



Seaford Town Council Planning & Highways Agenda – Thursday 20th February 2025

To the Members of the Planning & Highways Committee

Councillors L Wallraven (Chair), L Boorman (Vice Chair), R Buchanan, R Clay, O Honeyman, R Honeyman and J Lord.

A meeting of the Planning & Highways Committee will be held at **The View, Seaford Head Golf Course, Southdown Road, Seaford, BN25 4JS** on **Thursday 20th February 2025** at **7.00pm**, which you are summoned to attend.

A handwritten signature in blue ink, appearing to be 'SQ'.

Steve Quayle
Interim Town Clerk
14th February 2025

PLEASE NOTE:

- **This meeting is taking place at The View at Seaford Head Golf Course**
- **Public arrival time is between 6.45pm – 6.55pm**
- **Public attendance at this meeting will be limited due to the size of the meeting, so public will need to register to guarantee a place**
- **The meeting will be video recorded and uploaded to the Town Council's YouTube channel after the meeting**
- **See the end of the agenda for further details of public access and participation**

AGENDA

1. Apologies for Absence

To consider apologies for absence.

2. Disclosure of Interests

To deal with any disclosure by Members of any disclosable pecuniary interests and interests other than pecuniary interests, as defined under the Seaford Town Council Code of Conduct and the Localism Act 2011, in relation to matters on the agenda.

3. Public Participation

To deal with any questions, or brief representations, from members of the public in accordance with relevant legislation and Seaford Town Council Policy.

In accordance with Town Council policy, members of the public wishing to speak on individual planning applications may do so immediately before each planning application.

4. [Lewes District Local Plan Consultation – Final Draft Response](#)

To consider report 171/24 presenting the committee with the final draft of the Town Council's response to the Lewes District Local Plan consultation (pages 6 to 42).

5. [South Downs National Park Authority Local Plan Consultation – Introduction](#)

To consider report 169/24 introducing the South Downs National Park Authority Local Plan consultation (pages 43 to 46).

6. Planning Applications – For Comment

The planning and/or tree works applications for the Committee to consider and comment on as a statutory consultee are as follows:

Planning Applications received in week commencing Monday 27th January 2025

None received

Planning Applications received in week commencing Monday 3rd February 2025

None received

Tree Works Applications

[TW/25/0004/TPO](#) – **33 Barn Close** – T3 - Holm Oak - Crown reduction to top by 1.0m and sides by 2.0m all round for Mr. C Lowmass.

[TW/25/0007/TPO](#) – **4 Manor Road North** – T2 - Sycamore - Pollard to previous points for Mrs J Crouch.

[TW/25/0002/TPO](#) – **11 Barn Close** – T1 - Ash - Reduce by approx 3m to previous cuts, T2 - Ash - Reduce by approx 3m to previous cuts, T3 - Ash - Reduce to previous cut, T4 - Ash - Reduce to previous cut for Mr S O'Connor.

[TW/25/0010/TPO](#) - **5 Headland Avenue** - T3 - Sycamore - Removal of bifurcated trunk, T5 - Sycamore - Removal of bifurcated trunk for Dr. J Richenberg.

7. Road Closure Application – Friends of Bishopstone Station

To consider report 170/24 presenting details of a proposed road closure application for Friends of Bishopstone Station for the Committee to consider and comment (pages 47 to 48).

8. Update Report

To consider report 168/24 on the Lewes District Council and South Downs National Park Authority decisions received since the last meeting on applications previously considered by the Committee (pages 49 to 51).

AGENDA NOTES

For further information about items on this Agenda please contact:

Steve Quayle, Interim Town Clerk, 37 Church Street, Seaford, East Sussex, BN25 1HG

Email: meetings@seafordtowncouncil.gov.uk

Telephone: 01323 894 870

Circulation:

All Town Councillors and registered email recipients.

Public Access:

Members of the public looking to access this meeting will be able to do so by:

1. Attending the meeting in person.

The Town Council asks that you contact meetings@seafordtowncouncil.gov.uk or 01323 894 870 to register your interest in attending at least 24 hours before the meeting.

Spaces will be assigned on a first come, first served basis.

Please note that if you don't register and just attempt to turn up at the meeting, this could result in you not being able to attend if there is no space.

OR

2. Watching the recording of the meeting on the [Town Council's YouTube channel](#) , which will be uploaded after the meeting has taken place.

Public Access to the Venue:

If you are attending the meeting in person, please arrive between 6.45 – 6.55pm where you will be shown into the meeting for a 7.00pm start.

Public Participation:

Members of the public looking to participate in the public participation section of the meeting must do so in person, by making a verbal statement during the public participation section of the meeting.

Below are some key points for public participation in the meeting:

1. Your statement should be regarding business on the agenda for that meeting.
2. You will only be able to speak at a certain point of the meeting; the Chair of the meeting will indicate when this is.
3. You do not have to state your name if you don't want to.
4. If you are unsure of when best to speak, either query this with an officer/councillor ahead of the meeting or raise your hand during the public participation item of the meeting and ask the Chair – they will always be happy to advise.

5. When the Chair has indicated that it is the part of the meeting that allows public participation, raise your hand and the Chair will invite you to speak in order.
6. Statements by members of the public are limited to four minutes and you don't automatically have the right to reply. The Chair may have to cut you short if you overrun on time or try to speak out of turn – this is just to ensure the meeting stays on track.
7. Where required, the Town Council will try to provide a response to your statement but if it is unable to do so at the meeting, may respond in writing following the meeting.
8. Members of the public should not speak at other points of the meeting.
9. A summarised version of your statement, but no personal details, will be recorded in the minutes of the meeting.

Public Comments

Members of the public looking to submit comments on any item of business on the agenda can do so in writing ahead of the meeting and this will be circulated to all committee members. Comments can be submitted by email to planning@seafordtowncouncil.gov.uk or by post to the Town Council offices.

Health & Safety Measures:

While Covid restrictions are no longer mandated the Town Council wishes to stay vigilant and mindful of the health and safety of its meeting participants by upholding the requirement that you should not attend the meeting if you are displaying any Covid-19 symptoms (or have tested positive) as identified on the [NHS website](#) or symptoms of any similarly contagious illness.



Report No:	171/24
Agenda Item No:	4
Committee:	Planning & Highways
Date:	20 th February 2025
Title:	Lewes District Local Plan Consultation – Final Draft Response
By:	Isabelle Moulard, Assistant Town Clerk
Purpose of Report:	To invite discussion and approval on the Town Council’s final draft response to Lewes District Council’s Local Plan consultation.

Actions
The Committee is advised:
<ol style="list-style-type: none"> 1. To consider the contents of the report. 2. To consider the Town Council’s final draft response to the Lewes Local Plan consultation questionnaire, suggesting amendments where appropriate. 3. To consider the final draft response to site allocations. 4. To consider the final draft supporting arguments in response the Lewes Local Plan consultation. 5. To move to a vote on the motions below.

Recommendations
The Committee is recommended:
<ol style="list-style-type: none"> 1. To record a note of thanks to members of the public who have contributed invaluable evidence, comments and concerns which have aided the Town Council in its response to the consultation on behalf of the town. 2. To agree to finalise Seaford Town Council’s response to the Lewes Local Plan consultation questionnaire. 3. To agree to finalise Seaford Town Council’s response to site allocations in

Seaford.

4. To agree to finalise Seaford Town Council's supporting arguments in response to the Lewes Local Plan consultation.

1. Information

- 1.1 Lewes District Council (LDC) launched the first phase of consultation on the Lewes District Local Plan on 6th January 2025 which ends on 28th February 2025.
- 1.2 Phase one of the consultation regards the detailed policies for the plan area and considers sites within towns and a limited number of villages. The consultation is called "Defining our policies and early site allocation proposals".
- 1.3 The second phase will take place later in 2025 and have a greater emphasis on more rural parts of the district, while also re-evaluating areas considered during phase one.
- 1.4 Since the launch of the consultation, Seaford Town Council has been gathering evidence from members of the public, town councillors and officers to feed into the Town Council's response.
- 1.5 At this Committee's meeting on 4th February 2025, the Committee was presented with a wealth of evidence and concerns from members of the public and it was resolved to facilitate an informal community meeting to allow further opportunity to include members of the public in the Town Council's response to the consultation.
- 1.6 The informal meeting was held on 11th February 2025 at The View at Seaford Head, attended by over 30 members of the public and town councillors. Those in attendance were all given the opportunity to discuss key topics, policies and the Seaford site allocations.
- 1.7 The Town Council is immensely grateful for the invaluable contributions made by members of the public.
- 1.8 All of the evidence received and discussed at both 4th February 2025 Planning & Highways Committee meeting and 11th February 2025 informal community meeting have been collated and, where appropriate, included in the Town Council's final draft response to the Lewes Local Plan consultation.

- 1.9** This report presents three documents for consideration:
- 1.9.1.** Appendix A - the final draft response to the Lewes Local Plan consultation questionnaire
 - 1.9.2.** Appendix B - the final draft response to site allocations
 - 1.9.3.** Appendix C - supporting arguments in response to the Lewes Local Plan consultation

2. Lewes District Local Plan – Town Council’s Response to the Questionnaire

- 2.1** Appendix A presents the final draft of the Town Council’s response to the Lewes Local Plan consultation questionnaire.
- 2.2** For reference, the full draft policies, and/or a summary of each of the draft policies can be found within the consultation documents here - https://planningpolicyconsult.lewes-eastbourne.gov.uk/connect.ti/LP_DefiningPolicies25
- 2.3** The Committee is invited to consider the final draft response, suggesting amendments where appropriate.

3. Lewes District Local Plan – Town Council’s Response to Site Allocations and Supporting Arguments

- 3.1** Appendix B presents the final draft of the Town Council's response to the four site allocations within Seaford:
- ESAP 18 – Talland Parade,
 - ESAP 19 – Mardon Court,
 - ESAP 20 – Former St John’s School, and
 - ESAP 21 – Land to the South of Chyngton Way
- 3.2** For reference, the site allocation proposals can be found in the “Defining our policies and early site allocation proposals - Appendix 1 Early Site Allocation Proposals” here - https://planningpolicyconsult.lewes-eastbourne.gov.uk/connect.ti/LP_DefiningPolicies25
- 3.3** The Committee is invited to consider the final draft response to the site allocations, suggesting amendments where appropriate.

4. Lewes District Local Plan – Supporting Arguments

- 4.1** Appendix C presents the final draft supporting arguments covering six key topics which have been highlighted to the Town Council by the community.

4.2 The six topics include:

4.2.1. Housing Densities

4.2.2. Infrastructure

4.2.3. Tourism

4.2.4. Landscape Character Assessment

4.2.5. Affordable Housing

4.2.6. Brownfield Land Availability

4.3 The supporting arguments will be submitted in addition to the questionnaire and responses to site allocations.

4.4 The Committee is invited to consider the final draft supporting arguments, suggesting amendments where appropriate.

5. Financial Appraisal

5.1 There are no direct financial implications of this report.

6. Contact Officer

6.1 The Contact Officer for this report is Isabelle Mouland, Assistant Town Clerk.

Lewes Local Plan: Defining our policies and early site allocation proposals

Please respond to the consultation by completing the questions below. Return by email to LocalPlan@lewes-eastbourne.gov.uk or by post to Lewes District Council, 6 High Street, Lewes, BN7 2AD.

Your Details

Data Protection and Privacy Notice

For further information about how the council uses your information and your rights, please read our privacy notice [here](#)

Name: Seaford Town Council

Organisation (if relevant): Seaford Town Council

Agent providing comments on behalf of (if relevant) [Click or tap here to enter text.](#)

Postal Address: 37 Church Street, Seaford

Post Code: BN25 1HG

Email Address: planning@seafordtowncouncil.gov.uk

What type of stakeholder are you / who are you representing: (place 'x' in against box)

- | | |
|--|--|
| <input type="checkbox"/> Member of the public (Resident of Lewes District) | <input type="checkbox"/> Residents Association |
| <input type="checkbox"/> Member of the public (Resident elsewhere) | <input type="checkbox"/> National group / organisation |
| <input type="checkbox"/> Local business / employer | <input type="checkbox"/> Planning Consultant |
| <input checked="" type="checkbox"/> Neighbouring District / Parish Council | <input type="checkbox"/> Landowner / Developer |
| <input type="checkbox"/> Local group / organisation | <input type="checkbox"/> Infrastructure / service provider |
| <input type="checkbox"/> Other – please describe: | |

Vision for Lewes District's Plan Area

1. *Do you support the vision that is set out in this Local Plan?*
Yes

Theme: Spatial Strategy and Settlements

2. *What are your views on the Theme: Spatial Strategy and Settlements policies?*

Strategic Policy SDS1 - The emerging Spatial Strategy Developing a Spatial Strategy

Strategic Policy SDS2: Achieving Sustainable Development

Strategic Policy SDS3: Settlement Hierarchy

Policy SDS4: Settlement Boundaries

The Town Council agree that Lewes District Council should seek to lower the number of housing requirement as defined by central government, taking into consideration that a large part of the district is within the National Park, bordering the National Park and within two Special Areas of Conservation. However, the Town Council is concerned with the intensification of development within the Coastal towns, which appears to be non-optional.

This was selected as the favoured option during the last consultation. However, this followed a very successful media campaign by a self interest group which resulted in 40% of responses originating outside of the district. The exercise told people which choice to make without making them aware of the implications.

As detailed in the Sustainability Appraisal of the Local Plan 'the SDNP completely constrains expansion of the two main settlements (Newhaven and Seaford)'. The report also mentions that 'sensitivity around the edge of the coastal settlements is quite high'. It is recognised in the Sustainability Report that there is very limited growth opportunity in Seaford despite it being well suited to growth from a strategic perspective (as one of the two district centres).

In addition Seaford also has a number of Areas of Established Character and Conservation Areas. The tourist industry within Seaford is growing exponentially year on year which also needs to be factored in.

Taking the above into consideration alongside the failing services, in particular healthcare and the recognised capacity constraint of the wastewater treatment works, an equitable solution would be where every area can be seen to be taking a share of the strain of increased development.

3. *Do you think the wording of draft Strategic Policy SDS1 - The emerging Spatial Strategy Developing a Spatial Strategy is appropriate?*
No
4. *If not, what should be changed about draft Strategic Policy SDS1 - The emerging Spatial Strategy Developing a Spatial Strategy?*
Seaford Town Council suggest the removal of the following: 'The provision of new homes will seek to avoid a disproportionate level of growth in the less sustainable settlements, while

recognising that very limited growth in less sustainable areas may be appropriate in certain circumstances.'

5. ***What evidence do you have to support the change you have suggested to draft Strategic Policy SDS1 - The emerging spatial Strategy Developing a Spatial Strategy?***
There is very limited growth in some of the areas identified within the higher settlement areas which are constrained by the National Park and the sea as evidenced in the Sustainability Appraisal of the Local Plan.
The report also mentions that "sensitivity around the edge of the coastal settlements is quite high". It is recognised in the Sustainability Report there is very limited growth opportunity in Seaford despite it being well suited to growth from a strategic perspective (as one of the two district centres).
It will be impossible to focus the intensification of development in these areas whilst "maintaining and enhancing the natural and historic environment and the local distinctiveness of the plan area and retaining the current settlement pattern" which Lewes District Council claim is part of the policy.
6. ***Do you think the wording of draft Strategic Policy SDS2: Achieving Sustainable Development is appropriate?***
No comment
7. ***If not, what should be changed about draft Strategic Policy SDS2: Achieving Sustainable Development?***
No comment
8. ***What evidence do you have to support the change you have suggested to draft Strategic Policy SDS2: Achieving Sustainable Development?***
No comment
9. ***Do you think the wording of draft Strategic Policy SDS3: Settlement Hierarchy is appropriate?***
No
10. ***If not, what should be changed about draft Strategic Policy SDS3: Settlement Hierarchy?***
Seaford Town Council does not agree that Seaford is a District Centre, Seaford should be downgraded to a Service Centre.
11. ***What evidence do you have to support the change you have suggested to draft Strategic Policy SDS3: Settlement Hierarchy?***
Seaford has been identified as a District Centre based on the perception of services it has, or should have.
It is recognised that the medical services within Seaford are at capacity or not available. The GP services are unable to meet the current need within the town with patients often sent outside of Lewes District to surgeries that can usually only be accessed by a car as there are no public transport options from Seaford to the surgeries. Plans to create a Seaford Medical Hub were shelved during 2020, the Primary Care Network requires additional practice space, and the project to improve healthcare in Seaford is classed as 'critical' with a 'high risk' of failure. Parts of Seaford are semi-rural with only one round trip bus journey twice a week.

The Infrastructure Delivery Plan identifies there are pressures on places at all secondary schools in the coastal towns. This year, Seaford Head Secondary School is oversubscribed with children being offered places 5.9 miles away at Seahaven Academy.

The Settlement Hierarchy Review 2024 gives weight to accessibility of services and facilities via public transport, cycleways and pathways.

Seaford is unable to support the needs a District Centre aims to provide.

12. *Do you think the wording of draft Policy SDS4: Settlement Boundaries is appropriate?*
No Comment
13. *If not, what should be changed about draft Policy SDS4: Settlement Boundaries?*
No Comment
14. *What evidence do you have to support the change you have suggested to draft Policy SDS4: Settlement Boundaries?*
No Comment.

Theme: Climate Change

15. *What are your views on the Theme: Climate Change policies?*

Strategic Policy CC1: Mitigating and Adapting to Climate Change

Policy CC2: A Design Response to a Changing Climate

Policy CC3: Improving Energy Efficiency in Existing Buildings

Policy CC4: Solar PV, Storage and Demand Management

Policy CC5: Renewable Energy Generation

Policy CC6: Sustainable Construction

Policy CC7: Coastal Change Management Areas

Policy CC8: Coastal Vulnerability Areas

No Comment.

16. *Do you think the wording of draft Strategic Policy CC1: Mitigating and Adapting to Climate Change is appropriate?*
No Comment.
17. *If not, what should be changed about draft Strategic Policy CC1: Mitigating and Adapting to Climate Change?*
No Comment.
18. *What evidence do you have to support the change you have suggested to draft Strategic Policy CC1: Mitigating and Adapting to Climate Change?*
No Comment.
19. *Do you think the wording of draft Policy CC2: A Design Response to a Changing Climate is appropriate?*
No Comment.
20. *If not, what should be changed about draft Policy CC2: A Design Response to a Changing Climate?*
No Comment.

21. *What evidence do you have to support the change you have suggested to draft Policy CC2: A Design Response to a Changing Climate?*
No Comment.
22. *Do you think the wording of draft Policy CC3: Improving Energy Efficiency in Existing Buildings is appropriate?*
No Comment.
23. *If not, what should be changed about draft Policy CC3: Improving Energy Efficiency in Existing Buildings?*
No Comment.
24. *What evidence do you have to support the change you have suggested to draft Policy CC3: Improving Energy Efficiency in Existing Buildings?*
No comment.
25. *Do you think the wording of draft Policy CC4: Solar PV, Storage and Demand Management is appropriate?*
No Comment.
26. *If not, what should be changed about draft Policy CC4: Solar PV, Storage and Demand Management?*
No Comment.
27. *What evidence do you have to support the change you have suggested to draft Policy CC4: Solar PV, Storage and Demand Management?*
No Comment.
28. *Do you think the wording of draft Policy CC5: Renewable Energy Generation is appropriate?*
No Comment.
29. *If not, what should be changed about draft Policy CC5: Renewable Energy Generation?*
No Comment.
30. *What evidence do you have to support the change you have suggested to draft Policy CC5: Renewable Energy Generation?*
No Comment.
31. *Do you think the wording of draft Policy CC6: Sustainable Construction is appropriate?*
No Comment.
32. *If not, what should be changed about draft Policy CC6: Sustainable Construction?*
No Comment.
33. *What evidence do you have to support the change you have suggested to draft Policy CC6: Sustainable Construction?*
No Comment.

34. *Do you think the wording of draft Policy CC7: Coastal Change Management Areas is appropriate?*
No Comment.
35. *If not, what should be changed about draft Policy CC7: Coastal Change Management Areas?*
No Comment.
36. *What evidence do you have to support the change you have suggested to draft Policy CC7: Coastal Change Management Areas?*
No Comment.
37. *Do you think the wording of draft Policy CC8: Coastal Vulnerability Areas is appropriate?*
No Comment.
38. *If not, what should be changed about draft Policy CC8: Coastal Vulnerability Areas?*
No Comment.
39. *What evidence do you have to support the change you have suggested to draft Policy CC8: Coastal Vulnerability Areas?*
No Comment.

Theme: Natural Environment

40. *What are your views on the Theme: Natural Environment policies?*

Strategic Policy NE1: Protecting the Natural Environment

Policy NE2: Green and Blue Infrastructure

Policy NE3: Biodiversity and Nature Recovery

Policy NE4: Trees, Woodland and Hedgerows

Policy NE5: Green Gaps

This theme refers to the Landscape Character Assessment for an area as reference evidence. The Landscape Character Assessment for Seaford is inaccurate, with a vast amount of information missing. This was reported to the Lewes Local Plan Team as part of the previous consultation but has not been addressed.

These policies can not be adopted until all supporting evidence is complete and accurate.

In addition the Green and Blue Infrastructure (GBI) study maps form part of this theme. The GBI study document states "Planning Policy Guidance promotes evidence-based authority-wide green infrastructure strategies and recognises that green infrastructure networks cross administrative boundaries and the need for collaboration among stakeholders to address cross-boundary issues"; and "the rich and diverse landscape across the district, including the SDNP, is recognised as part of the local heritage and identity. Sustainable tourism is recognised as part of the Lewes District Local Plan: Part 1 (2016) Core Policy 5 – Visitor Economy, and GBI has a role in preserving the setting of existing assets and enabling new

sustainable tourism enterprise". However, the maps have failed to take account of the GBI that is within Seaford but part of the National Park. This GBI is iconic in attracting tourists from across the globe, it needs to be afforded the highest protection and must be acknowledged within the supporting evidence as supported by paragraphs 188 and 189 of the NPPF.

41. *Do you think the wording of draft Strategic Policy NE1: Protecting the Natural Environment is appropriate?*

No

42. *If not, what should be changed about draft Strategic Policy NE1: Protecting the Natural Environment?*

Seaford Town Council suggest that point 1e is changed to: "Resisting development in the setting of the South Downs National Park, and sites outside of the designation boundary which affects land within the protected landscape, if it fails to conserve and appropriately enhance its landscape qualities, including key views, its natural and scenic beauty, wildlife and cultural heritage, and dark night sky quality as informed by the most up to date South Downs Landscape Character Assessment and/or other relevant documents".

43. *What evidence do you have to support the change you have suggested to draft Strategic Policy NE1: Protecting the Natural Environment?*

The suggested wording is from the 'Guidance for Relevant Authorities on seeking to Further the Purposes of Protected Landscapes' published 16th December 2024 by central government as there are sites within Lewes District which border the SDNP which must be given special consideration.

44. *Do you think the wording of draft Policy NE2: Green and Blue Infrastructure is appropriate?*

No Comment.

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45. *If not, what should be changed about draft Policy NE2: Green and Blue Infrastructure?*

No Comment.

46. *What evidence do you have to support the change you have suggested to draft Policy NE2: Green and Blue Infrastructure?*

No Comment.

47. *Do you think the wording of draft Policy NE3: Biodiversity and Nature Recovery is appropriate?*

No.

48. *If not, what should be changed about draft Policy NE3: Biodiversity and Nature Recovery?*

Seaford Town Council suggest that the following is removed from point 1: "If harm to existing biodiversity cannot be avoided, by use of alternative sites or through design and layout, impacts must be minimised through measures to reduce the duration, intensity and extent of impacts on biodiversity and all ecological damage must be compensated or mitigated"

49. *What evidence do you have to support the change you have suggested to draft Policy NE3: Biodiversity and Nature Recovery?*
Allowing existing biodiversity to be harmed is contrary to the published Vision and Aims of the draft Local Plan.
50. *Do you think the wording of draft Policy NE4: Trees, Woodland and Hedgerows is appropriate?*
No Comment.
51. *If not, what should be changed about draft Policy NE4: Trees, Woodland and Hedgerows?*
No Comment.
52. *What evidence do you have to support the change you have suggested to draft Policy NE4: Trees, Woodland and Hedgerows?*
No Comment.
53. *Do you think the wording of draft Policy NE5: Green Gaps is appropriate?*
No Comment.
54. *If not, what should be changed about draft Policy NE5: Green Gaps?*
No Comment.
55. *What evidence do you have to support the change you have suggested to draft Policy NE5: Green Gaps?*
No Comment.

Theme: Water

56. *What are your views on the Theme: Water policies?*

Policy W1: Flood Risk and Flood Management

Policy W2: Protection of water resources and water quality

Policy W3: Water Efficiency in New Development, Extensions and Renovations

No Comment.

57. *Do you think the wording of draft Policy W1: Flood Risk and Flood Management is appropriate?*

No Comment.

58. *If not, what should be changed about draft Policy W1: Flood Risk and Flood Management?*

No Comment.

59. *What evidence do you have to support the change you have suggested to draft Policy W1: Flood Risk and Flood Management?*

No Comment.

60. *Do you think the wording of draft Policy W2: Protection of water resources and water quality is appropriate?*

No Comment.

61. *If not, what should be changed about draft Policy W2: Protection of water resources and water quality?*

No Comment.

62. *What evidence do you have to support the change you have suggested to draft Policy W2: Protection of water resources and water quality?*

No Comment.

63. *Do you think the wording of draft Policy W3: Water Efficiency in New Development, Extensions and Renovations is appropriate?*

No.

64. *If not, what should be changed about draft Policy W3: Water Efficiency in New Development, Extensions and Renovations?*

Seaford Town Council suggests the removal of "or impose an extraordinary burden" at point 5.

65. *What evidence do you have to support the change you have suggested to draft Policy W3: Water Efficiency in New Development, Extensions and Renovations?*

Not necessary.

Theme: Health

66. *What are your views on the Theme: Health policies?*

Strategic Policy HW1: Health and Wellbeing
Policy HW2: Minimising Pollution Impacts
Policy HW3: Healthy Vibrant Places
Policy HW4: Designing for Health and Wellbeing
Policy HW5: Outdoor Playing Space
Policy HW6: Healthy Local Food
No Comment

67. *Do you think the wording of draft Strategic Policy HW1: Health and Wellbeing is appropriate?*

No Comment.

68. *If not, what should be changed about draft Strategic Policy HW1: Health and Wellbeing?*

No Comment.

69. *What evidence do you have to support the change you have suggested to draft Strategic Policy HW1: Health and Wellbeing?*

No Comment.

70. *Do you think the wording of draft Policy HW2: Minimising Pollution Impacts is appropriate?*

No.

71. *If not, what should be changed about draft Policy HW2: Minimising Pollution Impacts?*

Seaford Ton Council suggests that additional wording is added at point 4 such as "outside of District Centres and Service Centres where it does not impact protected landscapes"

72. *What evidence do you have to support the change you have suggested to draft Policy HW2: Minimising Pollution Impacts?*

Point 4 does not take account the rural edges of the District and Service Centres that border the National Park.

73. *Do you think that the local plan should introduce a requirement for intensive agriculture proposals to be accompanied by a statement of compliance with regard to biodiversity, pollution and climate change requirements? Such an approach would require further evidence base work to help us to identify the scale/intensity of agricultural development below the Environment Agency permit requirements to which such a requirement should apply?*

No Comment.

74. *Do you think the wording of draft Policy HW3: Healthy Vibrant Places is appropriate?*

No Comment.

75. *If not, what should be changed about draft Policy HW3: Healthy Vibrant Places?*
No Comment.
76. *What evidence do you have to support the change you have suggested to draft Policy HW3: Healthy Vibrant Places?*
No Comment.
77. *Do you think the wording of draft Policy HW4: Designing for Health and Wellbeing is appropriate?*
No.
78. *If not, what should be changed about draft Policy HW4: Designing for Health and Wellbeing?*
Seaford Town Council is concerned that the wording is too vague without measurable parameters.
79. *What evidence do you have to support the change you have suggested to draft Policy HW4: Designing for Health and Wellbeing?*
For example "adverse impacts on the amenity of existing and future occupiers or users of nearby building and spaces has been minimised in terms of overlooking, dominance or overshadowing"
- It is not clear on what is considered acceptable, nor is it clear on the level of natural light to be available at neighbouring properties
80. *Do you think the wording of draft Policy HW5: Outdoor Playing Space is appropriate?*
No.
81. *If not, what should be changed about draft Policy HW5: Outdoor Playing Space?*
Seaford Town Council suggests the removal of: "Financial contributions to off-site provision of outdoor play space will be accepted, particularly where the applicant demonstrates that there is insufficient scope to provide an appropriately sized play space within the scheme in view of ongoing use and management of the space."
82. *What evidence do you have to support the change you have suggested to draft Policy HW5: Outdoor Playing Space?*
Seaford has a deficit of outdoor playing space and an expiring s106 agreement of £350k from a developer to replace sports facilities lost to the former Newlands school development. Despite strenuous efforts, little progress has been made to find a site to use this financial contribution, due to Seaford having insufficient recreational space available.
To ensure children have a healthy environment they require accessible outdoor playing space, particularly having regard to the density required for development which will result in little or no private garden space.
Financial contributions towards off-site provision has been proved very difficult to put to use in Seaford.
83. *Do you think the wording of draft Policy HW6: Healthy Local Food is appropriate?*
No Comment.

84. *If not, what should be changed about draft Policy HW6: Healthy Local Food?*
No Comment.
85. *What evidence do you have to support the change you have suggested to draft Policy HW6: Healthy Local Food?*
No Comment.

Theme: Homes for All

86. *What are your views on the Theme: Homes for All policies?*

Strategic Policy H1: Meeting Housing Needs
 Policy H2: Suitable Homes for All
 Policy H3: Affordable Housing
 Policy H4: Specialist Accommodation for Vulnerable People
 Policy H5: New Residential Development in the Countryside
 Policy H6: Making Best Use of Existing Rural Buildings
 Policy H7: Making Best Use of the Existing Housing Stock
 Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople
 No Comment.

87. *Do you think the wording of draft Strategic Policy H1: Meeting Housing Needs is appropriate?*
No.

88. *If not, what should be changed about draft Strategic Policy H1: Meeting Housing Needs?*
 Point 2 says "Contributions to meeting affordable housing needs will be required from all qualifying residential development with a target that 40% of the homes within a proposal should contribute to meeting the need". Where it has a target of 40% it also needs to have a mandatory minimum percentage.
 Point 4 needs to be amended to allow flexibility for example "aim for a minimum density of 50 dwellings per hectare having regard to other policies within the local and neighbourhood plans".
 Point 5 - remove "Exceptions to the achievement of space standards will only be permitted where the homes are intended to meet the needs of a specific client group, and the applicant demonstrates that ample ancillary residential accommodation is provided outside of the individual dwelling."

89. *What evidence do you have to support the change you have suggested to draft Strategic Policy H1: Meeting Housing Needs?*
 Point 2 - There is a lack of affordable housing in the district so this should be the priority.
 Point 4 - The aim of the spatial strategy is to protect and enhance the natural, built and historic environment. This can not be achieved if a minimum density of 50 dwellings per hectare is REQUIRED next to a conservation area, protected landscape or next to/within an Area of Established Character.
 Point 5 - Everyone needs to have a healthy living area. A large response to the last consultation said minimum space standards should be met and aim higher where possible.

90. *Do you think the wording of draft Policy H2: Suitable Homes for All is appropriate?*
No.

91. *If not, what should be changed about draft Policy H2: Suitable Homes for All?*
Allowance for bungalows within a development needs to be added even if it reduces the required density.
92. *What evidence do you have to support the change you have suggested to draft Policy H2: Suitable Homes for All?*
Currently, bungalows can be included within a scheme subject to the achievement of overall density requirements. This would not be possible in District Centres that have an extremely high density requirement.
Seaford has a large population of older people. If the provision to downsize to bungalows is lost family sized homes will not be released to the market.
Bungalows are also good for disabled people due to providing single-level living, which eliminates the need to climb stairs, making them easily accessible for those with mobility issues and especially are beneficial for wheelchair users.
93. *Do you think the wording of draft Policy H3: Affordable Housing is appropriate?*
No Comment.
94. *If not, what should be changed about draft Policy H3: Affordable Housing?*
No Comment.
95. *What evidence do you have to support the change you have suggested to draft Policy H3: Affordable Housing?*
No Comment.
96. *Do you think the wording of draft Policy H4: Specialist Accommodation for Vulnerable People is appropriate?*
No Comment.
97. *If not, what should be changed about draft Policy H4: Specialist Accommodation for Vulnerable People?*
No Comment.
98. *What evidence do you have to support the change you have suggested to draft Policy H4: Specialist Accommodation for Vulnerable People?*
No Comment.
99. *Do you think the wording of draft Policy H5: New Residential Development in the Countryside is appropriate?*
No Comment.
100. *If not, what should be changed about draft Policy H5: New Residential Development in the Countryside?*
No Comment.
101. *What evidence do you have to support the change you have suggested to draft Policy H5: New Residential Development in the Countryside?*
No Comment.

102. *Do you think the wording of draft Policy H6: Making Best Use of Existing Rural Buildings is appropriate?*
No Comment.
103. *If not, what should be changed about draft Policy H6: Making Best Use of Existing Rural Buildings?*
No Comment
104. *What evidence do you have to support the change you have suggested to draft Policy H6: Making Best Use of Existing Rural Buildings?*
No Comment.
105. *Do you think the wording of draft Policy H7: Making Best Use of the Existing Housing Stock is appropriate?*
No.
106. *If not, what should be changed about draft Policy H7: Making Best Use of the Existing Housing Stock?*
Both points 2 and 3 should include "having regard to other policies in the Local and Neighbourhood Plan".
107. *What evidence do you have to support the change you have suggested to draft Policy H7: Making Best Use of the Existing Housing Stock?*
There are Areas of Established Character and conservation areas which need to be protected.
108. *Do you think the wording of draft Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople is appropriate?*
No Comment.
109. *If not, what should be changed about draft Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople?*
No Comment.
110. *What evidence do you have to support the change you have suggested to draft Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople?*
No Comment.

Theme: Economy and Regeneration

111. *What are your views on the Theme: Economy and Regeneration policies?*
- Strategic Policy E1: Meeting Economic Needs
Strategic Policy E2: Newhaven Town
Policy E3: Newhaven Port
Policy E4: Rural Economy
Policy E5: Town Centres
Policy E6: Town Centre Uses
Policy E7: Visitor Economy
Policy E8: Equestrian Development
If the importance of Seaford as a tourist destination is not recognised in the Local Plan how can visitor economy and experience be protected in Seaford? It is

important the visitor economy across neighbouring authorities is considered. The SDNP People and Nature Network - Evidence and Action Report paragraph 1.76 states "The attractiveness of an area, well maintained cultural heritage and the quality of the green infrastructure has an impact on the number of visitors drawn to and spending time in a particular area. Within the Network area the nationally protected landscapes (NPL) are strong visitor attractions. Partner authorities need to both attract spend from these visitors and attract their own visitors. A quality environment is a key factor in areas outside of the NPLs succeeding in this."

Visitors to the SDNP spend around £464m annually, supporting 8,200 jobs and 6.8 million visitors stay overnight outside the National Park. (South Downs Visitor and Tourism Economic Impact Study, 2013). Seaford, an attractive town in its own right, has now become an crucial gateway town to the SDNP, in particular Seaford Head which provides an iconic and world famous panaroma of the Seven Sisters Cliffs. Seaford is increasingly visited by domestic and international tourists to explore this area of the SDNP.

Seaford should be recognised as this important gateway, and efforts should be made to capitalise on its important new role.

Seaford Town Council is also concerned that beach huts are being promoted as "popular forms of accommodation" when there is a rule to say beach huts must not be used for overnight accommodation.

112. *Do you think the wording of draft Strategic Policy E1: Meeting Economic Needs is appropriate?*
No Comment.
113. *If not, what should be changed about draft Strategic Policy E1: Meeting Economic Needs?*
No Comment.
114. *What evidence do you have to support the change you have suggested to draft Strategic Policy E1: Meeting Economic Needs?*
No Comment.
115. *Do you think the wording of draft Strategic Policy E2: Newhaven Town is appropriate?*
No Comment.
116. *If not, what should be changed about draft Strategic Policy E2: Newhaven Town?*
No Comment.
117. *What evidence do you have to support the change you have suggested to draft Strategic Policy E2: Newhaven Town?*
No Comment.
118. *Do you think the wording of draft Policy E3: Newhaven Port is appropriate?*
No Comment.
119. *If not, what should be changed about draft Policy E3: Newhaven Port?*
No Comment.

120. *What evidence do you have to support the change you have suggested to draft Policy E3: Newhaven Port?*
No Comment.
121. *Do you think the wording of draft Policy E4: Rural Economy is appropriate?*
No Comment.
122. *If not, what should be changed about draft Policy E4: Rural Economy?*
No Comment.
123. *What evidence do you have to support the change you have suggested to draft Policy E4: Rural Economy?*
No Comment.
124. *Do you think the wording of draft Policy E5: Town Centres is appropriate?*
No Comment.
125. *If not, what should be changed about draft Policy E5: Town Centres?*
No Comment.
126. *What evidence do you have to support the change you have suggested to draft Policy E5: Town Centres?*
No Comment.
127. *Do you think the wording of draft Policy E6: Town Centre Uses is appropriate?*
No Comment.
128. *If not, what should be changed about draft Policy E6: Town Centre Uses?*
No Comment.
129. *What evidence do you have to support the change you have suggested to draft Policy E6: Town Centre Uses?*
No Comment.
130. *Do you think the wording of draft Policy E7: Visitor Economy is appropriate?*
No.
131. *If not, what should be changed about draft Policy E7: Visitor Economy?*
Seaford Town Council is concerned that beach huts are being promoted as "popular forms of accommodation". Beach huts should not be listed in the last paragraph of the "Why do we think we need this policy" section.
132. *What evidence do you have to support the change you have suggested to draft Policy E7: Visitor Economy?*
No Comment.
133. *Do you think the wording of draft Policy E8: Equestrian Development is appropriate?*

There is a rule to say beach huts must not be used for overnight accommodation. Grouping them with hotels is confusing and this should be addressed.

134. *If not, what should be changed about draft Policy E8: Equestrian Development?*
No Comment.

135. *What evidence do you have to support the change you have suggested to draft Policy E8: Equestrian Development?*
No Comment.

Theme: Design, Landscape and the Built Environment

136. *What are your views on the Theme: Design, Landscape and the Built Environment policies?*

Strategic Policy D1: Development Principles

Policy D2: Achieving High-Quality Design in Development

Policy D3: Landscape Character

Policy D4: Conservation and Enhancement of Heritage Assets

As this theme is reliant on the Landscape Character Assessment, it is essential this document is revised. At the moment the document is incomplete and incorrect as it has missed out a swathe of area within Seaford

137. *Do you think the wording of draft Strategic Policy D1: Development Principles is appropriate?*

No Comment.

138. *If not, what should be changed about draft Strategic Policy D1: Development Principles?*

No Comment.

139. *What evidence do you have to support the change you have suggested to draft Strategic Policy D1: Development Principles?*

No Comment.

140. *Do you think the wording of draft Policy D2: Achieving High-Quality Design in Development is appropriate?*

No Comment.

141. *If not, what should be changed about draft Policy D2: Achieving High-Quality Design in Development?*

No Comment.

142. *What evidence do you have to support the change you have suggested to draft Policy D2: Achieving High-Quality Design in Development?*

No Comment.

143. *Do you think the wording of draft Policy D3: Landscape Character is appropriate?*

No Comment.

144. *If not, what should be changed about draft Policy D3: Landscape Character?*

No Comment.

145. *What evidence do you have to support the change you have suggested to draft Policy D3: Landscape Character?*

No Comment.

146. *Do you think the wording of draft Policy D4: Conservation and Enhancement of Heritage Assets is appropriate?*

No Comment.

147. *If not, what should be changed about draft Policy D4: Conservation and Enhancement of Heritage Assets?*

No Comment.

148. *What evidence do you have to support the change you have suggested to draft Policy D4: Conservation and Enhancement of Heritage Assets?*

No Comment.

Theme: Infrastructure & Community Facilities

149. *What are your views on the Theme: Infrastructure & Community Facilities policies?*

Strategic Policy IC1: Infrastructure Provision
Policy IC2: Water Supply and Wastewater Management
Policy IC3: Digital Infrastructure and Communications
Policy IC4: Non-commercial Community Facilities
Policy IC5: Commercial Community Uses
Policy IC6: Sustainable Transport and Movement
Policy IC7: Parking Standards
Policy IC8: Former Lewes to Uckfield Railway Line

No Comment.

150. *Do you think the wording of draft Strategic Policy IC1: Infrastructure Provision is appropriate?*

No.

151. *If not, what should be changed about draft Strategic Policy IC1: Infrastructure Provision?*

Remove from point 2 'unless exceptional circumstances are demonstrated'.

152. *What evidence do you have to support the change you have suggested to draft Strategic Policy IC1: Infrastructure Provision?*

It is essential that all infrastructure is in place to meet the needs of existing and proposed development.

153. *Do you think the wording of draft Policy IC2: Water Supply and Wastewater Management is appropriate?*

No Comment.

154. *If not, what should be changed about draft Policy IC2: Water Supply and Wastewater Management?*

No Comment.

155. *What evidence do you have to support the change you have suggested to draft Policy IC2: Water Supply and Wastewater Management?*

No Comment.

156. *Do you think the wording of draft Policy IC3: Digital Infrastructure and Communications is appropriate?*

- No Comment.
157. *If not, what should be changed about draft Policy IC3: Digital Infrastructure and Communications?*
No Comment.
158. *What evidence do you have to support the change you have suggested to draft Policy IC3: Digital Infrastructure and Communications?*
No Comment.
159. *Do you think the wording of draft Policy IC4: Non-commercial Community Facilities is appropriate?*
No Comment.
160. *If not, what should be changed about draft Policy IC4: Non-commercial Community Facilities?*
No Comment.
161. *What evidence do you have to support the change you have suggested to draft Policy IC4: Non-commercial Community Facilities?*
No Comment.
162. *Do you think the wording of draft Policy IC5: Commercial Community Uses is appropriate?*
No Comment.
163. *If not, what should be changed about draft Policy IC5: Commercial Community Uses?*
No Comment.
164. *What evidence do you have to support the change you have suggested to draft Policy IC5: Commercial Community Uses?*
No Comment.
165. *Do you think the wording of draft Policy IC6: Sustainable Transport and Movement is appropriate?*
No Comment.
166. *If not, what should be changed about draft Policy IC6: Sustainable Transport and Movement?*
No Comment.
167. *What evidence do you have to support the change you have suggested to draft Policy IC6: Sustainable Transport and Movement?*
No Comment.
168. *Do you think the wording of draft Policy IC7: Parking Standards is appropriate?*
No.
169. *If not, what should be changed about draft Policy IC7: Parking Standards?*
Remove point 1.e. Local car ownership levels.

170. *What evidence do you have to support the change you have suggested to draft Policy IC7: Parking Standards?*
When regenerating an area, or have people moving in from other areas it cannot be assumed that their car use will be the same as the existing population.
171. *Do you think the wording of draft Policy IC8: Former Lewes to Uckfield Railway Line is appropriate?*
No Comment.
172. *If not, what should be changed about draft Policy IC8: Former Lewes to Uckfield Railway Line?*
No Comment.
173. *What evidence do you have to support the change you have suggested to draft Policy IC8: Former Lewes to Uckfield Railway Line?*
No Comment.
174. *Do you think the wording of draft Policy IC9: Public Rights of Way is appropriate?*
No Comment.
175. *If not, what should be changed about draft Policy IC9: Public Rights of Way?*
No Comment.
176. *What evidence do you have to support the change you have suggested to draft Policy IC9: Public Rights of Way?*
No Comment.
177. *Do you think the wording of draft Policy IC10: Development Viability?*
No Comment.
178. *If not, what should be changed about draft Policy IC10: Development Viability?*
No Comment.
179. *What evidence do you have to support the change you have suggested to draft Policy IC10: Development Viability?*
No Comment.

**This Word version of the questionnaire was updated on 15 January 2025 to include questions 174 to 179 concerning policies IC9 and IC10, which were included on the online questionnaire from the start of the consultation on 6 January 2025.*



**Seaford Town Council's Response to Lewes Local Plan
Consultation February 2025**

Site Allocations

ESAP 18 – Talland Parade

Response: Seaford Town Council welcomes this site allocation.

ESAP 19 – Mardon Court

Response: Seaford Town Council's only concern for this site allocation is the viability of affordable housing.

Evidence: The land prices in Seaford are high, being a highly sought-after seaside destination town. A development on the seafront, offering an unspoiled beach on the doorstep and sea views, represents highly desirable real estate and thus is highly unlikely to provide the affordable housing requirement stated in Policy H3.

ESAP 20 – Former St John's School

Response: Seaford Town Council recognises that development of this site is needed, however the proposal is too large and not acceptable or in keeping with the area. The Town Council strongly objects to the proposal of 105 residential dwellings at this site allocation.

Evidence:

Housing Density

This is a designated Area of Established Character (AEC) in both the Lewes Local Plan and the Seaford Neighbourhood Plan (policy SEA5). The housing density proposed (105 dwellings) will overwhelm the Firle Road area and have a major detrimental impact on existing residential amenities and character.

The proposed housing density is over four times denser than that adopted to date for development in Firle Road which completely disregards the Area of Established Character. If the developable area is to be developed, it should reflect the low

density of its surroundings in order to retain at least some of the qualities which led to the AEC being designated.

Traffic and Public Transport

This area has limited vehicle and public transport. Major roads serving Seaford (A259, A26 and A27) are already at capacity, which is causing major disruption to traffic and most alarmingly, having a catastrophic impact on emergency services.

The additional traffic which would be generated from 105 dwellings would have to use the existing road, which is not up to adoptable standard, inadequate in width and not safe for pedestrians. There is limited pavement, and where the pavement exists it is not fit for purpose, being unsafe for families with pushchairs and people with wheelchair and/or mobility aids.

Although public transport is available in Seaford, this site is situated a significant distance from the town centre so is not close enough for residents in that area to access the main bus routes (closest stop 1.1km distance) or train station (1.6km distance).

Healthcare

The health service provision in Seaford is already at capacity. There are only two GP practices, both of which are not taking on new patients, and no minor injuries unit. The Town Council already has major concerns surrounding the lack of health services available for current residents. Some are having to travel a significant distance to access crucial services and those with mobility and/or mental health difficulties are struggling to get the support they need.

The Ambulance Service in Seaford is already overwhelmed as a result of people not being able to access primary and secondary care, which is having a catastrophic impact on ambulance waiting times.

Another 105 dwellings squeezed into an insufficiently sized site, in an inaccessible area of the town, in a town where its health services are already at capacity, will likely have a devastating effect on residents and the emergency services.

Greenspace & Sports Facilities

The site specific considerations in the proposal state “[the site] is identified for 105 residential dwellings. Planning permissions will not be granted for any other uses.”

Seaford Town Council is strongly opposed to any development of this site which fails to include a substantial portion of recreational space.

Seaford has an alarming deficit of recreation space for the size of the town's population. It is understood that a District-wide survey of open/green space is being carried out to inform policies in future phases of the Plan. Whilst this is encouraging, there is a compelling need in Seaford for additional recreational land, and until an Open Spaces Policy Officer is appointed and an Open Spaces Policy presented, the Town Council urges for a halt on all pre planning and planning applications for affected sites in Seaford.

In 2020, Lewes District Council benefitted from a commuted payment of £350,000 from Bellways to replace valuable public sports facilities lost to the former Newlands School development. Despite strenuous efforts, there has been little progress in finding a site to use this sum to provide the much-needed facilities. Seaford residents, in particular local children, need these facilities.

As an example, Seaford Town Football Club has over 40 teams, with an all-inclusive mix of girls, boys, young, old, and disability teams. They continually struggle for pitch space in Seaford and now routinely travel to Seahaven Academy in Newhaven because there is simply not enough provision in Seaford. Football is growing in popularity in the town, especially with children, and there are simply not enough football pitches to satisfy the need.

The closure of the former St John's School and the availability of the site offers a unique and fleeting opportunity to resolve the shortage of sports and recreational facilities in the town by requiring the dedication of the undeveloped land to the public as a quid pro quo for consent for housing.

The land should be retained partly as informal green space and partly as public sports facilities (the facilities are already there) using the Newlands s106 monies and any other available funding. This would help LDC to satisfy point 104 of the National Planning Policy Framework which requires that "Existing open space, sports and recreational buildings and land, including playing fields and formal play spaces, should not be built on".

Any concerns over the impact of public use on residential amenity could be dealt with through the strict use of a Travel Plan, for example requiring access mainly through minibuses for sports use and limited access for private cars.

ESAP 21 – Land to the South of Chyngton Way

Response: Seaford Town Council strongly objects to the inclusion of site allocation ESAP 21 and requests for its removal entirely.

Evidence:

Greenspace and Location

This area is the gateway to an increasingly popular, very well- visited and world-famous view point which must be protected.

The Lewes Local Plan does not appear to acknowledge or accommodate that parts of Seaford are within, or adjoining, the South Downs National Park and the considerations that should be made as a result of this. This site area is an invaluable buffer between the built form of Seaford and the National Park.

The site area acts as a 'visitor hub' to access tourist hot spots such as: South Hill Barn; the Sussex Heritage Coast at Seaford Head to the Seven Sisters and Beachy Head; the King Charles III England Coast Path National Trail; the National Cycle Network; Vanguard Way; and the new Avenue Verte.

This is also an important and popular area for people to enjoy one of England's two International Dark Sky Reserves. The Local Plan states that Seaford is not in a Dark Skies area, but parts of Seaford are in the SDNP and thus the dark skies area, including Bishopstone Village and the town's two golf courses, for example. This site at Chyngton Way abuts onto the Transition Zone of the dark skies reserve. The transition zone is described by the South Downs National Park Authority (SDNPA) within the Dark Night Skies Technical Advice Note as 'areas that lie between dark zones and the urban environment. While the skies are relatively brighter it is still important to reduce light pollution as these areas have the potential to become dark zones in the future.' The proposal to introduce dwellings on this site would pose a threat to reducing the light pollution within the transition zone. SDNPA state: "We think our star-studded skies overhead are as valuable as our beautiful rolling

landscapes and, with properly dark skies in the South East of England under threat, this is a statement that the skies of the South Downs are worth protecting.”

No amount of landscaping could possibly mitigate the huge adverse impact that the development of this site would have on what has become the most important visitor hub on the Downland between the Seaford and Eastbourne seafronts.

Any development, even allowing for a low density of approx. 15 dwellings per hectare, would have a severe detrimental impact on the adjacent National Park and the open character of the area.

South Hill Barn and Visitors

South Hill Barn itself is a major local asset owned by Seaford Town Council. There are long-standing plans to refurbish it and bring it into beneficial use for community and cultural purposes.

Seaford Town Council acknowledges however any such uses will have to be restricted in line with the sensitive nature of the area. The proposed uses would be directly in line with the second purpose of National Park designation, i.e. to promote opportunities for public understanding and enjoyment of the special qualities of the parks.

The proposed allocation of the Chyngton Way site for development would have a seriously detrimental visual impact on the Barn and would downgrade the high existing quality of the Park's character and landscape quality in this area.

As mentioned above, the area has become a popular hub for visitors local and international due to its accessibility. For many people with limited mobility, it can be the only part of the National Park they can access.

The area grew in popularity greatly during the Covid lockdowns and has retained that popularity due to an increase in people enjoying UK-based 'staycations' alongside internationally popular films that were filmed at the iconic beauty spots that this area provides a gateway to.

The area now attracts coachloads of visitors on a daily basis, particularly as many other sites in the local area such as the National Trust site at Birling Gap and the SDNPA/UK Forestry site at the Seven Sisters Centre have banned coaches. The

area must therefore be protected, not just for Seaford but for the country as this area plays an invaluable role in protecting, and making accessible, one of the country's most iconic views.

Traffic and Public Transport

It is an exposed site, adjacent to the SDNP boundary with limited access, serving a level of vehicular traffic which regularly overwhelms the car park adjacent to South Hill Barn. It is also frequented by walkers, often generating parking congestion on nearby roads. These problems would be massively exacerbated and the area would be overwhelmed by the proposed development and an influx of yet more resident's cars.

This area has very limited public transport, there is one local bus twice per week. As this site is situated a significant distance from the town centre it is not close enough for residents in that area to access the train station (2.5km distance).

Against Policies - National Planning Policy Framework, Lewes District Local Plan, South Downs National Park Local Plan and Seaford Neighbourhood Plan

In policy terms the allocation of the site would be totally contrary to Chapter 15 of the NPPF and in particular para 190 due to the aforementioned harm to the character and landscape quality of the adjoining downland.

In addition, it would be contrary to:

LDC draft policies:

- SDS1 – It will not be conserving and enhancing the natural, built and historic environment, including landscapes. It is also not a sustainable area
- SDS2 – point 8 – contribute to the protection and enhancement of the natural environment. Point 12 – Conserve and enhance the significance of heritage assets and their setting
- D3 – It is against the landscape character
- NE1 – Protecting the natural environment
- NE2 – Green, Blue Infrastructure. There is a requirement to protect GBI across boundaries

- IC6 – not in a sustainable transport area. There is one bus twice a week.
- IC9 – the development would adversely affect the character of an existing public right of way.

SDNP draft policies:

- SD4 – Landscape Character (this includes developments that are within the setting of the national park)
- SD6 – Safeguarding views – Landmark views to and from viewpoints
- SD7 – Relative Tranquillity – consider visual and aural environment in the immediate vicinity of development
- SD8 – Dark Skies

NPPF paragraphs:

- 187
- 188
- 189
- 190
- 191

Seaford Neighbourhood Plan policies:

- SEA1
- SEA5



Seaford Town Council Response to

Lewes Local Plan Consultation February 2025

Supporting Arguments

Housing Densities

Seaford and Newhaven have both been identified in the draft local plan as District Centres. Policy H1 specifies simply that in District Centres a housing density of 50 dwellings per hectare will be **required**. The definition of 'District Centre' is elsewhere in policy SDS3 and clearly is intended to cover the whole of the town.

This statement was raised with Lewes District Council officers, and it was stated that it has to be read with other policies in the Plan (this Plan or future phases) specifying environmental and other constraints that proposed densities in new schemes will also be 'subject to'. This assurance from Lewes District Council officers directly contradicts the statements in the appraisals of the two main allocated sites for Seaford that a density of 50 dwellings per hectare of the developable area will be sought as per Policy H1.

The Town Council, and members of the public, deserve confirmation of which assertion is correct.

The requirement in Policy H1, as it stands, may make sense in other towns where recent and/or proposed developments are characterised by high density, flatted developments on regenerated brownfield sites. However, in Seaford, the policy is wholly inappropriate as the two main allocated sites, (as explained in the Town Council's response per site allocation at Appendix B), are not suitable for such intensive development.

The Town Council strongly objects to an unqualified requirement in the principal housing policy. The policy must include suitable provisos, and/or references to constraints specified in other policies should be incorporated for clarification.

Infrastructure

Health

The health service provision in Seaford is over capacity. There are only two GP practices, both of which are not taking on new patients, and no minor injuries unit. The Town Council already has major concerns regarding the lack of health services available for current residents. Some are having to travel a significant distance to access routine services and those with mobility and/or mental health difficulties are struggling to get the support they require.

The Ambulance Service in Seaford is already overwhelmed as a result of residents being unable to access primary and secondary care, which is having a catastrophic impact on ambulance waiting times.

There is similarly a shortage of dentist services in Seaford, with new NHS patients not having been accepted for a significant period of time.

Roads

All roads serving Seaford are over capacity, which is already causing major disruption to traffic and most alarmingly, having a devastating impact on emergency services.

In reality, Seaford is only accessible via 3 roads. The road to the north through Alfriston to the A27 is regularly flooded and inaccessible and even when it is fully open the size of Alfriston village is clearly unsuitable for modern sized vehicles or the level of traffic that passes through it. The road to the east over the Exceat Bridge is a causeway and therefore not future proof, it is also a bottleneck which suffers from significant tailbacks on a daily basis. To the west, the new bus lane in Newhaven is bound to lead to further traffic disruption. Whenever there are blockages on the A259, all roads are gridlocked in and out of Seaford, which is dangerous for all emergency services, and as a coastal town this includes HM Coastguard and RNLI.

Seaford is already not able to offer the road services required for its residents and visitors, without adding the extra burden of additional housing, residents and vehicles.

Sewerage and Water Supply

The Newhaven Water Treatment Plant is at capacity, indicating that it is unable to accommodate increased demand.

There is also local concern over clean water supply, security and its protection.

Schools

The schools in Seaford are oversubscribed, and there is only one secondary school for the whole town, resulting in some secondary school students having to travel to attend Seahaven Academy in Newhaven.

Tourism & Visitor Economy

Seaford Town Council strongly urges that Seaford is recognised by Lewes District Council as a national and international tourist destination. Tourism is covered within several of the supporting documents. However, these do not accurately reflect the current situation relating to Seaford.

The Visitor Economy is based on figures from 2018/19 which was pre-Covid. One consultation document states: “tourism data demonstrates that the tourism economy continues to be a significant contributor to the overall economy of the district and therefore should be appropriately planned for and considered within the plan area”. However, tourism for Seaford is not recognised significantly in the consultation documents.

Seaford Head and the associated views of the Seven Sisters are actively promoted worldwide and are a world-famous attraction. In addition, Seaford has, or is the gateway to, the following nationally important tourist attractions widely publicised: South Hill Barn; the Sussex Heritage Coast at Seaford Head to the Seven Sisters and Beachy Head; the King Charles III England Coast Path National Trail; the National Cycle Network; Vanguard Way; and the new Avenue Verte. This is not given due regard.

It is important to note that the Lewes GBI Study Map Catalogue has ignored swathes of Seaford Head, including the area around South Hill Barn, the view of the Seven Sisters, the Coastguard Cottages and parts of the local and national nature reserve.

Seaford Head (and surrounding areas) is also a popular destination for people to enjoy the International Dark Skies Reserve.

There are many maps referring, amongst other things, to the notable habitats, accessible open space, outdoor visitor attractions and woodland coverage. These maps relate to all areas within Lewes District, but unfortunately, they miss out on the key areas of Seaford. The Town Council concludes that this part of Seaford was inexplicably not included within the site survey.

Another very concerning comment made states that Seaford is not in an international or national designated area. This is incorrect, as parts of Seaford are within, or are a gateway to, the nationally designated South Downs National Park.

Landscape Character Assessment

One of the key documents that feeds into important policies contained within the draft Local Plan is the Landscape Character Assessment (LCA).

Unfortunately, the current LCA for the draft Local Plan does not appear to consider the rural margins of Seaford which constitute the boundary between the town and the National Park. This leaves the margins of Seaford at risk from inappropriate and possibly high-density developments.

It appears from the report produced by the consultant AECOM that Seaford has been included within the LCA classed as B1 which relates to Peacehaven, Newhaven, Seaford and Saltdean Downland. They have only considered the urban area of Seaford and have completely failed to have regard to the boundary of Seaford stretching into the National Park to the east and north.

The areas of Seaford within the National Park are indeed covered by an LCA commissioned by the National Park Authority. Lewes District Council makes fleeting reference to the existence of this document but appears to draw no information from it. This information is critical to any proposed development on the boundary between Seaford and the National Park.

The failure to consider the iconic and historic characteristics and influences of the downland landscape of these areas of Seaford puts them at serious risk. This will likely impact many of the assessments regarding sites that have been or will be submitted for development in the future.

The National Park LCA, when referring to South Hill / Seaford Head states: “views east towards the cliffs of the Seven Sisters with cottages at Cuckmere Haven in the foreground are available from South Hill. This location provides views of some of the most iconic landscape features of the South Downs and is a popular location used for photography and paintings. This view is considered to be one of the best views in England”. This evidence is critical in determining whether sites close to the boundary of the National Park are to be developed, the density of the development, and whether the provision of a buffer zone between new development and the iconic landscape should be provided.

Affordable Housing

The Town Council is concerned that developers are unlikely to provide the affordable housing requirement stated in Policy H3.

The land prices in Seaford, being a highly sought-after seaside destination town, are high, making affordability almost impossible.

Brownfield Land Availability

Seaford Town Council encourages Lewes District Council to lobby central government to grant greater powers to penalise landowners that ‘landbank’ and, if necessary to prosecute, so Seaford (and local authorities nationally) can protect open spaces and use land identified in accordance with planning permissions granted.

In 2022, the Campaign to Protect Rural England (CPRE) identified “Largest number of brownfield sites ever recorded – enough for 1.2 million homes –lying dormant”. Something must be done to recognise that appropriate brownfield sites have been ‘banked’ and must be released and put to use.



Report No:	169/24
Agenda Item No:	5
Committee:	Planning & Highways
Date:	20th February 2025
Title:	South Downs National Park Authority Local Plan Consultation - Introduction
By:	Isabelle Mouland, Assistant Town Clerk
Purpose of Report:	To introduce the South Downs National Park Authority Local Plan consultation.

Actions
The Committee is advised:
<ol style="list-style-type: none"> 1. To consider the contents of the report. 2. To discuss the consultation, including the Seaford site allocation LE109 Land at Seaford Golf Club, Firle Road. 3. To feedback to the Assistant Town Clerk any comments for inclusion in the Town Council's response to the consultation. 4. To move to a vote on the motions below.

Recommendations
The Committee is recommended:
<ol style="list-style-type: none"> 1. To instruct the Assistant Town Clerk to draft the Town Council's response to the South Downs National Park Authority Local Plan consultation. 2. To note that the Committee will finalise the Town Council's response at the next Planning & Highways Committee meeting on Thursday 13th March 2025.

1. Information

- 1.1 The South Downs National Park Authority (SDNPA) has launched its first public consultation reviewing the SDNPA Local Plan, with the consultation running for eight weeks and ending on 17th March 2025.

- 1.2** The SDNPA Local Plan sets out the planning policies and allocations within the South Downs National Park (SDNP), which spans from Winchester to Eastbourne, through Hampshire, West Sussex and East Sussex.
- 1.3** Whilst the SDNP boundary largely runs adjacent to Seaford town, there are certain small areas within Seaford Town Council's jurisdiction that fall within the SDNP, including Bishopstone Village and both of the town's golf courses (including the The View), as examples. Consideration must also be given to the impact of the SDNP Local Plan and policies on the adjoining land and how this adjoining land can help to support the aims of the SDNP Local Plan.
- 1.4** With this in mind, it is important that the SDNP Local Plan is not just viewed as impacting the land within the SDNP, but is considered more holistically.
- 1.5** That this consultation is being run in parallel with Lewes District Council's Local Plan review is beneficial, as this will allow the Town Council to consider both plans in conjunction and ensure they are working in harmony for Seaford.
- 1.6** At its meeting on 29th August 2024, this Committee responded to an SDNPA Early Engagement Survey (on the SDNPA Local Plan). The response can be found in the minutes of the meeting here - <https://www.seafordtowncouncil.gov.uk/meeting-year/may-2024-2025/>
- 1.7** SDNPA held a consultation drop-in event in Lewes on 5th February 2025, which was attended by some members of this Committee.
- 1.8** Since the launch of the consultation, Seaford Town Council has shared SDNPA posts and consultation information on its social media and noticeboards.
- 1.9** This report introduces the consultation for the Committee to have an initial discussion and feedback comments to the Assistant Town Clerk in order to draft the Town Council's response.
- 1.10** It is recommended that the draft of the Town Council's response to the consultation is then presented for approval at the Planning & Highways Committee meeting on 13th March 2025.
- 1.11** Following this first public consultation, the second public consultation on the full version of the SDNPA Local Plan will take place in early 2026.

2. SDNPA Local Plan Consultation

- 2.1** The consultation documents can be found here:
<https://sdnpalocalplanreview.commonplace.is/>
- 2.2** The consultation is broken down into ten chapters, plus new site allocations, with an opportunity for comment on each chapter separately depending on interest.
- 2.3** The ten chapters are:
- 2.3.1.** Vision and Objectives
 - 2.3.2.** Core Policies
 - 2.3.3.** Landscape and Heritage
 - 2.3.4.** Nature Recovery
 - 2.3.5.** Climate Action
 - 2.3.6.** Water and Pollution
 - 2.3.7.** Homes
 - 2.3.8.** Economy
 - 2.3.9.** Communities, Open Space and Active Travel
 - 2.3.10.** Transport and Infrastructure
- 2.4** There is a 61 page PDF version of the survey, combining all ten chapters, which, due to its size, will be shared with Committee members via email. The survey can be found online [here](#).
- 2.5** The consultation also includes one site allocation for Seaford: LE109 Land at Seaford Golf Club, Firlie Road. The proposal is for housing, with 12 dwellings being proposed. Details of the site allocation can be found using the link in 2.1 above, in the following documents:
- Local Plan Review Regulation 18 – IIA Main Document
 - Local Plan Review Regulation 18 - IIA Appendix B Settlement Appraisal
- 2.6** As mentioned at 1.6, this Committee did previously respond to the SDNPA Early Engagement Survey and in its response the Town Council strongly objected to development on the edge of the National Park. Site LE109 is on the edge of the National Park.
- 2.7** The Committee is invited to discuss and feedback any comments for inclusion in the Town Council's response to the consultation.

3. Financial Appraisal

3.1 There are no direct financial implications of this report.

4. Contact Officer

4.1 The Contact Officer for this report is Isabelle Mouland, Assistant Town Clerk.



Report No:	170/24
Agenda Item No:	7
Committee:	Planning & Highways
Date:	20 th February 2025
Title:	Road Closure Application – Friends of Bishopstone Station
By:	Isabelle Mouland, Assistant Town Clerk
Purpose of Report:	To present details of a proposed road closure application from Friends of Bishopstone Station for a VE Day Celebration and for this Committee to consider and comment.

Actions
The Committee is advised:
<ol style="list-style-type: none"> 1. To consider the road closure application. 2. To move to a vote on the motions below.

Recommendations
The Committee is recommended:
<ol style="list-style-type: none"> 1. To note the contents of the report. 2. To consider any comments it may wish to forward to Lewes District Council on these applications.

1. Information

- 1.1 Lewes District Council has received an application for the temporary closure of the cul-de-sac end of Station Road, Bishopstone, Seaford from house number 11 across to house number 17 on Monday 5th May 2025.
- 1.2 The period covered by the proposed closure is 2pm-8pm on Monday 5th May 2025.

1.3 The event planned is described as a 'Street Party, VE Day Celebration'.

1.4 The Committee is requested to note the contents of the report and consider any comments it may wish to forward to Lewes District Council on this application.

2. Financial Appraisal

2.1 There are no direct financial implications of this report.

3. Contact Officer

3.1 The Contact Officer for this report is Isabelle Mouland, Assistant Town Clerk.



Report No:	168/24
Agenda Item No:	8
Committee:	Planning & Highways
Date:	20th February 2025
Title:	Update Report
By:	Isabelle Mouland, Assistant Town Clerk
Purpose of Report:	To notify the Committee of decisions taken by Lewes District Council and the South Downs National Park Authority on applications previously considered by the Committee

Actions
The Committee is advised:
<ol style="list-style-type: none"> 1. To consider the contents of the report. 2. To move to a vote on the motions below.

Recommendations
The Committee is recommended:
<ol style="list-style-type: none"> 1. To note the report and the decisions set out in the schedule.

1. Information

- 1.1 The attached schedule lists the decisions taken by Lewes District Council and South Downs National Park Authority since the last Committee meeting on applications previously considered by the Committee.

2. Financial Appraisal

- 2.1 There are no direct financial implications of this report.

3. Contact Officer

- 3.1 The Contact Officer for this report is Isabelle Mouland, Assistant Town Clerk.

Report 168/24 Appendix A

Schedule of Lewes District Councils Decisions received since the Committee's last meeting on 4th February 2025

Approvals – No Objections from Seaford Town Council

LW/24/0647 & LW/24/0648 - Fitzgerald House, Croft Lane - Removal of paving/flower beds where abutting the buildings envelope, cut down existing paving slabs to form a free draining gap with pea shingle and land drain below, hard and soft landscaping to front and rear of Block 3, localised remedial works to flint/brickwork boundary walls to the north and west boundaries, replace concrete slab between blocks 2 and 3 and renew surface water drains, install 1.2m high metal fence and gate to external store area, remove external 42 steps and replace with nominal ramps and reinstatement of a historic chimney to the west elevation.

LW/24/0650 - 65 Upper Belgrave Road - Variation of Condition 1 (Plans) in relation to approval LW/23/0478 to increase height of rear dormer and ridge by 12.5cm to accommodate the 2.0m headroom required by Building Control.

LW/24/0710 - 18A Chyngton Road - Single storey rear extension.

LW/24/0736 - 6 Mason Road - Single storey rear extension.

LW/24/0732 - 142-152, 154-164, 166-172 Hythe Crescent - Replacement of windows/doors.

LW/24/0757 - The Shore, 7 Dane Road - Conversion and extension of pub to form private members club and 7No. self contained flats.

LW/24/0812 - 1 Old Tree Parade, Broad Street - Section 73a Retrospective application for the installation of 2 no. refrigerant condenser units to rear elevation.

Approvals - Objection from Seaford Town Council – None

Refusals – No Objection from Seaford Town Council – None

Refusals – Objection from Seaford Town Council –

LW/24/0697 - 1 Vicarage Close - Single storey side extension.

Tree Works Applications –

TW/24/0110/TPO - 6 Roedean Close - T1 - Sycamore - Cutback to lower branches by 2m and upper branches approx 1m; T2 - Sycamore - Cutback to lower branches by 3m and upper branches approx 1m; T3 - Sycamore - Cutback to lower branches by 3m and upper branches approx 1m; T4 - Sycamore - Cutback to lower branches by 3m and upper branches approx 1m; T5 - Sycamore - Cutback to lower branches by 3m and upper branches approx 1m; T6 - Sycamore - Cutback to lower branches by 3m and upper branches approx 1m; T7 - Sycamore - Cutback to lower branches by 3m and upper branches approx 1m; T8 - Sycamore - Cutback to lower branches by 4m and upper branches approx 1.5m; T9 - Sycamore - Cutback to lower branches by 2m and upper branches approx 1m; T10 - N/A; T11 - Sycamore- Cutback to lower branches by 3m and upper branches approx 1m

Approved

TW/24/0124/TPO - Homeshore House, 92 Sutton Road - T384 - Sycamore (T1 of the order) - Prune away from building by 2.5-3.0m and crown lift to 3.5m (by removing up to 2.5m); T389 - Weeping Ash (T2 of the order) - Thin weight from heavy limbs by up to 2m.

Approved

TW/24/0130/TCA - 19 Blatchington Hill - T1 - Small copse of 7no. Sycamore - Re-pollard to old pollarding points.

Approved

Appeals – none

Withdrawn Applications – none