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Iona Cameron / Lisa Rawlinson
Eastbourne Borough Council
68 Grove Road
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Your Ref:

Our Ref: PINS/T1410/429/5 & 6

Date: 22nd February 2012

Dear Iona & Lisa,

Having had a preliminary look at the submission documents I have a few queries and would be grateful if the Council could respond to these as soon as possible:

Procedural question:

1. The Council will need to notify me formally whether it is requesting modifications under section 20(7C) of the Planning and Compulsory Purchase Act 2004.

Supporting docs/ evidence base

2. There seem to be no submitted documents, such as preferred options or CS spatial options, which explain the options that were considered and how the spatial strategy evolved. The same applies to the TCAAP. I can see that these documents are available on the Council's website. Please could they be provided or a summary explanation of the iteration of the strategy and action plan be prepared for the examination?

3. A copy of the latest AMR should be provided.

4. Windfall Housing delivery Briefing Note (CS31) refers to an Appendix (App A: Detailed Windfall Delivery Analysis) but this does not seem to be included.

5. Page 8 of Core Doc CS8 (Reg 30 Representation Statement) refers, at para 4.7, to Appendix C: Sovereign Harbour Retail Park Shopping Designation Briefing paper. Where is this located?

Proposed changes in CS2 (it would be helpful if these changes were numbered)

6. Most of the changes proposed are minor changes which, under the Localism Act, will not be considered at the examination. It is up to the Council to decide how and when to make these changes. If the Council makes it clear that it



wishes the submitted plan, as amended by the proposed changes, to be considered as the plan for consideration at the examination then this should be made clear. In this case CS2 should be re written as a numbered schedule. But see point 8 below.

7. Notwithstanding this, the proposed changes to Figure 2: Neighbourhood 1: Town Centre are not clear as the changes refer to replacing some of the orange "residential opportunity sites" with blue "mixed use opportunity sites" However blue sites currently on this diagram refer to "landmarks".

8. From initial reading CS2 includes a single Major Modification proposed by the Council which is in response to representation 115 and relates to deletion of reference to Sovereign Harbour as a District Centre in Policy D4. This change will need to be subject to public consultation of six weeks duration. This may be carried out immediately or, if the Council requests modifications as referred to in point 1 above, it could be undertaken together with consultation on any other major modifications that emerge from the examination. If the Council wishes the examination to consider the CS as amended by the changes in CS2 (as in note 6 above) then this major modification should be omitted from CS2 and placed on a separate schedule of proposed Major Modifications.

Housing supply general points

9. CS para 1.1.11. Please could the Council provide an explanation of how the figure of 222 dwellings per year is arrived at?

10. I cannot find a housing trajectory which shows when and where new housing development will take place. Please provide one.

11. There appear to be inconsistencies between the housing provision for neighbourhood 1 on Table 2 of the CS and the number of dwellings proposed in the TCAAP.

Housing supply major concerns

12. Reliance on windfall sites is "built in" to both the CS and the SHLAA, rather than emerging from a rigorous assessment of the situation. The SHLAA seems to leap to a windfall analysis before summarising the number of identified sites and identifying the shortfall. This is made worse by the absence of a trajectory to show when and where the identified sites will deliver housing. This leads to a number of questions:

Is the SHLAA up to date?

Is the SHLAA process consistent with the CLG Practice Guidance - particularly Figure 3 on Page 9?

TCAAP initial concerns

13. The TCAAP appears to be mainly a suite of development management policies which relate specifically to the TC area. There are proposals for a design led scheme to enhance the public transport interchange, for development opportunity sites and for areas of change. However there seems little detail of "action" taking place to progress these schemes or of how and when the proposals will be implemented. At this stage this document seems more akin to an SPD.

14. An AAP should take forward and provide more detail of the CS strategy. This AAP adds little to the CS in terms of the location and quantity of development and how it will be progressed.

In view of the concerns regarding housing supply and the AAP the council may wish to consider taking some time to prepare additional evidence or, if this would be helpful, arrange an exploratory meeting.

In the mean time could you also let me know whether or not you wish to hold a PHM?

Yours sincerely

Steve Carnaby (on behalf of the Inspector Sue Turner)
Plans and Major Casework Team