

Jan Weeks
Chairman
Sovereign Harbour Residents Association
PO Box 124
Eastbourne
East Sussex
BN24 9AW

5 July 2010

Dear Mrs Weeks

Eastbourne LDF Core Spatial Development Strategy

Thank you for your covering letter dated 4th June, which I received on 10th June, informing me that you have written to Eric Pickles, the Secretary of State for Communities, on behalf of your members.

The main thrust of your letter is that the Association is challenging the validity and credibility of the recent consultation events on which the emerging spatial development strategy is partially founded. The areas of concern to you are:

1. that the views of the Sovereign Harbour residents were excluded and therefore the consultation results were biased;
2. that the data presented at the consultation events was out of date and inaccurate;
3. that the council's officers were actively promoting a favoured option (Option 2: Creating Sustainable Centres);
4. that the requirements of PPS12 were not fully met and the consultation event was just a 'tick box' exercise.

In addition you are seeking an investigation into a report which went to Cabinet on 26th May 2010 recommending the preferred spatial development strategy for inclusion in the emerging LDF Core Strategy. In particular it is asserted that:

5. The views of the community are subservient to the developers - Carillion;
6. Further development at Sovereign Harbour is unsustainable; will 'destroy any remaining opportunity to salvage the sustainability of the Sovereign Harbour community' and; will damage its fragile sustainability;
7. That the requirements of PPS25 have been ignored;

8. That land at Sovereign Harbour should be given similar protection from developers as that at Kings Drive and Priory Heights.

I have addressed each of these points as follows:

1. Widespread community consultation was undertaken last year in order to gather feedback on 4 different spatial development options to achieve the Eastbourne's future housing land supply up to 2026. Each option had a different pattern of housing delivery, so affected the Borough's 14 neighbourhoods in different ways.

The four spatial options took into consideration:

- The different types of land that were available for development;
- The different strategies that could be brought forward e.g. residential density, mixed use developments, Greenfield urban extensions;
- The sustainability of locations and neighbourhoods.

The Council also sought openly and inclusively to engage with the wider community including residents at Sovereign Harbour so that it could provide input into an assessment that had been prepared for their area that will lead to a spatial vision for every neighbourhood. The Council recognised that residents will have different experiences of living in their area and issues that they may have, which may not have been identified by the Council. Altogether 15 drop-in consultation events were arranged; 1 for each neighbourhood and a further borough wide event for any one who missed their event and/or for statutory consultees and organisations.

The event to hear the views from the Sovereign Area was held at the Haven School on Saturday 14th November between 11am and 3pm and 51 people participated. All the events were publicised extensively through the local press and the Borough Council's website. An article was also included in the Eastbourne Review which was distributed to all households. Approximately 10,000 leaflets were distributed by the neighbourhood watch volunteers and another 2,000 were made available in Council buildings, community buildings and shops around each neighbourhood. Several Letters detailing the events were sent to all the Neighbourhood Panel chairpersons including yourself.

All the consultation materials, including the maps and data specific to each neighbourhood were made available to the public after each consultation event through the Council's online consultation portal.

A total of 472 people attended the consultation events with a further 49 individuals or organisations making formal representations by post or by internet. The results have been analysed and summarised for Councillors in a report that went to Cabinet on 26th May 2010.

Simple statistical analysis of the combined responses gives an overall summary of the level of support and opposition for each of the options. This showed that there is significant opposition to Greenfield urban extensions (Option 4) across the Borough. This was opposed by just under 4 times more than the other 3 options. Option 2 'Creating Sustainable Centres' had the greatest support Borough wide of all four options with 132 responses in support. Options 1 & 3 also had greater support than opposition across the Borough.

Early in our discussions with SHRA it was claimed opposition to the Greenfield Urban Extensions may have been affected by a disproportionate opposition by the local neighbourhoods (Old Town, Ocklygne & Rodmill) and this may have skewed the overall results across the Borough. Therefore further analysis was presented to show whether opposition to Greenfield Urban Extensions is a specific local issue or unanimous across the whole Borough. It was clear that the Greenfield urban extension option was not generally supported by Eastbourne residents across the Borough and that green spaces should be protected to maintain the environment and character of the Borough.

By the same token, it could be argued that the slightly higher level of attendance at the Sovereign Area event may have led to an over representation of that community's views compared to other areas. Therefore further analysis was undertaken. By discounting the results of the Sovereign neighbourhood, the level of opposition from across the Borough to Option 2 is significantly reduced. It then becomes the most supported and least opposed option (with the greatest differential) of the four proposed and demonstrates that the opposition to further housing in the Sovereign Area is a particular local issue. From earlier discussions with the SHRA the strong opposition is attributed to a lack of community facilities and services, which is believed to only be heightened with more housing development. The rest of the Borough is generally supportive of the principle of seeking to create more sustainable centres (Town Centre and Sovereign) as long as adequate infrastructure is provided before or alongside new development. Please be assured the Council is very supportive of ensuring that neighbourhoods are sustainable and would wish to see Sovereign Area given the facilities it currently lacks.

2. Participants at each neighbourhood event were also asked to comment on the accuracy of a Sustainable Neighbourhood Assessment for their neighbourhood based on the most up-to-date information available at the time. In addition they were asked to comment on what they liked and disliked about the built environment, the housing and employment opportunities, natural environment services and facilities etc. There were also opportunities to feed into surveys on their views on litter, graffiti,

vandalism trees and open spaces facilities for young people as well as pedestrian and cycle facilities. The findings from the Sovereign event were discussed at one of the recent meetings leading up to your letter and you confirmed that the summary reflected a fair assessment of their area.

Sovereign Area ranked 13th out of 14 neighbourhoods showing very poor sustainability. This confirmed the need for more community facilities, which the Council accepts are needed.

3. I can confirm the Council's officers were not actively promoting option 2. Each option has its own advantages and disadvantages and these were highlighted in the exhibition material at the consultation events. Once the results are analysed it is the officer's responsibility to convey these to Councillors and the general public. This was done by preparing a recommendation as to which spatial option should be carried forward as the preferred spatial development strategy in the LDF as soon as feasibly possible. This was done in reports to Planning and Cabinet Committees for the 20th and 26th May respectively.
4. Planning Policy Statement 12: (PPS12) 'Creating Safe Strong and Prosperous communities through Local Spatial Planning specifies that to be "sound" a Development Plan Document should be justified, effective and consistent with national policy. Justified means that the document must be founded on robust and credible evidence, and the most appropriate strategy when considered against the 'reasonable alternatives'. It also recommends that planning should ensure that 'strategies be based on the community's views' and that participation in the LDF process should provide 'evidence of the views of the local community and others who have a stake in the future of the area. It is our view that we have done everything possible to enable the local community to make their views known to us before recommending a preferred spatial development strategy to Councillors.
5. The views of the community and residents at Sovereign Harbour are very important to us. As you know we are currently encouraging the owners of the remaining undeveloped land at Sovereign Harbour to prepare a master plan. I recognise your concerns about ensuring that any future developments deal with the lack of community facilities. Consequently the Council is ensuring these concerns are addressed in the master plan and that the developer carry's out consultation and take account of the communities view before submitting a planning application.
6. Agreeing the proposed spatial development strategy involves some difficult choices, however through consultation the Council has considered the comments from a wider range of consultees in order to develop an informed and sound preferred development strategy that is the most sustainable. The Eastbourne Spatial Development Strategy will focus on

concentrating development in existing centres which need the most action but where there is the most potential for becoming more sustainable by way of providing new facilities through balanced housing led growth. This includes the Town Centre and Sovereign Area. Growth will be used to promote high quality design that reinforces local distinctiveness, more efficient use of previously developed land and resources and a reduction in inequalities. The Strategy will protect and safeguard the environmental quality of the Borough by not developing on any Greenfield sites outside the current built up areas.

As mentioned earlier the low sustainability ranking for Sovereign Area has shown it needs the facilities to become a sustainable area. Infrastructure that would be required by developers to balance new housing would include:

- A new community centre;
- Additional cycle routes;
- open space and children's play areas;
- protection of the existing shingle banks for recreation; and
- safeguarding employment and mixed use areas.

The Council sees no other way of delivering this level of community facilities in the area. Therefore without balanced housing growth on some of the remaining development sites, which were former minerals workings, the area will continue to be one of the least sustainable in the Borough.

7. PPS25 Guidance for following site selection has been followed. A Strategic Flood Risk Assessment (SFRA) has been undertaken jointly with our neighbouring authority in Wealden, and the Sovereign Area categorised as Tidal Flood Risk 3. Given that this classification covers nearly all of the eastern built up areas along the seafront towards in the town towards the Town Centre early discussions have taken place with the Environment Agency to explore a practical solution for this large the built area. We have been advised that the Environment Agency will consider an exception test for the brownfield sites included within this classification for reasons of social and economic renewal but would find it impossible to sanction the development of any virgin Greenfield sites with this or any similar flood risk classifications.
8. It is for all these reasons that the Council consider that Eastbourne Spatial Development Strategy should focus on concentrating development in existing centres which need the most action but where there is the most potential for becoming more sustainable by way of providing new facilities through balanced housing led growth. This includes the Town Centre and Sovereign Area. Of the four alternatives put to the community at the end of last year, this was the most popular, sustainable and delivered the highest amount of housing growth which can support other much needed

facilities. The efficient use of brownfield land will also encourage regeneration and renewal.

The next stage in the planning process is to prepare a draft Core Strategy and this is expected to be published for further community consultation this Autumn. This will provide a fully worked up strategy covering all spatial uses (not just housing) and showing how they all interlink to provide a coherent strategy for the town. There will be the opportunity to make representations on the document. By then I would hope the land owners at Sovereign Harbour would have prepared their draft master plan for consultation to help inform, in more detail, the development in your area.

Yours sincerely

Robert Cottrill
Chief Executive

CC: Stephen Lloyd MP
Cllr David Tutt, Leader Eastbourne Borough Council
Cllr David Elkin, Opposition Leader Eastbourne Borough Council
Eric Pickles, Secretary of State for Communities