

Response ID ANON-9C7U-2R5F-7

Submitted to Consultation on the modification to the two unitary proposal received from East Sussex County Council, Eastbourne Borough Council, Hastings Borough Council, Lewes District Council and Rother District Council
Submitted on 2026-06-15 16:29:38

Tell us about yourself

1 What is your name?

Name textbox:

Andrew Day

2 Are you responding as an individual or providing an official response on behalf of an organisation?

Official response on behalf of an organisation

3 Are you providing the official response from a named consultee?

No

4 In which council area is your address? (if you are responding as an individual this is your home address. If you are responding as an organisation this is your organisation address)

East Sussex County Council

5 If you are responding on behalf of an organisation, please let us know the organisation's name:

Organisation:

Ringmer Parish Council

6 If you are responding on behalf of an organisation, please let us know your position within the organisation:

Position in organisation:

Council Member with delegated responsibility to respond on behalf of the Council

7 If you are responding on behalf of an organisation, please select the type of organisation from the options below:

Local government - parish/town council

8 What is your email address?

Email address:

a.day@ringmerparishcouncil.gov.uk

Personal Data

1 Please read and tick the box before proceeding with the consultation

Multiple questions in this consultation include free text boxes where you can explain your answers. Please tick this box to confirm that you will not include information which may identify an individual in these boxes

Consultation on the modification to the proposal from East Sussex County Council, Eastbourne Borough Council, Hastings Borough Council, Lewes District Council and Rother District Council

1 To what extent do you agree or disagree that the potential modification to the two unitary proposal will deliver better unitary local government in East Sussex and Brighton and Hove than the original proposal received as judged against the criteria?

Strongly agree Somewhat agree Neither agree nor disagree Somewhat disagree Strongly disagree Don't know:
strongly disagree

2 If you would like to, please use the free text box to tell us about whether the potential modification will deliver new councils that:

Free text box:

Ringmer Parish Council strongly disagrees with the proposed modification in response to the questions raised above.

The modified proposal will not deliver the outcomes described any better, and most likely worse, than that submitted under the original One East Sussex proposal. Following the bullets above, this is based on:

- Are based on sensible geographies and economic areas;

- Enable stronger community engagement and give the opportunity for neighbourhood empowerment;

Geographies and Economic areas

The modified proposal ignores the realities of geographies and economic areas. The areas proposed for annexation are constrained geographically and physically by the South Downs National Park (SDNP) and the sea; these limit any potential development capacity. This is demonstrated for the coastal settlements by the proposed new site allocations and assessments published in the recent draft Reg 18 Lewes District Council (LDC) Local Plan. The total for Peacehaven and Telscombe was 177 dwellings with only 10 allocated to Telscombe, which indicates the lack of potential advantage to B&H.

Falmer Parish, part of Kingston ward, falls entirely within the SDNP and neither have any proposed developments included within the Draft Reg 19 Local Plan.

Moving boundaries of Authorities will not create any more land or options for development but could also impose city design statements on semi-rural and rural areas.

Affordability

The affordability argument also fails. Figures published by Sussex Live on 6/6/2026 show that average prices for Brighton & Hove (B&H) in postcodes BN1 and BN2 are lower than for Lewes, which are also slightly higher than Hove. The housing target figures for B&H using the standard methodology and affordability uplift gave a 5% increase for B&H as opposed to 7% for Lewes. Furthermore, house prices within the LDC part of the SDNP, which includes Falmer, are typically 17% higher than outside of the SDNP according to the SDNP analysis to determine the disaggregation of housing targets.

Community Engagement, Neighbourhood Empowerment and Meeting Local Needs

The coastal towns are aligned historically, culturally, economically, financially and geographically with the other coastal towns to the east than with B&H to the west.

Residents in the communities impacted have consistently and strongly expressed their opposition to both the original B&H proposal and to any modification to the boundaries. The 6 consultations undertaken either by MHCLG or by relevant local authorities have indicated overwhelming opposition regarding any annexation by B&H by those directly impacted. Even within B&H, with its own unique culture, social life priorities and challenges, there was opposition to the change. Furthermore, opposition was expressed across the wider areas in East Sussex where the indirect impact on services and budgets will also be felt.

- Will be able to deliver the outcomes described in the original proposal;
- Will meet local needs.

Proposed boundary changes

The LGC guidance required that existing district boundaries should be considered as the building blocks unless there is a strong justification otherwise. The B&H proposal and modification fail to support this crucial requirement and provides no such justification, not only suggesting the illogical and unsubstantiated fragmentation of Lewes District but also the fracturing of an existing ward.

The modification proposal suggesting that by slightly extending the boundary of B&H would enable further future economic growth and increase opportunities for residential and employment expansion within the city is fallacious and unsupported by evidence or logic with no demonstrable improved capacity gains. It appears to be more of a "land grab" by B&H to the detriment of the impacted residents. It does not create a greater level of economic output, whilst at the same time risking ant benefit to the residents impacted.

High cost of and disruption due to disaggregation at Sub-Ward Level

Falmer village is an integral part of Kingston ward. Other than proximity there are no cultural or historic links to B&H. This proposal to disaggregate Falmer village at a sub-ward level and to disengage it from Kingston ward defies any rational explanation. This is not only is contrary to the above criteria about boundary changes at a district level but will also result in serious and complex democratic and administrative difficulties. There seems to be no coherent consideration let alone a workable and robust plan addressing the difficulty and the high risks of implementation.

Demographics

There is a profound differential in demographics between the city and the settlements to be absorbed. B&H has a much higher ratio of younger people including a very large impermanent student cohort, whilst the coastal settlements have a higher proportion of older residents whose requirements are fundamentally different, in particular for vulnerable service users. The requirements are so divergent in all meaningful respects.

Nevertheless, B&H have ignored the results of these consultations and expressed wishes of residents, which goes against the principle of co-operative working set out in the guidelines. This modification therefore fails in the objective for community engagement and neighbourhood empowerment, and risks undermining public confidence in local government and any future devolution programme.

- Are the right size to be efficient, improve capacity and withstand financial shocks;
- Will put local government in the area as a whole on a firmer footing;
- Will deliver high quality, sustainable public services;
- Will support devolution arrangements

The original expectation for a unitary was for populations of around 500k, subsequently relaxed to 300k-500k but without any published justification addressing specific circumstances. The minor gain to be made by B&H in terms of area and population (23,900 souls) will still fail to make B&H "the right size" on the original criteria whilst weakening neighbouring authorities. Size does not, of itself, deliver high quality sustainable services, nor the ability to withstand financial shocks (as witness by Wealden District who have been well managed financially) but competent local staff with a sensible vision set by its elected members as directed by the communities which they represent. The modification does not address this and is so marginal but with such high risks that it risks an already fragile situation for both UAs and will not support devolution arrangements in any meaningful way.

3 To what extent do you agree or disagree that the potential modification to the East Sussex proposal for two unitary authorities from the East Sussex councils would have a strong public services and financial sustainability justification?

Strongly agree Somewhat agree Neither agree nor disagree Somewhat disagree Strongly disagree Don't know:
strongly disagree

4 If you would like to, please use this free text box to explain your answer to question 3.

Free text box:

The modified proposal provides no substantive evidence that it would create strong public services and financial sustainability over and above the original East Sussex proposal, whilst at the same time significantly increasing the public service and financial sustainability risks and the costs of the re-organisation. In fact, it demonstrates the pure political nature of the proposal which, as set out in the analysis in Q2, fails to take account of residents' opinions and their sense of place and belonging, ignores geographies, histories and cultures and would most likely further undermine confidence in truly local government and the democratic process.

Service disaggregation and re-aggregation risks and costs

The SoS raised concerns on 26th March 2026 about the costs associated with the B&H 5 unitary proposal. This modification carries the same concerns and risks, both for the impacted communities and across the whole of East Sussex. Despite the smaller scale, implementing any boundary changes would still require similar complex disaggregation of services and consequent re aggregation. B&H themselves indicated that there would be significant front-loaded costs and "higher transition costs" and it has been estimated that this would be around £3.25m to £4m with no guarantee of any additional funding to support this and no rigorous analysis of the benefits of so doing. It would divert limited existing resources away from frontline mandatory services impacting support to all residents in particular vulnerable ones across all areas and settlements and create unavoidable transitional risks. Re aggregation costs will also demand significant resources and disturbance at a time when these should be concentrating on any devolution programme.

Impact on Devolution Programme (DPP)

Disaggregation and re-aggregation for a short period prior to full devolution under DPP, for which full details are pending, will add an extra layer of complexity to what will be a challenging transformation in a short time scale. Many of the changes inherent in this modification will need to be unpicked and reformed under a mayoral authority which will impact the devolution process and achievement of outcomes. The DPP relies on co-operative working between all relevant bodies and informed discussion involving all parties equally. B&H's actions to date raise serious questions about their understanding of, their capability and capacity to consult with residents and to reflect the outcomes of that consultation to undertake services to the benefit of all residents.

Impact on residents within LDC

There will be immense disadvantages to all LDC and the wider East Sussex residents with the diversion of resources from existing services to facilitate this unnecessary and unwanted modification over and above that proposed under One East Sussex.

It is therefore inevitable that existing services will be disrupted and resources stretched further which will lead to a reduction in local essential services and the quality of public service provided. The level of uncertainty and lack of forward planning will impact staff as well as residents. Then this will need then to be repeated under the devolution programme.

As evidence of this, LDC entered into a shared service arrangement with Eastbourne Borough Council which in itself caused significant disruption and discontinuity of services whilst the projects were implemented. The modification proposed will therefore not only involve separation of services from LDC and East Sussex County Council but also from Eastbourne with consequent risks and degradation of service to their residents and this has not been acknowledged or factored into any discussion.

This proposal is yet another example of a poorly thought-through policy where the unintended consequences are ignored, and worse undefined, in order to promote a vision which is unsupported by local residents and are based on unrealistic assertions with little or no substantive analysis to support them.

Ringmer Parish Council therefore requests that Government rejects the proposed modification and retains the original One East Sussex proposal.

5 I confirm that I have not included any information that identifies an individual in the free text box.

Yes