis for the planning of employment land provisions in the Borough, provided that a number of main modifications [MMs] are made to it. Eastbourne Borough Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings. Following the hearings, the Council prepared schedules of the proposed modifications and carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary. I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- **MM1** recommends the use of Gross External Area (GEA) in Policy EL1. There are similar modifications recommended in the other Main Modifications in order for there to be consistency in the measurement and monitoring of floorspace for different use classes in the interests of effectiveness;
- **MM2-MM3** recommend changes to Policy EL2 Industrial Estates and its reasoned justification in order to:
 - Remove uncertainty as to how net floorspace increases would be measured,
 - Acknowledge that B1(b) uses and some limited non-ancillary B1(a) office floorspace would be acceptable on the estates and the B1(a) space is needed to replace the loss of such floorspace at Sovereign Harbour in favour of a community centre, and
 - Make the criteria effective for exceptional consideration of non-business development on the estates.
- **MM4-MM5 & MM7-MM9** recommend changes to Policy EL3 Town Centre to make office provision a mandatory instead of optional requirement on site DO2 as part of a mixed development but with added flexibility on layout, without which the office floorspace allocation is unlikely to be delivered and the policy would be ineffective.
- **MM10-MM12** recommend changes to Policy EL4 Sovereign Harbour:
 - for necessary clarity as to what floorspace shall be provided,
 - to adjust for the agreed incorporation of a community centre,
 - to confirm which parts of the allocation are suitable for which type of B1 development, and
 - to avoid prejudicing the delivery of a permitted mixed development on site 4.

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Introduction

1. This report contains my assessment of the Eastbourne Employment Land Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The Eastbourne Employment Land Local Plan, submitted in February 2016, is the basis for my examination. It is the same document as that published for consultation between 11 December 2015 and 22 January 2016.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and sustainability appraisal that has been undertaken. Where necessary I have highlighted these amendments in the report.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as '*Eastbourne Policies Map Draft - November 2015*' as set out in Document SD/8.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it. However, published MMs to the Plan's policies require further corresponding changes to be made to the policies map. One change to the policies map was

published for consultation in the Schedule of Main Modifications. It was described as MM6 in the consultation document alongside the other MMs of which MM4 and MM5 are relevant. For the above reason I am unable to include the change to the Map in my formal recommendations. However, in order to comply with the legislation and give effect to the Plan's policies, when the Plan is adopted, the Council will need to update the adopted policies map to reflect the changes to the policies that are proposed in the Schedule of Main Modifications.

Assessment of Duty to Co-operate

7. Section 20(5)(c) of the Planning and Compulsory Purchase 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation. Section 33A imposes a duty to cooperate with other local planning authorities and named bodies in the preparation of development plan documents such as a local plan.
8. The Council has prepared a '*Statement of Compliance with the Duty to Co-operate*' [Document SD/10]. The Statement describes the engagement that has taken place with relevant bodies. This has included formal consultation with a variety of named bodies and engagement in groups such as the Planning Liaison Group of East Sussex authorities.
9. Eastbourne is a coastal authority within East Sussex and is surrounded on all sides except the sea by the Wealden District Council administrative area. Part of the Borough lies within the South Downs National Park. The limited scope of the Local Plan means that the relevant cross-boundary issues mainly concern only Wealden District Council. The SD/10 statement acknowledges the close relationship with the southern part of Wealden District. However East Sussex County Council also has a particular interest both as the local highway and transportation authority and in the promotion of economic growth.
10. Both Wealden and Eastbourne have concluded that their employment needs could be met within their boundaries during the lifetime of their respective Core Strategies which end in 2027. Both authorities have also cooperated with East Sussex County Council on a Joint Transport Study to provide a suitable evidence base for this and other development plan documents.
11. As Eastbourne and Wealden District Councils are both preparing new Local Plans which will replace the development plan in each area (including this Employment Land Local Plan), continued engagement will be needed to identify employment needs in both areas and to address relevant cross boundary issues in the period until 2035.
12. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

13. The identified need for the Eastbourne Employment Land Local Plan (EELLP) arose out of the recommendations of the Inspector who examined the Eastbourne Core Strategy. In 2012 the Inspector concluded amongst other things that: *'The evidence on employment land supply lacked clarity and did not demonstrate that Policy D2 of the Core Strategy was the most appropriate strategy for supporting job growth and economic prosperity in Eastbourne'* and that: *'Furthermore uncertainty about the viability of directing 30,000sqm of employment floorspace to Sovereign Harbour casts doubts on whether the strategy is deliverable during the Plan period'*. The Inspector recommended a review of employment land supply and viability testing of proposals for employment development at Sovereign Harbour. That review was to commence immediately with the intention that the Plan could be adopted by 2014. Whilst the EELLP will in consequence have a shorter life than the Core Strategy, it remains tied to it. In any event the EELLP and the Core Strategy and other adopted plans are due to be replaced at an early stage by the emerging Eastbourne Local Plan.
14. Section 19(1) of the Planning & Compulsory Purchase Act 2004 requires that development plan documents are prepared in accordance with the local development scheme. Provision for this Local Plan is included in the Eastbourne Local Development Scheme 2016-2019 (February 2016). It confirms that the EELLP will:
 - re-examine Policy D2 of the Core Strategy,
 - review the employment needs of Eastbourne to 2027,
 - consider how much land needs to be identified for Class B uses, and
 - reassess the location and quality of land identified in the Core Strategy.
15. The Local Development Scheme confirms that the EELLP will replace Core Strategy Policy D2 and will otherwise conform with the Core Strategy.
16. During the examination the Council confirmed that an additional function of the EELLP is to establish how much B1(a) business space is to be provided within the mixed use allocations in the Town Centre Local Plan, as confirmed by Town Centre LP Policy TC17 and addressed by EELLP Policy EL3.
17. The EELLP estimates at paragraph 2.6 that Eastbourne has a stock of approximately 404,000sqm of B class floorspace.
18. The adopted Core Strategy [SD/19] identified a total requirement for employment floorspace of **55,430sqm** to be met by a supply target of **63,600sqm** made up of:
 - **30,600sqm** by redevelopment of existing employment areas;
 - **3,000sqm** within the town centre; and

- **30,000sqm** of B1a office floorspace at Sovereign Harbour.

The Core Strategy does not specify whether the floorspace is to be measured as gross external area (GEA) or net internal area (NIA).

19. The Employment Land Review 2013 [SD/24] concluded that the core strategy figure would be an oversupply. Based on that Employment Land Review the submitted EELLP seeks to provide a reduced 43,000sqm of B class floorspace to accommodate an additional 1,263 jobs within those classes by 2031. In the EELLP the floorspace is measured as net internal area (NIA) for B1a/b office/research space but as gross external area (GEA) for B1c light industry, B2 general industry and B8 storage.
20. The Plan's strategy set out in Policies EL1, EL2, EL3 and EL4 and amplified in the reasoned justification may be summarised as to provide **43,000sqm** of additional B class employment floorspace over the plan period made up of:
 - **20,000sqm** (Gross External Area) as B1c/B2/B8 by intensified use of existing industrial estates;
 - **3,000sqm** (Net Internal Area) as B1a/b office floorspace in the town centre (on Development Opportunity Sites 2 and 3 as defined in the adopted Eastbourne Town Centre Local Plan); and
 - **20,000sqm** (Net Internal Area) as B1 floorspace at Sovereign Harbour (predominantly on Sites 6 and 7a with a potential small amount on Site 4).

MAIN ISSUES

21. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified six main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by Representors.

Issue 1 –Whether the EELLP strategy is sound in that it is likely to meet an objectively assessed need for office development; to include whether the strategy is justified, effective and consistent with national policy in that regard.

Whether for effectiveness there should be consistent use of employment floorspace measurements in Policy EL1 and throughout the Plan.

22. Before considering how the floorspace requirements and supply targets have been assessed it is necessary to address how the figures are presented in the Local Plan. A difficulty arises in that the submitted Local Plan does not use floorspace measurements consistently. This results in policies that are unclear and which could therefore prove ineffective and unsound. In particular office floorspace is presented as net internal area (NIA) whereas industrial and storage space figures are presented as gross external area (GEA). This would present particular problems for the monitoring of development on mixed use employment sites at Sovereign Harbour and on the Industrial Estates.

23. The Core Strategy did not identify the basis of measurement of floorspace as either gross (GEA) or net (NIA). This hampers direct comparisons of figures. The Employment Land Review also did not identify whether floorspace figures were NIA or GEA. However the Review's floorspace per employee calculations indicate that they were interpreted as NIA. The NIA figures have been converted to GEA figures using a ratio figure. Because building design varies with differing amounts of circulation and other incidental space, there will be variations in practice when NIA figures are converted to GEA such that the figures will be approximate.
24. Following discussion at the Examination Hearings the Council proposed main modification **MM1** which provides for the use of Gross External Area figures in Policy EL1 and which is picked up consistently in other main modifications. The adopted conversion figure is considered reasonable and I conclude that **MM1** is necessary for soundness and is recommended.

Whether the identified office floorspace requirement has been adequately justified

25. The floorspace requirement is derived from the evidence of the Employment Land Review 2013 [SD/24] which post-dated the Core Strategy. A Supplementary Evidence Report [SD/25] was provided in 2014.
26. The Employment Land Review considered different employment densities before recommending 12sqm of floorspace per employee as a reasonable estimation which would also allow flexibility to account for higher and lower density occupiers. The overall forecast requirement for office space between 2012 and 2027 equates to 20,766sqm (NIA). This includes an allowance of 4,095sqm to replace windfall losses of office space, mainly by their conversion to residential uses under permitted development rules. Monitoring suggests that the potential losses of such office floorspace may be higher, however the figures are distorted by the change of use of one large former office site outside the town centre to education use. The offices in question had long ceased to provide significant employment.
27. The submitted plan proposes the allocation of 23,000sqm (NIA) of B1(a) space. This includes about a 10% surplus for 'headroom' to provide choice and to allow that all allocations may not be delivered in full. Some of the allocated floorspace at Sovereign Harbour may be used for alternative B1(b) and B1(c) use) but this is likely to be closely related to office employment. The recent Pacific House development already allows for B1(a), B1(b) and B1(c) uses.
28. The Employment Land Review evidence indicated that, with 33,000sqm of allocated space the adopted Core Strategy was proposing a significant oversupply of employment floorspace. On the basis of that evidence in the submitted Local Plan the Council has proposed (as recommended) a significant reduction in the floorspace allocation proposed by Core Strategy Policy D2 at Sovereign Harbour from 30,000sqm to 20,000sqm (NIA). The 3,000sqm (NIA) in the town centre would be unchanged.
29. I therefore conclude that the overall requirement for office floorspace of 23,000sqm (NIA) has been adequately justified. This figure corresponds to the higher GEA figure in the recommended Main Modifications which includes ancillary accommodation such as circulation space.

Whether the EELLP is justified as the most appropriate strategy for office development and would be effective in respect of the viability and deliverability of office development

30. Paragraph 173 of the National Planning Policy Framework amongst other things provides that: *'Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable'*. It continues: *'To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal costs of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable development to be deliverable'*.
31. The *Eastbourne Office Deliverability Assessment (September 2015)* by BiLFINGER/GVA on behalf of the Council [Document SD/28] concludes in Table 3 that conventional commercial town centre office development would make a loss of £839 per sq m and that out of town (centre) development would make a loss of £385 per sq m. This is without any return to the landowner.
32. As part of their representations on the EELLP, Sovereign Harbour Ltd submitted a critique by Stiles Harold Williams of the above B/GVA report and included its own assessment [Document SD/14]. That assessment used some different figures, particularly for rental income, fees, and contingency sums. It concluded that commercial office development (with 20% profit levels for the developer) would lead to greater losses of £1,440 per sq m in the town centre and £1,515 per sq m in out of town (centre) locations.
33. Subsequent evidence submitted by Sovereign Harbour Ltd during the examination with different rent assumptions also concluded that commercial office development at Sovereign Harbour would be loss-making. It drew attention to viability evidence submitted to the CIL Examination in 2013 which supported the conclusion of the CIL Inspector that a zero CIL rate should be applied to office development which was expected to be loss-making.
34. On the face of the above evidence no speculative freestanding commercial office development would be viable anywhere in Eastbourne unless there would first be a significant increase in rents that would also outpace any increase in construction costs. Whilst there is evidence that rents have risen in Eastbourne and elsewhere in the South East, especially for Grade A accommodation, this falls short of the levels needed for commercially viable development. That lack of commercial viability for speculative freestanding office development would be a serious conclusion with significant implications for local employment if this were the only means of delivering office development. The Employment Land Review itself acknowledged the challenging viability and advised that public sector intervention may be needed.
35. A lack of new office floorspace would exacerbate the on-going significant losses of office floorspace in the town centre, which are mainly as the result of the exercise of permitted development rights for conversion of existing office space to higher value residential use and other purposes. Those rights have

been extended and made permanent and further losses can therefore be expected to occur.

36. On the other hand there is some evidence that office space is being delivered in Eastbourne and nearby locations by other means. In particular:
- The recent delivery of a significant Grade A office building (Pacific House) by a non-profit organisation (Sea Change Sussex) within the proposed allocation site at Sovereign Harbour on land acquired from Sovereign Harbour Ltd
 - The commercial development of significant office space for the relocation of an identified local firm at the Chaucer Business Park (in Wealden District but close to the Borough boundary)
 - Other relatively recent developments of office space within mixed developments on the town's industrial estates
 - Relatively recent developments of office space at Bexhill (out of town centre) and Hastings (in town and out of town centre) by non-profit organisations in locations with similarly challenging viability
 - Evidence that some town centre office development might be deliverable as part of mixed development schemes with residential and retail space¹.
37. In these circumstances, to be effective the Local Plan needs to maximise the opportunities to deliver office development by a variety of means which provide a choice of locations and development types. Whilst the submitted plan does provide for some choice of locations it is not justified as the most appropriate strategy to deliver office development.
38. Firstly the policy wording does not clearly require that any office development is included in the town centre mixed development sites that are intended to be allocated for such development. If such provision is only optional, in practice the lower values of office development compared to residential and other uses would make office delivery unlikely without is a clear policy requirement to include office floorspace in a mixed development on an allocated site. Main Modifications are recommended below to address this under Issue 3.
39. Secondly the Local Plan is unclear as to whether any non-ancillary office development is acceptable on the designated industrial estates. At the examination hearings the Council acknowledged that some office development would be acceptable there. A further Main Modification is recommended to clarify the policy (see below).
40. Thirdly, at Sovereign Harbour the proposed reduction in employment floorspace and the diversification in the acceptable types of employment floorspace of the employment allocation is more realistic than the much larger single use B1(a) office allocation previously set out in Core Strategy Policy D2. A further reduction in floorspace has been agreed between the Council and the

¹ EBC-EL-12 Eastbourne Viability Report June 2016 – Cushman & Wakefield

landowner in order to accommodate a community centre. There remains uncertainty about how much office floorspace will be delivered there during the lifetime of the Plan. However given the lack of alternative locations in Eastbourne the site retains strategic importance in order to deliver a type of employment for which there is an identified need.

41. Overall I conclude on Issue 1 that the modifications recommended above are needed for the EELLP strategy to be sound and more likely to meet the objectively assessed need for office development and to be justified, effective and consistent with national policy in that regard.

Issue 2 –Whether Policy EL2 is likely to meet an objectively assessed need for non-office business development, and whether the Policy is clear about the development of other B1 employment uses; to include whether the strategy is justified, effective and consistent with national policy in those regards.

The amount of employment floorspace to be provided on the designated industrial estates

42. As submitted Policy EL2 identifies designated industrial estates to provide 20,000 sq m (GEA) of B1c, B2 and B8 floorspace by redevelopment and intensification. It also supports refurbishment for these purposes. This employment floorspace allocation would be a significant reduction as compared to the 30,000sqm figure proposed in Core Strategy Policy D2, whether that figure was intended to be GEA or NIA. The reasoning for the figure is adequately supported by the Employment Land Review. Significant delivery of new space by these means has already occurred since the start of the Plan period. However the scope for redevelopment will inevitably reduce as more of the estates are renewed.
43. The policy does not identify site allocations for redevelopment within the designated industrial estates. Neither does national policy require that all employment land supply should be on allocated sites. Nevertheless the policy does identify locations within which redevelopment and intensification for business use will be encouraged and where land will normally be protected from other uses unless specified criteria are met. During the examination supporting evidence has been provided as to the recent history of such intensification as well as to identify areas with redevelopment potential. This adequately supports the reduced target floorspace figure.

Provision for B1(a) office and B1(b) research space

44. Policy EL2 does not explicitly allow for either B1(a) (office) or B1(b) (research) development on the industrial estates. However at the examination hearings the Council indicated that such uses can be acceptable and that there is no reason to preclude them. However a limit is appropriate on the amount of non-ancillary office space in order to maintain priority for those other B1 uses for which alternative locations may be less suitable or not available.
45. There is a history of successful mixed use redevelopment including office uses on the industrial estates both in Eastbourne and nearby in Wealden District. This form of development may be more commercially viable than at other locations. To explicitly permit some such development would thus be likely to

improve the prospects of delivery when viability is generally challenging elsewhere.

46. The proposed broadening of the uses permitted at Sovereign Harbour to include uses B1(b) and B1(c) on Site 6 (as recommended in the Employment Land Review) would provide appropriate flexibility and choice. However a need for such floorspace there to be compatible with surrounding uses means that higher quality buildings and higher rents would make the location unsuitable for some industrial occupiers.
47. **MM2** is recommended to provide the necessary clarification that some B1(a) non-ancillary office floorspace development is acceptable on the designated industrial estates. It would also allow for B1(b) use. It acknowledges that there is some evidence that office development may be more viable in these locations but also emphasises that industrial and warehouse provision are the key priorities for these estates and therefore limits the overall increase in office floorspace to 1,875 sq m (GEA).
48. That figure would replace the equivalent amount of B1(a) office floorspace that is proposed to be deleted from the Policy EL4 allocation at Sovereign Harbour in order to accommodate the community centre there. The figure also recognises that bad neighbours and other environmental constraints would limit the attractiveness of industrial estates for some office users. It maintains the priority accorded to non-office uses. It also acknowledges that larger developments outside either the town centre or the designated sustainable centre at Sovereign Harbour would risk undermining the sequential approach to the location of main town centre uses that is recommended in national policy.

Calculation of floorspace changes

49. As worded Policy EL2 is unclear as to what account is to be taken of existing business floorspace on a site proposed for redevelopment when calculating what contribution new floorspace is making towards the policy target. That would undermine the effectiveness of the policy. The additional revised wording in **MM2** is needed for policy EL2 to be effective in relation to such monitoring of net increases in floorspace provision.

Criteria for non- business use development on industrial estates

50. Policy EL2 seeks to protect and prioritise business development in the industrial estates. This is an acknowledgement that redevelopment for other uses such as retailing or sui generis purposes (those outside any use class) could put at risk the delivery of business employment. However the Policy acknowledges that there may be exceptions (such as for some necessary bad neighbour uses) and seeks to set out criteria for their consideration. However the criteria are unclear and would therefore prove ineffective and unsound.
51. The **MM2** modification and the related **MM3** modification to the reasoned justification are therefore needed to provide a more workable test when assessing whether non-B class development should exceptionally be permitted within the designated industrial estates. The Council in its response to representations received on the main modifications has agreed that the wording of MM3 should be amended to replace 'alternate' with 'alternative' and

to add 'be' before 'supported' for clarity. I agree to this minor alteration to the main modification.

52. Overall I conclude on Issue 2 that Policy EL2 is likely to meet an objectively assessed need for non-office business development; but that the above recommended modifications are needed for the Policy to be clear about the scope for development of other employment uses and for the strategy is justified, effective and consistent with national policy in those regards

Issue 3 – Whether Policy EL3 Town Centre is likely to be effective in securing the delivery of office floorspace

53. Policies TC19 and TC20 of the Eastbourne Town Centre Local Plan (ETCLP) relate to Development Opportunity Site 2 (DO2) and Development Opportunity Site 3 (DO3) respectively.
54. Each policy provides as a requirement that the 2 sites both be developed with A1 retail uses at ground floor and C3 residential uses above the ground floor. The policies also allow that acceptable additional uses at ground floor will be A3 restaurants/cafes and A4 drinking establishments and above ground floor B1(a) offices (either site) and C1 hotel uses (DO2) or D1 community and assembly uses (DO3).
55. The result of the above wording is that all of the stated uses except for A1 retail and C3 residential would be optional. This is particularly relevant to the provision of B1(a) office space because the viability evidence indicates that commercial office development is unlikely to be viable here except as part of a mixed development. As alternative forms of development are more likely to be profitable then there is a risk that no significant office space would be developed here unless its provision is made mandatory as part of a mixed development.
56. Since the ETCLP was adopted, planning permission has been granted for a residential development on the northern part of site DO3 meaning that it is no longer available for other forms of development. The southern part of DO3 is largely occupied by an attractive former post office building. The retention of that building would be a significant additional constraint on the development of modern office floorspace and its viability. In the alternative its demolition would likely be controversial and hence make the successful delivery of office space even more uncertain.
57. By reason of Section 38(5) of the Planning and Compulsory Purchase Act 2004 should EELLP policies conflict with the older policies of the ETCLP then the EELLP policies would carry more weight as they would be the more recently-adopted development plan policies.
58. As submitted, EELLP Policy EL3 sets a target of 3,000sqm (NIA) for office development in the town centre. However it only provides that this requirement 'should' be provided on sites DO2 and DO3. That wording does not make provision of any office space a mandatory requirement on either site. Moreover the two sites are in separate ownership and there is no policy requirement for their joint development. The provision of office space could be readily avoided by either or both site developers in favour of other forms of more profitable development allowed by the ETCLP. Policy EL3 would

therefore be ineffective in delivering office floorspace and the policy as worded is consequently unsound.

59. The Council has provided supporting evidence that a mixed development of office, retail and residential space could be viable on site DO2. Moreover site DO2 is mainly owned by Network Rail. The Examination was informed that the Government is encouraging the redevelopment of such publicly owned land in sustainable locations to provide both housing and employment.
60. Main Modifications **MM4-5** and **MM7-MM9** would modify Policy EL3 and the reasoned justification such that the provision of 3,750 sq m (GEA) of office space would become a mandatory requirement. That would replace the optional provision of office space set out in both the ETCLP and in the submitted Policy EL3.
61. The modifications would delete reference to site DO3 from Policy EL3 with the effect that only the provisions of the ETCLP would apply to that site. Office development would thus remain optional on that site under the provisions of the ETCLP which would not be superseded in that regard. Whilst the delivery of office space on that site would remain unlikely there is no reason to exclude that possibility. Overall the modifications would make the delivery of office space in the town centre much more likely. However viability would remain marginal. An alternative strategy suggested by Sovereign Harbour Ltd to significantly increase office development in the town centre (with associated reductions in office floorspace provision at Sovereign Harbour) is thus unlikely to be viable or deliverable. Particularly as it would be likely to reduce the relative proportion of more profitable forms of development within mixed developments.
62. Overall I conclude on Issue 3 that the recommended modifications are need for Policy EL3 Town Centre to be effective in securing the delivery of office floorspace and consequently sound.

Issue 4 - Whether the allocation of the Policy EL4 Sovereign Harbour sites is justified and would be effective as worded.

63. Section 1 of the National Planning Policy Framework provides amongst other things that local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth. This includes the setting of criteria or the identification of strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period. By its scale the Sovereign Harbour allocation qualifies as a strategic site.
64. The Sovereign Harbour allocation mainly concerns part of an area of land that was first identified for the provision of 30,000 sqm of office space in an outline planning application in 1988. It forms part of a large and mixed but mainly residential development around Eastbourne Marina that also includes a nearby identified district centre with shops, restaurants and entertainment facilities.
65. Some Representations have claimed that Sovereign Harbour is not justified as a major employment location because it lies outside the town centre and has inferior accessibility by public transport. However the Core Strategy has identified Sovereign Harbour as a 'Sustainable Centre'. It seeks to rebalance

the area from its dominant residential use by providing employment including 30,000sqm of offices. This provides adequate justification for locating offices outside the town centre, where in any event the scope for new office development is limited for the reasons set out above. Moreover office development of this scale could not be accommodated within or adjacent to the town centre. The approach is consistent with the adopted Core Strategy and with national policy for the location of main town centre uses. .

66. The Employment Land Review identified that the Core Strategy employment floorspace allocations considerably exceed the objectively assessed needs. The proposed floorspace allocation at Sovereign Harbour is therefore reduced from that proposed in the Core Strategy. There has been an associated reduction in the site area at Sovereign Harbour which would now include Sites 6 and 7a but not sites 7b and 7c.
67. The overall potential supply of employment floorspace in the town would remain above the quantified basic need identified in that Review. However the Review recommended that surplus floorspace be identified in order to provide 'headroom' of about 10%. This would ensure an appropriate supply and mix of employment floorspace should some sites not come forward.
68. Policy D2 of the Core Strategy provided that the Sovereign Harbour employment allocation would only include B1(a) office use.
69. Policy EL4 describes the floorspace as 'B1' floorspace to be provided in a flexible format. That would allow for the inclusion of B1(b) and B1(c) floorspace. However Policy EL4 as worded does not distinguish between different parts of the allocation for this purpose. The Policy also refers to Site 4. However that site is subject to an extant planning permission that already provides for different forms of alternative uses. The implementation of that permission could be unnecessarily frustrated and delayed by the proposed wording of Policy EL4 since it would not allow for other employment generating uses to be delivered (including on Site 4) until the B1 floorspace had been fully provided.
70. As explained above, the Council's property advisors do not dispute that conventional commercial office development would not be viable either at this location or in the town centre. Nevertheless the proposed allocation at Sovereign Harbour is closely aligned with the planning permission recently granted there for employment development. That application was made on the application of Sovereign Harbour Ltd who retain ownership of Site 7a. The accompanying S106 Planning Obligation includes a commitment by Sovereign Harbour Ltd to actively market the remaining land for office development.
71. SeaChange Sussex control Site 6 and are supportive of the continued allocation of both Sites 6 and 7a for B1 development. With the support of the Council and with funding from the Growing Places Fund the organisation has recently developed 2,350 sqm NIA of serviced employment space at Pacific House. The first tenants have mainly been smaller firms relocating from elsewhere in Eastbourne and using the accommodation as offices. However the planning permission does allow for other types of B1 use within the building. A similar building developed by SeaChange Sussex at Bexhill on an out of centre site has been let to a single occupier as headquarters offices.

72. The Pacific House development has been delivered and has let reasonably well for a new development in a new location, albeit often on flexible terms. That does not mean that all of the Sovereign Harbour employment floorspace could be provided in the same way. At the Examination hearings SeaChange Sussex explained that they would be seeking to develop a second similar multi-occupier building but would otherwise be likely to promote development only for identified occupiers and not speculatively.
73. Sovereign Harbour Ltd maintains that serviced land has been available since 2000 and that they have been marketing the sites for some years, including to companies for their own occupation. This has not met with success - except to generate interest in the site for non B1 development including a retail warehouse development that was refused planning permission. They therefore seek a modification of the policy which, whilst not excluding B1 development, would permit development for other specified employment uses. They consider that Site 6 should continue to be reserved for 11,100sqm (NIA) of B1 floorspace whilst Site 7a would be allocated for uses within Classes C1 (Hotels), C2 (Residential Institutions) and D1 (Non Residential Institutions). Sovereign Harbour Ltd seek that B1a Office development would remain 'acceptable' on Site 7a. But in those circumstances the optional office development would almost inevitably lose out to other more valuable development and would not be delivered.
74. The recent development of Pacific House, by establishing Grade A office accommodation at a new location, may or may not result in the catalytic effect anticipated by SeaChange Sussex and the Borough Council, thus encouraging further development. It is too early to tell. The high quality of the accommodation and the flexible terms on offer has resulted in relatively high rents for the local market. This has not yet tipped the balance in favour of the viability of speculative office development. Nevertheless it cannot be concluded that there is 'no reasonable prospect' of delivery for employment which is the test applied by paragraph 22 of the Framework when the release of sites from long term protection is proposed.
75. On the other hand the availability of developable land in Eastbourne is generally constrained by the small proportion of the Borough's land area. Much of the Borough that is not already built up is subject to floodrisk and other environmental constraints. Parts are located within the South Downs National Park. There is also a need to control excessive surface water run-off from new development to reduce flood risk. Sites 6 and 7a thus represent a scarce opportunity to provide good quality employment and to ensure that Eastbourne, as the largest urban area in East Sussex, remains a balanced and sustainable local community and able to meet its objectively assessed employment needs.
76. A C1 hotel or C2 care home would provide some employment. But there is a lack of evidence as to the need for such facilities, the viability of such development, the amount and quality of employment that could be provided, and whether there would be scope for a mixed use development including offices (as proposed in the Town Centre by the modifications to Policy EL3). Moreover when Cushman & Wakefield looked at the local hotel market they

concluded that there was intense competition amongst the large number of existing hotels and a lack of demand for additional provision in Eastbourne.²

77. There is a lack of evidence that there is a greater need for these other forms of development than for the employment sought by Policy EL4. Moreover Sovereign Harbour has only recently been established as a significant office location by the development of Pacific House. I conclude that it would be premature to allocate Site 7a for alternative uses in this Local Plan. Neither would it be logical to delete the office allocation of Site 7a on viability grounds whilst maintaining that allocation on Site 6.
78. The Core Strategy would have certainly resulted in an oversupply of office space as compared to the need identified in the Employment Land Review. In spite of the floorspace reductions the EELLP would still provide significant headroom. However this provides appropriate choice and reasonably allows that not all of the site allocations (or all parts of them) will necessarily be taken up within the Plan period by 2027 even if viable developments can be achieved in all locations.
79. The Local Development Scheme 2016-2019 provides that the EELLP will be overtaken by the emerging Eastbourne Local Plan early in its life. Work on the Eastbourne Local Plan has commenced and consultation on Issues and Option is expected in 2017 with adoption anticipated in 2019. The Local Plan will review and replace all existing planning policies including the Core Strategy and the EELLP.
80. That Eastbourne Local Plan will need to review employment requirements for a longer period and in conjunction with the preparation of the Wealden Local Plan with which Eastbourne shares a travel-to-work area and strong cross-border linkages. The Eastbourne Local Plan will also need to examine the need for land for other forms of development. Those may potentially include hotels, care homes and other employment generating uses. However I am not in a position on the evidence before me to assess those wider needs or to make comparisons of relative needs.
81. Main Modification **MM10** is needed for effectiveness to clarify the B1 floorspace figures as Gross External Area and to adjust them to allow for the agreed provision of a community centre on part of site 7a. The inappropriate and uncertain use of the term '*should provide*' would be replaced by the clearer term '*shall provide*'. It also clarifies that, whilst Site 6 is suitable for all types of B1 business space (offices, research, and light industry), Site 7a is not suitable for industrial use. This is because of its closer proximity to residential property and the shared use of the residential access road by commercial traffic.
82. For effectiveness, Main Modifications **MM11 and MM12** are needed to provide reasoned justification for the MM10 changes and to clarify the need for shared parking provision for the proposed community centre. The modifications also explain why any surplus land on sites 6 and 7a would be suitable for other employment development but not for Class A development which should be located in the nearby District Centre.

² EBC –EL-12 Eastbourne Viability Report June 2016.

83. I conclude on this issue that the allocation of the Policy EL4 Sovereign Harbour sites is justified and would be effective subject to the above recommended modifications.

Issue 5 - Whether the EELLP strategy is sound without the allocation of additional employment land

84. The above reasoning relates to the EELLP policies as submitted. Other representations have been made that additional provision is needed for both B class and other employment uses.
85. Paragraph 182 of the Framework provides amongst other things that to be sound the plan should be justified as the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.
86. In selecting the chosen strategy for the provision of business floorspace the Council has considered other reasonable alternatives. In particular, consideration was given to including the allocation of open land adjoining the designated industrial estates. These alternatives were subject to sustainability appraisal which however identified significant environmental constraints. There is also the potential for significant conflict with other Core Strategy policies including Policy D11 which seeks to restrict development in Eastbourne Park. It is not part of the role of the EELLP to review or alter such policies. That would be a matter for the emerging Local Plan.
87. I consider that the EELLP strategy makes adequate provision for B class business development. For the reasons set out above the Plan already makes sufficient provision to address the assessed needs. It acknowledges that there may be some sui generis and other non-B Class development that may be suitable on the designated industrial estates, subject to criteria. In summary there is a lack of evidence before me to justify an overriding need to allocate land for other non-B class employment.
88. In conclusion on this issue I consider that the Local Plan strategy is justified as the most appropriate in this regard and is thus sound without the allocation of additional employment land.

Issue 6 - Whether the proposed monitoring and review arrangements would be effective.

89. The EELLP includes an Implementation and Monitoring Chapter with a monitoring framework. The Council has proposed minor changes to the Framework which are mainly consequential on other Main Modifications and which do not affect soundness.
90. Whilst the Monitoring Framework is described as a means to assess the performance of the EELLP up to 2027, in practice the review of policies will be part of the preparation of the emerging Eastbourne Local Plan at a much earlier date. The monitoring information obtained in the early years of the EELLP will inform that process.

Assessment of Legal Compliance

91. My examination of the compliance of the Plan with the legal requirements is summarised in the table below. I conclude that the Plan meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Eastbourne Employment Land Local Plan has been prepared in accordance with the Council's LDS February 2016.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in July 2009. Consultation on the Local Plan and the MMs has complied with its requirements.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Habitats Regulations Assessment (HRA)	The Habitats Regulations AA Screening Report November 2015 sets out why AA is not necessary. Natural England supports this.
National Policy	The Local Plan complies with national policy except where indicated and MMs are recommended.
2004 Act (as amended) and 2012 Regulations.	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

92. The Plan has a number of deficiencies in respect of soundness for the reasons set out above, which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.
93. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the Eastbourne Employment Land Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Robert Mellor

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

INSPECTOR'S REPORT - APPENDIX

EASTBOURNE EMPLOYMENT LAND LOCAL PLAN

Schedule of Main Modifications

October 2016

- To be read in conjunction with the Employment Land Local Plan – Submission version (February 2016) (Submission Document SD/01).

Ref	Section/ Paragraph	Modification
MM1	Strategy – Economy and Employment Land	<p>Amend Policy EL1:</p> <p>Policy EL1 – Economy and Employment Land</p> <p>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:</p> <ul style="list-style-type: none">• Taking a positive approach that reflects a presumption in favour of sustainable economic development;• Meeting the requirement for 43,000 sqm <u>48,750 sqm (GEA)</u> 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;

Ref	Section/ Paragraph	Modification
		<ul style="list-style-type: none"> • Seeking Local Labour Agreements on all development of 1,000sqm or more, including change of use, to secure local employment and training measures as part of development proposals; and • Supporting the Education and Training sector of the Eastbourne economy through a flexible approach to expansion proposals.
MM2	Policies – Industrial Estates	<p>Amend Policy EL2:</p> <p>Policy EL2: Industrial Estates</p> <p>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 <u>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</u> over the plan period. <u>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.</u> Proposals for the refurbishment of existing class B floorspace will also be supported.</p> <p><u>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 Estates will be supported, where it can be demonstrated that:</u></p> <ul style="list-style-type: none"> • <u>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)</u> <p>Proposals for the redevelopment of sites within a designated industrial estate in class B use to an alternative non-B use will only be granted where it can be demonstrated to the</p>

Ref	Section/ Paragraph	Modification
		<p>satisfaction of the Council that:</p> <ul style="list-style-type: none"> • The proposed alternative use is an appropriate use to the industrial estate that cannot be located elsewhere due to its un-neighbourliness; or • The loss of the site would not impact upon the long term supply of the employment land in terms of quality and quantity; and • The site does not meet the current or long term needs of modern business, and could not be upgraded to do so. <p>Within the designated Industrial Estates, change of use of units in class B use to other employment generating non B-class uses may be granted where it can be demonstrated to the satisfaction of the Council that that there is no reasonable prospect of the site continuing to be used for class B use.</p> <p><u>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:</u></p> <p><u>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</u></p> <p><u>b) the applicant can demonstrate:</u></p> <ul style="list-style-type: none"> <u>• 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;</u> <u>• That there is evidenced demand and need for the proposed alternate employment generating use(s);</u> <u>• Why the site/premises is suitable for the proposed use(s);</u>

Ref	Section/ Paragraph	Modification
		<ul style="list-style-type: none"> • <u>That the development accords with policies set out in the adopted Core Strategy, including the sequential test for main town centre uses; and</u> • <u>That, once delivered, the proposed use would not compromise the wider functioning of the Industrial Estate for B class uses.</u>
MM3	Policies – Industrial Estates	<p>Amend para 4.12 and delete para 4.13 and 4.14:</p> <p>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. <u>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:</u></p> <ul style="list-style-type: none"> • <u>The impact of the proposed use on neighbouring properties and businesses in terms of bad neighbour effects and operational hours;</u> • <u>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;</u> • <u>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</u> • <u>The impact the proposed development will have on enhancing the image and quality</u>

Ref	Section/ Paragraph	Modification
		<p style="text-align: center;"><u>of the Industrial Estate in terms of its built form and in providing complementary amenities.</u></p>
MM4	Policies – Town Centre	<p>Amend Policy EL3:</p> <p>Policy EL3: Town Centre</p> <p>The quantum of office space that should be provided in the Town Centre is 3,000 sqm of floorspace. The requirement for office floorspace in the Town Centre should <u>Within the Town Centre, a total of 3,750sqm (GEA) of office (class B1a and B1b) floorspace shall be provided across on</u> Development Opportunity Site 2 and Development Opportunity Site 3 as identified in the Town Centre Local Plan. <u>This mandatory requirement for office development on Development Opportunity Site 2 supersedes the optional requirement in Policy TC19 of the Town Centre Local Plan.</u> Office development should be high quality class B1a/b floorspace that is flexible to meet multi-occupier needs.</p> <p>Proposals for the refurbishment of existing office stock to meet modern occupier demands will be supported.</p>
MM5	Policies – Town Centre	<p>Delete para 4.26 and replace with:</p> <p>The sites that provide the most potential and best meet the basic expectations for office development are Development Opportunity Site 2 and Development Opportunity Site 3, and therefore the 3,000 sqm of office floorspace should be provided across these two sites. These sites are identified in Figure 2. If one site comes forward without sufficient provision of office space, the balance should be provided on the other.</p>

Ref	Section/ Paragraph	Modification
		<p><u>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.</u></p>
There is no MM6	Policies – Town Centre	<p>The consultation version of the main modifications included as 'Main 6' a proposed change to the Policies Map. For reasons set out in the Report the Inspector does not have the power to recommend this change. However the Council will still need to consider what changes may be needed to the Policies Map to reflect the other main modifications to the EELLP policies.</p>
MM7	Policies – Town Centre	<p>Add new paragraph after para 4.27:</p> <p><u>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 offices 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 used development of Development</u></p>

Ref	Section/ Paragraph	Modification
		<p><u>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.</u></p>
MM8	Policies – Town Centre	<p>Add new paragraph after new paragraph proposed in Main-7, and before current para 4.28:</p> <p><u>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.</u></p>
MM9	Policies – Town Centre	<p>Delete para 4.28:</p> <p>Office development on Development Opportunity Site 3 should be provided on the eastern part of the site to present linkages to the Station and the rest of the town centre, and establish a frontage that links the key junctions of Grove Road and Upperton Road with Terminus Road.</p>
MM10	Policies – Sovereign	Amend Policy EL4:

Ref	Section/ Paragraph	Modification
	Harbour	<p>Policy EL4: Sovereign Harbour</p> <p>Sovereign Harbour should accommodate 20,000 sqm of additional B1 floorspace. This should be delivered predominantly on Sites 6 and 7a, however Site 4 could accommodate a small amount of office space. 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.</p> <p>The B1 floorspace should be provided in a flexible format that will allow businesses to adapt their operations depending on circumstances.</p> <p>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 20,000 sqm <u>23,125 sqm (GEA)</u> of B1 floorspace.</p>
MM11	Policies – Sovereign Harbour	<p>Add new paragraph after para 4.45:</p> <p><u>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</u></p>

Ref	Section/ Paragraph	Modification
		<p><u>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.</u></p>
MM12	Policies – Sovereign Harbour	<p>Amend para 4.46:</p> <p>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 20,000 sqm <u>23,125 sqm GEA</u> 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. <u>It is not considered that these Class A uses would be appropriate outside the defined Sovereign Harbour District Centre.</u></p>