

Sovereign Harbour – Site 8, changes to conditions application, ref: 170685

I write on behalf of The Sovereign Harbour Residents Association to make objections to the changes sought by this application. We refer to the agent's covering letter of 18 May (EBC doc. 9642755) with 4 amendment items. Our specific concerns relate to items 1, 2 and 4 as follows:

Item 1 Any change from permeable to non-permeable surface runs contrary to the National Planning Policy Framework regarding sustainable drainage. This policy, designed to ensure that surface water run-off does not increase flood risk, is of particular importance to the Harbour, Eastbourne and the Levels. Excessive run-off is also likely to affect water quality, due to contamination from silt, bacteria and other detritus.

EBC planning policy **NE4** deals with sustainable drainage and calls for management of surface water in terms of both quantity and quality of run-off. The use of non-permeable paving (as now proposed) will increase the quantity of surface water run-off and is also more likely to result in 'ponding' in parts. Public access areas at this site, exposed to a diverse range of pedestrian and animal traffic, may also be expected to introduce unwanted bacteria to the harbour waterways and thus affect quality. None of this is acceptable.

There should be no question of any further run-off into the harbour waterways or to the local public sewers. This would cause further silt, bacteria and detritus build-up in the harbour, which needs to be kept reasonably clean and for which the harbour residents pay through their annual rentcharge. Such extra costs should fall not on our residents or the wider public, but solely on the developer who seeks to cause it. Far better of course, that there is no pollution of the waterways in the first place. EBC policy **NE13** is directly in point.

Item 2 The same comments as at item 1 above apply equally to the proposal to retain existing tarmac surfaces and not replace with permeable paving. Further, due to the significant fall from Pacific Drive down to the harbour wall, there is an even greater need to install sustainable drainage. Permeable paving should be installed in compliance with the existing approved plans and conditions, with appropriate measures to prevent run-off to the harbour water. Just because existing surfaces (both here and elsewhere around the harbour) were constructed to earlier standards, there is no reason to depart from the current standards for sustainable drainage.

Item 4 The proposal to replace the approved brick boundary wall and railings on top, with merely railings alone, is unacceptable in terms of visual amenity – both to the public and to the occupiers. Railings alone will be detrimental to occupiers' privacy, due to loss of screening, and this is particularly sensitive with plots so close to the highway. We consider railings alone would be out of keeping and detrimental to public and private amenity. EBC policy **UHT4** refers. The brick wall boundary treatment must be retained as approved.

General

A Please note that despite the agent's intention to provide EBC with details of their 'alternative drainage strategy' (in connection with points 1 and 2 above) no such details are available. It is not acceptable for a developer to propose a drainage condition change without knowing or explaining how it can comply with NPPF and EBC policy on sustainable drainage. It would be wholly wrong for EBC to allow this application to proceed any further as it would be perverse to approve a change that will fundamentally fetter the Council's ability to determine the best final scheme.

B Please note that we also object to the developers seeking to weaken or remove conditions and change plans already approved following lengthy consultation and negotiation. Such continued

attempts, not in line with the Sovereign Harbour SPD, should be resisted.

C MEPHAM

CHAIRMAN SHRA

June 2017