

Rachel Maclean MP
Minister of State (Housing and Planning)
Department for Levelling Up, Housing & Communities
2 Marsham Street
London
SW1P 4DF
By email to: correspondence@levellingup.gov.uk

11 September 2023

Dear Minister,

Eastbourne Borough Council Planning Application 220849

EBC has asked you to consider ‘calling-in’ its own decision of 21st August, effectively to approve the application, notwithstanding it contravenes EBC planning policies and the NPPF. Further below, we outline the more serious policy breaches and why we believe this has wider implications worthy of your Department’s resources – and exercise your power to call-in.

We represent some 1500 households across the community of Sovereign Harbour, who are particularly opposed to the present plans to develop a supermarket retail outlet (Aldi) at Site 7a in this residential area.

Sustainability – sequential test and access.

- Site 7a lies entirely beyond outside any existing designated shopping centre. This Aldi store would be about ½ mile away by public highway from the Sovereign Harbour Retail Park – a “District Centre” in the retail hierarchy.
- Site 7a is located in the wholly residential “North Harbour” community of about 2000 households, between the A259 and the sea, with just one single access road junction with the wider highway network, the capacity of which needs a fuller independent investigation.

EBC Local Plan Policy.

- It is generally accepted that the present allocation for office employment use at site 7a is redundant, so other uses must be considered. Supporting the emerging new local plan, EBC’s Growth Strategy (2022-2023) identifies Site 7a as a “key development site with a capacity for 40 homes...”, whilst by contrast there is a current *oversupply of A1 (class E) floorspace* in Eastbourne. [EBC: “No sites are currently being consideredfor retail...”]
- EBC Employment Land Local Plan (adopted 2016) policy EL4 specifically declares Site 7a as being unsuitable/not acceptable for retail uses, which are stated to be incompatible and inappropriate within a residential area.
- EBC Core Strategy policy D4 is also engaged as Site 7a is not part of an existing shopping area AND (as EBC state) “*it has not been evidenced that the proposal will not have an unacceptable impact on the designated shopping centres....*”.

National Planning Policy Framework.

- **NPPF para 11 d.** The directly relevant local plan policies (above) are *not* out of date, so the presumption in favour of development should be rebutted. Neither the applicant, Aldi, or the EBC have justified or explained their reasons to depart from policy nor have they dealt with the adverse impacts of development (even if other policies may be out of date).
- **NPPF para 49.** The emerging new EBC local plan will be seriously prejudiced by this Aldi proposal – not only by losing a site for 40 homes but also a much larger site of 250 units, identified in EBC Growth Strategy, which shall require highway access via the same A259 junction currently serving Sovereign Harbour (North). Aldi’s transport assessment (TA) concluded that its’ proposal would maximise that junction’s existing capacity, and thus (if Aldi is approved) it would preclude any new housing proposal without major infrastructure. East Sussex County Council (highways) desk-top only consideration merely accepted Aldi’s own TA analysis as presented, without any investigation of their underlying data – or the results of our own data. We believe the Aldi data to be significantly flawed to a material extent and that the junction capacity as it is will be greatly exceeded if Aldi goes ahead.
- **NPPF para 122** rightly requires consideration of alternative uses, particularly where there is an un-met need. Eastbourne has a demonstrable need for housing whilst having *no present need for retail provision*. Site 7a can provide 40 new homes – and SHRA support that idea.

We would urge the Minister to call-in this decision so that a wider and independent analysis may better inform the sustainability issues, highway access and the greater need for housing in the context of EBC emerging local plan and the prejudicial effect this application will have on that process.

Yours sincerely,



Dilys Iverson
Chair
Sovereign Harbour Residents Association
Eastbourne
www.shra.co.uk
email: chair@shra.co.uk