



3/12 Kite Wing
Temple Quay House
2 The Square
Bristol
BS1 6PN

Direct Line: 0117 372 8468
Customer Services: 0117 372 6372
Fax No: 0117 372 8782
e-mail: stephen.carnaby@pins.gsi.gov.uk

Iona Cameron / Lisa Rawlinson
Eastbourne Borough Council
68 Grove Road
Eastbourne
BN21 1DF

Your Ref:

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

Date: 5th March 2012

Dear Iona & Lisa,

Thank you for your email and letter both dated 29 February 2012, and for the additional documents that you have provided. I am currently looking at the additional documents and will write to you separately to summarise my continuing concerns regarding housing land supply. However in the mean time, and to enable us to agree the dates for examination hearings as soon as possible, this letter deals with procedural matters relating to the way in which the Council's "Schedule of Proposed Minor Changes" is best handled through the examination process.

1. Submitted plan and track changed version

Thank you for submitting document CS1 (A), which is a track change version of the submission Core Strategy, CS1, incorporating the Council's proposed minor changes that are set out in document CS2. Having looked again at the legislation it is now clear that the examination can only deal with the original submitted Core Strategy, ie document CS1. As outlined in my letter of 22 February 2012 most of the proposed changes in CS2 are minor and will not need to be considered at the examination. However the track change document, CS1(A), whilst not required for the examination, will remain a useful reference to summarise the minor changes that the Council wishes to make should the Core Strategy proceed to adoption.

2. Dealing with the Council's proposed changes that constitute potential "Major Modifications" (MMs)

My letter of 22 February identified one proposed change in document CS2 that I consider to be a potential MM. This is the

proposed change to the designation of Sovereign Harbour Shopping Centre in Policy D4 and in the Retail Hierarchy. This change was proposed in response to points made in Representation ID115, but it would clearly conflict with the support set out in Reps ID52 and ID195.

Subsequently, as set out in my email dated 29 February, I identified a further potential MM which is a change to Table 3. This would amend the reliance on windfall sites before 2022 from 248 to 798 units. This proposed change appears to be the correction of a drafting error, but it is significant and may affect the support for the CS expressed in Rep ID9 which specifically refers to the lower (incorrect) figure.

Clearly the priority is to decide on a way forward with regard to consultation on these two proposed MMs, as this will have a bearing on the hearing dates. I set out below what I see as the benefits of consultation BEFORE the Hearings:

- Both matters have been referred to in the representations but it is not clear whether all representors are aware of the proposed changes and if so whether they would wish to make further reps in response to them. Consultation is important to ensure openness and ensure all interested parties are aware of the proposed changes in advance of the examination hearings. It would allow new representations to be made and enable existing representors to re assess whether or not they wish to attend the hearings in the light of the proposed changes.
- Allowing/inviting further reps on the up to date situation may save time at the hearings by ensuring that all participants have had a chance to consider the proposed changes in advance.
- Consultation in advance of the hearings would ensure that the examination is thorough and inclusive, allowing all interested parties to be made aware of the proposed changes, to make representations and if they wish to attend the hearings (see next point).
- It could avert the risk of having to re open the hearings after consultation, which could be necessary if interested parties do not learn of the proposed changes until after the hearings (through post- hearing consultation).

I hope that these thoughts are helpful and look forward to hearing the Council's decision.

Yours sincerely

S J Turner RIBA MRTPI IHBC
Inspector