

MATTER 7

Regarding Two Site Allocations in Central St Leonards that will negatively impact this ward, the most densely populated and most deprived in East Sussex.

Inappropriate Allocation 1

7.1 The North and South of the grounds of the College of the Holy Child of Jesus should be **designated** as (Private) Open Space and **none** of this green space should be allocated to development, as this would not appear to be legally sound. This relates to Representations 4056, 4057, 4058, 4059 and 4060 and also to policies FA2, FA4 and ENI. The reasons include:-

7.1.1 As there is a current Enabling Development application regarding the former convent and its grounds, and there is a strong likelihood of others in the future, it should not be allocated as this would be likely to jeopardise an optimal outcome/use for these heritage assets and, therefore its potential for heritage-led regeneration, The English Heritage Guidance document *Enabling Development and the Conservation of Significant Places (2008)* states in Chapter 2:-

2.2.2 Owners may propose, through the local development framework process, site-specific provision for enabling development in development plan documents on the grounds that it would help, or even be essential, to secure the future of a significant place. Such proposals should be resisted, since optimum uses, costs and values fluctuate over time. The case for enabling development can only be properly considered in the context of a specific application; and if a case is made, a binding and enforceable link to its heritage objective is a prerequisite to a grant of planning permission.

2.2.3 Moreover, site-specific provisions run the risk of becoming development in accordance with the statutory plan. By definition it would not be enabling development, and so could not be securely and enforceably linked to benefit to the place. Any link would depend on the goodwill of the owner; and owners, and their circumstances, can change in quite unforeseeable ways.

7.1.2 The whole of the convent grounds make a very important contribution to the townscape of this historic area.

7.1.3 The Local Plan 2004 states in its description of the Magdalen Road Conservation Area that,

To the east the Convent school and its grounds are the major elements of the conservation area.

7.1.4 Designation would make selling off the Northern part of the Convent grounds to a speculative purchaser much less lucrative proposition. In a sense, it might enable an Enabling Development if it was truly the Last Resort.

7.1.5 HBC failed to provide any compelling justification for its nondesignation in the Local Plan 2004. I think both North and South of the Convent Grounds had been designated prior to that plan.

7.1.6 Sport England classify the North of the Convent Grounds as a playing field and currently object to this land being used for development.

Inappropriate Allocation 2 –B31 in the previous DMP consultation document

7.2 Site allocation A20 - Taxi Office and BR Social Club in the Development Management Plan Consultation document, 3 February -27 April 2012, I believe this allocation in Central St Leonards is legally unsound and would be contrary to a number of strategic objectives (see Representation **4059**). Preserving the historic environment is extremely important to Central St Leonards which is the most deprived and densely populated ward in East Sussex, because of the potential for heritage-led regeneration and tourism. It was the most densely populated ward in 2001 with a density of 84.9 persons/hectare and this density has increased dramatically to 105.4 in 2011 (ESCC statistics).

7.3 This allocation is contrary to **Policy FA2 k** and **Policy EN1** and should be excluded from **FA4a** where it is referred to as the Alpha Café, for reasons that include the following:-

7.3.1 This allocation (30 units on a 0.12ha site) implies a multi-storey block in this extremely densely populated area and this would be seriously detrimental to the historic environment. It would become the dominant focal point of many views and vistas in this predominantly Victorian landscape

7.3.2 It would be seriously detrimental to elegant Italianate station (William Tress 1851-1852) with its 1869 latticed footbridge (1869). Neither the Taxi Office nor the

7.3.3 Alpha Café, which house two thriving businesses and make useful social contribution to the area, should be demolished. The taxi office was the original coal office and is an integral part of the Victorian fabric of the station (Sussex Industrial Archaeological Society). The Alpha Café is a characterful building and **importantly is single storey building** which allows the historic environment to be shown to its best advantage.

7.3.4 On exiting the station a multi-storey block would not provide a fitting entrance to historic St Leonards with all its architectural gems and detrimental to the towns under- realised tourist potential and also to its general economic potential

7.3.5 The former site of the BR Social Club would be an ideal space for Outdoor Table Tennis which would be of real benefit to this deprived area.