

KINGSTON PARISH COUNCIL

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19th August 2025

Jim McMahon OBE MP
Minister of State for Local Government
House of Commons
London
SW1A 0AA

Dear Mr McMahon

Kingston Parish Council Response to Proposed Unitary Authority Expansion

This response is on behalf of Kingston Parish Council (KPC) but the points made apply to the vast majority of the Kingston Ward, which is included in two of the expansion proposals being put forward by Brighton and Hove City Council (B&H CC) to create an enlarged Unitary Authority (UA). It is apparent that the proposal to annexe areas outside the natural limits of the City are for the expedience of the City Council, and not for the benefit of the residents of those areas.

Kingston is largely a rural ward which feels very remote from Brighton, both geographically and culturally. Because of the South Downs, we literally look eastwards; i.e. to East Sussex. There is a large section of uninhabited downland between the eastern boundary of Brighton and the settlements of the Ouse Valley of at least two miles, but which feels like a lot more due to the topography and its emptiness. While the ancient parish boundaries abut the boundary of the city UA, the communities are a world apart.

Our District Council services have been working well under the management of a very efficient council. East Sussex would have been greatly improved if the 2025 County Council elections had been held and the anticipated removal of the incumbent administration had not been prevented by the LGR agenda. A case has not been made that services would be improved if Kingston were incorporated into Brighton. Indeed, services are likely to be degraded by such a move as the distance between provider and service user will be extended. Lewes town centre is 2 miles from the village centre. Lewes, as the historic County Town of all Sussex, hosts the East Sussex County Council headquarters as well as Lewes District Council offices. B&H CC offices are based at Hove Town Hall, which is 11 miles away, and involves driving through congested streets or two changes of bus or train; it is very possible to walk or cycle into Lewes and many residents of the Ouse valley do so regularly.

One of the rationales put forward by Bella Sankey, with whom KPC have met, is that the current population size of B&H is smaller than being stipulated by your department for consideration as a UA. The case for a new UA being formed with the current Brighton and Hove UA as a starting point would be better made by extending the boundary westward. The City Council area already covers the neighbouring town of Portslade, which is part of a large conurbation which extends for 20 miles to Littlehampton, at the mouth of the river Arun. The coastal conurbation is only interrupted by the River Adur between Shoreham and Lancing and many residents of this coastal strip are unlikely to realise where the boundaries between existing authorities or communities lie and for many the distinction will be limited to which logo is on the refuse bins. If population size is a consideration, then neither West Sussex nor B&H form the ideal size. The population of West Sussex is 882 000, and for Brighton its 277 000, (East Sussex as proposed is 546 000, near the ideal). Therefore, it would be logical and practical to incorporate areas of West Sussex into the enlarged B&H CC area, if it is considered to be too small. Extending the boundary to the Adur would transfer nearly 36 000, and if the Arun is the western limits of the newly created UA, a further c180 000. In other words, the population of the Sussex Coast Unitary Authority would be near the ideal at 505 500, and West Sussex would be reduced in population size to c 650 000. The population of Kingston Ward is c 1900, so will add little to the population size of an enlarged Brighton UA. Even by adding the Coastal strip to the East of Brighton, particularly East Saltdean, Telscombe Cliffs and Peacehaven only adds an additional 22 000, people. Expanding Eastwards does not address the criteria your department considers to be an imperative when considering UA size.

Kingston's natural administrative alignment with ESCC/LDC reflects its position embedded in East Sussex; the effect of annexation by BHCC would be to sever administrative ties with these bodies. Were the proposal to succeed, it would run counter to Kingston's community identity and disrupt existing governance arrangements. Kingston's remoteness from Brighton means inefficiencies are likely to result from our inclusion, and not efficiencies. Bella Sankey has often used the term "efficiencies of scale" without realising it has a bedfellow, "the law of diminishing returns"

When asked why BHCC was not considering expanding West to satisfy its (and West Sussex's' target population) Bella Sankey said it was "financially unviable" for Brighton and Hove UA to extend westwards. No explanation has been provided as to why this might be the case. The urban areas of BHCC and West Sussex share a boundary of over 2 miles, through which cuts three main arterial road connections, the A27, the A270 and the A259, numerous residential streets as well as a rail connection with regular services between the communities along the coastal strip and further to London and Portsmouth. Whereas the West-East road connection between Brighton and East Sussex are heavily congested. In Newhaven the A259 is one of the most heavily congested roads in the South of England. Likewise, during peak hours, the A27 becomes grid locked. There are no alternative routes East-West. This road network is so heavily congested that 10 000¹ vehicles a day use the north-south connecting road on the Western bank of The River Ouse, the C7, to access the A27 and other routes away from the south coast. This 10 000 figure does not include the vehicles that use the other North-South route, the A26, on the Eastern bank of the River Ouse, which will include much of the traffic, including freight, using the Newhaven to Dieppe ferry crossing. The communities that live along the C7 are seeking to improve travel conditions and options by introducing schemes to reduce volumes and speeds along what should be a quiet country road. This would increase pressure on the other roads connecting these annexed areas, particularly if B&H UA seek to build more homes on this coastal strip to meet housing targets.

One potential reason for B&H CC hoping to incorporate Kingston ward into an enlarged UA is the value of the houses here, and therefore the Council Tax revenue. This may well benefit a poorly run council to balance its books but ignores the fact that East Sussex too has the kind of demands on its services that B&H CC has. Eastbourne, Bexhill and Seaford are towns well known for their incoming

¹ Sources. Safer C7 Project: Draft Project Report 06.06.24

retirement community. As well as a degree of relative comfort in many parts of East Sussex, there are high levels of deprivation. Large tracts of East Sussex are in the 25% of most deprived areas in the country.² Hastings is the 20th most deprived local Authority Area out of 370 LA's. East Sussex's financial viability should not be sacrificed to alleviate the profligacy of another's. B&H CC has a debt of £1350 per resident as opposed to £470 pp for Lewes and £396 pp for East Sussex. Therefore, the combined debt for the UA area is £866 per person, i.e. two thirds that of Brighton.

Kingston is a semi-rural community which feels remote from Brighton. All our services are based nearby, the Household Waste Recycling site is two miles distant, as is the library and the District Council leisure facilities. Our health services are provided locally, and we have an Urgent Treatment Centre based at the community Hospital in Lewes. There are cultural and artistic events held in Lewes, and the outlying villages and we are an established, functioning community. While many residents do utilise the facilities offered by a large city like Brighton, we don't need to be residents of their council area to do so, which is the same for many other communities further away in East Sussex, to the north of the Downs and indeed the residents of the coastal conurbation to the west. We feel differently to residents of Brighton about the South Downs and their importance to our sense of place. We live mindful of the Downland Landscape on our doorstep and try to reflect the diversity and richness of the natural environment in our gardens and villages.

There is enormous public resistance to the areas currently in the County Council area of East Sussex being run from a large city. The notion that all areas will become part of one enlarged unitary authority is fallacious. The needs and priorities of the large urban conurbation will undoubtedly and inevitably, take precedence over those of the rural hinterland. Residents of East Sussex affected by these proposals believe we would forever be an afterthought.

We fully support the submission made by East Sussex Council to form a Unitary Authority on existing County Council boundaries.

Yours sincerely,

Kingston Parish Council

² Source [Indices of Deprivation 2015 and 2019](#). Accessed 6th August 2025 20:40 hrs