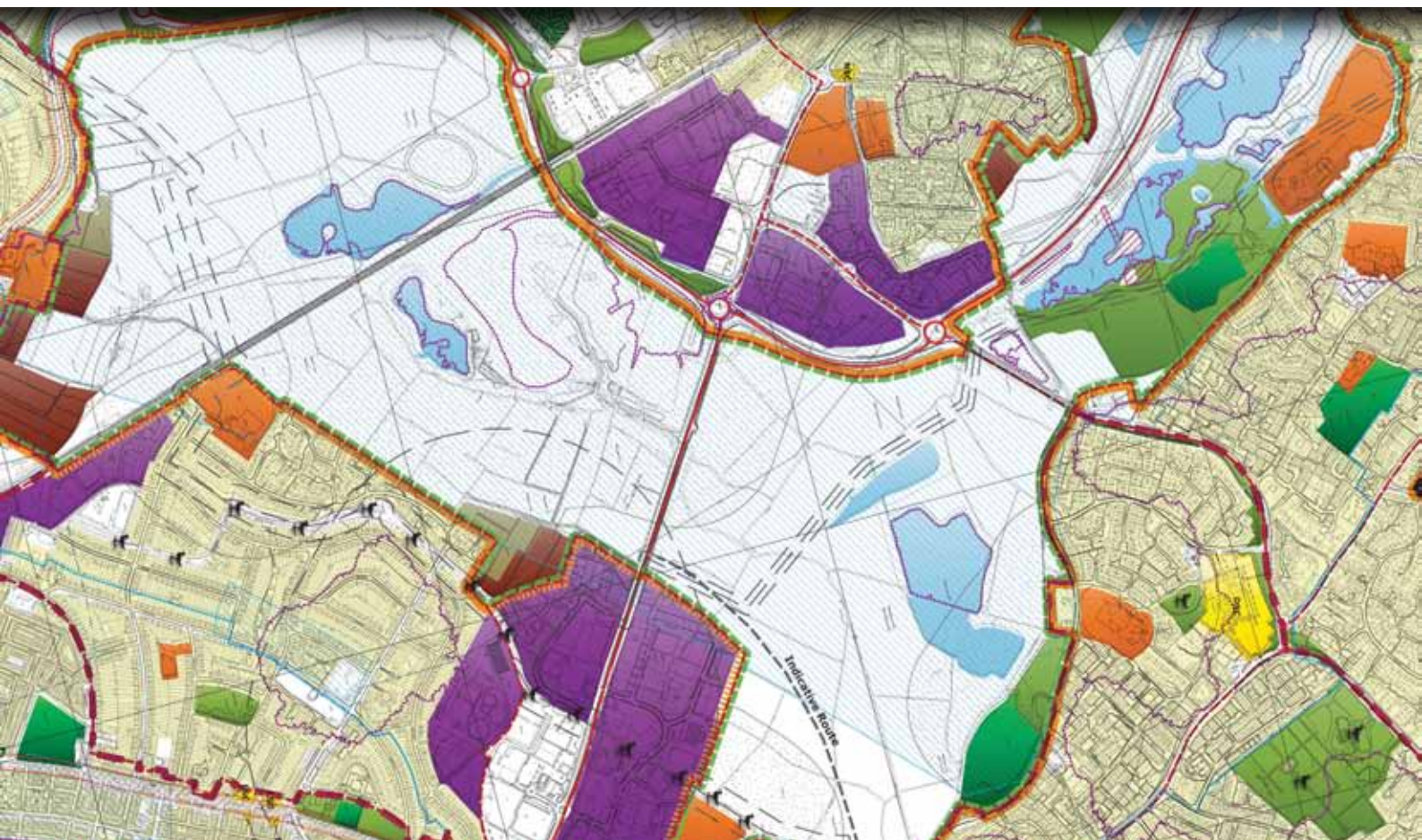


# EMPLOYMENT LAND LOCAL PLAN

## Representations on Changes to the Policies Map

*February 2016*



**Eastbourne Borough Council**

Regeneration & Planning Policy

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BN21 1TW

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**Employment Land Local Plan****Representations on Changes to the Policies Map**

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

<b>Rep</b>	<b>Respondent</b>	<b>Page</b>
<u>Proposed Submission Version</u>		
<b>PS-ELLP/38</b>	Sovereign Harbour Ltd (Teal Planning Ltd (Marie Nagy))	1
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## View Comment



## Comment Information

<b>Document Section</b>	<a href="#">Employment Land Local Plan - Proposed Submission Version</a> <a href="#">Introduction</a>
<b>Comment ID</b>	PS-ELLP/38
<b>Respondent</b>	<a href="#">Sovereign Harbour Limited (Mark Orriss)</a>
<b>Agent</b>	<a href="#">Teal Planning Ltd (Marie Nagy)</a>
<b>Response Date</b>	03 Feb 2015
<b>Uploaded By</b>	<a href="#">Eastbourne Borough Council (Matthew Hitchen)</a>
<b>Current Status</b>	Accepted
<b>Do you consider the document is Legally Compliant?</b>	Yes
<b>Do you consider the document is Sound?</b>	No
<b>If no, Do you consider it is unsound because it is:</b>	Not Positively Prepared, Not Justified, Not Effective, Not Consistent with national policy

**Comment****Changes to the Policies Map**

The current document is unsound. It has not been positively prepared, is not justified and is not effective.

- It contains a number of errors and typos and should be revisited to ensure that the details contained within it are factually correct.
- The site boundary details for Site 6 are incorrect and must be revisited to reflect the land that is available for development.
- The details for Sites 4 and 7 are incorrect and should be deleted from Map No.7 as their allocation for Class B1 use is not required, is

<p><b>What changes do you suggest to make the document legally compliant or sound?</b></p>	<p>inappropriate for their setting and is contrary to policies and objectives that promote sustainable development.</p> <ul style="list-style-type: none"> <li>- The Proposals Map and Town Centre Inset Plan at Appendix B should be updated, made clearer and more legible.</li> <li>- It contains a number of errors and typos and should be revisited to ensure that the details contained within it are factually correct.</li> <li>- The site boundary details for Site 6 are incorrect and must be revisited to reflect the land that is available for development.</li> <li>- The details for Sites 4 and 7 are incorrect and should be deleted from Map No.7 as their allocation for Class B1 use is not required, is inappropriate for their setting and is contrary to policies and objectives that promote sustainable development.</li> <li>- The Proposals Map and Town Centre Inset Plan at Appendix B should be updated, made clearer and more legible.</li> </ul>
<p><b>Do you consider it necessary to participate at the Examination in Public?</b></p>	<p>Yes</p>
<p><b>Why do you feel it is necessary to participate at the Examination in Public?</b></p>	<p>THE POINTS OF DIFFERENCE BETWEEN EBC AND SHL ARE OF STRATEGIC AND SITE SPECIFIC IMPORTANT WHICH MUST BE APPRIASED IN FULL AND ARE THEREFORE BEST CONSIDERED THROUGH EXAMINATION</p>
<p><b>Attachments</b></p>	<p> <a href="#">03b - Statement 3 - Policies Map - pdf.pdf</a> (607 KB)</p> <p> <a href="#">03a - PS ELLP Representation Form - Proposals Map - pdf.pdf</a> (124 KB)</p>

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



# EMPLOYMENT LAND LOCAL PLAN

## Proposed Submission Representation Form (Regulation 19)

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

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

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

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

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

### Personal Details

<b>Title:</b>	Ms	<b>First Name(s):</b>	MARIE
<b>Surname:</b>	NAGY		

<b>Organisation:</b>	TEAL PLANNING LTD		
<b>Position:</b>	DIRECTOR		
<b>Agent acting on behalf of:</b>	SOVEREIGN HARBOUR LTD		

<b>Address:</b>	BRENTANO SUITE, SOLAR HOUSE, 915 HIGH ROAD, NORTH FINCHLEY, LONDON		
<b>Post Code:</b>	N12 8QJ		



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

Representation

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

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

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

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

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

Chapter: CHANGES TO PROPOSALS MAP

Policy: EL4 - SOVEREIGN HARBOUR

Paragraph Number: -

Figure: MAP 07

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

Yes

No

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

-

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

Yes

No

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

Positive prepared

Justified

Effective

Consistent with National Policy

Other  -

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

PLEASE REFER TO -

SUBMISSION STATEMENT 3 - CHANGES TO POLICIES MAP DOCUMENT

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

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

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

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

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

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

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

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

Submission of the Employment Land Local Plan for examination

Publication of the Inspectors Report

Formal adoption of the Employment Land Local Plan

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

Representations cannot be treated in confidence and copies of all representations will be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, emails or

Employment Land Local Plan                      Representations on Changes to the Policies Map  
private addresses. By submitting your views on the document you confirm that you agree to  
this and accept responsibility for your comments.

<b>Signature:</b>		<b>Date:</b>	03/02/2015
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**Draft ELLP  
Submission Statement 3**

On behalf of:  
**Sovereign Harbour Ltd**

In respect of:  
**CHANGES TO POLICIES MAP DOCUMENT  
December 2014**

Date: 2 February 2015

Reference: 12001/Reps/14/SS03

### Matter 1

- 1.1 **Paragraph 2.5** of the **Changes to Policy Map** document refers to the Proposed Submission version of the Employment Land Local Plan (ELLP) being published in **October 2014**.
- 1.2 This should read: '**November 2014**.'

### Matter 2

- 2.1 **Paragraph 4.3** of the Proposals Map document explains the colour coding that is used within the three sets of maps that are provided within the document, This includes reference to the:
- **blue site boundary line** defined as representing '*the new or amended policies and designations that have changed as a result of changes to the **Town Centre Local Plan***'.
- 2.2 **Paragraph 4.5** summarises the details contained within the three sets of maps provided as including:
- those showing new policies and designations contained in the **Town Centre Local Plan (TCLP)**
- 2.3 We assume the references to the TCLP should be to the '**Employment Land Local Plan**'

### Matter 3

- 3.1 **Map No. 7 at Appendix A** of the document indicates Sites 4, 6 and 7 as the land that is **proposed to be allocated through ELLP Policy EL4**.
- 3.2 The site boundaries and plan details however do not reflect:
- The land that is actually available to be development as part of **Site 6**, i.e. the land that was in SHL's ownership but that has now been sold to other parties for the promotion of Class B1 development.
  - The land that is available for the development of **Site 4**, with (1) the potential development of this site also being restricted to Class B1a office use only subject to the ELLP consultation and examination

process and (2) a preference for the site to be developed for a mix of uses, including additional commercial space as an extension of the Waterfront tourist and leisure destination.

These objectives for Site 4 are consistent with the setting and existing context of the Site, Policy C14 of the adopted Eastbourne Core Strategy Local Plan, the adopted Sovereign Harbour SPD, and the now approved outline planning permission ref. 131002 as granted by EBC dated 2 December 2014.

- The land that is potentially available for B1 development within **Site 7** being restricted to **Site 7a only**, and this also being subject to the outcome of the ELLP consultation process. **Site 7b** is set aside for a new public open space and **Site 7c** for new residential development.
- The potential development of Site 7a is also further restricted to Class B1a office space only. This also accords with the adopted Sovereign Harbour SPD February 2013, and the details of the approved outline planning permission ref. 131002 and the linked s106 agreement to that permission.
- The possible further restriction of land that may potentially be available for development on Site 7a for B1a development, if the new community hall building for the Harbour that forms part of outline planning permission ref. 131002 is ultimately to be built on Site 7a, i.e. on land adjacent to the existing medical centre.

3.3 EBC is aware of these facts following their review of the site details that form part of the outline permission. **Paragraphs 4.45 and 4.46** of the Proposed Submission Draft ELLP also acknowledges that Site 7a only is available for development within Site 7 for potential B1a space.

3.4 Copies of the site boundaries for Sites 4, 6 and 7a with the land that is set aside within Site 7a for the possible community hall building are however provided here for reference (**Annex A**).

3.45 **Appendix B** of the document additionally provides a draft update of the **full Proposals Map and the Town centre Inset Plan**. The former of these again indicates the incorrect site areas for Sites 6 and 7(a) and does not clearly indicate Site 4; instead it appears to indicate Site 5 of the Harbour for employment use. The colours used within the Inset Plan are also unclear and confusing.

3.5 The **site details must therefore be corrected and the plans at Appendix B made clearer.**

3.6 Notwithstanding the correct site details for the Sovereign Harbour sites, the **proposed allocation of Sites 4 and 7a** for the strict provision of Class B1a space **should be deleted from the draft ELLP** for the reasons set out within SHL's additional objections to the ELLP, i.e:

- Sites 4 and 7a are not required to meet the Borough's needs for new office floorspace;
- they do not represent a sustainable development option for Eastbourne Borough or the Sovereign Harbour neighbourhood; and
- proposed Policy EL4 accordingly does not comply with the NPPF.

### **Summary and Required Changes**

4.1 The current document is **unsound**. It has **not been positively prepared, is not justified and is not effective**.

- It contains a **number of errors and typos** and should be revisited to ensure that the details contained within it are **factually correct**.
- The **site boundary details for Site 6** are incorrect and **must be revisited** to reflect the land that is available for development.
- **The details for Sites 4 and 7 are incorrect and should be deleted from Map No.7** as their allocation for Class B1 use is not required, is inappropriate for their setting and is contrary to policies and objectives that promote sustainable development.
- The **Proposals Map** and **Town Centre Inset Plan** at **Appendix B** should be **updated**, made clearer and **more legible**.

## **ANNEX A**

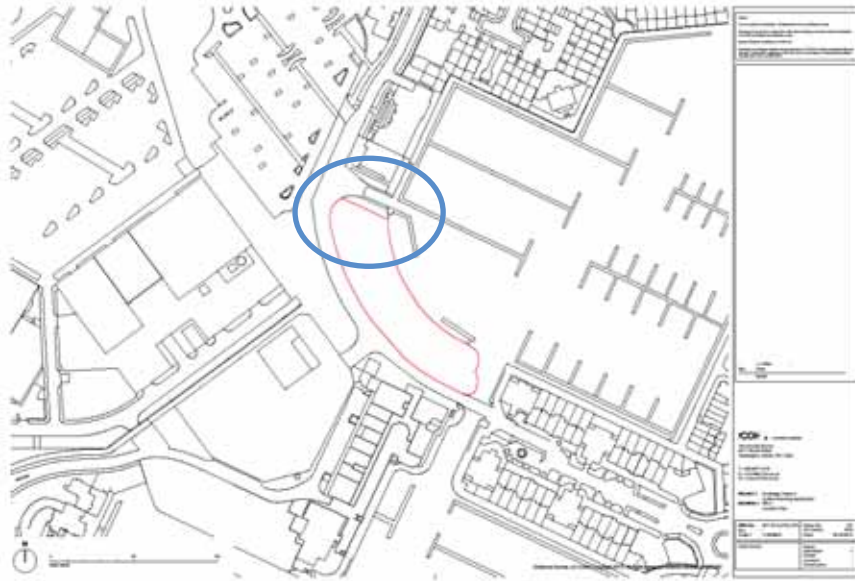
### **SITE OWNERSHIP BOUNDARIES AT SOVEREIGN HARBOUR**

**(areas of difference between EBC Draft Plans and  
actual site boundaries of readily developable sites** 





**Site 4**



**Site 6**



Site 7a

