SHRA
Sovereign Harbour Residents Association
www.shra.co.uk

Head of Planning
Eastbourne Borough Council
Town Hall
Grove Road
Eastbourne
BN21 4UG

9 August 2024

By email to: planningfirst@lewes-eastbourne.gov.uk

Dear Sir

Planning Application 2306847: Martinique Way Village Ltd. Site 1 off Martinique Way, Eastbourne, East Sussex.

Sovereign Harbour Residents Association (SHRA) represents the collective view of 1500 Sovereign Harbour residents who are members of the Association. Since the revisions to the above planning application by Untold Living were published, we have again been listening to, and speaking with, members and residents affected by the proposed development.

We objected strongly to the original plans put forward by Untold Living in December 2024 and heard by the Planning Committee on 18 March 2024. For ease of reference, I have summarised the principal objections put forward at that time:

1. Overdevelopment of the site. The original plan approved for Site 1 in 2014 was for a total of 72 residences (62 apartments in two blocks with a total of 102 car parking spaces, and 10 houses) Untold Living wanted to build 137 apartments (around a 90% increase).

2. The proposed car parking facilities were inadequate. 52 spaces to be shared amongst 137 apartments plus up to 16 staff members and visitors to the residents, along with additional visitors to the restaurant, would create a safety issue and traffic flow problems. Martinique Way is already short of spaces for the number of residents and visitors.

3. At its highest point, the proposal appeared to be some 4 metres higher than Anguilla Close (the next highest building adjacent to the development).

4. The location of the proposed building in relation to the Martello Tower compromised the integrity and beauty of this historic protected building.

At that time, we believed the significant increase in the number of residences proposed by Untold Living was a fundamental flaw and at the very least the application should be amended to reflect the specification of the original 2014 planning approval for 62 apartments.

We were pleased the planning committee agreed with the thrust of our objections and also decided the proposed development was simply too large and unsympathetic to the surrounding area and broader landscape. As you know, the committee deferred their decision until Untold Living amended their proposal, requiring them to make a reduction in the number of units, the height and separation of buildings, and to revisit the design to reflect the maritime locality and the Martello Tower.

Having now received and reviewed their amended plans we are hugely disappointed with their proposal for the following reasons:

- The revised proposal reduces the number of apartments by only nine - from 137 to 128. Only the most northern block (block A) has been reduced in height and only by one floor.
- At its highest point block A is still 1.5 metres higher than the adjacent Anguilla Close.
- The car parking facilities have not been improved at all. Untold Living are still suggesting that 52 parking spaces to serve 128 apartments and 16 staff is acceptable.

Again, we would respectfully remind Councillors that when Site 1 was originally granted planning permission for residential units in 2014, it was for 62 apartments over 7 floors and 10 houses (only the 10 houses were built). This revised application by Untold Living for 128 apartments over 7 floors remains a significant departure from the original approved plan.

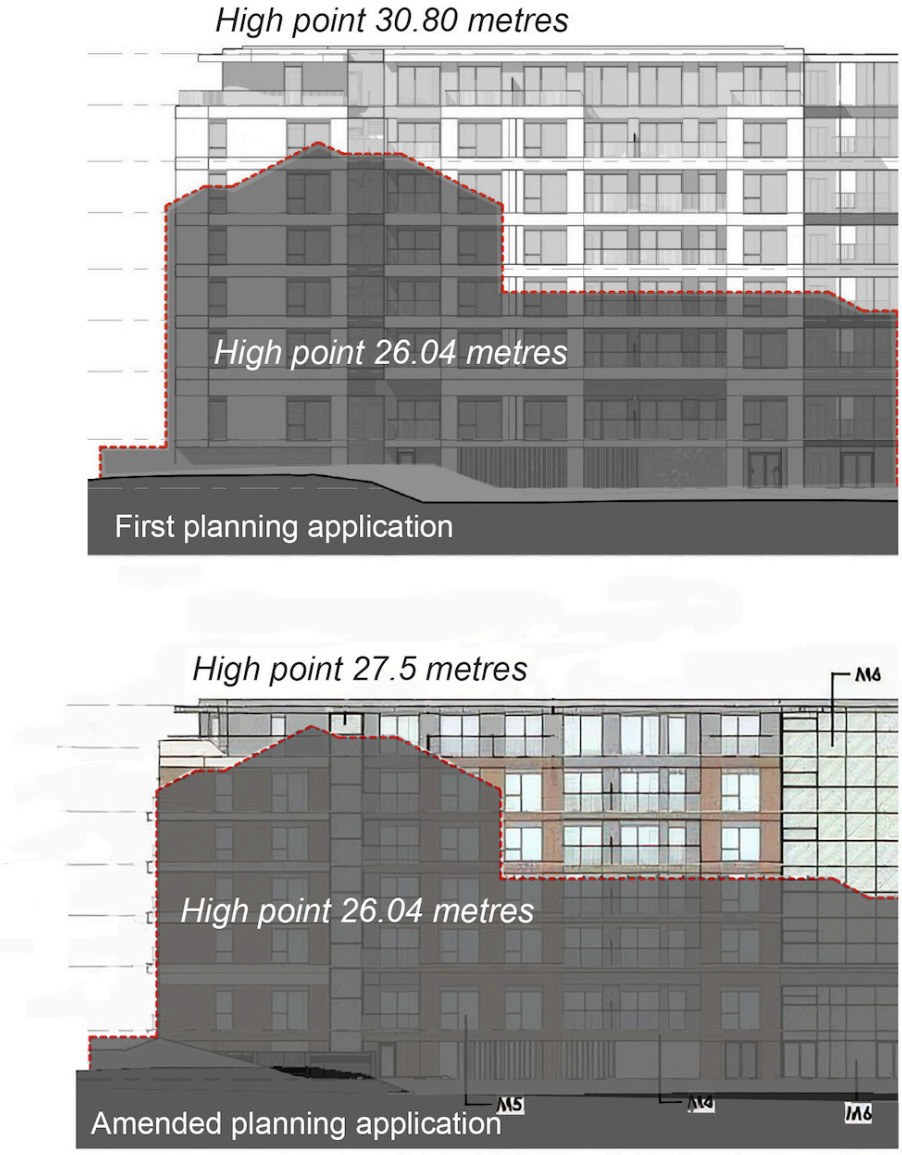
We believe Untold Living has taken absolutely minimal steps to listen to or act upon the wishes of the Planning Committee or the local residents. Our objections, therefore, remain in place as follows.

1. Overdevelopment of the site. This latest application is for 128 apartments and represents a 78 % increase to what was previously approved.

2. The result of the overdevelopment will place an unacceptable strain on the surrounding facilities and infrastructure. The traffic movements alone generated by at least 150 additional residents (across 1 and 2-bedroom apartments), plus associated services and deliveries to the building along with staff movements will generate a significant increase and risk to safety in what is an already congested access point along Martinique Way.

3. Linking to this; the proposed car parking facilities are inadequate. 52 spaces to be shared amongst 128 apartments plus up to 16 staff and the visitors are untenable. The overspill from the new development into Martinique Way and the surrounding area, including the potential to obstruct the Langney Point roundabout and current residents' driveways, will undoubtedly cause serious congestion and neighbourhood conflict.

4. At its highest point the new proposal is still 1.5 metres higher than Anguilla Close (the next highest building adjacent to the development). The following images illustrate the minimal changes to the size and height of the proposed development.



Site 1 approx height comparisons

In the original planning application put forward by Untold Living the height of the tallest 7-storey block was shown as 30.80 metres. In their amended second application, the height of the tallest 6-storey block is shown as 27.50 metres. The height of the tallest block of Anguilla Close on Martinique Way is 26.04 metres.

It must be noted that the proposed building displays an additional floor when seen from Martinique Way compared to when viewing it from the beach i.e. it looks taller from Martinique Way where block A will be 7 storeys high (see following image). This is the prospect of the building that will always be seen by the residents of Martinique Way, St Kitts Drive, Dominica Court and Anguilla Close.



Contextual Section - Block AA North
1 : 200

The revised plan from Untold Living remains a significant departure from the vision created and approved in 2014. We maintain the 2014 vision is even more appropriate in 2024 and must be upheld.

5. The location and bulk of the proposed development creates an intrusion into this section of coastline. Eyes are drawn away from the Martello Tower, seriously compromising the integrity and status of this historic, protected building and giving prominence to what is, in reality, a very large block of flats. These flats would rise above the coastline and be visible from Beachy Head to Hastings

6. While we recognise the need for homes and affordable housing both locally and nationally, we maintain this proposal by Untold Living offers does not address this problem. We believe that prospective buyers will come from outside the area. Eastbourne already offers a great deal of choice in elderly residential care, and we question the value of yet another new development of this nature. This is not the type of accommodation the town and people of Eastbourne need.

Finally, we would draw your attention to, Policy C14: Sovereign Harbour Neighbourhood Policy, that is set out in the Eastbourne Core Strategy Local Plan [Annex A below] and the Sovereign Harbour Supplementary Planning Document (SPD) [Annex B below] published by Eastbourne Borough Council in 2013 after consultation with Eastbourne and Harbour residents.

The Sovereign Harbour SPD sets out in detail the vision and requirements for any development on Site 1. The protection of the coastline aesthetic, heritage assets, public spaces (to include a children's play park and cycle/pedestrian path) are clearly documented (see Annex B) but are not reflected in the revised planning application.

Both the Core Strategy Local Plan and the Sovereign Harbour SPD state that a maximum of 150 new homes will be developed in Sovereign Harbour to contribute towards the delivery of housing in meeting the target of 5,022 new houses in Eastbourne between 2006 and 2027. In addition to the 150 dwellings being identified as the maximum figure for delivery, the Local Plan also states the majority of the dwellings should be houses rather than flats.

This maximum figure of 150 dwellings has already been reached between the Port Moresby and Macauley Place development constructed after the 2013 publication date, and the planning approval already in place for the LNT 66 Bedroom Care Home for Older People, and the McCarthy and Stone 57 retirement apartment development, due to be constructed at Site 7a on Pacific Drive.

The additional 128 residences proposed by Untold Living for yet another elderly care apartment development within Sovereign Harbour, if approved, will make a mockery of this commitment to the residents of Eastbourne and the credibility of planning strategy.

We ask that you stand by the restrictions and requirements you set out in Policy C14.

We trust you will consider these serious issues, listen to the voices of the many local residents unhappy with the design of these apartment blocks and again refuse permission for this development in its current form.

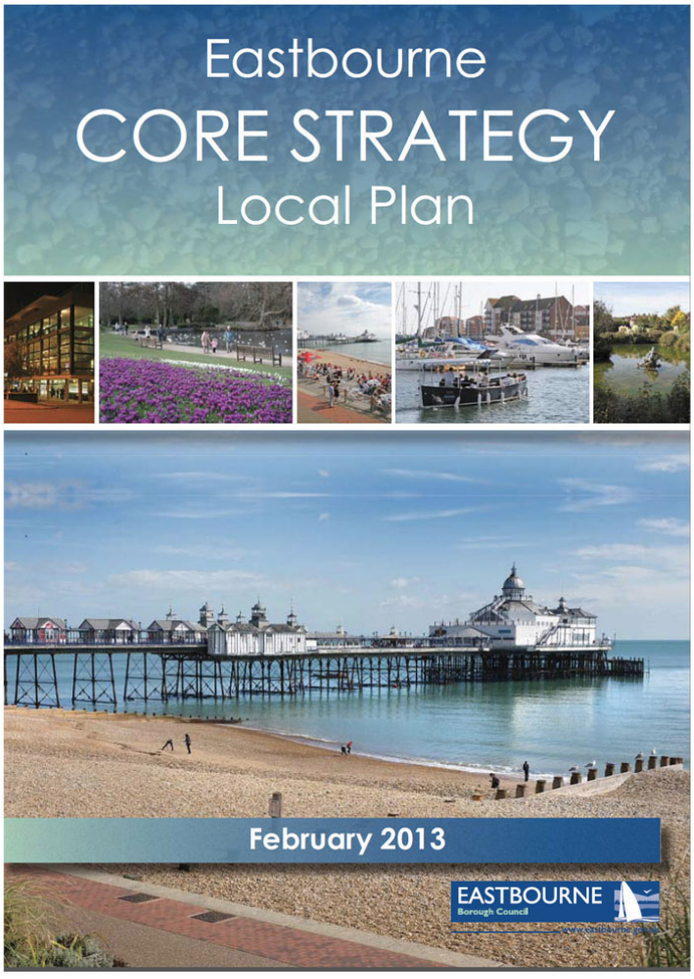
Yours faithfully,

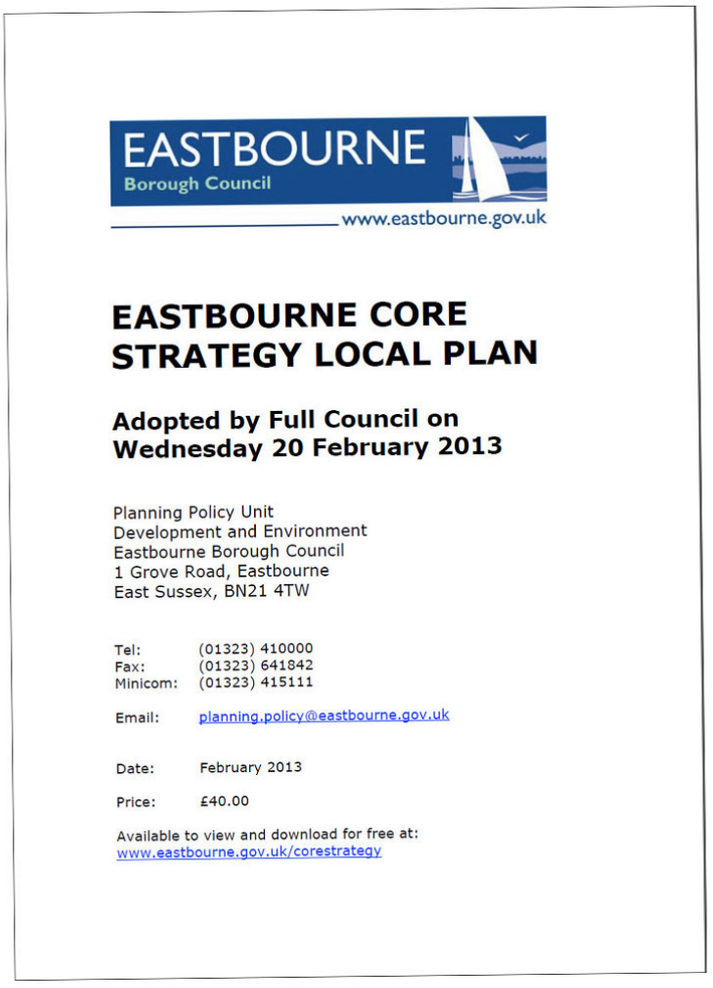
Frances Lawrence

Frances Lawrence
Chair
Sovereign Harbour Residents Association
email chair@shra.co.uk
www.shra.co.uk

Annex A - Policy C14 from Eastbourne Core Strategy Local Plan
Annex B – Pages from the Sovereign Harbour Supplementary Planning Document (SPD)

Annex A - Policy C14 from Eastbourne Core Strategy Local Plan





EASTBOURNE
Borough Council
www.eastbourne.gov.uk

EASTBOURNE CORE STRATEGY LOCAL PLAN

Adopted by Full Council on Wednesday 20 February 2013

Planning Policy Unit
Development and Environment
Eastbourne Borough Council
1 Grove Road, Eastbourne
East Sussex, BN21 4TW

Tel: (01323) 410000
Fax: (01323) 641842
Minicom: (01323) 415111

Email: planning.policy@eastbourne.gov.uk

Date: February 2013

Price: £40.00

Available to view and download for free at:
www.eastbourne.gov.uk/corestrategy

Policy C14: Sovereign Harbour Neighbourhood Policy

The vision for Sovereign Harbour neighbourhood will be promoted by:

- **Developing community facilities in order to meet the needs of local residents;**
- **Providing extensive employment opportunities through the development of a Business Park (B1a Office);**
- **Increasing the amount of appropriately landscaped, usable open space and the number of children's play areas;**
- **Allowing up to a maximum of 150 new homes, (including affordable homes) the substantial majority of which should be houses rather than flats, but only if the community facilities are guaranteed to be delivered;**
- **Increasing the importance of the Waterfront as a leisure and tourist centre;**
- **Encouraging opportunities to improve the provision of public transport through improvements to bus routes;**
- **Enhancing the importance of the Marina for tourism through appropriate measures including the provision of additional berths and associated boat storage facilities;**
- **Enhancing the provision of cycle and walking routes to improve connections within the neighbourhood and to other parts of the town; and**
- **Encouraging opportunities for renewable energy generation particularly combined heat and power (CHP) on development sites.**

Annex B - Pages from Sovereign Harbour SPD

SOVEREIGN HARBOUR

Supplementary Planning Document









February 2013

EASTBOURNE
Borough Council
www.eastbourne.gov.uk

4.1 Site 1 - Off Prince William Parade

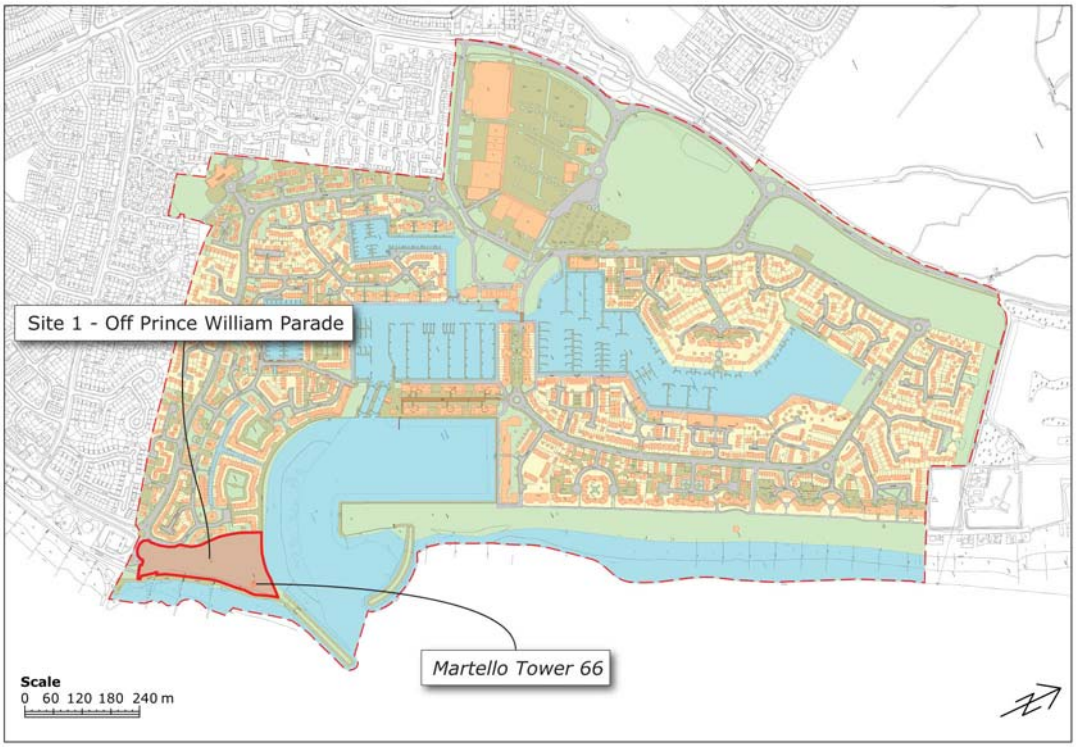


Figure 11 Site 1 - Off Prince William Parade

Vision Statement for Site 1

The setting, character and heritage of Site 1 provide an opportunity for a unique and high quality architectural response. Currently, the site is characterised by an unfinished domestic edge that fails to mark out this gateway to the Harbour or provide a suitable destination at the eastern end of the Eastbourne seafront. The development of this site offers the opportunity to address this by finishing this edge with built form of an appropriate scale and character, to provide an entrance to the Harbour and a backdrop to both the Martello Tower and a new public open space. As part of the development of this site it will be necessary to provide a new public open space using the area of shingle that has been shaped by the sea defence works and is also the setting for Martello Tower 66. The provision of a public open space in this setting will have to meet the challenges of the exposed coastal location and climate, as well as being sympathetic and appropriate to the setting of the Martello Tower. There is an opportunity to use the character and ecology of the indigenous Sussex vegetated shingle habitat to achieve this and create a space that is rich in biodiversity and a positive addition to the Eastbourne seafront. Public access will be maintained along the frontage of the site. It is envisaged that this access way will not form a traditional hard surface but will still allow full access to the beach for the public and vehicles for sea defence replenishment works. In addition, a formal pedestrian/cycleway should be provided through the residential development. The design proposals for Site 1 should be

treated as a 'set piece' with the architectural and landscape elements treated as one part of an integrated design approach, that focuses on 'place-making' to ensure that all facets of the design are complimentary in their function and contribution to the setting of the Martello Tower, the creation of a Harbour gateway and the provision of a new public open space.

Characteristics and Constraints

4.1.1 Site 1 has an area of approximately 2.3 hectares and is located at the southern entrance to Sovereign Harbour off Prince William Parade.



Figure 12 Site 1 viewed from Prince William Parade roundabout

4.1.2 The site, which is essentially linear in shape, extends to a maximum width of 310 metres and a maximum depth of 130 metres.

4.1.3 The site is highly visible from the water and marks the entrance to the Harbour. However the site has limited visibility when viewed from the land, being sited away from major roads and the main approaches into the town. The site is also remote from the commercial part of the Harbour, being a 1 kilometre walk away.

4.1.4 The site, which is owned by SHL, comprises a raised shingle beach protected by large rocks on the seaward side and can be accessed via a roundabout at the junction of Atlantic Drive and Prince William Parade and on foot via the Outer Harbour promenade.

4.1.5 The site is bounded by the coast on its northern and eastern sides and by the residential development in Martinique Way to the west, which comprises two storey terraced housing and apartment blocks ranging in height from three to seven storeys. This undeveloped piece of land, which is exposed to harsh winds, is approximately two metres higher than the residential development in Martinique Way.

4.1.6 Adjoining the site's southern boundary is the roundabout which serves the Water Treatment Works, which could also be used to serve the proposed development site. Immediately adjacent to the roundabout is where the seafront promenade currently terminates.

4.1.7 In the north eastern corner of the site there is Martello Tower 66; a Grade II Listed Building and Scheduled Monument which is currently disused. As detailed in paragraph 3.3.15 to 3.3.20 above, it will be essential to protect the setting of the Martello Tower but it will also be necessary to retain views between Tower 66 and Martello Tower 64, which is on the opposite side of the Harbour.

4.1.8 The Environment Agency require access for lorries from the western edge of the site to the seafront at the eastern end to be maintained, to enable shingle to be moved to the other side of the Harbour to manage the long shore drift.

Site Specific Proposals and Development Opportunities

4.1.9 Please refer to Appendix 1 for a site plan illustrating the site specific proposals and development opportunities associated with Site 1.

4.1.10 It is considered that Site 1 could accommodate some residential development. However, in order to protect the openness of the site, deliver the necessary community benefits and respect the setting and views of the Martello Towers, it is considered that approximately two thirds of the site should remain open which would therefore restrict the amount of built form to approximately only one third of the site.

4.1.11 In addition, having regard to the size of the site, relative to the other remaining development sites within Sovereign Harbour, it is considered that between 50 and 80 homes could be built on the site.

4.1.12 Development should be set back from the waterfront, towards the existing residential development in Martinique Way and should respect the height, scale and form of the adjacent residential properties.

4.1.13 To reduce impacts on the setting of the Martello Tower, it is considered that vehicle access and parking should be screened behind the existing beach level. Houses should be a maximum of three storeys in height and any apartment buildings, should range in height from between three and six storeys.

4.1.14 Due to the site's prominence when viewed from the sea, it is considered that any proposed residential development should provide an attractive frontage to the coast and the opportunity exists to develop uniquely designed properties incorporating energy efficient measures and sustainable design techniques.

4.1.15 As the northern boundary of Site 1 forms the entrance to the Harbour, there is the space and opportunity to provide a building of greater scale up to 6 storeys. However, this must avoid adverse effects on the setting of the Martello Tower.

4.1.16 As part of any development on this site, it will be essential to provide a significant area of public open space (approximately two thirds of the site), which could be planted with appropriate species to restore the naturally occurring habitat along the beach frontage and must incorporate children's play space. The exposure and coastal location may limit the choice of hard and soft landscape finishes. There is however an opportunity to provide a unique space designed to reflect the maritime location.

4.1.17 Development of the site will also require public access to be maintained along the frontage of the site. It is envisaged that this access way will not form a traditional hard surface but will still allow full access to the beach for the public and vehicles for sea defence replenishment works. In addition, a formal pedestrian/cycle way should be provided through the residential development.

4.1.18 Adoption issues associated with this connection would need to be discussed with the Highway Authority and public access would need to be secured by a Section 106 Agreement if the area is not to be adopted by the Highway Authority.

4.1.19 The existing pay and display car park adjacent to the Water Treatment Works is ideally sited for visitors to the open space and extended promenade.

4.1.20 As detailed in Paragraph 4.1.7 above, it will be essential to ensure the setting of Martello Tower 66 is maintained, but it should also be enhanced to reveal the heritage significance of the Tower. With the proposed extensive area of open space, it is considered that the site will become an important destination and the Martello Tower could be converted to a new use. It could for example become a café, with an external seating area, where customers could take advantage of the long range views out to sea. However such a proposal would need to be discussed in detail with English Heritage, and the key criterion should be whether the heritage significance of the place will be protected and preferably revealed or enhanced. Care should be taken to ensure that the treatment of the open space around the Tower retains a naturalistic beachscape character, and in particular that any hard landscaping is minimised. Planting should maintain a shingle beach character and any topographic profiling to create public spaces should not substantially change the open shingle beach character.



Figure 13 Martello Tower 66

4.1.21 Whilst Paragraphs 4.1.4 and 4.1.6 above state that access to the site could be from either the roundabout at the junction of Atlantic Drive and Prince William Parade or the roundabout which serves the Water Treatment Works, it is considered that vehicular access should be from Martinique Way and that areas of hardstanding should only be provided at the rear of any buildings (adjacent to Martinique Way).

4.1.22 Due to the difference in levels on site, it is considered that undercroft parking could be provided to serve the development. This will not only limit the amount of hardsurfacing on site, but will also provide added security for habitable rooms on the ground floor.

4.1.23 As detailed above, as part of any development on Site 1, it will be necessary to maintain access for the Environment Agency to move shingle from the site to the other side of the Harbour in order to maintain the sea defences. This will involve the movement of heavy construction plant and lorries. Access should be from the existing roundabout access shared with the Water Treatment Works and surface treatments within the open shingle area to accommodate the Environment Agency operations should be low key and in keeping with the shingle character so as to protect the setting of the Martello Tower. Any additional requirements such as signage should be minimised for the same purpose and where required, temporary solutions should be considered first.

4.1.24 There may also be the opportunity to provide a slipway into the sea from Site 1, as there has been some support for such a facility. However this would require further discussions with Premier Marinas and would need to take account of both the setting of the Martello Tower and on the general amenity and other users of the space.

4.1.25 It is considered that there may be opportunities for renewable energy generation on Site 1, particularly combined heat and power (CHP).

4.1.26 Therefore it is considered that the development of Site 1 as proposed will complete this southern part of Sovereign Harbour and provide a high quality development when viewed from the land and the sea and will also ensure the delivery of considerable community benefits, with the provision of a public park, children's play space, an alternative use for the Martello Tower and a pedestrian and cycle link between the promenade and the Harbour. There is a need to protect the setting of the Tower and there are opportunities for new uses to be accommodated within or directly alongside it, so long as these are sympathetic to the structure of the Tower and to the function of the proposed public open space.

Appendix 1 Site 1 - Off Prince William Parade

