

Seaford Neighbourhood Plan Environment and Countryside Evidence Report



Introduction

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. But with this privilege comes responsibility; we need to ensure that the natural beauty, iconic locations, wildlife, biodiversity and our 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 or remain in the Town, creating a strong environment for suitable housing, employment and recreation.

Aim and Objectives of group

Background: The aims and objectives below are based upon:

- Answers to the relevant questions in the Neighbourhood Survey undertaken to support the Neighbourhood Plan Process;
- Input from the Workshops held regarding the Neighbourhood Plan;
- Input from local stakeholder groups;
- The input of the Focus Group and the Steering Group; and
- A range of data sources that we have researched.

A list of the key sources and events utilised to date is included in Annex A.

Next Steps: The combination of the above 5 bullet points creates a strong foundation of evidence. The information included in this report will be presented on the 30th November at the major consultation evening to get even more input from Town Residents. After this event we will:

1. Seek input from a range of stakeholders to both discuss our ideas and get further evidence to inform our eventual recommendations. Annex B sets out a list of the key Stakeholders we will approach.
2. Continue our strong dialogue with residents through further consultation, including a questionnaire on any areas we wish to follow-up on; and
3. Continue our research into specific sites/ issues identified.

Aim: To preserve and enhance the environment and countryside, including the historic environment and assets, of the Town by setting out specific proposals in the Neighbourhood Plan that complement the existing national and district policies.

In delivering the above aim the Focus Group has the following objectives:

1. Enhancing and preserving the environment and countryside both within and around the Town by examining if any sites should be given Local Green Space designation, or other recommendations made;
2. Examine whether there are any heritage assets or heritage character (including conservation area) concerns that may require recommendations in the Neighbourhood Plan;
3. Seek to understand if there is any farmland that may require recommendations in the Neighbourhood Plan;
4. Promote and enhance biodiversity in the Town;
5. Consider allotments in the Town;
6. To think about the risks associated with climate change;
7. Examine whether light pollution is a key issue for the Town;
8. Examine whether air quality is of concern to the Town.

To inform and shape these objectives, we undertook a SWOT analysis:

SWOT Analysis for Group

<p>Strengths:</p> <ul style="list-style-type: none">• Nestled between a stunning coastline and the South Downs National Park;• Nationally and internationally recognised iconic sites including Cuckmere Haven and Seaford Head;• Strong history with a number of scientific and archaeological sites of interest;• Unspoilt seafront with excellent vistas and accessibility;• Strong built heritage and conservation areas;• Gateway to the South Downs National Park;• Number of national cycle routes	<p>Weaknesses:</p> <ul style="list-style-type: none">• No listed parks or gardens;• Seafront has lacked investment – e.g. seating, lighting and toilets;• Recreational space for the size of the population is low;• Lack of “green assets” such as trees in the post-war developments of the town.• Town vulnerable to urban encroachment with detrimental effect on the environment, wildlife and the Town as whole – especially where development negatively “impacts” the SDNP.• Vulnerability of some archaeological remains.
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run through the Town.	
<p>Opportunities:</p> <ul style="list-style-type: none"> • To ensure green spaces are enhanced and preserved to support the environment, biodiversity, tranquillity and/ or recreation for the citizens of the Town. • To promote sustainable tourism given our environment and countryside are key assets; • To promote sustainable development which supports our strong environment and countryside assets 	<p>Threats:</p> <ul style="list-style-type: none"> • Risk of flooding, adequate drainage; • Loss of footpaths owing to erosion – e.g. Splash Point footpath. • Erosion impacts on rare plants – e.g. moon carrot at Hope Gap. • Risk of invasive plants (e.g. russian vine, catoneaster); • Urban sprawl without careful planning considerations. • Seafront is both a leisure/ tourism asset and a flood defence system. • Unique flint walls at risk of decay. • Suitable access for those with limited mobility and/ or are registered disability.

Summary of issues and concerns (backed with evidence)

The remainder of this report now sets out evidence against each of the above 8 objectives, which combined will deliver the aim we have set for this Focus Group, but also the wider Neighbourhood Plan vision. The Focus Group has also been very aware of the fact that our role is to look at where we think the Neighbourhood Plan can make recommendations which **add** to the policy framework, which at this stage we refer to as our key proposals. As a result, we have undertaken a full review of what we see as the key current policy framework – this is set out fully in Annex C, but overall covers:

1. The National Planning Policy Framework¹;
2. Lewes District Local Plan Part 1 – Joint Core Strategy²; and
3. Specific policies that Lewes District Council already have³

As a result, the report also sets out where we think an issue is important, but where additional recommendations are not needed. A key example would be allotments, where Lewes District Council has a policy which we believe meets the concerns and wishes of the Town's community.

¹https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² http://www.lewes.gov.uk/Files/plan_Adopted_JCS_with_front_cover.pdf

³ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/contents_written.htm

Objective 1: Enhancing and preserving the environment and countryside both within and around the Town by examining if any sites should be given Local Green Space designation or other recommendations made;

Core Strategy: Seaford is fortunate to benefit from Lewes District Council having adopted its Core Strategy after substantial consultation. In particular, Cllr Tom Jones describes the Strategy in his foreword as “It promotes sustainable development and sets out the scale, type and location of key development proposed in the district to 2030.”

On further analysis of the Core Strategy, Paragraph 6.39 (page 54 of the Core Strategy) specifically states:

“In the case of the District Centres within the plan area (Lewes, Newhaven, Peacehaven/Telscombe and Seaford), the National Park designation either covers the whole settlement, or immediately borders it in most locations. Given the need “to conserve and enhance the natural beauty, wildlife and cultural heritage of the National Park” (the first National Park purpose), opportunities to expand these settlements outwards into the National Park whilst ensuring this purpose is not compromised are limited. This has been particularly evident for Seaford, which is the largest town in the plan area, where any significant expansion of development into the surrounding countryside cannot be achieved without damage to the landscape value and scenic beauty of the National Park. This has been a key contributing factor in very limited planned growth being identified for the town.”

This is extremely important for our Focus Group.

Proposal 1: We fully support upholding the approach set out in the Core Strategy.

Local Green Space Assessment: In delivering this objective we have undertaken a Local Green Space Assessment (LGSA) which accompanies this evidence report. In summary, the LGSA:

- Used all available data to create an initial list of 66 potential sites from a slightly longer list. The longer list included a small number of duplications and/ or errors.
- We did an initial assessment of all 66. Of these 22 seemed to have green space potential.
- We then did a more detailed assessment of these 22 sites, including site visits, because we thought they might meet the LGSA criteria set out in the National Planning Policy Framework set by Central Government.
- Of these 22, we have identified 8 which we believe meet the LGS criteria.

These 8 sites all include substantial evidence of meeting the LGS criteria, and it is these sites that we wish to discuss with stakeholders as we continue to consult as part of the Neighbourhood Plan process.

We are keen to emphasise that where a site has not meet the LGS assessment it is not that we assume it can be used for development, nor does it ear-mark land for development. What it means is that given the work we have undertaken we do not think they will meet the strict criteria and there is not sufficient evidence to support a LGS designation. The findings of our work will of course be used, and inform, the work of other Focus Groups to ensure the Neighbourhood Plan looks at a range of local needs and issues.

Our work on the LGSA has informed a lot of our thinking, much of which is included in the remainder of this report under other objectives.

Proposal 2: That the Focus Group take forward to wider consultation the 8 sites for Local Green Space Designation

Non Local Green Space recommendations as part of objective 1:

Seaford Seafront

Seaford's Seafront is a key asset both in terms of flood defence, recreation, tourism and natural beauty. Thankfully, the Town already has a strong policy framework through Lewes District Council's policies SF14, SF15 and SF16.

In effect, there is already policy in place to ensure that the beautiful vistas and unspoilt seafront is preserved as a natural asset of the Town. This should be upheld fully.

However, the Focus Group also recognises that there is 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 – we will share the findings with the focus group looking at the economy and facilities. But they are equally relevant to this Focus Group. Our recommendations for this are set out below.

Proposal 3: Whilst recognising the existing policy in place to enhance and preserve the Seafront, if funding becomes available we would urge:

- 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 Groyne and shelters; and
- Lighting to be reviewed to ensure it as effective as possible, and at the same time reducing wherever possible any light pollution.

The Focus Group also recognised that looking ahead there is no reason not to consider the refurbishment of the existing housing stock, including creating multiple dwellings from larger buildings, sympathetically designed development or indeed the provision of additional visitor accommodation such as a hotel. It was recognised this could potentially enhance the environment of the Seafront, so long as it:

- Was sensitively developed;
- Was done fully in compliance with the existing policies;
- Does not detract from the natural, open, un-commercialised environment of the Seafront; and
- Did not impact on the spatial or visual openness or attractiveness of the Seafront and its unspoilt vistas.

In our view, this would help support the Vision for Seaford set out on page 35 of the Lewes District Council Core Strategy Part 1 and the existing policy framework.

Provision of Sport, Recreation and Play and Existing Recreational Open Space

The Focus Group reviewed a number of schools and playing fields as we see these as integral to the Town. However, we are also aware that the role of the Neighbourhood Plan is to add to the policy framework, not to duplicate it. We are aware that Lewes District Council has retained policies RE1, RE2 and SF12. RE1 and RE2 state:

RE1 - Provision of Sport, Recreation and Play

- ***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:***
 - o ***1.7 ha per 1,000 population for outdoor sports, including pitches, courts and greens, and***
 - o ***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.***

RE2 - Existing Recreational Open Space

- ***Planning permission will not be granted for development proposals which would result in the loss of existing outdoor playing space, or other space with recreational or amenity values regardless of their current or past availability to the public, unless it can be demonstrated that:***
 - (a) sports and recreation facilities can be best retained and enhanced through the redevelopment of a small part of the site, or***
 - (b) alternative provision of at least equivalent community benefit is made available.***

SF12 goes on to state that, at the time it was written, that there is a recognised shortfall of recreation space in the Town. This is a very strong policy backdrop and an area where, in our view, no additional policy recommendations are required.

Proposal 4: That RE1 and RE2 considerations continue to be given full weight and consideration as part of the planning process.

Objective 2: examine whether there are any heritage assets or heritage character (including conservation area) concerns that may require recommendations in the Neighbourhood Plan;

Seaford is fortunate to have a significant number of heritage assets and sites, almost all of which are currently designated with some form of status/ designation. Annex D provides an overview of the registered sites, and based on current information and analysis we believe that almost all have been adequately accounted for already. There were, however, three identified that we thought needed further clarification:

- i. **Sutton Road War Memorial:** We had rightly considered adding the Sutton Road War Memorial as a key heritage asset to the Town, but are pleased to confirm that designation had already been given prior to this report being published. As such, no further action is required.
- ii. **Drinking Fountain Monument:** 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.*" We are unaware of any designation for this, and propose that this important heritage site is added to the list for the Town of Seaford and afforded due designations.

The Focus Group also recognises that many of our heritage sites are not only important to our environment, but also to tourism. We would therefore urge sites that promote tourism to be maintained as much as possible. This could be through a mix of:

- i. Where available, funding being provided for their maintenance;
- ii. The Town Council acting as a "convenor" and "communicator" to support any community led action to help maintain and preserve our heritage sites.

Proposal 5: Add the Steyne Road drinking fountain to the list of Town heritage designated sites.

Proposal 6: That through funding (if available) or community action that our heritage and conservation sites, are better prioritised for maintenance wherever possible.

Objective 3: seek to understand if there is any farmland that may require recommendations in the Neighbourhood Plan;

This was considered as part of our work on Local Green Spaces. Please see the separate report. Our considerations would be farmland outside of the South Downs National Park that may require special consideration. In practice, our Focus Group recognised that it was extremely important to enhance, preserve and promote good quality agricultural land, especially given the limited amount outside of the National Park designation. The Focus Group also noted that this was set out in the National Planning Policy Framework (NPPF), such as paragraph 112, which again provides our Town, therefore, a robust policy framework.⁴

Objective 4: promote and enhance biodiversity in the Town;

The Focus Group rightly identified that promoting and enhancing biodiversity is absolutely essential. The Group was therefore particularly pleased to see the focus on both biodiversity and green infrastructure in the Lewes District Council Core Strategy, in particular:

- Page 33: "Enhancements to the biodiversity of the district, including the further creation of a high quality network of habitats"
- Page 111 – Core Policy 8 sets out an approach to Green Infrastructure, and includes how biodiversity (amongst many other issues) can be both enhanced and preserved. Paragraph 7.80 in particular states:

Green infrastructure refers to a multi-functional linked network of green spaces that provide opportunities for biodiversity and recreation. It includes:

- **parks and gardens**
- **natural and semi-natural urban greenspaces – including woodlands, scrub, grasslands, wetlands, open and running water, cliff tops and foreshore, disused quarries and pits.**
- **green corridors – including river banks and rights of way**
- **outdoor sports facilities (with natural or artificial surfaces, either publicly or privately owned) and cycleways**
- **amenity greenspace (most commonly, but not exclusively, in housing areas)**
- **provision for children and teenagers**
- **allotments and community gardens**
- **cemeteries and churchyards**
- **accessible countryside in urban fringe areas**
- **river corridors**
- **green roofs and walls**

⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

The Focus Group recognises that the NPPF (paragraphs 7 and 118 in particular), the Core Strategy, and wider District Policies, create a very good framework to both enhance and to promote biodiversity within the development and planning process. As a result, there was only one area where the Focus Group wants to make recommendations based on the work we have done to date:

Grass verges: The Town is fortunate to have a significant number of grass verges that are integral to the Town because:

- i. They naturally absorb rain and therefore support the natural flood defences of the Town;
- ii. Many act as “green corridors” for a range of wildlife;
- iii. They add to both the visual aesthetics and natural beauty of the Town;
- iv. Many are home to trees and flora which support the environment and natural habitats of the Town.

Whilst we recognise that at some point in the future some verges may be deemed suitable for development, additional thought to preserving and enhancing verges is important. There are two areas where we think policy recommendations may be necessary:

Proposal 7: That we take forward a policy on Grass Verges that likely includes:

- 1) If, in the future, development is proposed on what is, in effect, a very wide grass verge, then due consideration should be given to their role in the aesthetics of the built environment as well as their role in enhancing and preserving the natural environment and habitats of the Town;
- 2) Where possible, the quality of verges is enhanced and preserved through, for example, the planting of trees and/ or plants. To facilitate this, when utility firms seek to place new, or maintain, infrastructure underground, the impact on tree planting on verges should be given consideration to help ensure as many trees as possible can be planted to enhance our environment; and
- 3) Where possible, mowing should be undertaken in such a way as to minimise the impact on sensitive species which may be present in grass verges.

We set out in Annex E some background on the benefit that trees can play in enhancing the environment of the Town. This supports both this objective, as well as others. We clearly recognise that trees cannot be planted everywhere, but where a tree(s) planted on a verge positively contributes to the natural environment, and doesn't impact on the visual or spatial appearance in an adverse way, could benefit the local community.

Objective 5: Consider allotments in the Town;

The Focus Group identified one allotment in Seaford at Sutton Drove⁵. The Focus Group considered if there was any further work to be done on this and specifically looked at Lewes District Council's policy RE9, which states:

RE9 - Allotments

- **Planning permission will not be granted for proposals resulting in the loss of allotments unless:**
 - (a) the plots have no special townscape value as urban open space, and**
 - (b) the plots have no potential for future beneficial use under allotment cultivation.**

This policy is extremely clear and as such we did not think additional wording was required in the Neighbourhood Plan.

Proposal 8: Policy RE9 as written is sufficient.

Objective 6: To think about the risks associated with climate change

The Focus Group again looked at the existing policy framework and fully supports the vision for the District set on page 33 of the Core Strategy which states:

District wide

By 2030 the district and its residents will have made every effort to respond to the challenges of climate change, through a reduction in the district's carbon footprint and by adapting to the consequences of climate change. This will have been done through a variety of means, such as sustainable construction techniques, utilising alternative travel options to the private car (including a reinstated Lewes to Uckfield railway line) and increased production of green energy. As a consequence of these approaches, air quality levels in the towns will have improved. Measures to reduce risk to the district from the increased frequency and severity of flood events will have been introduced, particularly in the urban areas. Despite the risk of flooding posed by the rivers, the recreational opportunities presented by these key environmental features will have been realised.

Strategic objectives 10 & 11 of the Strategy also state:

10. To ensure that the district reduces causes of climate change and is proactive regarding climate change initiatives.

This objective will involve the District Council, National Park Authority and other responsible agencies seeking to reduce the current carbon emissions from the

⁵ <http://www.seafordtowncouncil.gov.uk/Allotments.aspx>

existing development stock and encourage the sustainable use of resources, as well as promoting low carbon emissions, resource efficiency measures and renewable energy in new development. Key to the achievement of this objective will be the successful achievement of the sustainable transport objective.

11.To reduce the district's vulnerability to the impacts of climate change, particularly by seeking to reduce the number of properties, community assets and infrastructure that are at an unacceptable risk of flooding, or coastal erosion.

The District Council and National Park Authority will work closely with the Environment Agency and East Sussex County Council (the lead local flood authority) on current and future river and sea flooding issues. An important element of this objective will be seeking to ensure that climate change impacts on biodiversity habitats and species are minimised.

Our Focus Group fully supports this approach to climate change. Specifically, for a seaside Town, flood defences, ensuring development does not create an enhanced risk of flooding and managing the impacts of erosion are crucial. We also recognise the benefits of promoting renewable energy and would support this.

Importantly coastal erosion, including footpaths and bridleways as well as the preservation of styles are clearly responsibilities of a mix of Lewes District Council, the SDNPA and ESCC. We strongly encourage the them to undertake a review of the assets within the Town. The Focus Group is still examining if specific policy is needed within the Neighbourhood Plan.

Proposal 9: Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation flooding, costal erosion and footpaths.

Objective 7: Examine whether light pollution is a key issue for the Town;

The Focus Group was unaware of any evidence being brought forward that posed a concern to the Town for the Neighbourhood Plan. It was acknowledged that this was likely due to the proximity to the sea, the National Park and the current planning boundary. Equally, it was recognised that light pollution was an issue that would be considered in relation to specific developments.

Proposal 10: The Focus Group will consider, after stakeholder and public consultation if any evidence comes forward that changes our current position.

Objective 8: Examine whether air quality is of concern to the Town.

The Focus Group was unaware of any evidence being brought forward that posed a concern to the Town for the Neighbourhood Plan. It was acknowledged that more concentrated development without regard to air quality could pose a risk in the future, but that air quality was already an issue that was covered by existing local authority policy.

Proposal 11: The Focus Group will consider, after stakeholder and public consultation if any evidence comes forward that changes our current position.

Focus Group general recommendation/solutions for future development (to address identified issues above)

The Focus Group positively encourages development in the Town and believes this can be done at the same time as enhancing and preserving the environment and countryside of the Town.

Throughout this report we have set out our proposals, but in summary:

- **Proposal 1:** We fully support upholding the approach set out in the Core Strategy to planning and development, and recognise this is a firm foundation to enhancing and preserving the environment and countryside of our Town.
- **Proposal 2:** That the Focus Group has identified 8 sites to take forward to wider consultation for Local Green Space Designation. Please see the separate detailed report on this.
- **Proposal 3:** Whilst recognising the existing policy in place to enhance and preserve the Seafront, if funding becomes available we would urge:
 - 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 Groyne and shelters; and
 - Lighting to be reviewed to ensure it as effective as possible, and at the same time reducing wherever possible any light pollution.
- It was recognised Seafront development could potentially enhance the environment of the Seafront, so long as it:
 - Was sensitively developed;
 - Was done fully in compliance with the existing policies;
 - Does not detract from the natural, open, un-commercialised environment of the Seafront; and
 - Did not impact on the spatial or visual openness or attractiveness of the Seafront and its unspoilt vistas.

- **Proposal 4:** To ensure sufficient play, recreation and sport, that policies RE1 and RE2 continue to be given full weight and consideration as part of the planning process.
- **Proposal 5:** That the Steyne Road drinking fountain is added to the list of Town heritage designated sites.
- **Proposal 6:** That through funding (if available), or community action, that our heritage and conservation sites, are better prioritised for maintenance wherever possible.
- **Proposal 7:** We develop a policy and undertake further investigation of grass verges. Our suggested approach to grass verges is currently:
 - If, in the future, development is proposed on what is, in effect, a very-wide grass verge, then due consideration should be given to their role in the aesthetics of the built environment as well as their role in enhancing and preserving the natural environment and habitats of the Town;
 - Where possible, the quality of verges is enhanced and preserved through, for example, the planting of trees and/ or plants. To facilitate this, when utility firms seek to place new, or maintain, infrastructure underground, the impact on tree planting on verges should be given consideration to help ensure as many trees as possible can be planted to enhance our environment; and
 - Where possible, mowing should be undertaken in such a way as to minimise the impact on sensitive species which may be present in grass verges.
- **Proposal 8:** With respect to allotments, Policy RE9 as written is sufficient.
- **Proposal 9:** Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to flooding, costal erosion and footpaths.
- **Proposal 10:** The Focus Group will consider, after stakeholder and public consultation, if any evidence comes forward to suggest that light pollution is an issue for the Town and therefore this Focus Group.
- **Proposal 11:** The Focus Group will consider, after stakeholder and public consultation, if any evidence comes forward to suggest that air pollution is an issue for the Town and therefore this Focus Group.

As set out at the beginning of this report, we look forward to engaging with our fellow residents and stakeholders to take our work forward.

Focus Group Members:

- Keith Blackburn
- Margery Diamond
- Sylvia Dunn
- Ted Hart
- Jim Howell
- Vanessa Lawrence
- Anne Marr
- Linda Wallraven
- Debbie Ward

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Annex A: List of Key Evidence Used (Surveys, workshops, public events, existing information, census, etc)

1. The National Planning Policy Framework⁶;
2. Lewes District Local Plan Part 1 – Joint Core Strategy⁷;
3. Specific policies that Lewes District Council already have⁸
4. Responses to the Neighbourhood Plan survey circulated to households in the Town;
5. Data available on land from the government Magic data-set;⁹
6. Designated sites registered with Natural England;¹⁰
7. Sites of Special Scientific Interest (SSSI's) registered with government;¹¹
8. Lewes District Council/ Sussex Wildlife Trust Sites of Nature Conservation Importance;
9. Input from the Workshops held regarding the Neighbourhood Plan;
10. The input of the Focus Group and the Steering Group;
11. English Heritage record of heritage assets;
12. Seaford Town Council War Memorials listings;¹²
13. Seaford Town Council allotment listings.
14. Seaford Community Partnership's work to establish the public's views on the seafront.

⁶https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁷ http://www.lewes.gov.uk/Files/plan_Adopted_JCS_with_front_cover.pdf

⁸ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/contents_written.htm

⁹ www.magic.gov.uk

¹⁰ <https://designatedsites.naturalengland.org.uk/>

¹¹ <https://www.gov.uk/guidance/protected-areas-sites-of-special-scientific-interest>

¹² <http://www.seafordtowncouncil.gov.uk/War-Memorials.aspx>

Annex B: List of key stakeholders we will approach after 30th November

No	Who	Why
1	Lewes District Council	The main LA
2	East Sussex County Council	Statutory Consultee
3	Newhaven Town Council	Adjoining Parish
4	Wealden District Council	Adjoining Parish
5	Alfriston Parish Council	Adjoining Parish
6	Cuckmere Valley Parish Council	Adjoining Parish
7	Natural England	Statutory Consultee
8	Environment Agency	Statutory Consultee
9	Historic England (English Heritage)	Statutory Consultee
10	South Downs National Park Authority	Statutory Consultee
11	Highways Agency	Statutory Consultee
12	Seaford Community Partnership	Stakeholder
13	South Downs Society	Stakeholder
14	Friends of Seaford Head	Stakeholder
15	Sussex Wildlife Trust	Stakeholder
16	RSPB	Stakeholder
17	National Trust	Stakeholder
18	Seaford and Newhaven Access Committee	Stakeholder
19	Seaford Seniors	Stakeholder
20	Friends of Tide Mills	Stakeholder
21	Seaford Residents Voice (SRV)	Stakeholder
22	The Seaford Museum and Heritage Society	Stakeholder
23	Friends of the Old Brickfield	Stakeholder
24	East Blatchington Pond Conservation Society	Stakeholder
25	Allotment Society	Stakeholder
26	Horticultural & Gardening Society	Stakeholder
27	Flood Action Group	Stakeholder
28	Natural History Society	Stakeholder
29	British Open Spaces Society	Stakeholder

Annex C – Existing Policy

There are 3 major policies for us to be aware of:

1. The National Planning Policy Framework¹³;
2. Lewes District Local Plan Part 1 – Joint Core Strategy¹⁴; and
3. Specific policies that Lewes District Council already have¹⁵ – for us the key ones are:
 - a. ST3 – Design, Form and Settling of Development
 - b. ST4 Planning applications for backland and tandem developments will be refused unless proposals provide for:
 - c. ST30 – Protection of Air and Land Quality
 - d. RES6 – Residential Development in the Countryside;
 - e. RES19 – Provision of Outdoor Playing Space;
 - f. CT1 - Planning Boundary and Key Countryside Policy;
 - g. CT2 – Landscaping Conservation and Enhancement;
 - h. H2 – Listed Buildings
 - i. H3 – Buildings of Local, Visual or Historic Interest
 - j. H4 – Conservation Areas
 - k. H5 – Development within or affecting Conservation Areas
 - l. H7 – Traffic in Conservation Areas
 - m. H12 -Areas of Established Character
 - n. RE1 - Provision of Sport, Recreation and Play
 - o. RE2 - Existing Recreational Open Space
 - p. RE7 - Recreation and the Rivers
 - q. RE9 – Allotments
 - r. SF1 – Land North of Cradle Hill
 - s. SF5 -Land at Blatchington Road
 - t. SF8 – Cradle Hill Industrial Estate
 - u. SF9 – Footpath to Church Lane
 - v. SF10 – Car Parking
 - w. SF11 – Bishopstone Conservation Area (SF11)
 - x. SF12 – Land North of Alfriston Road
 - y. SF14 – SF16: The Seafront

¹³https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁴ http://www.lewes.gov.uk/Files/plan_Adopted_JCS_with_front_cover.pdf

¹⁵ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/contents_written.htm

Annex D: List of heritage sites as recorded by English Heritage

The English Heritage classification of Listed Buildings shows that the Town of Seaford contains the following:

4.12.1 Grade I listed buildings and structures including:

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

4.12.2 Grade II listed buildings and structures including:

- 8, SOUTH STREET, Seaford, Lewes, East Sussex
- 2 3 AND 4, CROUCH LANE, Seaford, Lewes, East Sussex
- FIZGERALD 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
- 43 AND 45, STEYNE ROAD, 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
- TWYN COTTAGE, 3, BLATCHINGTON ROAD, TWYN 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
- BARN NORTH EAST OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford, Lewes, East Sussex
- COTTAGE OR ANNEXE NORTH WEST OF DEAN'S PLACE HOTEL, SEAFORD ROAD, Alfriston, Wealden, 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

Grade II* Listed:

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

Scheduled Monuments

- Medieval crypt, Church Street, Seaford, Lewes, East Sussex
- Bowl barrow on High and Over, Seaford, Lewes, East Sussex
- 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

Parks & Gardens

- **The Town contains no listed Parks & Gardens**

DRAFT

Annex E – An assessment of the benefits of trees

1. Clean air and Health benefits

Air pollution is a serious health threat to many people living in cities, causing asthma, coughing, headaches, respiratory heart disease, and cancer. Air pollution is caused by elevated levels of ozone (O₃), dust and other small particulate matter (PM₁₀) as well as other toxic gases. Urban tree planting provides multiple air quality benefits, including, but not limited to:

1. Absorbing gaseous pollutants (e.g., O₃, nitrogen dioxide [NO₂], and sulphur dioxide [SO₂]) through leaf surfaces
 2. Intercepting PM₁₀ (e.g., dust, ash, pollen, smoke)
 3. Releasing oxygen through photosynthesis¹
- *Children are exposed to 15 times the average level of airborne pollutants; children with asthma miss 3.7 more school days than those without. Children living in areas with more street trees have lower asthma prevalence².*
 - *A study estimates that doubling the number of trees in the West Midlands would reduce excess deaths due to particulate pollution by up to 140 per year⁵.*
 - *Patients with views of trees have been found to recover significantly faster than those who cannot see any natural features³.*

2. Economic benefits:

A number of studies have demonstrated the benefits of urban tree planting, including, but not limited to:

1. Encouraging investment: the attractiveness of an environment is an important factor in attracting inward investment; both consumers and businesses have been found to favour districts with high tree cover³
2. Tourism and recreational expenditure: An attractive natural environment and urban green infrastructure is a significant attractor of tourist and recreation expenditure³
3. Property values: Several studies in the USA have found that values of properties in tree lined areas may be up to 6% greater than in similar areas without trees⁶. London's house prices increase with the amount of green space in a ward, roughly equating to a 0.4% increase in price for each 1% increase in the amount of green space⁴.

3. Environmental benefits:

Significant research has demonstrated the environmental benefits of urban tree planting, including, but not limited to:

1. Heating and cooling: Trees provide shelter and reduce windspeed, thus reducing heat loss from buildings during winter. They also provide shade in the summer, whilst the evapo-transpiration of water from the leaf surface has a general cooling effect on surrounding air⁷. Concrete and other hard surfaces retain heat much more than trees, plants and grass. It has been estimated that a 10% increase in green space in a city like Manchester could prevent a temperature rise of more than 3C⁴.

2. Noise reduction: Trees and other vegetation can play an important role in attenuating noise through reflecting and absorbing sound energy. One estimate suggests that 7db noise reduction is achieved for every 33m of forest⁷ whilst other reported field tests show apparent loudness reduced by 50% by wide belts of trees and soft ground⁸
 3. Reduction in ground water runoff: Trees have a number of hydrological effects. These include reducing erosion and improving water quality through interception of pollution. Perhaps the most important effect in Britain at present, given the trend for increasing winter flooding, is the reduction in ground water runoff. One study has estimated that for every 5% increase in tree cover area, run-off is reduced by 2%⁷
 4. Wildlife benefits: Trees are an important wildlife habitat. They provide nesting sites for birds and support a wide range of insects that are an important food source for birds and other wildlife. Trees that bear berries are also a direct source of food for many bird species. In an urban setting, linear corridors of habitat are among the most important, connecting otherwise isolated areas to each other and out to the rural surroundings. Trees and other vegetation along highways, waterways and railways are particularly important to wildlife in the respect.³
- Annually a mature tree absorbs the carbon of 26,000 car miles and Produces enough oxygen to support 2 Humans⁹

4. Road surfaces and traffic safety

Managers of both trees and highways are well aware of the detrimental effects that trees can have on the surface of footways and carriageways through direct damage by roots. Less well known is the fact that the shade cast by trees can significantly increase the life of road surfaces by reducing the temperatures which the surface reaches during hot weather.³

References:

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9. RETAINING EASTBOURNES' URBAN TREES, Tim Whelan Arboricultural Officer