

# **Seaford Neighbourhood Plan 2017 – 2030**

## **Submission Version**

**February 2019**

**Contents** Note this report is colour coded for ease of reference: Blue is introductory and contextual material; Green is the vision, objectives and planning policies of the Neighbourhood Plan; and Orange is the other aspirations and delivery proposals and the appendices.

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## Background, policies and aspirations

On 24 September 2015, Seaford Town Council resolved to start the project of creating the Seaford Neighbourhood Plan. Following appointment of Action in Rural Sussex (AiRS) as the consultant to oversee the creation of this draft plan, a Steering Group was created to put together the plan, assisted by a large group of local volunteers, in various Focus Groups, who collected evidence that would then be used to shape the proposals now contained in this document. Thus, the process has taken 3 years to achieve. The Neighbourhood Plan must be in general conformity with the strategic policies of the local planning authorities, in particular the Joint Core Strategy 2015. However, it can update and add more detailed policies as appropriate to Seaford. The Steering Group on behalf of Seaford Town Council has been advised by AiRS, and assisted by Lewes District Council, South Downs National Park Authority and East Sussex County Council (ESCC). The Neighbourhood Plan includes planning policies that will form part of the Development Plan for the area. It also includes community aspirations that will inform a Delivery Plan.

This plan is supported by various documents which are on the website <https://www.seafordtowncouncil.gov.uk/Neighbourhood-Plan.aspx>

- **Sustainability Appraisal** which has assessed the policies and site allocations in the Neighbourhood Plan to ensure that they are the most sustainable available (that is, they are likely to provide the optimum balance between developments for housing and conserving and enhancing the environment, infrastructure and facilities within a thriving local economy. The Sustainability Objectives are listed in **Appendix C** of this Plan;
- **Statement on Seaford's Local Landscape Character and Views;**
- **Character Assessment of Seaford** (which has informed the General Design Guidelines for Seaford);
- **General Design Guidelines for Seaford;**
- **Detailed Working Papers and Evidence Reports from Focus Groups** (covering Housing, Environment and Countryside, Local Economy and Facilities and Transport).

## List of Planning Policies and Community Aspirations proposed in this plan

### SEA1 Development within or affecting the South Downs National Park

New development within or affecting the South Downs National Park will be expected to have a landscape led approach to design, must have regard for the setting of the National Park in terms of its landscape and visual amenity and conserve and enhance the landscape, seascape and townscape character of Seaford. In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances:

- a) the landscape setting of Seaford, including meeting the purposes of the South Downs National Park and protecting the character of the Heritage Coast;
- b) the key views as identified in the Statement on Seaford's Local Landscape Character and Views and shown on Map 2 above;
- c) tranquillity and dark night skies;
- d) the natural, locally distinctive and heritage landscape qualities and characteristics of Seaford including trees and hedgerows, particularly in areas which are currently deficient in such natural assets;
- e) features of biodiversity, geological and heritage interest, including appropriate management of those features; and
- f) the River Cuckmere, its margins and associated wetlands, preventing development which would adversely affect its quiet and natural character or have a direct or indirect effect on its wildlife

and geological features, but allowing for change that accommodates natural coastal erosion, responds to climate change and facilitates naturally functioning river systems.

## **SEA2 Design**

The design of all developments within the Plan area will have regard to the General Design Guidelines for Seaford and be subject to other relevant development plan policies. Development which contributes towards local character and distinctiveness through high quality design will be permitted where the following criteria are met:

- a) the design has regard to the distinctive and attractive characteristics of Seaford and its setting and the key views identified in the Statement on Seaford's Local Landscape Character and Views and shown on Map 2 above;
- b) the site is located and designed to facilitate connectivity between the site and local services by cyclists and pedestrians, having regard to the ESCC Local Cycling and Walking Infrastructure Plan for the area. This will take into account the need to provide routeways with sufficient informal surveillance and lighting so that people feel safe using them;
- c) the site provides good access to public transport to help reduce car dependency and support public transport use, including where appropriate, provision of better connections between bus and rail, and improved passenger information;
- d) the design makes an efficient use of land and incorporates a high-quality layout, building design, energy efficiency and durable and sustainable materials of an appropriate texture, colour, pattern and appearance that will contribute positively to the landscape and townscape character and local distinctiveness of Seaford;
- e) the design incorporates public and private spaces which are clearly defined and designed to be attractive, well-managed and safe. There should be suitable private outdoor amenity space for new dwellings so passers-by respect the boundaries and residents feel their personal space is protected, and adequate, appropriately-designed external storage space for bins and recycling facilities as well as bicycles;
- f) where appropriate the design is informed by a landscape assessment that has regard to the existing topography and landscape features of the site and the townscape, landscape and seascape of the surrounding area;
- g) where appropriate the design is informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidelines, has regard to the mitigation hierarchy in NPPF paragraph 175a, and provides a net gain in biodiversity. Existing individual trees or tree groups that contribute positively to the area will be retained and opportunities taken to provide or improve green and blue infrastructure and habitat connections and linkages to green spaces and/or the countryside;
- h) Where the development could impact on designated or non-designated heritage assets, the design is informed by a heritage assessment using the Historic Environment Record as well as archaeological work which are research-driven to answer specific questions relevant to the history and archaeology of Seaford and the plan area;
- i) Car parking or other servicing areas that will meet ESCC standards and be appropriate to the context, and sensitively located and designed, so as not to dominate the public realm. Where appropriate electric vehicle charging points will be supported;
- j) The development will incorporate Sustainable Drainage Systems (SuDS) which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and wildlife and will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

### **SEA3 Conservation Areas**

Subject to other relevant development plan policies, development within or in the setting of Conservation Areas in Map 3 above will be permitted provided that it:

- a) conserves or enhances the special architectural or historic character or appearance of the Conservation Area and its setting and reinstates historic elements wherever possible;
- b) does not require the demolition or partial demolition of any unlisted buildings which make a positive contribution to the character or appearance of the Conservation Area;
- c) uses materials which are traditional to the Conservation Area or are otherwise sympathetic to the character of the particular building or site;
- d) respects the design of the existing buildings of the Conservation Area;
- e) respects any important traditional groupings of buildings which contribute to the character of the Conservation Area; and
- f) protects open spaces, trees and significant public views as identified in the Conservation Area Appraisals and the Character Areas in the General Design Guidelines for Seaford.

Retention in the town centre of commercial use on the ground floor will be supported and, above this level, conversion to domestic use will also be supported.

### **SEA4 Bishopstone Conservation Area**

Subject to other relevant development plan policies, and specifically Policy SEA3 Conservation Areas, development will be permitted provided that it does not detract from the isolated character of Bishopstone village and its downland setting in the Bishopstone valley. No further development will be allowed to intrude into the valley or the ridgelines around the valley.

### **SEA5 Areas of Established Character**

In considering proposals for development within Areas of Established Character, as shown on Map 3 above, the existing character of the area in terms of spaciousness, building heights, building size and site coverage, building lines, boundary treatments, trees and landscaping shall be retained. The Areas of Established Character in Seaford are:

- Firle Road area including Firle Close, Firle Grange and Firle Drive
- St Peter's Road
- Glebe Drive
- Belgrave Road, Westdown Road and Beacon Road
- Corsica Hall
- Chyngton Road and Cuckmere Road
- Chyngton Way area including South Way and Lullington Close
- Blatchington Road/Richmond Terrace and Broad Street, north of the A259.

### **SEA6 Development on the Seafront**

Subject to other relevant development plan policies, sensitive development around Seaford Seafront, as shown on Map 4 above, that has regard to the General Design Guidelines for Seaford will be permitted provided that:

- a) It does not detract from the natural, open, un-commercialised environment of the Seafront;
- b) It is designed to be resilient to impacts from adverse weather conditions (wind damage) and flood risk and does not prejudice the ability of relevant agencies to manage the coastal flood risk, beach management and sea defence maintenance;
- c) It should be low density and low rise so it does not impact on the spatial or visual openness or attractiveness of the Seafront and its vistas and protects the setting of and views to and from

the South Downs National Park, the Heritage Coast, the shoreline and the Seaford Head gateways;

- d) It enhances and conserves the biodiversity of the Seaford (for example, the kittiwake colony at Splash Point and the shingle vegetation at Tide Mills):
- e) It conserves and enhances the amenity use of the seafront; and
- f) Opportunities are taken to enhance the public realm of the Seaford and improve walking and cycling facilities as part of the development.

### **SEA7 Recreational Facilities**

Development on existing open space, sports and recreational buildings and land, including playing fields, will not be permitted unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

The following outdoor sports facilities, as shown on Map 5 above, are of particular importance in Seaford:

- School Playing Fields
- Downs Leisure Centre and grounds
- The Salts Recreation Ground
- Blatchington Bowls Club
- Seaford Tennis Club
- Walmer Road Recreation Ground
- The Crouch

### **SEA8 Local Green Spaces**

The Neighbourhood Plan designates the following locations as Local Green Spaces as shown on Map 6 above:

1. Bishopstone Village Green
2. Blatchington Pond
3. Foster Close Open Space
4. Land North of South Hill Barn/ Chyngton Way field
5. Normansal Park/Chalvington Fields not in the National Park
6. Princess Drive Green and old Grand Avenue bridleway
7. The Crouch
8. The Old Brickfield and site adjacent to 47 Surrey Road
9. The Ridings, Lexden Road
10. Tidemills
11. Land North of Alfriston Road (4 plots)
12. Land at Grand Avenue (3 fields)

Proposals for any development on these Local Green Spaces will only be permitted in very special circumstances, for example, where it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.

### **SEA9 Allotments**

Proposals resulting in the loss of allotments, as shown on Map 7 above, will only be permitted if it is demonstrated that:

- a) Alternative allotment provision is made on a site of equivalent visual and horticultural value; or
- b) there is no need or demand for the allotments and that this is unlikely to change in the foreseeable future; and
- c) there is no net loss of biodiversity.

### **SEA10 Health Facilities**

Proposals for new or expanded health facilities, including the new proposal for new health facilities on part of the Downs site, will be strongly supported subject to other relevant development plan policies.

### **SEA11 New Business Space at Cradle Hill**

Land at Cradle Hill Industrial Estate, as shown hatched blue on Map 8 above, is allocated for business development (Use Classes B1, B2 and B8), subject to other development plan policies and the following criteria:

- a) the site of the proposed extension shall be excavated to the generally prevailing levels of the existing estate prior to the commencement of the development
- b) the height of the development shall be no higher than the existing buildings
- c) the scheme shall provide for any off-site highway works proportional to the additional traffic created by the development (or a contribution to such works) if measures of this kind are demonstrated to be a pre-requisite of development
- d) the eastern boundary of the Cradle Hill Estate extension shall be clearly demarcated with a substantial landscaped buffer of varying width, but no less than 4 metres, to be provided at the time of the layout of the estate roads.

### **SEA12 Visitor Accommodation in Seaford**

Subject to other relevant development plan policies, proposals for increased visitor accommodation will be permitted within the development boundary or just outside the boundary, if sympathetic to the surroundings. Properties with easy access to the seafront would be particularly suitable for this use.

The limited existing visitor accommodation will be safeguarded unless an alternative use is demonstrated to provide more social, economic and/or environmental benefits to the area.

### **SEA13 Footpath to Church Lane**

A pedestrian way meeting recognised standards, linking Broad Street (between Nos 17 and 25 Broad Street) to Church Lane will be protected from development. Development proposals will incorporate such a link (or the relevant parts of such a link) in any proposals for redevelopment of any of the land or premises in the area of the route shown on Map 9 below. The local authorities will seek to secure the dedication of this route as a public right of way.

### **SEA14 Safeguarding Future Transport Projects**

Development within the Seaford Neighbourhood Plan Area will not be permitted if it would inhibit the future implementation of the re-dualling of the train lines through the parish. The safeguarded areas from such development are delineated on Map 9 above.

### **SEA15 Site Allocations**

The following sites as defined on Map 10 are allocated for development subject to other relevant development plan policies and meeting the Sustainability Objectives in **Appendix C**:

- i. Dane Valley Project Area – 104 dwellings in the initial, deliverable phase, (net addition of 74 dwellings) and employment space
- ii. Jermyn Ford, 10 Claremont Road – 20 dwellings
- iii. 10 Homefield Place – 19 dwellings
- iv. Brooklyn Hyundai, Claremont Road – 13 dwellings
- v. \*Holmes Lodge, 72 Claremont Road – 12 dwellings
- vi. \*Station Approach/Dane Road – 12 dwellings above existing retail space
- vii. Seven Sisters pub, Alfriston Road – 9 dwellings
- viii. \*Old House Depository, Claremont Road - 35 dwellings
- ix. \*Elmcourt, Blatchington Road - 9 dwellings
- x. Homes above new retail unit on the Downs site - 8 dwellings
- xi. Land at Florence House - 7 dwellings

A total of 218 dwellings against a target of 185 dwellings.

Occupation of sites (ii) and (viii) to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Layout for site (ii) must be planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes.

\* identified by Lewes District Council in 2015.

### **SEA16 Dane Valley Project**

Development of the Dane Valley Project sites shall be carried out in accordance with a comprehensive masterplan to ensure that the following requirements are met:

- a) The delivery of about 131 dwellings over the whole area, 104 of which are in the initial deliverable phase;
- b) The delivery of employment space on the site;
- c) High quality development that incorporates best practice in sustainable design;
- d) Measures to manage the potential for flooding on the site and prevent increased risk of flooding as a result of the development;
- e) Measures to investigate the extent of contaminated land and remove any contaminated material from the site;
- f) The masterplan will be informed by an Ecological Constraints and Opportunities Plan and there will be provision of open space to provide amenities for the new residents and to protect areas of biodiversity and archaeological interest;
- g) Enhanced transport provision to encourage users of the development to access the town centre and railway station by foot, cycle and bus. The key walking and cycling links will be identified as part of the master planning process;
- h) The layout is planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes, and to ensure a gap of 15 metres between development and Brooklyn Road pumping station;

- i) The masterplan must be informed by an adequate assessment of the surrounding highway network to determine the scale of specific off-site highway works required to accommodate the development; and
- j) Occupation of the development to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

### **SEA17 Florence House**

Development of the Florence House site will be subject to the following criteria:

- a) This site is within a high risk archaeological zone and therefore any planning application will need to be accompanied by an archaeological assessment which includes on-site investigation works to demonstrate that the development can be implemented without causing harm to archaeology on the site; and
- b) This site is adjacent to priority habitat deciduous woodland and the design must avoid harm to this habitat where possible or mitigate any unavoidable harm in accordance with the mitigation hierarchy.

### **SEA18 Seaford Planning Boundary**

Proposals for development within the Planning Boundaries for Seaford parish as shown on Map 11 above will be permitted subject to other relevant development plan policies. Planning permission will not be granted for development outside the Planning Boundaries, other than in those circumstances specifically referred to in other development plan policies or if it is for essential utility infrastructure where no suitable alternative sites are available.

### **SEA19 Windfall Development**

The redevelopment of brownfield sites within the Planning Boundaries of Seaford will be permitted subject to other relevant development plan policies and having regard to the Sustainability Objectives in **Appendix C**. The conversion of upper storey space to housing and/or building of residential units above non-residential premises such as shops and other businesses is particularly encouraged.

### **SEA20 Utility Infrastructure**

New and improved infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other relevant development plan policies.

## **Community Aspirations**

### **Community Aspiration 1 (Seafront and town centre)**

It is recommended that:

- a) Consideration is given to improving signage and access from the A259 to the Town Centre and Seafront and from the Seafront to the Town Centre as well as rationalising signage elsewhere.
- b) Enhancing the town centre, such as, with new light standards, Victorian shop front scheme, cobbled lanes, etc.
- c) Wherever possible, any disturbance to wildlife and natural vegetation should be avoided;

- d) There should be better maintenance of the paths and walls along the Seafront, as well as sensitive enhancement of the man-made features, such as benches, toilets, sea defence groynes and shelters;
- e) Lighting should be reviewed to ensure it as effective as possible, and at the same time reducing wherever possible any light pollution;
- f) The “free parking” policy, for cars and motor cycles, on the Seafront, with a dedicated coach bay (with drop off point in the town centre) should be retained;
- g) Seaford Town Council and the South Downs National Park Authority should continue to work closely together to deliver a joint approach to better signage and fencing to the National Park from the Town, particularly within the Heritage Coast, and possibly associated tree planting and landscaping if deemed appropriate.
- h) Impact Seaford and Seaford Town Council should take the lead in investigating the level and type of demand for accommodation for visitors to the town and consider the options for sites for such accommodation including:
  - o The soon to be vacated GP surgeries sites in the town centre
  - o The site adjacent to the Seaford Head Golf Course which could accommodate chalets and pods for visitors.

### **Community Aspiration 2 (Heritage)**

It is recommended that:

- a) Seaford Town Council works with the Seaford Museum and Heritage Society and Historic England to refresh the list of designated heritage assets, including adding Sutton Park Road War Memorial, Steyne Drinking Fountain, and Jubilee Gardens;
- b) Seaford Town Council works with the above partners and the local planning authorities to draw up a list of non-designated ‘Locally Listed Buildings’.

### **Community Aspiration 3 (Grass Verges)**

It is recommended that:

- a) Further work be undertaken to understand which verges in Seaford are in the Wildlife Verge Scheme, or should be proposed for addition to the scheme, to ensure they are appropriately enhanced and preserved;
- b) Appropriate verges in Seaford should be put forward for consideration of reduced verge cutting to promote biodiversity. Such discussions should include assessment of the wider impact (such as, on wildlife, road safety issues and blocking of drains) of reducing the frequency of verge cutting; any pilot scheme should be well publicised; and
- c) Utility Companies, in locating underground cables, should be encouraged to consider the impact of works on existing and proposed trees.

### **Community Aspiration 4 (Climate change and flooding)**

It is recommended that the Flood Action Group and the Beach User Group should continue to meet regularly with the Environment Agency and be consulted on future flood defence strategy as well as on more day to day issues (such as flash flooding). When appropriate the South Downs National Park Authority (SDNPA) should be consulted on any future flood defence strategy given the impact this can have on the natural appearance of the Heritage Coast. The lead local flood authority (East Sussex County Council) leads on surface water flooding issues.

### **Community Aspiration 5 (Infrastructure)**

It is recommended that priority must be given to ensuring that any future developments in the Town are accompanied by a commensurate increase in resources for patient care and education; and this should be a core priority of all relevant Authorities.

### **Community Aspiration 6 (Services for young people)**

It is recommended that:

- a) The provision of services (and facilities) for the young receive a high priority to attract young people to the Town;
- b) The provision of a café style facility for young people be explored;
- c) Existing recreation space be maintained and enhanced with facilities such as a BMX track.
- d) Lewes DC to carry out a playing pitch strategy and informal play strategy with a view to working with Seaford Town Council to ensure adequate facilities are provided to all parts of the Town.

### **Community Aspiration 7 (Policing)**

It is recommended that policing in Seaford continues to be monitored closely to ensure that as the population increases the policing of the Town remains adequate.

### **Community Aspiration 8 (Recycling)**

It is recommended that:

- a) Lewes DC investigates the potential for correcting the lack of recycling facilities on the seafront and north of the Town and considers the following additional locations for recycling points: Princess Drive, Area where Blatchington Road meets Avondale Road, Walmer Road and Micklefield Way;
- b) Lewes DC considers providing additional facilities for recycling cardboard; and
- c) Lewes DC continues to consult with the community on its Waste Strategy.

### **Community Aspiration 9 (Transport and air quality)**

- a) It is a community aspiration that East Sussex County Council Highways deal with the severe dangers on the A259 at Bishopstone/ Hill Rise and Hawth Hill and implement an appropriate solution using available funding.
- b) It is recommended that the suggestions in **Appendix B** are used to inform decisions by the local highway authority and other relevant bodies to improve the sustainable transport network in Seaford.
- c) Seaford Town Council and East Sussex County Council should work closely with Cycle Seahaven, and other local groups as appropriate, to make improvements to the cycling infrastructure, particularly in the town centre.

## 1.0 How to read and use the Seaford Neighbourhood Plan

- 1.1 Neighbourhood plans are a new type of document that enables local people, who know, live in, work in and love an area, to write planning policies for their area. The plan can state where new areas of housing, community, retail or employment development should be located and what it should look like as well as designate local green spaces. A neighbourhood plan cannot override national or local authority policies; however, it becomes part of the legal planning framework and works alongside national and local authority policies in determining planning applications. Neighbourhood plans are therefore powerful documents.
- 1.2 The Seaford Neighbourhood Plan sets out a vision and the objectives for the future of Seaford up to 2030. One of the key challenges for the Neighbourhood Plan is to identify land to deliver at least 185 new homes in that period. Without the Neighbourhood Plan, the local planning authority, not the local community, would identify where the housing land should be allocated.
- 1.3 In January 2016 Lewes District Council and the South Downs National Park Authority, the local planning authorities for Seaford parish, designated a Neighbourhood Area for the whole of the parish of Seaford for the purpose of enabling Seaford Town Council to prepare the Seaford Neighbourhood Plan. The designated area, contained within the Parish Boundary, is shown below:

*Insert Map 1 (Designation area)*

- 1.4 The Seaford Neighbourhood Plan area comprises the administrative area of Seaford Town Council, including the large coastal town of Seaford and Bishopstone village covering 6.6 square miles. Although Seaford has a Town Council and is generally referred to as a town, in local government legislative terms, it is a “parish”. Unusually the parish is covered by two local planning authorities, with most of the urban area coming under Lewes District Council and the rural hinterland mostly under the South Downs National Park Authority. 61.4% of the area covered by this plan is in the National Park. Within the urban area of Seaford all decisions on planning applications are made by Lewes District Council. Within the National Park area most decisions on planning applications are also made by Lewes District Council under an agency agreement with the National Park Authority, but the Authority retains ‘call-in’ powers for significant applications. The whole parish is covered by Lewes District Council for other non-planning matters such as waste collection and leisure provision.
- 1.5 A section called ‘Background, policies and aspirations’ has been inserted at the front of the Neighbourhood Plan to provide the reader with a quick summary of the planning policies and other recommendations. The rest of the Neighbourhood Plan has been set out in a clear manner with a different colour code for each section to clearly illustrate the following themes: **Blue is introductory and contextual material;**

Green is the vision, objectives and planning policies of the Neighbourhood Plan; and  
Orange is the other aspirations and delivery proposals and the appendices.

1. How to Read and Use the Seaford Neighbourhood Plan
2. Neighbourhood Planning: Legislative and Planning Policy Context
3. Community Consultation
4. The Parish of Seaford
5. Vision & Objectives
6. Policies & Proposals
7. Non-Statutory Community Aspirations
8. Delivery Plan  
Appendices

- 1.6 This Plan, and its associated maps and policies should be used by residents, local authorities, developers and other stakeholders to understand how the local community wishes future development to occur. Attention should be paid to the aspirations and objectives set out within this document, whether or not the development requires planning permission. For applications that require planning permission, whether proposing a scheme or assessing the acceptability of a scheme the policies contained within this document are key. For a planning application to be considered favourably, all relevant policies contained within this plan should be considered and complied with.

## 2.0 Neighbourhood planning: legislation and planning policy context

- 2.1 The legislation and planning framework described below need to be seen within the context of Government policy which, in essence, seeks to:
- Delegate decisions on planning as close as possible to local people; and
  - Address the severe shortage of homes to rent and to buy.
- 2.2 The Seaford Neighbourhood Plan must be in general conformity with both national and local strategic planning policies. Neighbourhood plans are influenced by various higher-level plans, policies and guidance. The legal basis for the preparation of Neighbourhood Plans is provided by:
- the Localism Act 2011,
  - Neighbourhood Planning (General) Regulations 2012,
  - Planning and Compulsory Purchase Act 2004
  - Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) and
  - the Town and Country Planning Act 1990
- 2.3 The Seaford Neighbourhood Plan takes account of relevant national requirements, including:
- The National Planning Policy Framework (NPPF) 2018
  - The National Park's Purposes in the Environment Act 1995

A full list of relevant plans, policies and programmes that were considered and influenced the content of the Neighbourhood Plan is set out in the Sustainability Appraisal, which is a key document supporting this Plan.

The following is a summary of the key planning policy context for the Neighbourhood Plan.

### National Planning Policy Framework

- 2.4 The National Planning Policy Framework (NPPF) 2018 sets out the Government's planning policies for England and how they are expected to be applied. At its heart is a presumption in favour of sustainable development. The application of the presumption has implications for how communities should engage in neighbourhood planning. Critically, it means that neighbourhoods should:
- develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;
  - plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and
  - identify opportunities to enable developments that are consistent with their neighbourhood plan to proceed.

- 2.5 NPPF paragraph 172 sets out guidance on development within National Parks and further detail is provided in the 2010 Circular ‘English National Parks and the Broads’. In summary, all development in the National Park must give great weight to conserving and enhancing natural beauty, and major development should not take place there except in exceptional circumstances.

### The National Park purposes

- 2.6 The Government has provided two statutory purposes for National Parks in England. All public bodies and utility companies, when undertaking any activity which may have an impact on the designated area, have a duty to have regard to these purposes.

**Purpose 1:** To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.

**Purpose 2:** To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

### Local planning context

- 2.7 The ambition of the Neighbourhood Plan should be aligned with the strategic needs and priorities of the wider local area. Neighbourhood plans must be in general conformity with the strategic policies of the local planning authorities. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. As the Parish is located across the boundaries of two Local Planning Authorities, the Plan needs to be in general conformity with both the policies of LDC and SDNPA, the key documents are:
- The Lewes District Local Plan Joint Core Strategy 2010 -2030 Part 1 (hereafter called the ‘Core Strategy’) and emerging Part 2
  - The emerging South Downs National Park Local Plan.
- 2.8 The Lewes District Council and South Downs National Park Authority **Lewes District Local Plan Part 1 Joint Core Strategy 2010 -2030** was adopted by both local planning authorities in 2016<sup>1</sup>. The Core Strategy sets the strategic policies for Seaford including housing numbers.
- 2.9 **The Lewes District Local Plan** was adopted in March 2003. Some of its policies have now been replaced by the policies of the Core Strategy. However, there are a number of saved policies that are relevant to Seaford. The retained Local Plan (2003) policies will be reviewed through the Local Plan Part 2 or the South Downs Local Plan as appropriate. Those that are specific to Seaford will also be reviewed as part of this Neighbourhood Plan.

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<sup>1</sup> The adoption of the Joint Core Strategy by the South Downs National Park Authority was successfully challenged by Wealden District Council on the grounds of misapplying the Habitats Regulations and policies S1 and S2 will now have to be reconsidered by the National Park Authority. The challenge to Lewes DC’s adoption of the same Plan was deemed out of time by the Courts.

- 2.10 The **Lewes District Local Plan Part 2** will allocate sites for specific land uses, such as housing, employment and recreation, and set out detailed development management policies. Local Plan Part 2 when adopted will allocate land for different types of development (including housing, gypsy and traveller pitches and employment), as well as land to be protected. Lewes DC submitted the Plan for examination in January 2019.
- 2.11 The **South Downs National Park Local Plan** was submitted for examination in April 2018, hearings have been carried out by the Inspector and the National Park Authority is currently consulting on main modifications to the Plan.

### The link between development and infrastructure

- 2.12 The Community Infrastructure Levy is a planning charge, introduced by the Planning Act 2008 as a tool for local authorities in England and Wales to help deliver infrastructure to support the development of their area. It came into force on 6 April 2010 through the Community Infrastructure Levy Regulations 2010. Both Lewes District Council and the South Downs National Park Authority have adopted Community Infrastructure Levy Charging Schedules, which allow them to collect contributions from developers towards local infrastructure projects. Some on-site infrastructure and affordable housing is still secured via legal agreements known as Section 106 agreements. Further details are contained in **Chapter 8** below.

### Sustainability Appraisal and Strategic Environmental Assessment

- 2.13 The local planning authorities have screened the scope of the Seaford Neighbourhood Plan and determined that it requires a Strategic Environmental Assessment under the EU Directive 2001/42. This means that the effects of the Neighbourhood Plan's policies and proposals, in combination with other policies and proposals, must be assessed during its preparation against a series of environmental objectives.
- 2.14 The Neighbourhood Plan Steering Group agreed to undertake a Sustainability Appraisal which incorporates Strategic Environmental Assessment but also tests the Neighbourhood Plan against social and economic objectives. As well as complying with the EU Directive 2001/42, the Sustainability Appraisal also demonstrates how the Neighbourhood Plan "contributes to the achievement of sustainable development", which is one of the 'basic conditions' for Neighbourhood Plans. The Sustainability Appraisal process helps to achieve sustainable development by ensuring that the development policies and proposals in the Neighbourhood Plan will meet the needs of people living, studying and working in the parish, while at the same time helping to ensure that any adverse environmental impact is minimised. The ongoing consideration of the sustainability objectives of the Neighbourhood Plan will enable alternative options for those policies and proposals to be compared and evaluated.

- 2.15 The Scoping Report of the Sustainability Appraisal has been consulted upon and a revised draft Sustainability Appraisal (incorporating the strategic environmental assessment report) is published alongside this Pre-Submission Plan for re-consultation. A final Sustainability Appraisal will be published with the Submission Plan for examination.

### The Plan preparation process

- 2.16 The process of preparing the Seaford Neighbourhood Plan is set out in the Neighbourhood Planning (General) Regulations 2012. This comprises:
- Undertaking background research and evidence baseline work and informal public and stakeholder consultation (carried out 2016-2017);
  - Publishing a Pre-Submission Neighbourhood Plan and the draft Sustainability Appraisal for a statutory six-week public consultation period (current stage);
  - Revising the draft Neighbourhood Plan and Sustainability Appraisal where appropriate in line with consultee responses;
  - Submission of the Neighbourhood Plan and Sustainability Appraisal to the local planning authorities for a legal check;
  - Publication of the Neighbourhood Plan for a further 6 weeks by the local planning authorities;
  - Examination by an independent Examiner appointed by the local planning authorities in consultation with Seaford Town Council (see section below).

### The examination process

- 2.17 The independent Examiner must consider whether the Neighbourhood Plan meets the 'Basic Conditions'. The Basic Conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood development plans by section 38A of the Planning and Compulsory Purchase Act 2004. They are that:

1. *"Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan;*
2. *The making of the neighbourhood plan contributes to the achievement of sustainable development;*
3. *The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.*
4. *The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.*
5. *Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the plan".*

- 2.18 With regard to Basic Condition 5 above, this includes that "The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(3)" (The Conservation of Habitats and Species and Planning (Various Amendments) (England

and Wales) Regulations 2018 which amends The Neighbourhood Planning (General) Regulations 2012(1)). This means that, if the neighbourhood development plan is likely to have a significant effect on a European protected site, even if that affect could be mitigated, a full Habitats Regulations Assessment of the plan needs to be undertaken.

2.19 The Examiner must also consider whether other legislative requirements are met namely:

- *“The Neighbourhood Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provisions relating to ‘excluded development’, and must not relate to more than one Neighbourhood Area) and*
- *The policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of the Planning and Compulsory Purchase Act 2004 Section 38A”.*

### The approval process

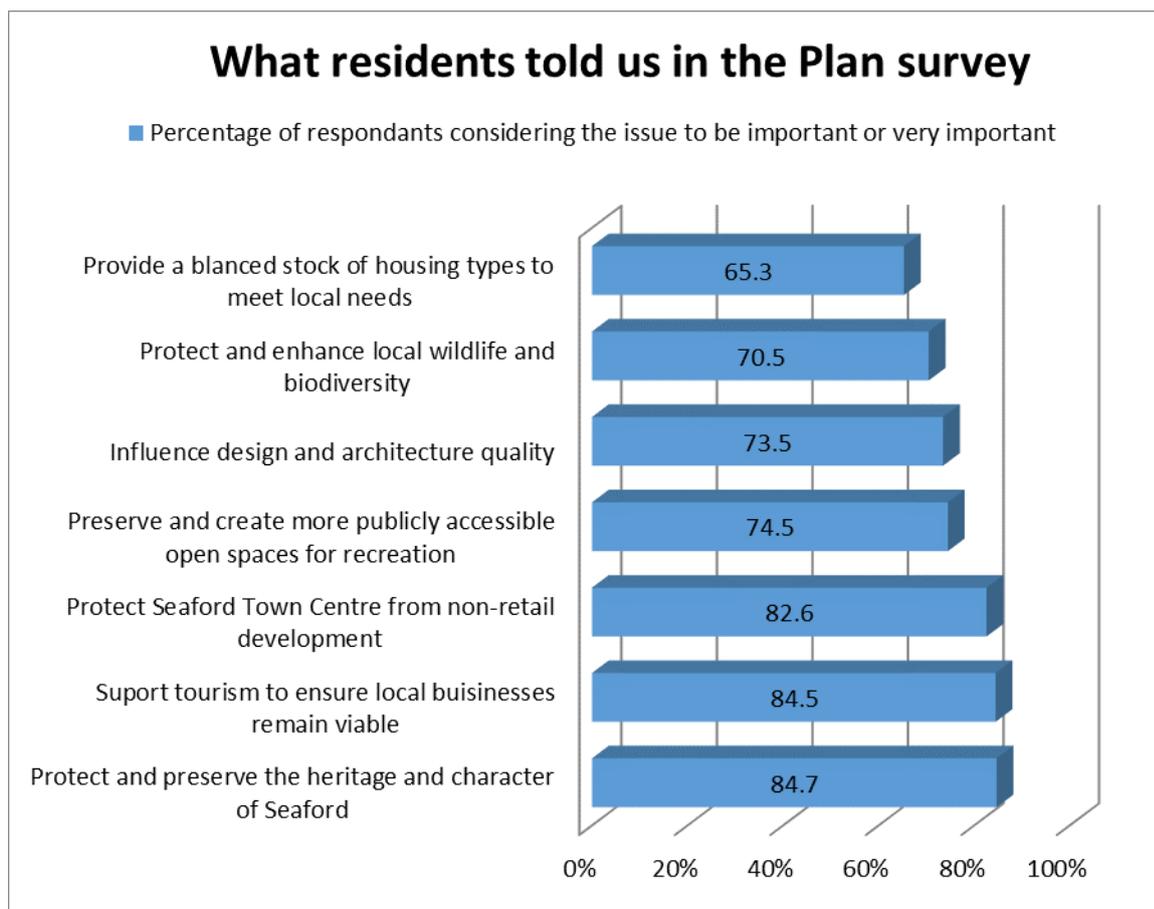
2.20 The Examiner must recommend one of three things:

- That the Neighbourhood Plan goes forward to referendum unchanged;
- That the Neighbourhood Plan be modified and then goes forward to referendum;
- That the Neighbourhood Plan should not go forward to referendum (because it does not meet the legislative requirements above and cannot be modified to make it compliant).

2.21 If the examination is successful then the local planning authorities in consultation with Seaford Town Council will consider making any modifications recommended by the Examiner. Lewes District Council will then make arrangements for a referendum of all the electorate in Seaford parish on whether the Neighbourhood Plan should be used to help make decisions on planning applications. If the referendum result is more than 50% ‘yes’ then the local planning authorities will make the Seaford Neighbourhood Plan part of the statutory Development Plan for the area.

## 3.0 Community consultation

- 3.1 A successful Seaford Neighbourhood Plan is entirely dependent on the involvement of sufficient, representative, community-minded individuals, associations and groups to drive the project forward to completion. Appropriate community engagement is therefore key to the success of the Neighbourhood Plan. The Steering Group's communication objectives are to engage with the right people, at the right time, about the right things and to provide appropriate and timely support to the volunteers to enable the project to move forward in accordance with agreed milestones, through to the ultimate delivery of the Neighbourhood Plan with a successful public referendum.
- 3.2 This draft Neighbourhood Plan is informed by extensive engagement with the community in Seaford parish and other relevant stakeholders. This engagement is detailed in the 'Consultation Statement', which is being prepared in accordance with the Neighbourhood Planning Regulations 2012 and will be submitted to the local planning authorities with the plan proposal under Regulation 15 of the Neighbourhood Planning Regulations (General) and publicised alongside other relevant documents in line with Regulation 16 of the Neighbourhood Planning Regulations (General). It includes the following:
- details of the persons or bodies consulted and how they were consulted;
  - summary of the main issues and concerns raised during the consultation process; and
  - how the issues and concerns have been considered to inform the Neighbourhood Plan.
- 3.3 The Town Council and Seaford Neighbourhood Plan Steering Group have undertaken a series of consultation activities with residents, statutory bodies and interested parties to enable an extensive engagement and involvement in the preparation of the Neighbourhood Plan. The Consultation Statement sets out details of all the events and activities carried out in the parish and with key bodies identified as stakeholders. All activities were carried out to ensure full inclusivity in the decision-making throughout the development of the plan.
- 3.4 The Neighbourhood Plan Team issued a questionnaire to all households in the parish (that is including Bishopstone). There were 1100 responses – a response rate of 10.2%. The table below summarises these responses.

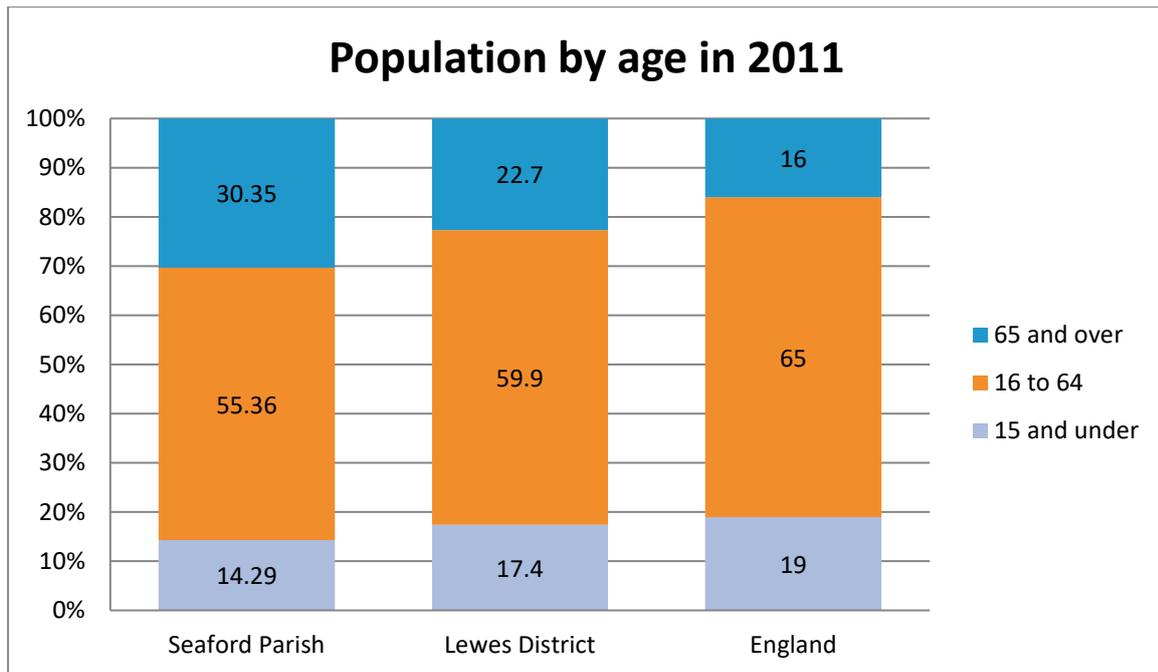


3.5 Surprisingly, whilst 64.3 % of respondents considered “Providing a balanced stock of housing types to meet local needs” to be important or very important, 84.5% considered it important or very important to “Support tourism to ensure local businesses remain viable”. This clear statement is an important issue for the Neighbourhood Plan to take forward in recommending new policies and in identifying Community Aspirations. To state the obvious, to support tourism we need more tourist accommodation.

3.6 A Pre-Submission consultation was carried out in late 2017 and approximately 200 comments were received. These comments have all been considered and as a result some allocations have been changed. This has required a further consultation based on this current document.

## 4.0 The parish of Seaford

- 4.1 Seaford is located in the County of East Sussex, approximately 4 miles to the east of the port and town of Newhaven, 13 miles to the east of the coastal City of Brighton and Hove and 10 miles to the west of the coastal resort of Eastbourne. Lewes, the administrative centre of the Lewes District and the County Town of East Sussex, is located approximately 11 miles to north, further along the Ouse Valley. Seaford was originally a port until the harbour became blocked in the 16<sup>th</sup> Century and this function moved to Newhaven. The historic town of Seaford is set back from the modern seafront on higher ground. To the east, cliffs rise to Seaford Head and to the north-west cliffs rise at Castle Hill, Newhaven. The area between the cliffs is a shingle beach known as Seaford Bay. For a more detailed history that has informed the Seaford Neighbourhood Plan, the 'Seaford Historic Character Assessment Report, a Sussex Extensive Urban Survey', by Dr. Roland B Harris, commissioned by English Heritage and ESCC, and published in March 2005, gives an excellent and comprehensive summary.
- 4.2 Seaford lies on the old coast road (A259), although this was modified in the late 19th century so that it followed newly-built Clinton Place and Sutton Park Road rather than Place Lane and Sutton Road to the south. The A259 provides linkages to Newhaven and Brighton to the west and Eastbourne to the East. Access to the A26 is also close by and this provides direct access to the arterial A27 road as well as onward travel to Lewes, Uckfield and Crowborough.
- 4.3 Seaford railway station is located in the centre of the town and is the last stop on the line. It provides rail connectivity to the west and offers services north to Lewes and via onward connections to London Victoria, London Bridge, Kings Cross and Brighton. Bishopstone station on the same line is also located within the Parish Boundary and provides additional access to these services.
- 4.4 A number of bus services provide linkages to and from Seaford. These include circular routes around both the Ouse and Cuckmere valleys, together with mainstream bus services to Newhaven, Brighton and Eastbourne.
- 4.5 The population mix of Seaford Parish at the time of the 2011 Census is shown in the chart below. The proportion of younger people was lower than average for Lewes District and for England as a whole. Notably the proportion of people aged 65 and over was nearly double the average for England.



4.6 The range of services and facilities available in the parish are both numerous and wide ranging and include: two Golf Clubs; a Museum; a Martello Tower; a Sixth Form College; several schools; Recreation Grounds; Places of Worship; a Leisure Centre and Sports Ground; Allotments; a Caravan Site and Camping Park; a Cemetery; an Industrial Estate and various shops and businesses.

## 5.0 Vision and objectives

5.1 The Seaford Neighbourhood Plan Steering Group has developed a draft Vision Statement and a set of Strategic Objectives for the Seaford Neighbourhood Plan. This may be further refined as the Neighbourhood Plan evolves or in response to consultation.

### Seaford Neighbourhood Plan vision statement

#### By 2030

- **Seaford will have retained its strong sense of community, made greater use of its seafront and heritage assets, including conserving and enhancing the character of its Heritage Coast, as well as promoting sympathetic development respecting the tranquil character of its historic nature to improve the economic, environment and social wellbeing of residents and visitors alike.**
- **Seaford's location as a gateway to the South Downs National Park with its green open spaces, seafront and spectacular views will have been retained, protected, enhanced and promoted, to benefit future generations. An improved transport infrastructure will have made the seafront, town centre, railway stations and outlying areas of the town readily accessible for all.**
- **Expanding the rich and diverse mix of independent shops, light industrial services, businesses, community and tourist facilities, while simultaneously addressing the shortfall in visitor accommodation, will have widened the town's economic base.**

### Seaford Neighbourhood Plan's objectives

1. To ensure that the Neighbourhood Plan area has robust, accessible and sustainable rail and road transport systems for its residents and businesses that encourage and facilitate sustainable economic development.
2. To promote sustainable tourism using the town's natural assets and regenerating the seafront.
3. To promote a balanced local economy by supporting local businesses and new economic floor space.
4. To promote an active community by retaining and enhancing the economic infrastructure, physical infrastructure including green infrastructure and facilities to promote sustainable development to ensure a thriving social, cultural and community life.
5. To preserve and enhance the environment and countryside both within and around the town, including the historic environment and heritage assets and protecting landscape character and important views as identified in the Statement on Seaford's Local Landscape Character and Views and the South Downs Local Plan.
6. To protect, preserve and expand on the local green spaces in Seaford and to maintain and enhance connectivity for wildlife throughout the town through the conservation and enhancement of green infrastructure and by seeking to achieve

net-gain in biodiversity and connecting people (both residents and tourists) to the natural environment.

7. To encourage the provision of a mix of housing of different types and tenures in sustainable locations accessible to local services and facilities, and particularly to support housing aimed at younger people.
8. To facilitate the provision of affordable housing to meet the needs of local people, particularly younger residents who cannot afford open market rents or house prices.
9. To ensure new housing and developments and redevelopments are of high quality as described in the General Design Guidelines for Seaford and complement and enhance the town's built and natural heritage.
10. To improve the existing, and develop new, walking and cycling routes which reduce reliance on vehicular use, reduce carbon emissions, and which improve the health and well-being of residents and visitors.

## 6.0 Policies and proposals

### Introduction

- 6.1 The Neighbourhood Plan Team in formulating policies and proposals has sought to balance:
- the potential disadvantages of damage to the environment: loss of green spaces; loss of views; pressure on infrastructure, etc. against
  - the potential advantages of development: encouraging new residents, possibly younger ones; helping to support the town's shops and services; financial contribution from developers spent on improving local facilities (see paragraph 6.5).
- 6.2 Building on the vision and objectives, and the sustainability issues identified in the Sustainability Appraisal, four main areas needing policy interventions were identified. These are:
- Environment and Countryside
  - Economy and Facilities
  - Travel and Transport and
  - Housing and Development
- 6.3 The Seaford Neighbourhood Plan Steering Group set up four Focus Groups to consider these issues and they published, in November 2016, Draft Evidence reports under these subject headings. Three Working Papers, covering the Environment and Countryside, Economy and Facilities, and Transport and Travel were published for informal consultation in spring 2017. The Housing and Development Focus Group have produced a Working paper which is issued along with this Plan. Working Papers all included 'policy recommendations' a term which recognised that some will be appropriate for inclusion as Neighbourhood Plan policies but others are best considered outside of the Neighbourhood Plan's framework because they do not relate to land-use planning matters. However, they were included in the Working Papers to ensure that the valuable input the groups gathered is taken forward and, for the same reason, have been collated under **Chapter 7** 'Non-Statutory Community Aspirations'.
- 6.4 Similarly, some of the Working Papers' policy recommendations support the existing policy framework, which will require no new additional policies, but rather confirm the need for adhering to existing planning policies that are already in place, such as those in the Core Strategy 2016. These existing policies are cross-referenced in the supporting text but generally do not need repeating in the Neighbourhood Plan policies. The exception to this is relevant policies in the 2003 Lewes Local Plan that are currently saved, which have been reviewed as part of this Neighbourhood Plan to ensure that they are up to date and that all the Seaford specific policies are in one document to make it simpler for future planning decision-makers and all other users of the Seaford Neighbourhood Plan.

## Environment and countryside

### Landscape, seascape and townscape

- 6.5 The Town of Seaford is privileged to be located in one of the most beautiful locations in the UK, nestled between the English Channel and surrounded by the South Downs National Park where Section 62 of the Environment Act 1995 requires decisions to have regard to the purposes for which National Parks are designated. The coastline between the urban areas of Seaford and Eastbourne was defined by Natural England in the 1970s as ‘Heritage Coast’, a definition established to conserve the best stretches of undeveloped coast in England.
- 6.6 With this privilege comes responsibility; to ensure that the natural beauty, iconic locations, wildlife, biodiversity and the heritage assets are enhanced and preserved for both future and current generations. This will bring multiple benefits, including the promotion of tourism and therefore employment, growth and jobs, but also to ensure that Seaford continues to have a pleasant environment to live in, where people want to move to or remain in the Town, creating a strong environment for suitable housing, employment and recreation.
- 6.7 To ensure that the Seaford Neighbourhood Plan takes proper account of its unique landscape, seascape and townscape character, a background paper has been produced which identifies that character and its significance for future development. This is referred to as the ‘Seaford’s Local Landscape Character and Views’ report. This report is published separately along with this plan. Also of relevance to the design of any development within or affecting the National Park is the South Downs Integrated Landscape Character Assessment (SDILCA), specifically Landscape Type A: Open Downland, A1: Ouse to Eastbourne Open Downs <http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf> . Development proposals in close proximity to the National Park can deleteriously impact on tranquillity for example by increases in lighting and noise as well as visual impacts, these are Special Qualities of the National Park which need to be considered. Any sites in the setting of the National Park will need to be demonstrate their contribution for biodiversity, green infrastructure, recreational value, access to the National Park protection of water resources for example. The following overarching policy emphasises the landscape-led approach of this Neighbourhood Plan, that is that development should enhance, respect and reinforce the landscape through its design approach, informed by contextual analysis of the local landscape and built character.

**Insert Map 2**(Views)

- 6.8 In May 2016 the South Downs National Park was designated an International Dark Sky Reserve and Birling Gap to the east of Seaford parish is one of the best observation sites within the National Park as it is possible to see the Milky Way with the naked eye from there. The National Park has a Strategic Policy (SD8) in its Preferred Options Local Plan to preserve and enhance the intrinsic quality of dark night skies across the National Park. It should be borne in mind that lighting impacts on wild life (such as moths, bats and night flying birds) as bright lights can be very distracting.
- 6.9 The reserve is divided into five zones (including a buffer zone) which depend upon the present quality of the night skies. The zones determine the level of protection of dark night skies. The urban area of Seaford itself is in Zones Three or Four (the lowest level of protection) and residential developments within the town are unlikely to be a problem. Sites adjacent to the National Park would be within Zone 1 (buffer or Rural Transition Zone) where there are various technical requirements (for example, the brightness of outside lights and the direction the lights are facing).
- 6.10 Given the strategic nature of this issue it is considered appropriate for the details of lighting to be controlled through the Local Plans rather than the Neighbourhood Plan. However, a reference to the importance of tranquillity and dark night skies has been included in SEA1.

**SEA1 Development within or affecting the South Downs National Park**

**New development within or affecting the South Downs National Park will be expected to have a landscape led approach to design, must have regard for the setting of the National Park in terms of its landscape and visual amenity and will conserve and enhance the landscape, seascape and townscape character of Seaford. In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances:**

- a) the landscape setting of Seaford, including meeting the purposes of the South Downs National Park and protecting the character of the Heritage Coast;**
- b) the key views as identified in the Statement on Seaford's Local Landscape Character and Views and shown on Map 2 above (Views from and within Conservation Areas are shown in detail in Appendix D):**
- c) tranquillity and dark night skies;**
- d) the natural, locally distinctive and heritage landscape qualities and characteristics of Seaford including trees and hedgerows, particularly in areas which are currently deficient in such natural assets;**

- e) features of biodiversity, geological and heritage interest, including appropriate management of those features; and
- f) the River Cuckmere, its margins and associated wetlands, preventing development which would adversely affect its quiet and natural character or have a direct or indirect effect on its wildlife and geological features but allowing for change that accommodates natural coastal erosion, responds to climate change and facilitates naturally functioning river systems.

## Design

6.11 A new General Design Guidelines for Seaford has been produced alongside this Neighbourhood Plan to encourage a higher standard of design for development and for public realm (that is, public space) within the town. Criteria g) of the policy below requires development to take opportunities to provide or improve green and blue infrastructure and habitat connections and linkages to green spaces and/or the countryside. These include recreational fields and green spaces; gardens; public rights of way; sustainable urban drainage systems; habitat networks; allotments; green droves and cemeteries as well as watercourses and road and rail verges. Opportunities to increase and enhance green infrastructure links into the South Downs National Park will be particularly supported. Development should favour Sustainable Drainage Systems (SuDS) which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and wildlife.

## SEA2 Design

The design of all developments within the Plan area will have regard to the General Design Guidelines for Seaford and be subject to other relevant development plan policies. Development which contributes towards local character and distinctiveness through high quality design will be permitted where the following criteria are met:

- a) the design has regard to the distinctive and attractive characteristics of Seaford and its setting and the key views identified in the Statement on Seaford's Local Landscape Character and Views and shown on Map 2 above;
- b) the site is located and designed to facilitate connectivity between the site and local services by cyclists and pedestrians, having regard to the ESCC Local Cycling and Walking Infrastructure Plan for the area. This will take into account the need to provide routeways with sufficient informal surveillance and lighting so that people feel safe using them;
- c) the site provides good access to public transport to help reduce car dependency and support public transport use, including where appropriate provision of better connections between bus and rail, and improved passenger information;
- d) the design makes an efficient use of land and incorporates a high quality layout, building design, energy efficiency and durable and sustainable materials of an appropriate texture, colour, pattern and appearance that will contribute positively to the landscape and townscape character and local distinctiveness of Seaford;
- e) the design incorporates public and private spaces which are clearly defined and designed to be attractive, well managed and safe. There should be suitable private

outdoor amenity space for new dwellings so passers-by respect the boundaries and residents feel their personal space is protected, and adequate, appropriately designed external storage space for bins and recycling facilities as well as for bicycles.

- f) where appropriate the design is informed by a landscape assessment that has regard to the existing topography and landscape features of the site and the townscape, landscape and seascape of the surrounding area.
- g) where appropriate the design is informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidelines, has regard to the mitigation hierarchy in NPPF paragraph 175a, and provides a net gain in biodiversity. Existing individual trees or tree groups that contribute positively to the area will be retained and opportunities taken to provide or improve green and blue infrastructure and habitat connections and linkages to green spaces and/or the countryside;
- h) where the development could impact on designated or non-designated heritage assets, the design is informed by a heritage assessment using the Historic Environment Record as well as archaeological field work where appropriate and will be accompanied by appropriate levels of archaeological work which are research driven to answer specific questions relevant to the history and archaeology of Seaford and the plan area.
- i) car parking or other servicing areas will meet ESCC standards and be appropriate to the context and sensitively located and designed so as not to dominate the public realm. Where appropriate electric vehicle charging points will be supported.
- j) the development will incorporate Sustainable Drainage Systems (SuDS) which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and wildlife and will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

### Heritage assets

6.12 Seaford has a significant number of heritage assets and sites, most of which are formally designated. **Appendix A** to this Neighbourhood Plan lists the designated heritage assets. **Chapter 7** 'Non-Statutory Community Aspirations' includes recommendations relating to amendments to the National Heritage List for England; producing a list of non-designated 'Locally Listed Buildings'; and funding for preservation and enhancement of heritage sites. The Lewes Local Plan 2003 has three policies relevant to heritage assets in Seaford, H5 relating to protecting Conservation Areas in general, SF11 relating to Bishopstone Conservation Area, and H12 relating to Areas of Established Character. It is considered that these policies are still relevant and similar policies are included below together with supporting text.

### Conservation Areas

- 6.13 There are four conservation areas within the Seaford Neighbourhood Plan area:
- Seaford Town Centre Conservation Area designated in 1969, extended in 1976 and 1988 and reviewed in 2005;
  - Bishopstone Conservation Area designated in 1976;

- East Blatchington Conservation Area designated in 1976, extended in 1988 and reviewed in 2005; and
- Chyngton Lane Conservation Area designated in 1990.

6.14 Retained Policy H5 of the Lewes District Local Plan 2003 seeks to protect these conservation areas, and in particular refers to significant public views affecting a conservation area. These views are defined in the relevant conservation area appraisals, which can be accessed at <http://www.lewes.gov.uk/planning/1097.asp> and the Landscape and Key Views Report, which will be published separately, along with this Plan. A similar policy is included below as SEA3.

**Insert Map 3** (Conservation Areas and Areas of Established Character)

### SEA3 Conservation Areas

**Subject to other relevant development plan policies, development within or in the setting of Conservation Areas in Map 3 above will be permitted provided that it:**

- (a) conserves or enhances the special architectural or historic character or appearance of the Conservation Area and its setting and reinstates historic elements wherever possible;**
- (b) does not require the demolition or partial demolition of any unlisted buildings which make a positive contribution to the character or appearance of the Conservation Area;**
- (c) uses materials which are traditional to the Conservation Area or are otherwise sympathetic to the character of the particular building or site;**
- (d) respects the design of the existing buildings of the Conservation Area;**
- (e) respects any important traditional groupings of buildings which contribute to the character of the Conservation Area; and**
- (f) protects open spaces, trees and significant public views as identified in the Conservation Area Appraisals and the Character Areas in the General Design Guidelines for Seaford.**

**Retention in the town centre, of commercial use on the ground floor will be supported and, above this level, conversion to domestic use will also be supported.**

### Bishopstone Conservation Area

6.15 Bishopstone Conservation Area is based around the old village of Bishopstone. Set in the Bishopstone Valley, to the west of Seaford, it is separated from the town of Seaford and the modern Rookery Hill development by an open wedge of fields and the Rookery escarpment with the result that it retains the unspoilt character of an isolated downland hamlet.

6.16 The attractive character of Bishopstone village has been retained by restricting the intrusion of buildings into the valley including protection of the particularly sensitive skyline formed by the ridges on the east and south sides. It is considered that any further development beyond the existing limits of development adjacent to these ridgelines would seriously damage the setting of the Conservation Area.

- 6.17 On street parking by the Church and Village Hall erodes verges and compromises the character and appearance of the Conservation Area. Proposals for the creation of an off-street parking area will be supported to enhance the historic character of the village and improve the local amenity.

#### SEA4 Bishopstone Conservation Area

**Subject to other relevant development plan policies, and specifically Policy SEA3 Conservation Areas, development will be permitted provided that it does not detract from the isolated character of Bishopstone village and its downland setting in the Bishopstone valley. No further development will be allowed to intrude into the valley or the ridgelines around the valley.**

#### Areas of Established Character (AECs)

- 6.18 There are a number of areas within Seaford which are extremely attractive and make a valuable contribution to the character of Seaford town and Bishopstone village. They do not have the necessary historic or architectural value to enable them to be Conservation Areas and so lack statutory protection. However, it is considered that these areas are of sufficient merit to justify particular care when development (including redevelopment) proposals are considered. Areas of Established Character, therefore, are shown on Map 3 above in the following areas:
- Firle Road area including Firle Close, Firle Grange and Firle Drive
  - St Peter's Road
  - Glebe Drive
  - Belgrave Road, Westdown Road and Beacon Road
  - Corsica Hall
  - Chyngton Road and Cuckmere Road
  - Chyngton Way area including South Way and Lullington Close
  - Blatchington Road/Richmond Terrace and Broad Street, north of the A259
- 6.19 **Firle Road** has a very spacious and informal character formed by large detached houses of varying styles set in large, well landscaped gardens on either side of the road which has grass verges between the road and the footways. Two private schools, set in maturely landscaped gardens contribute to the established character of the area. The spacious character is reflected in the low-density of development of 4.5 dwellings per hectare.
- 6.20 **St Peter's Road** has a denser development pattern than Firle Road, but still retains an attractive spacious character.
- 6.21 **Glebe Drive** has a relatively high density of 16 dwellings per hectare which does not reflect the semi-rural, tranquil character of this little backwater. The character of this cul-de-sac is formed by the unmade surface of the private road, the lack of footways

and street lighting, and the level of screening afforded by the mature vegetation in the area.

- 6.22 **Belgrave Road, Westdown Road and Beacon Road** is an established residential area laid out in a formal style with broad tree-lined streets.
- 6.23 **Corsica Hall** is a large, classically proportioned listed building set on a small hillock surrounded by low-lying open land between the town centre and The Esplanade. The area is a major landmark in views from the seafront.
- 6.24 **Chyngton Road and Cuckmere Road** are located on the southern edge of the town, adjacent to Seaford Head Golf Course, this area has a very spacious character with a density of some six dwellings per hectare. The large detached houses are set in generous, maturely landscaped gardens. The majority of the houses are of a broadly similar age and although there is a variety of styles they do form a congruous group. Brick and flint walls form an almost continuous front boundary to the properties along the north side of Chyngton Road. Cuckmere Road runs parallel with and to the north of Chyngton Road. The houses in the street are relatively large and set in spacious gardens and have a Sussex character. Local materials have been extensively used. The unmade road surface, lack of footways and street lighting, flint boundary walls with render coping and mature vegetation give the area an informal, semi-rural character appropriate to its edge-of-town location.
- 6.25 **Chyngton Way** is an extension of Chyngton Road to the east linking through to Chyngton Lane Conservation Area and the track to South Hill Barn. The area reflects a much later stage of development than Chyngton Road and Cuckmere Road with a much higher density of development, smaller houses on the north side and bungalows on the south, comprehensively laid out with a definite building line in an open plan estate. Nevertheless, the area has a spacious character by virtue of a tree-lined wide grass verges between the highway and the pavements and “open plan” front gardens. The spacious character is accentuated by the proximity of open downland to the south.
- 6.26 **Blatchington Road/Richmond Terrace.** This area has a very intimate informal character created by the tightly-knit townscape mix of traditional Victorian terraced housing and small-scale commercial sites randomly interspersed with small, but well landscaped, open spaces. Built form is dominated by the domestic scale and rhythm of the terraced blocks, some of which are fairly intact, notably Nos 30 to 38 Blatchington Road and Richmond Terrace. The area also includes a yard containing a group of small-scale commercial workshops and storage buildings which, in conjunction with the terraced housing, gives the area the character of a traditional “working”/artisan quarter on the edge of the town centre. Because one of these buildings is on the site of the medieval Leper Hospital this sensitive redevelopment of the commercial yard has enhanced the character of this location.
- 6.27 Preserving the character of these areas depends upon respecting detailed elements of the street scene, such as building heights, building size and site coverage, hard

and soft landscaping, boundary treatments, trees and vegetation, open spaces and appropriate street furniture. Any improvements to these areas will be encouraged. However, this policy is in line with LDC's existing Local Plan policy and that proposed in the Part 2 Local Plan. There is no evidence base for adding further areas at this time.

### **SEA5 Areas of Established Character**

**In considering proposals for development within Areas of Established Character, as shown on Map 3 above, the existing character of the area in terms of spaciousness, building heights, building size and site coverage, building lines, boundary treatments, trees and landscaping shall be retained. The Areas of Established Character in Seaford are:**

- **Firle Road area including Firle Close, Firle Grange and Firle Drive**
- **St Peter's Road**
- **Glebe Drive**
- **Belgrave Road, Westdown Road and Beacon Road**
- **Corsica Hall**
- **Chyngton Road and Cuckmere Road**
- **Chyngton Way area including South Way and Lullington Close**
- **Blatchington Road/Richmond Terrace and Broad Street, north of the A259.**

### **Seaford Seafront**

6.28 Seaford's Seafront from Tide Mills through to Splash Point is a key asset both in terms of flood defence, recreation, tourism and natural beauty. The RSPB have evidence that Kittiwakes are nesting at Splash Point and all the beaches at Seaford are identified in the East Sussex Vegetated Shingle Management Plan 2009 as having important species that need management. There has been a strong policy framework through the saved Lewes Local Plan policies SF14, SF15 and SF16. It is considered that these policies should be updated and replaced by the following Neighbourhood Plan policy.

6.29 There is also the need to consider how best this natural asset can be enhanced, and much work has been done by the Seaford Community Partnership to establish the public's views on the Seafront. The Town Council adopted its Seafront Improvement Plan in March 2017, which includes:

- Martello Toilets - Demolition of existing toilet facility and a complete new build
- Bönningstedt Beach Huts – 60 additional beach huts
- Bönningstedt Café and Toilets - an additional café unit and toilets at Bönningstedt Promenade
- A restaurant on the edge of the Salts built up to the same level as the promenade and hence overlooking the sea
- Cordyline Trees and plants - 30 cordyline trees planted at intervals along the seafront

- Sandpits - installing two sandpits on the beach; one at Martello Tower and one at Frankie's Beach Café.
- Concession Units - providing additional concession units for Water Sports, Fresh Fish and Gourmet Food Van
- Replacement Bins – replacing existing dual bins for increased capacity and easier access
- Improved Signage - unifying all signage along the seafront
- Linkage to the Town Centre - improving the linkage between seafront and town centre through use of information boards, town maps with keys, walkway route planners and pavement markings
- Art Features - installing local art features on the seafront
- Seasonal concessions housed in huts (not food outlets)
- Seasonal rental Beach Huts
- A cycle repair station, pump and racks
- Disabled beach access
- Bönningstedt Promenade Gabion Wall

6.30 Some of this enhancement is most appropriately achieved through community projects and this is reflected in **Chapter 7** 'Non-Statutory Community Aspirations'. However, some of the proposals will require planning permission, such as the beach huts, restaurant, chalets and new toilets, and these will be covered by the following policy.

*Insert Map 4(Seafront)*

### SEA6 Development on the Seafront

Subject to other relevant development plan policies, sensitive development around Seaford Seafront, as shown on Map 4 above, that has regard to the General Design Guidelines for Seaford will be permitted provided that:

- a) it does not detract from the natural, open, un-commercialised environment of the Seafront;
- b) it is designed to be resilient to impacts from adverse weather conditions (wind damage) and flood risk, and does not prejudice the ability of relevant agencies to manage the coastal flood risk, beach management and sea defence maintenance
- c) it should be low density and low rise so it does not impact significantly on the spatial or visual openness or attractiveness of the Seafront and its vistas and protects the setting of and views to and from the South Downs National Park, the Heritage Coast, the shoreline and the Seaford Head Gateways;
- d) it enhances and conserves the biodiversity of the Seafront (for example, the kittiwake colony at Splash Point and the shingle vegetation at Tide Mills);
- e) it conserves and enhances the amenity use of the seafront; and
- f) opportunities are taken to enhance the public realm of the Seafront and improve walking and cycling facilities as part of the development.

### Recreation

- 6.31 The Lewes Local Plan 2003 saved policy RE1 on sport recreation and play space states:

*RE1 The Council will seek (through positive planning and provision, and through the control of development) to achieve provision of outdoor public and private playing space, which are as a matter of practise and policy available for public use, to at least the following minimum standards:*

- *1.7 ha per 1,000 population for outdoor sports, including pitches, courts and greens, and*
- *0.7 ha per 1000 population for children's play, of which about 0.2 – 0.3ha will comprise equipped areas and 0.4 – 0.5ha will be of a more casual or informal nature.*

However, the revised Lewes DC Local Plan Part 2 which is going through public consultation proposes to replace RE1 with new proposed policies **DM14-16**.

**DM14** deals with 'Multi-functional Green Infrastructure, **DM15** with Outdoor Playing Space, and **DM16** with Children's Play Space in new housing developments.

**DM15** amends the spatial requirement by deleting a requirement for 'areas of a more casual or informal nature. As this revised policy is proposed following the publication of national benchmark guidelines by Fields in Trust (FiT) in 2015 (Guidance for Outdoor Sport and Play: Beyond the Six-Ace Standard), we have calculated the impact of this new proposed policy if it is adopted in due course. The results show that Seaford's provision still falls short overall by 15Ha.

- 6.32 A study has been carried out by the Neighbourhood Plan Steering Group to assess the amount of open space in Seaford against the 2015 population projections.

This shows a significant shortfall in space for organised sport, and also notes that a significant amount of the sports activity space is under the control of state and private schools, rather than publicly available. The following policy seeks to address this issue through the provision of additional outdoor sports and play areas as part of new development and where other opportunities arise.

**Insert Map 5** *Outdoor sports facilities)*

## **SEA7 Recreational Facilities**

**Development on existing open space, sports and recreational buildings and land, including playing fields, will not be permitted unless:**

- a. an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or**
- b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or**
- c. the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.**

**The following outdoor sports facilities, as shown on Map 5 above, are of particular importance to Seaford:**

- **School Playing Fields**
- **Downs Leisure Centre and grounds**

- **The Salts Recreation Ground**
- **Blatchington Bowls Club**
- **Seaford Tennis Club**
- **Walmer Road Recreation Ground**
- **The Crouch**

### Local Green Space designation

6.33 Paragraphs 99-101 of the NPPF set out what a Local Green Space is and the criteria that it must meet. It states

*99. The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.*

*100. The Local Green Space designation should only be used where the green space is:*

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land.*

*101. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.*

6.34 The work undertaken on reviewing potential sites for designation as Local Green Spaces is set out in full in the Seaford Neighbourhood Plan Local Green Spaces Report. This reviewed a total of 66 sites against the criteria in the NPPF and recommended the allocation of 11 of these for the November 2017 Consultation. As a result of significant feedback that Grand Avenue should be also considered, research was carried out, the site assessed according to the criteria in the NPPF and Grand Avenue was approved for addition to the 11 sites. The location of each of these allocations is contained in the map below.

**Insert Map 6**(Location of Local Green Spaces)

### SEA8 Local Green Spaces

**The Neighbourhood Plan designates the following locations as Local Green Spaces, as shown on Map 6 above:**

- 1 Bishopstone Village Green
- 2 Blatchington Pond
- 3 Foster Close Open Space
- 4 Land North of South Barn (Chyngton Way Field)
- 5 Normansal Park/ Chalvington Fields not in the National Park
- 6 Princess Drive Green and old Grand Avenue Bridleway
- 7 The Crouch
- 8 The Old Brickfield and site adjacent to 47 Surrey Road
- 9 The Ridings (Lexden Road)
- 10 Tidemills
- 11 Land north of Alfriston Road (4 plots)
- 12 Land at Grand Avenue (3 fields)

**Proposals for any development on these Local Green Spaces will only be permitted in very special circumstances, for example, where it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.**

### **Allotments**

6.35 Feedback from stakeholders and the Community has indicated that the popularity of allotment holding in Seaford is increasing, with younger people and families increasingly becoming more involved. Indeed, there is always a waiting list for allotments. The Lewes DC Local Plan 2003 included a specific policy on allotments (RE9), however, this has now been replaced by the Core Strategy policy CP8 on green infrastructure which is more general and only mentions allotments in supporting text. The consequences of losing allotments include the loss of green space, the loss of a place to grow food, reduced opportunity for mental and physical exercise and general health, and the loss of important wildlife spaces and flood storage areas. Given the importance of allotments for Seaford it is considered that it merits its own policy in the Neighbourhood Plan and that the opportunity should be taken to clarify the circumstances in which allotment land could be released for other uses. There is only one allotment site in Seaford, accessed off Sutton Drove shown in the site plan below.

*Insert Map 7 (Allotment)*

### **SEA9 Allotments**

**Proposals resulting in the loss of allotments as shown on Map 7 above, will only be permitted if it is demonstrated that:**

- a) **Alternative allotment provision is made on a site of equivalent visual and horticultural value; or**
- b) **there is no need or demand for the allotments and that this is unlikely to change in the foreseeable future; and**
- c) **there is no net loss of biodiversity.**

### **Economy and facilities**

## Infrastructure

6.36 The Neighbourhood Plan supports the approach to infrastructure set out in the existing policy framework. In particular, the Joint Core Strategy Core Policy 7 on Infrastructure recognises that residents' quality of life depends on protecting and enhancing community facilities; the provision of necessary physical and social infrastructure; and ensuring that land is only released for development where there is sufficient capacity in the existing local infrastructure to meet the additional requirements arising from the proposed development. Both local planning authorities now collect Community Infrastructure Levy from developments to go towards general infrastructure projects and Section 106 legal agreements will continue to be used to address direct effects of development and provide affordable housing.

## Health

6.37A It has been established that there is a clear link between the health and wellbeing of a population and the use of recreation and green space facilities and access to heritage assets. However, it is also recognised that for there to be sustainable development in Seaford, improved medical services are crucial. 92% of respondents to the Economy & Facilities Focus Group's Survey were in favour of exploring the capacity levels of health services in the Town. The two GP surgeries in Seaford report that demand is at the upper level of that recognised possible without being detrimental to patient care. Seaford GP surgeries and community clinics have been reporting that their clinical and office space is full to capacity, affecting staff morale, recruitment and retention. Whilst any increase in population would have to be accommodated, the consequence will be longer waiting times.

6.37B A group known as The Seaford Health Stakeholder Group meets quarterly and includes town councillors, Clinical Commissioning Group (CCG) and primary care managers, mental health providers, ESCC social care workers and patient representatives. The aim of the Group is to promote and enhance health services for all age groups in Seaford. A particular focus of the group is to ensure that more health services are provided locally in Seaford and that the health provision copes with the Town's increase in population.

6.37C At the present time pregnant women and unwell children tend to be referred to Brighton (13 miles away) whereas medical, surgical and mental health emergencies tend to be referred to Eastbourne (10 miles away) but may have to transfer to Hastings (20 miles away). In addition, counselling, rehabilitation and therapy services as well as basic diagnostic investigations such as scans and X-rays are often not available locally. Multi-disciplinary team working required for complex patients involving health and social care is most adversely affected.

6.37C In order to ease this problem, Lewes District Council recently secured a £17 million public works loan to provide a Health Hub in a new development leased to the CCG

on its site at the Downs Leisure Centre. Aspects of the proposal such as effects on town centre activity, patient transport, urgent care/out of hours base, traffic flow, parking issues and loss of green space have yet to be fully explored. It is hoped that public consultation will allow these important issues to be explored further as well as aspirations for future health service provision.

## SEA10 Health Facilities

**Proposals for new or expanded health facilities, including the new proposal for new health facilities on part of the Downs site, will be strongly supported subject to other relevant development plan policies.**

## Town centre

6.38 The Neighbourhood Plan supports the approach to the economy, retail and town centres in the existing planning policy framework. For instance, in the Joint Core Strategy, Seaford is described as a main town centre. It provides for a range of appropriate uses including leisure facilities, restaurants, offices, arts and culture. Facilities catering for tourists will be encouraged in the area near to the primary shopping area to maintain and enhance the diversity of the town centre and improve linkages with the seafront. It is the second largest retail centre in the Lewes District and has a relatively strong and 'self-sufficient' retail performance. Much of the town centre is covered by a conservation area and the centre is distinct in character with a mix of commercial premises, community uses and clusters of residential properties. In addition, the location of the town adjacent to the sea and surrounded by the South Downs National Park, presents opportunities for building on tourist and leisure focused retail provision and other facilities. The potential for improving links between the town centre and the promenade and beach, whilst not losing the special understated identity of the town and its seafront, is included in a Seafront Improvement Plan (which was adopted by Seaford Town Council in March 2017). See also **Community Aspiration 1**.

6.39 Joint Core Strategy Core Policy 4 on Economic Development and Regeneration seeks to stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns;

- Core Policy 5 on the Visitor Economy supports sustainable development of the visitor economy where it is of a scale, type and appearance appropriate to the locality; and
- Core Policy 6 on Retail and Town Centres identifies Seaford and Lewes as the main town centres that are the primary focus for retail activity, but also include leisure facilities; restaurants; offices; arts, culture and tourism facilities.

These policies should be given full weight when considering future development in Seaford as this will support the Town maintaining its commercial, retail and leisure services.

## Business space

- 6.40 A recent survey of the 80 or so members of the Chamber of Commerce established the need for more support of local business premises. Overall the key findings were:
- 76% believed there was demand for an Enterprise Centre;
  - 67% of respondents stated the need for office accommodation;
  - 57% of respondents stated the need for flexible start-up accommodation;
  - 52% saw a lack of suitable business accommodation as their highest challenge to growth;
  - 43% ranked high costs as the greatest challenge; and
  - Only about 1 in 5 said a lack of skilled labour was a growth challenge.
- 6.41 A local example of a successful business centre is the “Newhaven Enterprise Centre” which was established in 2007 in partnership with Lewes District Council. The Council owns the facility and this is managed on its behalf by a third-party organisation. The Newhaven Enterprise Centre provides *“fully managed office space in Newhaven. With a range of small furnished incubator units for start-ups, workshops, and larger units aimed at businesses with one to fifteen people our managed office space provides a range of modern business facilities including high speed broadband, serviced meeting rooms, breakout areas, mail and phone service and free parking.”*<sup>2</sup> The Newhaven Enterprise Centre provides various sized units but rather than these being used for physical manufacture, storage or repair, the vast majority of units are used as offices.
- 6.42 An allocation for additional employment land was made at Cradle Hill in the Lewes Local Plan 2003 (policy SF8). Since this policy will not be saved beyond the adoption of the Part 2 Lewes Local Plan, this allocation is included within SEA11. Land at Cradle Hill Industrial Estate, as shown on Map 8 below, is allocated for new business development (Use Classes B1, B2 and B8). The Estate is located on the edge of the town adjacent to open downland with access through residential areas. Its extension is, therefore, constrained by environmental and traffic grounds. The setting of the Estate, on the edge of open downland, requires that any extension should be well integrated into the landscape. The existing buildings have been constructed on excavated land so as not to be visually intrusive on the skyline. The land allocated for extension should, therefore, be excavated to a similar level prior to development taking place. A substantial landscape buffer will also be required along the eastern edge in order to demarcate the boundary of the town and to screen it from view from the open countryside to the east and protect the setting of the National Park. Access to the area of land allocated for extension should be provided by extending the existing estate road eastwards. Cradle Hill Road is presently too narrow to meet full adoption standards. The existing intersection of Cradle Hill Road and Vale Road junctions with Alfriston Road are not considered satisfactory. The effect of the additional traffic generated as a direct result of this development on this highway infrastructure and highway safety will be very carefully examined as part of a

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<sup>2</sup> Information taken from the Newhaven Enterprise Centre’s website at <http://www.basepoint.co.uk/locations/newhaven>

development proposal and Highways England will be consulted on the proposals for this site in terms of potential impacts on the A27. If it is considered that improvements are required to the local highway infrastructure in order to allow the development to proceed then the developer/landowner will be expected to fund these improvements proportional to the requirements generated by the proposed development itself

**Insert Map 8** (Cradle Hill Industrial Estate showing extension)

### SEA11 New Business Space at Cradle Hill

Land at Cradle Hill Industrial Estate, as shown hatched blue on Map 8 above, is allocated for business development (Use Classes B1, B2 and B8), subject to other relevant development plan policies and the following criteria:

- a) the site of the proposed extension shall be excavated to the generally prevailing levels of the existing estate prior to the commencement of any development
- b) the height of the development shall be no higher than the existing buildings
- c) the scheme shall provide for any off-site highway works proportional to the additional traffic created by the development, (or a contribution to such works) if measures of this kind are demonstrated to be a pre-requisite of development
- d) the eastern boundary of the Cradle Hill Estate extension shall be clearly demarcated with a substantial landscaped buffer of varying width, but no less than four metres, to be provided at the time of the layout of the estate roads.

### Visitor accommodation

6.43 The Neighbourhood Plan supports the existing policy framework on the visitor economy, particularly Joint Core Strategy CP5. An overwhelming majority (85%) of respondents to the Neighbourhood Plan Survey agreed that tourism is vital to the local economy to ensure local businesses remain viable. This is supported by the Town's Tourist Information Office and discussions with accommodation providers. Clearly more visitor accommodation is required so that support can be given to tourism in the town. A number of community aspirations to support and strengthen the visitor economy are proposed in **Chapter 7** (Paragraphs 7.2 to 7.4) and a policy is proposed to enhance, encourage and preserve visitor accommodation in the town.

### SEA12 Visitor Accommodation in Seaford

Subject to other relevant development plan policies, proposals for increased visitor accommodation will be permitted within the development boundary or just outside the boundary, if sympathetic to the surroundings. Properties with easy access to the seafront would be particularly suitable for this use. The limited existing visitor accommodation will be safeguarded unless an alternative use is demonstrated to provide more social, economic and/or environmental benefits to the area.

### Travel and transport

- 6.44 The NPPF requires local planning authorities to “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable” and states that “Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel”.
- 6.45 The Joint Core Strategy has the following Strategic Objective:  
*“To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, study in and visit the district. The District Council and National Park Authority will work with the relevant transportation agencies to promote alternative and sustainable modes of transport to the private car, including improving the provision of facilities that enable safe walking and cycling, and the connectivity, capacity, accessibility and frequency of public transport to places in the district and outlying areas, including to continental Europe through Newhaven Port. Successful achievement of this objective will also involve the delivery of high speed broadband across the whole of Lewes District, supporting those who work, or wish to work, from home, and those who wish to have improved access to services, thereby reducing the need for travel. Achieving this objective should assist in tackling some of the areas that are currently subject to poor air quality in the district (predominantly caused by transport) and ensure that further areas do not become apparent”.*
- 6.46 This strategic objective is taken forward in Core Policy 13 which sets out specific requirements to help achieve a rebalancing of transport in favour of sustainable modes. The Neighbourhood Plan supports this approach and all existing relevant policies should be given full consideration as part of the planning process.
- 6.47 One specific policy in the Lewes Local Plan 2003 which should be carried forward into this Neighbourhood Plan is SF9 which supports the retention and protection of a pedestrian access between Broad Street and Church Lane. This is still an aspiration of the community as a means of maintaining the permeability of the town centre for pedestrians who would otherwise have lengthy detours to cross the town centre.

### **SEA13 Footpath to Church Lane**

**A pedestrian way (meeting recognised standards) linking Broad Street (between Nos 17 and 25 Broad Street) to Church Lane will be protected from development. Development proposals will incorporate such a link (or the relevant parts of such a link) in any proposals for redevelopment of any of the land or premises in the area of the route shown on Map 9 below. The local authorities will seek to secure the dedication of this route as a public right of way.**

### **Transport infrastructure**

6.48 There are two local projects that were referred to during the stakeholder engagement:

- Potential to re-dual the train lines through the parish; and
- Potential to widen or re-site the Exceat Bridge on the A259.

6.49 The residents survey showed that 90% of residents are concerned about the reliability and availability of rail services. An enhanced railway would also support any proposed increase in the population going forward and enhance the Town as a destination for business and tourism. Re-dualling the train lines through the parish would enhance the capacity of these rail services. Whilst such a project is outside the control of the local authorities, it is considered that development within Seaford should not inhibit the future potential to re-dual the Town's train lines. An area within Network Rail's ownership alongside the existing train lines is delineated on Map 9 below. It is proposed to safeguard this area from development that would prejudice any future re-dualling.

**Insert Map 9** *Safeguarding future Transport: area adjacent to railway line and Church Street map*

6.50 Similarly, discussions have taken place concerning the possibility of widening or re-siting the Exceat Bridge on the A259 to the east of Seaford. The restricted width of this bridge currently causes congestion on this route. In June 2017, East Sussex County Council agreed to use a Government grant of more than £2million together with £500,000 of its own funds to address this issue by replacing the existing single-lane bridge with a new two-lane bridge. This work has now commenced.

### **SEA14 Safeguarding Future Transport Projects**

**Development within the Seaford Neighbourhood Plan Area will not be permitted if it would inhibit the future implementation of the re-dualling of the train lines through the parish. The safeguarded areas from such development are delineated on Map 9 above.**

## **Housing and development**

### **Targets**

6.51 Core Strategy Spatial Policy 2 – Distribution of Housing- states that, during the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be delivered in the Lewes district, including those parts within the National Park.

6.52 A total of 6,000 homes has been allocated by Lewes DC to individual towns and villages in Lewes District. As explained in the paragraphs below, Seaford will be expected to contribute to the balance of 900 homes which has not been allocated to towns/villages but retained by Lewes District Council to cover:

- 600 homes, Windfall (defined in the Lewes Core Strategy: Local Plan Part 1 glossary as "a site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the

lifetime of a plan. Most "windfalls" are referred to in a housing context. They tend to be small sites for a small number of homes);

- 200 homes, Unidentified (i.e. large schemes not identified on 1<sup>st</sup> April 2015)
- 100 homes, Rural exceptions (not relevant to Seaford)

6.53 The planned level of housing growth (that is, the target allocated by Lewes District Council in 2015) for Seaford for the period 2010-to 2030 is a minimum of 554 units. This figure is composed of:

- **216** units built in Seaford between April 2010 and 31 March 2015 and completed
- **153** units, identified by LDC as commitments on 1<sup>st</sup> April 2015. LDC defines commitments as "*all proposals for development that are the subject of a current full or outline planning permission, or are unimplemented allocations in an existing Local Plan*".

This therefore leaves a **minimum target of 183 (rounded to 185) for net additional units** that will need to be delivered through the Neighbourhood Plan.

6.54 In addition, Seaford is expected to contribute towards the 600 dwellings windfall and the 200 units on unidentified sites referred to in 6.52 above. A detailed examination of the LDC Planning website for planning permissions (outline or detailed) granted since 1 April 2015 reveals that Seaford has contributed **48 windfall new homes**, and **212 homes on 3 previously unidentified sites** (Newlands School, The Constitutional Club and Sutton Leaze, Eastbourne Road).

### Achieving sustainable development

6.55 The Neighbourhood Plan aims to identify a range of types and tenures of high quality open market and affordable housing:

- in the most sustainable locations that reduce energy consumption;
- accessible to local services and facilities;
- complementing and enhancing the built and natural environment; and
- that meets the needs of the individuals and families seeking housing in Seaford.

6.56 To achieve this, all the potential sites identified by the Housing Focus Group have been reviewed by our independent consultants who have advised the Steering Group and tested them against the Sustainability Objectives (see **Appendix C**) in the Sustainability Appraisal. Details of this work are contained in the Seaford Neighbourhood Plan Housing & Development Focus Group Site Assessments and the Sustainability Appraisal. In summary the process was:

- Identification, initially, of 306 apparently separate sites which were found on close scrutiny to contain many duplicate sites so that 193 potential separate sites were examined during 5 months of extensive research;
- Reducing that list to 74 sites by eliminating sites that were too small, that already had planning permission, where development would breach Policy RE1, or that were unlikely to be available in the Plan timetable;
- Gathering evidence on these 74 sites in 74 individual Site Evidence files. Each file contains information in terms of ownership, current use, previous use, planning history and policies affecting the site, availability and achievability, comments

from documents from statutory bodies, whether greenfield or brownfield, proximity to community services including schools, shops, GP surgeries, bus stops and other transport networks. This comprehensive and substantial database is available as evidence reports on each site;

- This process led to 61 of the sites going forward to our professional consultants, to be assessed under the Sustainability Appraisal system using both their professional knowledge, and our evidence database;
- As a result of the consultants' work nine sites were identified for development
- A tenth site has been added (Florence House) following the preparation of a revised Sustainability Appraisal and a detailed comparison of the site's performance against the Sustainability Objectives;
- An eleventh site has been identified since the announcement of the availability of a large site to combine the present fitness facilities at The Downs with healthcare provision, along with a supermarket and housing.

### Affordable housing

6.57 An objective of the Neighbourhood Plan is to facilitate the provision of affordable housing for local people, particularly younger residents who cannot afford open market rents or house prices. Government guidance says a proportion of affordable housing can only be sought on sites of 10+ homes in Seaford, and 6+ homes in the National Park. Since many of the potential sites are small there is a real danger that the affordable housing objective will not be achieved. Therefore, larger sites such as the Dane Valley Project are key to delivering significant levels of affordable housing. However, we recognise that the term 'affordable housing' in planning policy usage provides only one element of a comprehensive affordable housing policy, and will not provide homes for those on low incomes. Many local people, including the young, the vulnerable and those with specific needs cannot access the housing market as it stands. There should be the opportunity for the local authority to work with community-led groups, housing associations, housing trusts and others to facilitate the provision of social housing, self-build and shared ownership properties and The Neighbourhood Plan welcomes the involvement of Social Housing Providers such as Registered Housing Landlords (RSL's) who can through financial subsidies reduce the net housing scheme costs to enable affordable rented and shared ownership options also, to be provided for a wider cross-section of the lower income households that need such accommodation.

6.57A There was significant support in the response to the Neighbourhood Plan Survey for considering including a Community Land Trust (CLT) within our proposals. A CLT is a form of community-led housing, set up and run by ordinary people to develop and manage homes as well as other assets. After considerable discussion by Steering Group members, it is considered that, whilst the principle of CLTs is supported, in practice there are a number of difficulties at the present time, which include:

- There is insufficient land in public ownership within Seaford to enable STC or LDC to endow such a body, as such assets are currently being considered as a source of funding of other community initiatives.

- The limited opportunities for housing identified by the Neighbourhood Plan process are all from private owners who have not expressed an interest in endowing land for a CLT, even within the context of those sites that will require an affordable content.
- The objective of maximising the affordable housing element within the Neighbourhood Plan's policies is most effectively delivered within the context of existing structures, given that the time and resources required to set up a CLT have not become apparent since the suggestions were made.

However circumstances can change over time and any proposals for CLTs that come forward and address these problems will be supported in principle. The Sussex Community Hub, partly funded by Lewes District Council, provides support to community groups wanting to create CLTs.

- 6.58 Core Policy 1 of the Lewes DC Joint Core Strategy sets out the requirements for the provision of affordable housing, setting the percentage to be provided. In the National Park this will be updated by the emerging South Downs National Park Local Plan. Core Policy 2 of the Core Strategy states that housing developments must provide a range of dwelling types and sizes to meet the identified local need, based on the best available evidence. This need will generally include 1 and 2 bedroom homes for single person households and couples with no dependants; accommodation appropriate for the ageing population and disabled residents; and special needs housing such as for nursing homes, retirement homes, people with special needs including physical and learning disabilities. Specific percentages of such housing have not been set because this is likely to change over the plan period.

### Site allocations

- 6.59 10 of the 11 sites identified are within the development boundary of Seaford where the development is acceptable in principle under current planning policies. All have been given positive assessments by AiRS in their Sustainability Appraisal. It will be noted that the Dane Valley Project Area, whilst allocated for 104 homes, only contributes 74 homes to the 185 target. This is because The Old Gasworks Site was identified by Lewes DC in 2015 as contributing 30 homes to their 153 homes 'Committed' target, and this cannot be double-counted.

**Insert Map 10** (*Shows the location of each allocated site within the Town*)

- 6.60 The proposed site allocation totals **218 dwellings**. The four sites marked with \*were identified by Lewes DC in 2015 from the start of the creation of the Joint Core Strategy which was approved after public examination in 2016, and therefore formed part of the evidence for the 185 target. We propose to over-programme by 33 homes because experience shows that not all planning permissions are implemented.

## SEA15 Site Allocations

The following sites as defined on Map 10 (total dwellings 218) are allocated for development subject to other relevant development plan policies and meeting the Sustainability Objectives (Appendix C):

- i. Dane Valley Project Area – 104 dwellings (net addition of 74) and employment space
- ii. Jermyn Ford, 10 Claremont Road – 20 dwellings
- iii. 10 Homefield Place – 19 dwellings
- iv. Brooklyn Hyundai, Claremont Road – 13 dwellings
- v. \*Holmes Lodge, 72 Claremont Road – 12 dwellings
- vi. \*Station Approach/Dane Road – 12 dwellings above existing retail space
- vii. Seven Sisters pub, Alfriston Road – 9 dwellings
- viii. \*Old House Depository, Claremont Road - 35 dwellings
- ix. \*Elmcourt, Blatchington Road - 9 dwellings
- x. Homes above new retail unit on the Downs site - 8 dwellings
- xi. Florence House - 7 dwellings

\* identified by Lewes District Council in 2015

A total of 218 dwellings against a target of 185 dwellings.

Occupation of sites (ii) and (viii) to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Layout for site (ii) must be planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes

### Map10A shows the detail of each site

**The Dane Valley Project** 6.61 The Dane Valley Project, which was conceived in February 2016, involves brownfield, potentially contaminated, land in multiple ownerships and uses. (See Map 11 below )The project has required and will continue to require significant efforts from the local authorities working in collaboration with landowners and potential developers. In November 2017, a London-based consultancy firm, AECOM, delivered a capacity and feasibility study, based upon their own findings and expertise, guided by the original report. This estimated the total capacity of the site was for 165 homes and 1,100sq.m. of employment space. Notwithstanding this, the Neighbourhood Plan has used the conservative estimate of 131 homes for the total site, for the purposes of this Plan. That AECOM study has been put through the business plan programme of a national Registered Social Landlord (RSL) and proved to achieve a reasonable net land value, thus encouraging further exploration of the sites. Almost all the owners have committed a contribution to the next stage of investigation, involving a geophysical and topographic survey, and the production of a further financial viability study. This commitment from the owners is

another reason for confirming site availability. This second study will report around Christmas 2018.

#### **Insert Map 11: (Dane Valley site)**

6.62 Lewes DC has already recognised the potential of several of these sites, as 3 have been included in the SHELAA. These 2 AECOM studies, together with a full topographic and geophysical survey completed in September 2018 by the owner of the Gasworks site (Scotia Gas Networks) have given significant impetus to the deliverability of most of the sites within a masterplan framework. For the purposes of the Neighbourhood Plan, at this point in time, 4 sites within the overall masterplan area have been excluded, and it is considered prudent to only include 7 of the sites within the timescale of the Neighbourhood Plan, and these are shown on the above map. The Sustainability Appraisal also found that a comprehensive redevelopment provided the opportunity for a more sustainable development that yielded higher housing numbers and the ability to replace lost employment space with more modern employment facilities such as live-work units. It also provided enhanced opportunities for providing open space and the protection of sensitive biodiversity and archaeological areas from development. The scale of a comprehensive development will also support sustainable transport options, encouraging such proposals as new cycle lanes and bus stops. These benefits would not be achieved with a piece-meal development of the individual sites.

#### **SEA16 Dane Valley Project**

**Development of the Dane Valley Project sites shall be carried out in accordance with a comprehensive masterplan to ensure that the following requirements are met:**

- a. The delivery of 131 dwellings over the whole area, 104 of which are in the initial deliverable phase and the balance of 27 homes may be deliverable beyond the 2030 planning period;**
- b. The delivery of employment space on the site;**
- c. High quality development that incorporates best practice in sustainable design;**
- d. Measures to manage the potential for flooding on the site and prevent increased risk of flooding as a result of the development;**
- e. Measures to investigate the extent of contaminated land and remove any contaminated material from the site;**
- f. The masterplan will be informed by an Ecological Constraints and Opportunities Plan and there will be provision of open space to provide amenities for the new residents and to protect areas of biodiversity and archaeological interest;**
- g. Enhanced transport provision to encourage users of the development to access the town centre and railway station by foot, cycle and bus. The key walking and cycling links will be identified as part of the master planning process;**
- h. The layout is planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes, and to ensure a gap of 15 metres between development and Brooklyn Road pumping station;**

- i. The masterplan must be informed by an adequate assessment of the surrounding highway network to determine the scale of specific off-site highway works required to accommodate the development; and
- j. Occupation of the development to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

### SEA17 Florence House

Development of the Florence House site will be subject to the following criteria:

- a) This site is within a high risk archaeological zone and therefore any planning application will need to be accompanied by an archaeological assessment which includes on-site investigation works to demonstrate that the development can be implemented without causing harm to archaeology on the site; and
- b) This site is adjacent to priority habitat deciduous woodland and the design must avoid harm to this habitat where possible or mitigate any unavoidable harm in accordance with the mitigation hierarchy.

### Planning boundaries

6.63 The Seaford Neighbourhood Plan area is subject to significant constraints and as a result new development **has been mainly** focused within the Planning Boundary of Seaford as set in the Lewes Local Plan 2006. However, it has been necessary to vary this boundary slightly to include the site of Florence House allocated in SEA15. The new boundary is identified in Map 11 below. Proposals for development outside of these boundaries will be considered under the countryside policies of the development plan of the relevant authorities (that is Lewes District Council, South Downs National Park and East Sussex County Council).

*Insert New Map 12 (revised planning Boundary)*

### SEA18 Seaford Planning Boundary

Proposals for development within the Planning Boundaries for Seaford parish as shown on Map 11 above will be permitted subject to other relevant development plan policies. Planning permission will not be granted for development outside the Planning Boundaries, other than in those circumstances specifically referred to in other development plan policies or it is for essential utility infrastructure where no suitable alternative sites are available.

### Windfall development

6.64 Developments, particularly housing, will continue to come forward, up to 2030 (the duration of the plan) on sites within the urban area that cannot currently be anticipated. These sites will be classified as 'windfall' (if they are small, less than 6 homes), and 'unidentified' (if they are large sites). These sites will contribute to LDC's figures as referred to in paragraph 6.52 above, and add to the performance to date as described in para 6.54 above. All such sites will be subject to relevant

development plan policies, including the design policy SEA2 in this Neighbourhood Plan (when the plan is adopted), as well as the current requirement in Core Strategy Core Policy 1, to provide affordable housing, and the housing mix requirements in Core Policy 2.

- 6.65 It is important to stress that such development should be on brownfield sites as the green spaces within the urban area of Seaford are highly valued by the community and act as important green lungs within the town. Furthermore, Seaford does not currently achieve the RE1 target for Open Spaces in the town (see paragraphs 6.31/2 above) and therefore any loss of Open Spaces would aggravate the situation.

### **SEA19 Windfall Development**

**The redevelopment of brownfield sites within the Planning Boundaries of Seaford will be permitted subject to other relevant development plan policies and having regard to the Sustainability Objectives in Appendix C. The conversion of upper storey space to housing and/or building of residential units above non-residential premises such as shops and other businesses is particularly encouraged.**

### **New and improved utility infrastructure**

- 6.66 Southern Water has advised that although there are no current plans for improving infrastructure over the life of the Seaford Neighbourhood Plan, it is possible that the total extent of development during the period will require Southern Water to provide new or improved infrastructure to meet such growth, or to meet stricter environmental standards to ensure consistency with the NPPF. It should be noted that this policy does not cover waste water treatment works or other 'county matter' waste facilities which are precluded from inclusion in a neighbourhood plan and are instead covered by the Waste Local Plan for the area.

### **SEA20 Utility Infrastructure**

**New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other relevant development plan policies.**



## 7.0 Non-Statutory Community Aspirations

### Introduction

7.1 This section sets out Non-Statutory Community Aspirations. Some have been developed by the Seaford Community Partnership<sup>3</sup> after an extensive questionnaire and analysis of the views of the public attending a weekend exhibition which were then given to, and endorsed by, the Seaford Neighbourhood Plan Focus Groups (Environment and Countryside; Economy and Facilities; and Travel and Transport). These aspirations do not form part of the development and land use policies in the Neighbourhood Plan. Rather they will inform a Delivery Plan to be prepared and implemented alongside the Neighbourhood Plan. This will include projects identified during the process that residents consider should be addressed. The actions in this Delivery Plan, together with the policies set out in the previous section of the Neighbourhood Plan, will guide residents and other stakeholders on how the Seaford community seeks to plan for and deliver upon its issues and objectives. They can also form the basis for funding from the Community Infrastructure Levy raised by developments within Seaford, and other sources of funding as applicable. This Section summarises recommendations for the Delivery Plan.

### Seaford seafront and tourism

- 7.2 Seaford's Seafront is a key asset in terms of flood defence, recreation, tourism and natural beauty. There are planning policies in place and proposed in this Neighbourhood Plan to ensure that the beautiful vistas and unspoilt seafront are preserved and developed as a natural asset of the Town. However, there is also the need to consider how best this natural asset can be enhanced, and much work has been done by the Seaford Community Partnership and Seaford Town Council to establish the public's views on the Seafront and implement a Seafront Improvement Plan adopted by Seaford Town Council in March 2017 ([www.seafordtowncouncil.gov.uk/Seafront-Development-Plan.aspx](http://www.seafordtowncouncil.gov.uk/Seafront-Development-Plan.aspx) ). The number of independent retailers in the town is a valuable asset and visitors to the seafront should be encouraged to shop, eat and stay in the town. Policy SEA12 supports this aspiration by encouraging the development of tourist accommodation. By way of clarification, there are no proposals to have cobbled streets and the new Martello Toilets will not be unisex.
- 7.3 Over 96% of respondents to the Economy and Facilities Focus Group's questionnaire were in favour of enhancing the Town's main tourism "asset", the Seafront, to support the local economy, visitor numbers and the opportunities and enjoyment for residents. Respondents to the survey however stated that enhancements should only be made if its unspoilt character is retained.

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<sup>3</sup> Established as a company limited by guarantee in 2004 as an alliance between Seaford Town Council, Lewes District Council, East Sussex County Council, some statutory authorities, local organisations and individuals. The mission of the Seaford Community Partnership is to promote the social, economic and environmental well-being of the community and in particular the residents of Seaford. A comprehensive review of the structure and activities of the Seaford Community Partnership can be found at [www.seafordpartners.co.uk](http://www.seafordpartners.co.uk)

- 7.3A As stated in Paragraph 6.43 above on Visitor Accommodation, the Neighbourhood Plan Survey identified 85% of respondents who considered it important or very important “to support Tourism to ensure local businesses remain viable” Policy SEA 12 (Visitor Accommodation in Seaford), which encourages the provision of increased visitor accommodation. However, this important matter requires rather more proactive action.
- 7.3B We are aware from discussions with the Tourist Information office, and from contacts within the Town, that there is an unmet demand for visitor accommodation. This demand comes from a number of sources including;
- Visitors to the town as a quiet coastal retreat on the South Coast
  - Visitors to family who have downsized and moved to Seaford in Retirement
  - Visitors to major family events
  - Visitors to the world famous Seven Sisters and Coastguard Cottages
  - Tourists stopping off at various points along the South Coast who do not want the hustle and bustle of nearby Brighton
  - Visitors completing the Vanguard Way (soon to be added to with the completion of the Great Britain Coastal Way)
  - Visitors to the Town for the many events held here including the South Coast Triathlon, bonfire event, and new planned events such as music festivals
- 7.3C The Chamber of Commerce support the addition of visitor accommodation as many recognise that without visitors using the Town Centre it would very quickly become unsustainable.
- 7.3D The number of visitors to Seaford will continue to grow significantly as the use of the Town as a venue to film increases its profile massively. Next year two feature films will be released that are both primarily based in Seaford.
- 7.3C Whilst we are clear that there is an unmet demand for visitor accommodation, we have not yet been able to do sufficient research to quantify the demand and to assess what sort of accommodation (such as Bed and Breakfast, hotel, self catering etc) is needed to meet the demand. The recent announcement of the Downs Health Centre to replace the GP surgeries in the centre of town will mean that two prime town centre sites close to the Seafront will become available in the next two or three years.
- 7.3D Another possibility for accommodation for visitors could be provided by chalets and pods at Seaford Head Golf Course.
- 7.4 Impact Seaford is a group of Councillors and officials from Town, District and County Councils, the Seaford Community Partnership, the Chamber of Commerce and local residents. It identifies, monitors and co-ordinates as necessary various projects to regenerate the local economy. One such project is a restaurant on the edge of the

Salts overlooking the sea. Provision of the necessary level of hotel accommodation in the town is within its remit.

### **Community Aspiration 1 (Seafront and Tourism)**

**It is recommended that:**

- a. Consideration is given to improving signage and access from the A259 to the Town Centre and Seafront and from the Seafront to the Town Centre as well as rationalising signage elsewhere.**
- b. Enhancing the town centre, such as with new light standards, Victorian shop front scheme, cobbled lanes, etc.**
- c. Wherever possible, any disturbance to wildlife and natural vegetation should be avoided;**
- d. There should be better maintenance of the paths and walls along the Seafront, as well as sensitive enhancement of the man-made features, such as benches, toilets, sea defence groynes and shelters;**
- e. Lighting should be reviewed to ensure it as effective as possible, and at the same time reducing wherever possible any light pollution;**
- f. The “free parking” policy, for cars and motor cycles, on the Seafront, with a dedicated coach bay (with drop off point in the town centre) should be retained;**
- g. Seaford Town Council and the South Downs National Park Authority should continue to work closely together to deliver a joint approach to better signage and fencing to the National Park from the Town, particularly within the Heritage Coast, and possibly associated tree planting and landscaping if deemed appropriate;**
- h. Impact Seaford and Seaford Town Council should take the lead in investigating the level and type of demand for accommodation for visitors to the town and consider the options for sites for such accommodation including:**
  - b) The soon to be vacated GP surgeries sites in the town centre**
  - c) The site adjacent to the Seaford Head Golf Course which could accommodate chalets and pods for visitors**

### **Heritage assets**

7.5 Seaford is fortunate to have a significant number of heritage assets and sites, most of which are currently designated with some form of status/ designation. Appendix A provides an overview of the registered sites. In addition, the Dane Valley Project provides the opportunity for establishing the precise location of the chapel and burial ground associated with the 12th century Leper Hospital. If achieved, it will add to the heritage asset list for the town. Appendix A also contains information on Sutton Park Road War Memorial, Steyne Drinking Fountain and Jubilee Gardens.

7.6 Following discussions with Lewes DC and the Seaford Museum and Heritage Society, it is understood that there are a number of sites within Seaford parish that may not meet the criteria for addition to the National Heritage List for England but could be deemed as being “Locally Listed Buildings” which should be used to inform planning decisions.

- 7.7 Many of the heritage sites are not only important to the historic environment, but also to tourism. Sites that promote tourism should be maintained as much as possible. This could be through a mix of:
- i. Where available, funding being provided for their maintenance;
  - ii. Seaford Town Council acting as a “convenor” and “communicator” to support any community led action to help maintain and preserve heritage sites. If funds become available, it is recommended that the preservation, maintenance and/or enhancement of heritage sites is given a high priority.

### **Community Aspiration 2 (Heritage Assets)**

#### **It is recommended that:**

- a. **Seaford Town Council works with the Seaford Museum and Heritage Society and Historic England to refresh the list of designated heritage assets, including adding Sutton Park Road War Memorial, Steyne Drinking Fountain, and Jubilee Gardens;**
- b. **Seaford Town Council works with the above partners and the local planning authorities to draw up a list of non-designated ‘Locally Listed Buildings’.**

### **Grass verges**

- 7.8 Grass verges, and the appropriate planting of trees beside the highway, are recognised as being beneficial to the natural environment and the local community. East Sussex County Council operates a Wildlife Verge Scheme and some verges, such as the one on Edinburgh Road, Seaford, are already included in the scheme. It is proposed that further work be undertaken to understand which verges in Seaford are in the scheme, or should be proposed for addition to the scheme, to ensure they are appropriately enhanced and preserved. Additionally, East Sussex County Council is to trial a reduction in verge cutting in some areas to increase biodiversity. If the trial proves successful, verges in Seaford should be put forward for reduced verge cutting in future to promote biodiversity.
- 7.9 Where possible, the quality of verges should be enhanced and preserved through, for example, the planting of trees and the protection of wild plants. To facilitate tree planting, it is recommended, that when utility firms seek to place new, or maintain, infrastructure underground, the impact on tree planting on verges should be considered to help ensure as many trees as possible can be planted to enhance the environment.

### **Community Aspiration 3 (Grass Verges)**

#### **It is recommended that:**

- a. **Further work be undertaken to understand which verges in Seaford are in the Wildlife Verge Scheme, or should be proposed for addition to the scheme, to ensure they are appropriately enhanced and preserved;**
- b. **Appropriate verges in Seaford should be put forward for consideration of reduced verge cutting to promote biodiversity (such discussions should include assessment of the wider impact (such as, on wildlife, road safety issues and blocking of drains) of**

- reducing the frequency of verge cutting, any pilot scheme should be well publicised; and
- c. Utility companies, in locating underground cables be encouraged to consider the impact of works on existing and proposed trees.

### Climate change and flooding

- 7.10 Climate change is a large-scale, long-term shift in the planet's weather patterns or average temperatures. The seven main sources of evidence for climate change are:
- **Higher temperatures** - the average temperature of the planet's surface has risen by 0.89 °C from 1901 to 2012;
  - **Changing rainfall** - the UK's summer rainfall is decreasing on average, while winter rainfall is increasing;
  - **Changes in nature** - the UK spring starts earlier and autumn starts later which results in butterflies appearing earlier in the year and birds shifting their migration patterns;
  - **Sea level rises** - since 1900, sea levels have risen by about 10 cm around the UK and about 19 cm globally, on average;
  - **Retreating glaciers** - glaciers are melting and the rate of shrinkage has increased in recent decades;
  - **Sea ice** - Arctic sea-ice has been declining since the late 1970s, reducing by about 4% per decade whilst Antarctic sea-ice has increased, but at a slower rate of about 1.5% per decade; and
  - **Ice sheets** - The Greenland and Antarctic ice sheets, which between them store the majority of the world's fresh water, are both shrinking at an accelerating rate<sup>4</sup>.
- 7.11 Potential flooding is the key element of climate change that is likely to impact on Seaford. There are two elements of potential flood risk: coastal flooding and surface drainage flooding. The Environment Agency has a long-term Sea Defence Strategy which is reviewed periodically in consultation with relevant bodies including the Seaford Beach User Group. Similarly, for surface water flooding (which is an increased increasing problem owing to the increase in very heavy rainfall in a short time), the Environment Agency works with the Local Authority Emergency Planning Officer, Southern Water and the Seaford Flood Action Group. The lead local flood authority (East Sussex County Council) leads on surface water flooding issues.
- 7.12 The Seaford Beach User Group, (led by Seaford Town Council and including Councillors, Newhaven Port staff and local residents) discussed the Sea Defence Strategy with the Strategy Team as options for the flood defences were developed and costed (including ideas put forward by the Beach User Group which included an off-shore reef and breakwaters of various designs As a result of close working with the Environment Agency and the Local Authority Emergency Planning Officer, a Flood Action Group was set up in 2015 to minimise the potential impact of coastal and surface water flooding on the town. Surface water flooding has also been an

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<sup>4</sup> Information taken from <http://www.metoffice.gov.uk/climate-guide/climate-change>

important aspect of the Action Group's work and constructive discussions have been held with Southern Water. It is recommended that the Beach User Group should continue to meet regularly with the Environment Agency and be consulted on future flood defence strategy as well as on more day to day issues.

- 7.13 Joint Core Strategy Policy 12 – Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability requires planning applications for large developments to prepare a Sustainable Urban Drainage System plan for the site and these details will need to be considered very carefully when applications are made (including the cumulative impact on areas beyond the immediate area of the development). However, the majority of planning applications for additional homes since 2010 have been on small sites for which attenuation schemes are not applicable. This issue is being addressed by the Seaford Flood Action Group to create a multi-layered response to the current experience of flooding in the town from surface water.

#### **Community Aspiration 4 (Climate Change and Flooding)**

**It is recommended that**

- a) the Flood Action Group and the Beach User Group should continue to meet regularly with the Environment Agency and be consulted on future flood defence strategy as well as on more day to day issues (such as flash flooding).**
- b) When appropriate the South Downs National Park Authority (SDNPA) should be consulted on any future flood defence strategy given the impact this can have on the natural appearance of the Heritage Coast.**

#### **Infrastructure**

- 7.14 It is recognised that for there to be sustainable development in the Town, adequate educational and medical services are crucial. 92% of respondents to the Economy & Facilities Focus Group's Survey were in favour of exploring the capacity levels of health and education services in the Town. These providers were contacted and overall the findings were that:

- The two GP surgeries in the Town report that demand is at the upper level of that recognised possible without being detrimental to patient care. Whilst any increase in population would have to be accommodated, the main consequence of an increasing population would be longer waiting times. Seaford Town Council co-ordinates a Health Stakeholders Group comprising representatives from the GP Practices, Town and District Councils, CCG (Clinical Commissioning Group), Sussex Partnership NHS Trust, Horder Health Care, Access, Wave Leisure and the Seaford Senior Forum. The Group meets quarterly. It is important to recognize that while CIL (Community Infrastructure Levy) income will cover infrastructure capital costs, running costs (including manpower) must be accommodated through the relevant NHS cost centres. In parallel discussion and work up of the necessary provision between interested parties is therefore critical to achieving the required services

- For education, there is a clear system to estimate future needs and capacity and, hence, no recommendations are required;
- There is no obvious concern about dental service capacity overall.

7.15 No existing capacity problems have been identified with utilities, but it is clear that detailed consultation will be crucial to ensure sustainable development. This is already a core component of the existing policy framework.

### **Community Aspiration 5 (Infrastructure)**

**It is recommended that priority must be given to ensuring that any future developments in the Town are accompanied by a commensurate increase in resources for patient care and education; and this should be a core priority of all relevant Authorities.**

### **Provision of services for the young**

7.16 Whilst 70% of respondents to the Neighbourhood Plan Survey said they were in favour of exploring the need for a Youth Centre, discussions with the Seaford Community Partnership's Youth Task Group, which includes young people, indicated that a café style facility that stayed open into the evening, with Wi-Fi and games facilities would be a welcome alternative. In addition, making sure that existing recreation space was enhanced and maintained (e.g. an athletics track and an additional BMX track) would also be welcome. Seaford Town Council's plans for a skateboard park in The Salts recreation area, as a part of its Seafront Development Plan, are at an advanced stage and discussions have shown this will be popular.

### **Community Aspiration 6 (Services for young people)**

**It is recommended that:**

- a. The provision of services (and facilities) for the young receive a high priority to attract young people to the Town;**
- b. The provision of a café style facility for young people be explored;**
- c. Existing recreation space be maintained and enhanced with facilities such as a BMX track.**
- d. Lewes District Council to carry out a playing pitch strategy with a view to working with Seaford Town Council to ensure adequate facilities are provided to all parts of the Town.**

### **Provision of a community centre**

7.17 Although 68% of respondents in the Neighbourhood Plan Survey were in favour of exploring the benefits of a Community Centre, no clear evidence, other than a generalised aspiration, has come forward. No organisation has made representations for such a centre.

## Policing

- 7.18 An increased population may require more police. Seaford is fortunate to be a low crime area, which may account for the lower than average police presence in the Town. This issue is monitored through Seaford Town Council which reviews crime statistics at full Council meetings.

### Community Aspiration 7 (Policing)

**It is recommended that policing in Seaford continues to be monitored closely to ensure that as the population increases the policing of the Town remains adequate.**

## Recycling

- 7.19 Improved recycling facilities are essential as the population grows. 25% is the current re-cycling rate for Lewes DC, below the 35% national average. Whilst there are a number of recycling centres throughout the Town, the largest (Cradle Hill) is not open every day and a number of the “self-service” sites do not accept a full array of items – most noticeably cardboard. It is understood that Lewes DC has nearly completed a new Waste Strategy which aims to improve recycling rates and there is the possibility of new small sites being added. Space may be freed up to create more cardboard recycling facilities by putting all glass into one bin rather than having to separate it by colour. This would be very welcome because currently only the Cradle Hill recycling centre can accommodate cardboard that is too large for kerbside collection, but it is only open Friday, Saturday and Sunday (yet Seaford is the largest settlement in the District).

- 7.20 With the exception of Cradle Hill, there are no recycling facilities north of the A259. Potential locations for further consultation could be:

- Princess Drive;
- Area where Blatchington Road meets Avondale Road;
- Walmer Road;
- Micklefield Way.

Although much of the contents of litter bins on the seafront could be recycled there is no provision for recycling waste from the seafront.

### Community Aspiration 8 (Recycling)

**It is recommended that:**

- a. **Lewes DC investigates the potential for correcting the lack of recycling facilities on the seafront and north of the Town and considers the following locations for recycling points:**
  - i. **Princess Drive**
  - ii. **Area where Blatchington Rd meets Avondale Rd;**
  - iii. **Walmer Road**
  - iv. **Micklefield Way**

- b. Lewes DC considers providing additional facilities for recycling cardboard; and
- c. Lewes DC continues to consult with the community on its Waste Strategy.

## Transport and air quality

- 7.21 The Joint Core Strategy acknowledges that “Transport issues remain a major concern for many local people. The rate of road casualties in the district is above the national average and 43% of residents in the Place Survey 2008 identified traffic congestion as a priority issue that needs to be addressed” (paragraph 7.117). There has been, and will continue to be, much development of new housing that feeds into the A259 between Peacehaven and Seaford. The infrastructure Levy and Section 106 funding can provide funds for work directly related to a particular development but there seems to be no strategic mechanism to ensure adequate roads are provided to match the cumulative effect of such developments. The junctions of the A259 Buckle Bybass with Bishopstone Road/Hill Rise and Hawth Hill continue to be an accident black spot, including fatalities. A reduced speed limit (to 50 mph) has recently been introduced but the problem has not been solved. A roundabout seems to be the only possible solution.
- 7.21a Air quality is monitored carefully by Lewes District Council by means of automatic monitoring in areas where a problem may arise. The nearest automatic monitoring device to Seaford is in Newhaven. There were, up to 2014, two roadside “manual monitoring” sites in Seaford: A259 near to St Crispians and A259 near to Chyngton Gardens. The St Crispians site is no longer monitored as, over a number of years, levels of pollutants were very low. The site near Chyngton Gardens has relatively low readings of pollutants which indicate there is not a problem at the moment but monitoring will continue.
- 7.22 Following engagement with the public, it is recommended that development within the Town of Seaford should not inhibit the future potential to re-dual the Town’s train lines, nor inhibit the widening or re-siting of the Exceat Bridge on the A259. Suggestions are made in **Appendix B** to improve road, rail, cycling, buses and pedestrian facilities.

## Community Aspiration 9 (Transport and air quality)

- a) It is a community aspiration that East Sussex County Council Highways deal with the severe dangers on the A259 at Bishopstone/ Hill Rise and Hawth Hill and implement an appropriate solution using available funding.
- b) It is recommended that the suggestions in Appendix B are used to inform decisions by the local highway authority and other relevant bodies to improve the sustainable transport network in Seaford.
- c) Seaford Town Council and East Sussex County Council should work closely with Cycle Seahaven, and other local groups as appropriate, to make improvements to the cycling infrastructure, particularly in the town centre.

## Conclusion

- 7.23 A Delivery Plan to address the above issues will be discussed and agreed with Seaford Town Council in consultation with relevant partners and the public and will be implemented alongside the Neighbourhood Plan. This Delivery Plan will identify those projects which require funding and cost them, where possible, so that it can be used to bid for money from the Community Infrastructure Levy and other funding sources.

## 8.0 Delivery Plan

### Introduction

8.1 The Seaford Neighbourhood Plan will be implemented through a combination of the local planning authorities' consideration and determination of planning applications for development in the parish and through steering public and private investment into a series of infrastructure projects contained in the plan. The community aspirations set out in Chapter 7 will inform a Delivery Plan which will be implemented by Seaford Town Council in the lead, working in partnership with other relevant bodies.

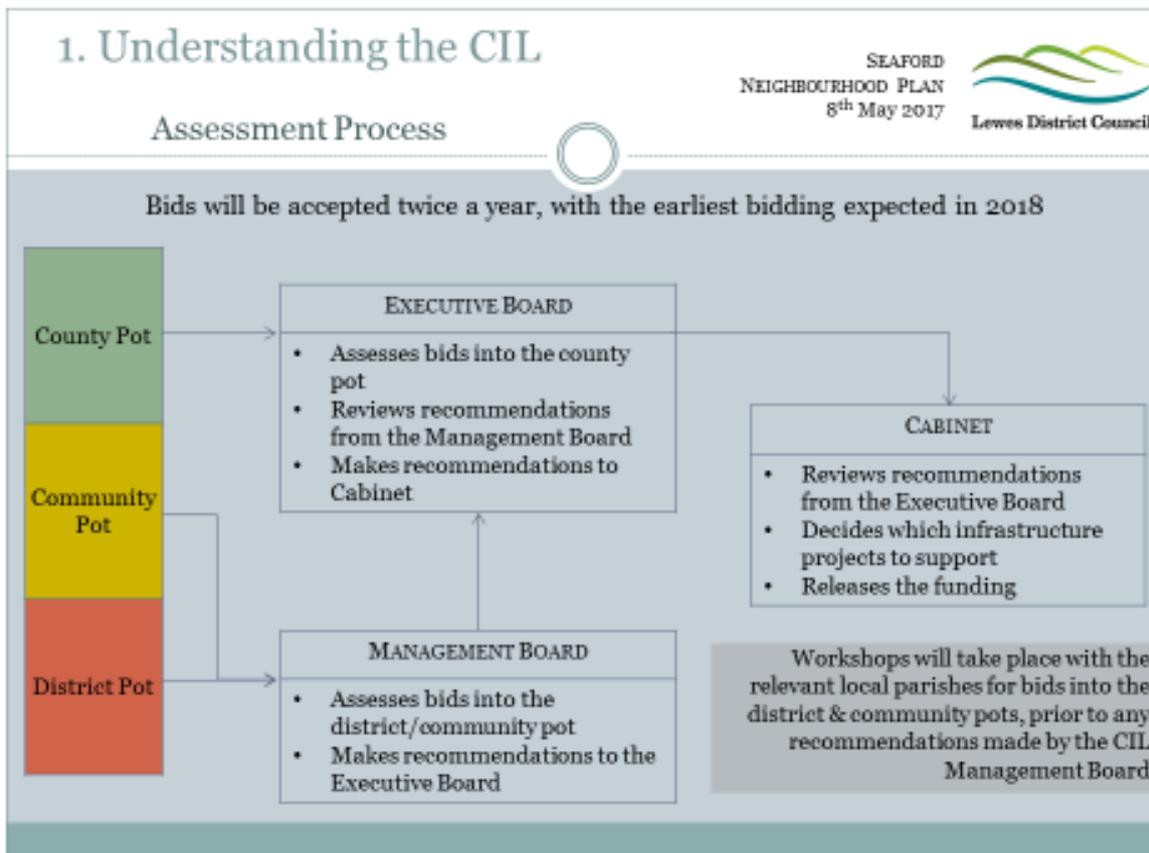
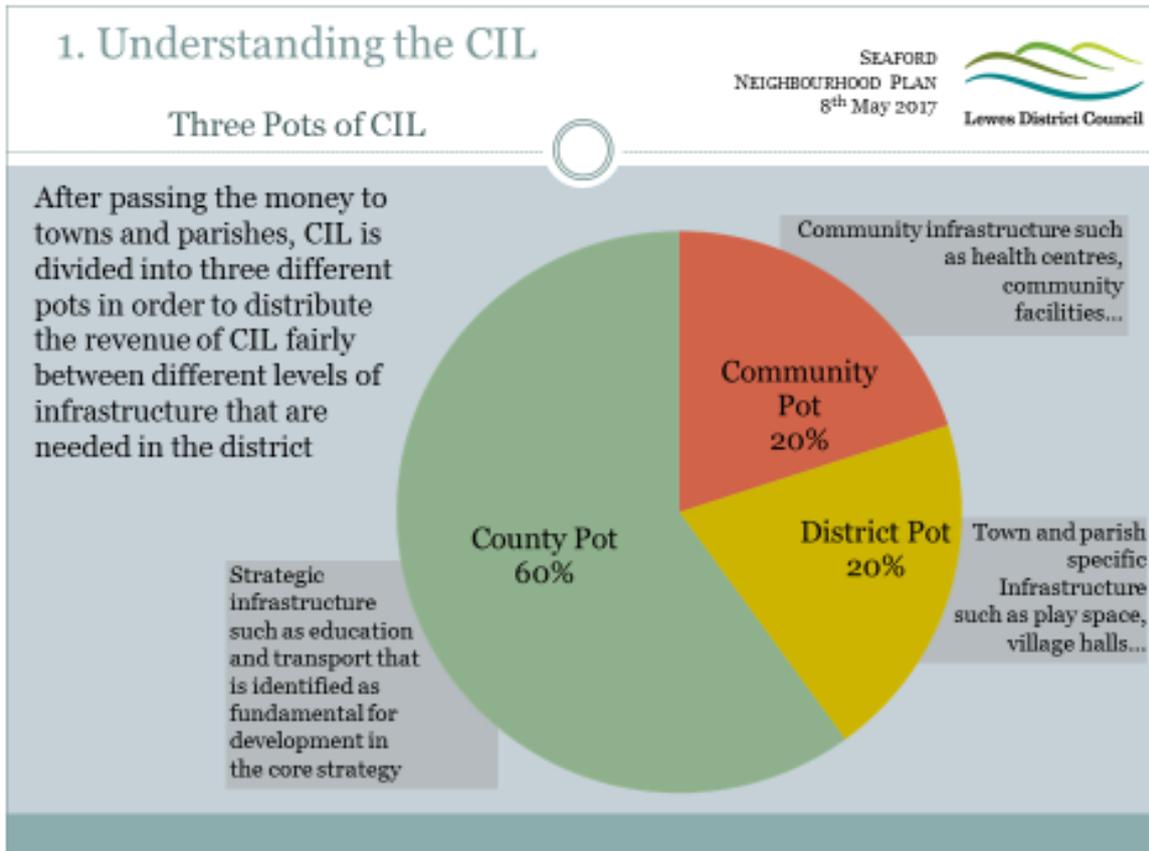
### Development management

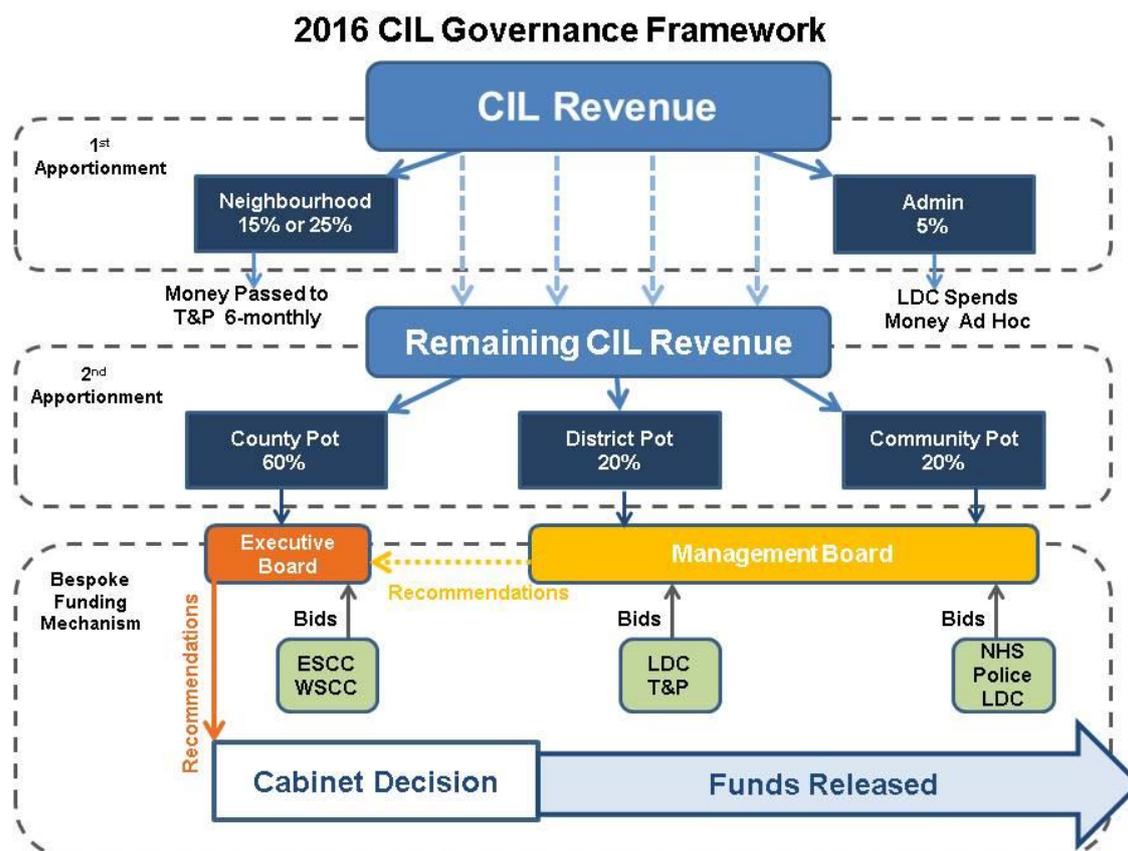
8.2 Most of the policies contained in the Neighbourhood Plan will be delivered by landowners and developers responding to its proposals for encouraging and managing development. In preparing the Plan, care has been taken to ensure, as far as possible, that these proposals are achievable.

8.3 Whilst Lewes DC and the South Downs National Park Authority will be responsible for determining planning applications for development within Seaford Parish, in line with their Core Strategy and Local Plans and the Seaford Neighbourhood Plan, Seaford Town Council will use the Seaford Neighbourhood Plan to frame its representations on submitted planning applications. It will also work with the authorities to monitor the progress of sites coming forward for development.

### Infrastructure projects

8.4 The Community Infrastructure Levy has largely replaced the pooling of S106 agreement financial contributions and is charged on qualifying residential and commercial development. At least 25% of the levy collected by the local planning authorities from development in the Parish of Seaford will be transferred to Seaford Town Council once it has a made Neighbourhood Plan. The Delivery Plan referred to in Chapter 7 above will be used to inform the Infrastructure Delivery Plans of the local planning authorities and to guide Seaford Town Council's own expenditure of its proportion of the Community Infrastructure Levy. The following figures illustrate how the Lewes DC's Community Infrastructure Levy is apportioned between the local authorities and sets out the governance arrangements for deciding expenditure.





8.5 Local Town, District and County Councillors involved in the Management Boards and Workshops should give a high priority to these tasks as it is important to ensure the appropriate infrastructure is in place and effective to support development in the Town.

### Monitoring and review of the Neighbourhood Plan

8.6 The Sustainability Appraisal of the Neighbourhood Plan sets out a number of indicators to assess whether the Plan is meeting its sustainability objectives (**Appendix C**). These will be regularly monitored in partnership with the local planning authorities, as a significant change in these indicators could trigger the need for a review. Similarly changes in the local planning context, such as an increase in the housing requirement or a deficiency in the five-year supply of housing land, could result in the Neighbourhood Plan needing to be reviewed. In these ways, the Neighbourhood Plan will be kept relevant to the evolving needs of the Town.

## APPENDICES

Appendix A Heritage Assets

Appendix B List of Proposed Transport Improvements

Appendix C Sustainability Objectives (extract from Sustainability Appraisal being published separately)

Appendix D Views from and within Conservation Areas

## Appendix A Heritage Assets in Seaford

**Part A recorded on the National Heritage List** for England ([www.historicengland.org.uk](http://www.historicengland.org.uk)) as of 1<sup>st</sup> March 2017, 70 results:

### **Heritage Category: Grade I Listed Buildings**

CHURCH OF ST ANDREW, BISHOPSTONE, Seaford, Lewes, East Sussex  
THE PARISH CHURCH OF ST LEONARD, CHURCH STREET, Seaford, Lewes, East Sussex

### **Heritage Category: Grade II\* Listed Buildings**

THE PARISH CHURCH OF ST PETER, BLATCHINGTON HILL, Seaford, Lewes, East Sussex

### **Heritage Category: Grade II Listed Buildings**

18, SOUTH STREET, Seaford, Lewes, East Sussex  
2, 3 AND 4, CROUCH LANE, Seaford, Lewes, East Sussex  
FITZGERALD HOUSE, 1-14, CROFT LANE, Seaford, Lewes, East Sussex  
CAUSEWAY HOUSE, 37, STEYNE ROAD, Seaford, Lewes, East Sussex  
SEAFORD RAILWAY STATION, SEAFORD, Seaford, Lewes, East Sussex  
THE GABLES, BLATCHINGTON HILL, Seaford, Lewes, East Sussex  
THE STABLES (BELONGING TO 'THE GABLES'), BLATCHINGTON HILL, Seaford, Lewes, East Sussex  
MONKS ORCHARD, BLATCHINGTON HILL, Seaford, Lewes, East Sussex  
CHURCHYARD WALL, CHURCH STREET, Seaford, Lewes, East Sussex  
ALMA HOUSE, 4, CHURCH STREET, PHOENIX CORNER HOUSE, CHURCH STREET, Seaford, Lewes, East Sussex  
SEAFORD COLLEGE OF EDUCATION, COLLEGE ROAD, Seaford, Lewes, East Sussex  
STONE HOUSE (IMMEDIATELY BEHIND SEAFORD HOUSE), CROUCH LANE, Seaford, Lewes, East Sussex  
SUTTON PLACE, EASTBOURNE ROAD, Seaford, Lewes, East Sussex  
THE STAR HOUSE, HOMEFIELD ROAD, EAST BLATCHINGTON, Seaford, Lewes, East Sussex  
ALBION HOUSE, 2, HIGH STREET, Seaford, Lewes, East Sussex  
5-9, HIGH STREET, Seaford, Lewes, East Sussex  
THE OLD HOUSE, 15 AND 17, HIGH STREET, Seaford, Lewes, East Sussex  
BARN OPPOSITE DORCAS COTTAGE, SAXON LANE, Seaford, Lewes, East Sussex  
5 AND 5A, STEYNE ROAD, 7 AND 9, STEYNE ROAD, Seaford, Lewes, East Sussex  
1-4, STEYNE ROAD, 1-4, MARINE TERRACE, Seaford, Lewes, East Sussex  
151 AND 152, CHYNGTON LANE, Seaford, Lewes, East Sussex  
OUTBUILDING IMMEDIATELY EAST OF DOVECOTE AT CHYNGTON HOUSE, CHYNGTON LANE, Seaford, Lewes, East Sussex  
OUTBUILDING SOUTH OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford, Lewes, East Sussex  
CHYNGTON COTTAGES, 155 AND 156, CHYNGTON LANE, Seaford, Lewes, East Sussex  
FIELD COTTAGE, BELGRAVE ROAD, EAST BLATCHINGTON, Seaford, Lewes, East Sussex  
WALL OF CHURCHYARD AND ENCLOSURE TO THE EAST, BISHOPSTONE, Seaford, Lewes, East Sussex  
ARCHWAY LEADING INTO CROUCH GARDEN, EAST STREET, Seaford, Lewes, East Sussex  
MARTELLO TOWER, THE ESPLANADE, Seaford, Lewes, East Sussex  
GARDEN WALL AT NO 2, HIGH STREET, Seaford, Lewes, East Sussex  
GARDEN WALL TO THE NORTH AND SOUTH OF PEAR TREE COTTAGE, SAXON LANE, Seaford, Lewes, East Sussex  
GARDEN WALL AT SAXON LODGE, SAXON LANE, Seaford, Lewes, East Sussex

CHYNGTON HOUSE, CHYNGTON LANE, Seaford, Lewes, East Sussex  
OUTBUILDING IMMEDIATELY WEST TO DOVECOTE AT CHYNGTON HOUSE, CHYNGTON LANE,  
Seaford, Lewes, East Sussex  
THE OLD TOWN HALL, SOUTH STREET, Seaford, Lewes, East Sussex  
44 46 48 AND 50, HIGH STREET, Seaford, Lewes, East Sussex  
BISHOPSTONE RAILWAY STATION, STATION ROAD, BISHOPSTONE, Seaford, Lewes, East Sussex  
TWIN COTTAGE, 3, BLATCHINGTON ROAD, TWIN HOUSE, 5, BLATCHINGTON ROAD, Seaford, Lewes,  
East Sussex  
COWSHEDS EAST OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford, Lewes, East Sussex  
GARDEN WALL IN FRONT OF NOS 1 TO 4 (CONSECUTIVE), STEYNE ROAD MARINE TERRACE, Seaford,  
Lewes, East Sussex  
THE REGENCY LOUNGE, 20, HIGH STREET, Seaford, Lewes, East Sussex  
SMUGGLERS COTTAGE, PELHAM ROAD, WEST HOUSE, PELHAM ROAD, 15, PELHAM ROAD, Seaford,  
Lewes, East Sussex  
GARDEN WALL AT FIELD COTTAGE, BELGRAVE ROAD, EAST BLATCHINGTON, Seaford, Lewes, East  
Sussex  
ALMSHOUSES (NOW 2 DWELLINGS), BISHOPSTONE, Seaford, Lewes, East Sussex  
THE MANOR HOUSE, BISHOPSTONE, Seaford, Lewes, East Sussex  
BARN OPPOSITE CHURCH AND TO THE SOUTH OF MARKSDOWN, BISHOPSTONE, Seaford, Lewes,  
East Sussex  
CHURCHYARD WALL, BLATCHINGTON HILL, Seaford, Lewes, East Sussex  
DREW COTTAGE, 28, BLATCHINGTON HILL, RECTORY COTTAGE, 26, BLATCHINGTON HILL, Seaford,  
Lewes, East Sussex  
12-16, HIGH STREET, Seaford, Lewes, East Sussex  
PEAR TREE COTTAGE, SAXON LANE, Seaford, Lewes, East Sussex  
SAXON LODGE, SAXON LANE, Seaford, Lewes, East Sussex  
51, STEYNE ROAD, 1, ST MARTINS, Seaford, Lewes, East Sussex  
DOVECOTE SOUTH EAST OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford, Lewes, East Sussex  
NEW BARN, BISHOPSTONE, Seaford, Lewes, East Sussex  
STEYNE HOUSE, 35, STEYNE ROAD, Seaford, Lewes, East Sussex  
ABERDEEN HOUSE, 41, STEYNE ROAD, Seaford, Lewes, East Sussex  
HONEYSUCKLE COTTAGE, 1, SOUTH STREET, SAXON COTTAGE, 3, SOUTH STREET, Seaford, Lewes,  
East Sussex

**Heritage Category: Scheduled Ancient Monuments**

- Medieval crypt, Church Street, Seaford, Lewes, East Sussex
- Bowl barrow on High and Over, Seaford
- Two bowl barrows, the south easternmost pair of a group of six bowl barrows, forming part of a linear round barrow cemetery on Rookery Hill, Seaford, Lewes, East Sussex
- A pair of bowl barrows forming part of a linear round barrow cemetery, and a hlaew on Rookery Hill, Seaford, Lewes, East Sussex
- Bowl barrow forming part of a linear round barrow cemetery on Rookery Hill, Seaford, Lewes, East Sussex
- Bowl barrow, the north westernmost barrow of a group of six bowl barrows, forming part of a linear round barrow cemetery on Rookery Hill, Seaford, Lewes, East Sussex
- Hillfort and a bowl barrow on Seaford Head, Seaford, Lewes, East Sussex
- Martello tower no 74 on Seaford Esplanade, Seaford, Lewes, East Sussex

## Part B Sites to be added to the Heritage List for England

### 1. Sutton Park Road War Memorial:

It is understood that Seaford Town Council has already made an application for the site to be included on the National Heritage List for England. Following feedback from the Seaford Museum and Heritage Society, it is proposed to seek clarification that this includes the inscribed Victoria Cross memorial which was placed there in 2005. Subject to clarification, no further action is required.

### 2. Steyne Drinking Fountain and Jubilee Gardens:

This is located at the junction of South Street and Steyne Road in Seaford. The inscription reads as follows: "*Erected by public subscription to commemorate the completion of fifty years of the reign of her most gracious Majesty Queen Victoria. A.D. 1887.*" Following feedback from the Seaford Museum and Heritage Society it is understood that the site is the location of the ancient Cinque Port. The actual drinking fountain is believed to be originally part of a gun mount at the Seaford Fort on the Esplanade. It was placed within the Jubilee Gardens in 2002, where it was transformed into a sun-dial to commemorate the Golden Jubilee of Her Majesty Queen Elizabeth II. It is proposed that an application is made for both sites be added as heritage assets to the National Heritage List for England.

### 3. Coastguard Cottages overlooking the Seven Sisters:



This iconic group of Coastguard Cottages, built in the 1820's has been a feature of this famous panorama of the Seven Sisters. At a public presentation in July 2017, several residents made representations that with the effects of coastal erosion, the future of these cottages, as with those at Birling Gap, was in doubt. It is therefore worth investigating the risks of losing this historic element in this coast's heritage, whilst there is a chance. Adding the group of cottages to the National Heritage List will give them a wider public profile, and assess if it is feasible to protect them.

## Appendix B: List of Proposed Transport Improvements

The following specific issues were raised through public engagement on Transport:

### **Rail**

- Maintain two-station provision, with station quality improvements, additional proximity parking, and pedestrian access to Seaford Station from Richmond Road.
- Continued train connectivity is overwhelmingly supported.

### **Road provision**

- Provide bus bays, taxi bays, secure-cycle and pedestrian areas, 20 mph limit, electric vehicle charging, and adequate off-road domestic parking, in developments and redevelopments.
- Maintain free parking provision on the seafront where existing, and current parking time-limits and restrictions in shopping streets and school approaches.
- Provide separation of industrial estate and residential street traffic. Provide sufficient and appropriate road links to industrial / commercial areas such as Cradle Hill.
- Improve vehicular flow through pinch-points at Exceat, Alfriston and Newhaven.
- Provide roundabouts on A259 connecting all proposed developments, residential or light industrial.

### **Cycling**

- Increase percentage of journeys using cycles by making improvements in the cycling infrastructure (both exclusive and shared with motor traffic) and by extending 20mph speed limits. This would include provision of secure cycle storage at shopping areas, surgeries and an increase of existing provision at railway stations and schools
- Further prioritise road safety, such as by separating pedestrians and cyclists from other modes of transport wherever possible, with particular emphasis needed from the existing seafront provision to Exceat Bridge on A259, and from Sutton Corner in the direction of Alfriston. This would not necessarily need to follow the router of Alfriston Road itself within Seaford. It is also necessary to enhance the number of A259 joining / crossing points, at Beacon Road, Station Approach, War Memorial, and Sutton Corner to increase the ease and safety of crossing or joining the A259. Discrete Cycling Routes to Schools are desirable.
- Enforce the separation of motor vehicle and cycle use, where separate provision is already made (A259 Seaford to Newhaven).

### **Other public transport (including buses)**

- Provide additional public transport for the north of Seaford to town centre shops, doctors, main bus and rail hubs, and the seafront.
- Provide more frequent bus services later into the evening.
- Examine/remedy the time-delay-effect of three 'loops' for buses in Newhaven (Denton, Railway Station, North Lane) which hinder the timeliness of services to / from Seaford.
- Remedy the difficulties for large buses caused by on-street parking in locations such as Vale Road, Chyngton Estate and Hawth Hill (before some services are withdrawn).
- Add public hospital transport to Eastbourne and Hastings Hospitals.
- Support the widespread demand for a Newhaven-Dieppe passenger ferry service with timetables catering for day-trip passengers, and the re-instatement of a fast-ferry service.

### **Accessibility: Pedestrians and those with disabilities**

- Widen or replace narrow footways (such as those at Blatchington Hill, Blatchington Road, Firlie Road, Sheep Pen Lane, Saxon Lane, Crouch Lane) or implement singling of vehicular direction, or speed restriction and ensure sufficient pavement width.
- Preserve/enhance existing footways and tverns with enhanced features: accessibility, lighting and removal of vegetation. Ensure these pedestrian (and cycle in some cases) facilities are continued through new developments and are not prohibited by 'gating'.
- Improve safety at school entrances by enforcing 20mph limits and parking restrictions, with additional 20mph zones and additional crossings such as at Belgrave Road adjacent to Kingsway for Seaford Primary School.
- Attend to dropped kerbs which are too precipitous for wheeled-disability-users' safety.

## Appendix C: Sustainability Objectives

The Sustainability Appraisal seeks to test the contribution that the Seaford Neighbourhood Plan (SNP) will make towards achieving sustainable development. The first part of this process is identification of a number of objectives, questions and indicators, presented below in the Sustainability Framework. Combined, these will be used to inform the SNP by assessing the sustainability impacts of the options considered and policies taken forward in the plan. The objectives are based on the three strands of sustainability - environmental, social and economic. The questions/ indicators have been chosen to quantify and measure the degree to which each objective has been achieved or will be achieved, although additional considerations and further details have been taken into account where necessary. The Sustainability Framework has emerged through careful appraisal of higher-level plans, the collection of baseline data and local knowledge of sustainability challenges faced in the Parish.

### Objectives, questions and indicators

The sustainability objectives are set out below and each is followed by its corresponding questions and indicators. The objectives are colour coded to show whether they are **social**, **environmental** or **economic**.

Sustainability objectives and indicators (the Sustainability Framework) of the SNP are as follows:

Objective	Questions & Indicators	Category	SEA/SA Topic
<p><b>1. Housing</b> To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future.</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does the SNP approach support the number of homes required by Lewes DC in the Parish?</li> <li>2. Will the approach deliver quality and sustainably built homes to meet local need, including for younger/ older residents and those on the housing register?</li> <li>3. Does the approach help meet affordable housing needs?</li> <li>4. Does the approach encourage the use of brownfield land in the first instance, and land efficiency?</li> <li>5. Is the approach/ site appropriate given the Parish's setting within/ by the National Park?</li> <li>6. Does it preserve and enhance the existing built environment?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of new homes completed;</li> <li>• Number of affordable dwellings completed;</li> <li>• Hectares of brownfield land redeveloped for housing;</li> <li>• Number of new homes built to meet the needs of younger residents and/or older people.</li> <li>• Number of people on the housing register.</li> <li>• Number of homes within the existing built environment.</li> </ul>	<p><b>Social</b></p>	<p><b>Housing/Health /Community</b></p>

<p><b>2. Sustainable Transport (including walking/cycling)</b> To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does the approach encourage sustainable modes of transport?</li> <li>2. Would the approach increase congestion significantly?</li> <li>3. For site allocation: is the site within walking distance of a school, convenience store, a GP surgery, an existing transport stop – e.g. bus stop or railway station?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of retained and/ or new sustainable and public transport facilities provided in the SNP area.</li> <li>• Number of households /dwellings proposed within a 10-minute walk (approximately 800m) of a transport stop – i.e. bus stop or railway station.</li> <li>• Number of new cycling facilities.</li> </ul>	<p><b>Social/ Economic</b></p>	<p><b>Roads and Transport</b></p>
<p><b>3. Community infrastructure:</b> To maintain and enhance community infrastructure within the Parish</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Will the SNP retain and/or enhance the provision of community services and facilities?</li> <li>2. Will accessibility to new and/or existing facilities be retained and/or enhanced?</li> <li>3. Will there be sufficient medical provision not to impact patient care negatively?</li> <li>4. Will there be sufficient school places?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of new and/ or retained community infrastructure proposed in the Parish</li> <li>• Number of new and/or retained GPs in the SNP area.</li> <li>• Number of patients per GP</li> <li>• GP Appointment waiting times</li> <li>• Number of school places</li> <li>• Number of existing community facilities improved or enhanced</li> </ul>	<p><b>Social</b></p>	<p><b>Housing/Health /Community</b></p>
<p><b>4. Green Infrastructure</b> To maintain and enhance green infrastructure within the Parish.</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does the SNP enhance and preserve key green spaces within the SNP area?</li> <li>2. Does the approach promote access to recreational space such as open space and recreational facilities, woodlands, ponds, allotments and hedgerows?</li> <li>3. Does the approach support links into the National Park?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of households within a 10-minute walk (approximately 800m) of public recreational space and open space and/or other public green infrastructure such as allotments, woodlands and ponds.</li> <li>• Number of local green spaces allocated within the SNP and supported by the community.</li> <li>• Number of opportunities to increase</li> </ul>	<p><b>Environmental</b></p>	<p><b>Nature Conservation &amp; Landscape &amp; Housing/Health /Community</b></p>

	and enhance green infrastructure links into the South Downs National Park.		
<p><b>5. Heritage Assets</b> To protect or enhance the heritage assets and historic environment of the Parish.</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does the approach take account of listed buildings in the SNP area and respect the historic character?</li> <li>2. Does the approach take account of conservation areas and any locally designated assets, as well as areas known for being rich in archaeological interest in the SNP area?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of heritage assets and their setting enhanced and/ or preserved as part of development.</li> <li>• Number of positive features of local character identified through the character statement protected or enhanced as part of any development proposals.</li> </ul>	<b>Environmental</b>	<b>Heritage</b>
<p><b>6. Countryside, Landscape and Key Views</b> To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Will the approach enhance and preserve the valued landscape of the SNP area?</li> <li>2. Is development in keeping with the landscape and existing features, including the setting of the National Park?</li> <li>3. Does the approach take account of the key views in and around the SNP area?</li> <li>4. Does the SNP minimise impact on the countryside?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of key views identified.</li> <li>• Number of sites allocated for development beyond the defined built up area boundary.</li> <li>• Number of landscape masterplans delivered which will provide multifunctional green infrastructure</li> </ul>	<b>Environmental</b>	<b>Nature Conservation &amp; Landscape</b>
<p><b>7. Flooding</b> To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does development avoid areas at risk of flooding as defined by the Environment Agency?</li> <li>2. Does development encourage the removal/ not adversely affect surface water?</li> <li>3. Does the combination of sites ensure that it will not exacerbate the risk of flooding?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of properties at risk of flooding within the Parish/SNP area, as defined by the Environment Agency Flood Maps.</li> <li>• Number of flood improvement schemes incorporated within development proposals.</li> </ul>	<b>Environmental</b>	<b>Air and Climate</b>

<p><b>8. Biodiversity</b> To protect and enhance the biodiversity of the SNP area</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does the approach enhance and preserve locally, nationally and internationally designated areas as well as local wildlife sites and priority habitats and species?</li> <li>2. Will the SNP enhance and/ or preserve the wildlife and biodiversity of the SNP area?</li> <li>3. Does development minimise the impact on the biodiversity of the SNP area?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of enhancement schemes incorporated into development.</li> <li>• Number of schemes that preserve and enhance the condition of nationally protected and local wildlife sites within the neighbourhood plan area.</li> <li>• Number of priority habitats and species impacted.</li> </ul>	<p><b>Environmental</b></p>	<p><b>Nature Conservation</b></p>
<p><b>9. Sustainable Design</b> To encourage high quality design and layout in all new development and promote systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Does the SNP promote energy efficiency and the use of renewables within the plan area?</li> <li>2. Does development promote water efficiency?</li> <li>3. Does the SNP seek to reduce the impact on climate change?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Number of new developments that incorporate renewable energy systems.</li> <li>• Number of new developments incorporating sustainable urban drainage systems (SUDS).</li> <li>• Number of new schemes where measures to ensure the sustainable use of water and energy form part of the overall design.</li> </ul>	<p><b>Environmental</b></p>	<p><b>Heritage &amp; Air and Climate</b></p>
<p><b>10. Local businesses and tourism</b> Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish.</p>	<p>Questions:</p> <ol style="list-style-type: none"> <li>1. Will the approach support local retail and employment opportunities?</li> <li>2. Will the approach support tourism?</li> </ol> <p>Indicators:</p> <ul style="list-style-type: none"> <li>• Net amount of employment floor space maintained and/ or created in the SNP area.</li> <li>• Number of vacant business spaces</li> <li>• Number of tourists</li> <li>• Number of new tourist facilities.</li> </ul>	<p><b>Economy</b></p>	<p><b>Economic Characteristics</b></p>