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**

|  |
| --- |
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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)

|  |  |
| --- | --- |
|[ ]  Member of the public (Resident of Lewes District)  |[ ]  Residents Association  |
|[ ]  Member of the public (Resident elsewhere)  |[ ]  National group / organisation  |
|[ ]  Local business / employer  |[ ]  Planning Consultant  |
|[x]  Neighbouring District / Parish Council  |[ ]  Landowner / Developer  |
|[ ]  Local group / organisation  |[ ]  Infrastructure / service provider  |
|[ ]  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

1. *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.

1. *Do you think the wording of draft Strategic Policy SDS1 - The emerging Spatial Strategy Developing a Spatial Strategy is appropriate?*

No

1. *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.'

1. *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.

1. *Do you think the wording of draft Strategic Policy SDS2: Achieving Sustainable Development is appropriate?*

No.

1. *If not, what should be changed about draft Strategic Policy SDS2: Achieving Sustainable Development?*

The wording at point 3 "where consideration has been given to…" - this is too vague and the Town Council would expect to see this changed to reflect more of an aim with specific guidelines.

1. *What evidence do you have to support the change you have suggested to draft Strategic Policy SDS2: Achieving Sustainable Development?*

This will be taken as more of a suggestion rather than policy if the wording at point 3 is not strengthened to become and aim with specific guidelines.

1. *Do you think the wording of draft Strategic Policy SDS3: Settlement Hierarchy is appropriate?*

No

1. *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.

1. *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 capcity 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.

1. *Do you think the wording of draft Policy SDS4: Settlement Boundaries is appropriate?*

No Comment

1. *If not, what should be changed about draft Policy SDS4: Settlement Boundaries?*

No Comment

1. *What evidence do you have to support the change you have suggested to draft Policy SDS4: Settlement Boundaries?*

No Comment.

## Theme: Climate Change

1. *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.

1. *Do you think the wording of draft Strategic Policy CC1: Mitigating and Adapting to Climate Change is appropriate?*

No Comment.

1. *If not, what should be changed about draft Strategic Policy CC1: Mitigating and Adapting to Climate Change?*

No Comment.

1. *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.

1. *Do you think the wording of draft Policy CC2: A Design Response to a Changing Climate is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC2: A Design Response to a Changing Climate?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC2: A Design Response to a Changing Climate?*
2. *Do you think the wording of draft Policy CC3: Improving Energy Efficiency in Existing Buildings is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC3: Improving Energy Efficiency in Existing Buildings?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC3: Improving Energy Efficiency in Existing Buildings?*

No comment.

1. *Do you think the wording of draft Policy CC4: Solar PV, Storage and Demand Management is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC4: Solar PV, Storage and Demand Management?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC4: Solar PV, Storage and Demand Management?*

No Comment.

1. *Do you think the wording of draft Policy CC5: Renewable Energy Generation is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC5: Renewable Energy Generation?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC5: Renewable Energy Generation?*

No Comment.

1. *Do you think the wording of draft Policy CC6: Sustainable Construction is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC6: Sustainable Construction?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC6: Sustainable Construction?*

No Comment.

1. *Do you think the wording of draft Policy CC7: Coastal Change Management Areas is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC7: Coastal Change Management Areas?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC7: Coastal Change Management Areas?*

No Comment.

1. *Do you think the wording of draft Policy CC8: Coastal Vulnerability Areas is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy CC8: Coastal Vulnerability Areas?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy CC8: Coastal Vulnerability Areas?*

No Comment.

## Theme: Natural Environment

1. *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 addtion the Green and Blue Infrustructure (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.

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

No

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

Seaford Town Council suggest that point 1b is strengthened by being more clear on what is expected as 'compensation' - the current wording is too vague and the Town Council would like to see some sort of calculation or assessment expectation here.

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".

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

Seaford Town Council has experienced development (Newlands) which has taken vital recreational space and the compensation for this loss has not appropriately mitigated the loss. There needs to be something in place which ties developers in with significant compensation which is less attractive than avoiding harm to the natural environment.

The suggested wording for point 1e 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.

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

No Comment.

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

No Comment.

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

No Comment.

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

No.

1. *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"

1. *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.

1. *Do you think the wording of draft Policy NE4: Trees, Woodland and Hedgerows is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy NE4: Trees, Woodland and Hedgerows?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy NE4: Trees, Woodland and Hedgerows?*

No Comment.

1. *Do you think the wording of draft Policy NE5: Green Gaps is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy NE5: Green Gaps?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy NE5: Green Gaps?*

No Comment.

## Theme: Water

1. *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.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

1. *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.

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

No.

1. *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.

1. *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

1. *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

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

No Comment.

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

No Comment.

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

No Comment.

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

No.

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

Seaford Town Council suggests either the removal at point 4 of the sentence "Outside of District Centres and Service Centres", or that additional wording is added at point 4 such as "outside of District Centres and Service Centres where it does not impact protected landscapes"

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

District and Service Centres should also be protected by this policy. Point 4 does not take account the rural edges of the District and Service Centres that border the National Park.

1. *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.

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

No Comment.

1. *If not, what should be changed about draft Policy HW3: Healthy Vibrant Places?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy HW3: Healthy Vibrant Places?*

No Comment.

1. *Do you think the wording of draft Policy HW4: Designing for Health and Wellbeing is appropriate?*

No.

1. *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.

1. *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

1. *Do you think the wording of draft Policy HW5: Outdoor Playing Space is appropriate?*

No.

1. *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."

1. *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 facilties lost to the former Newlands school development. Dispite 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.

1. *Do you think the wording of draft Policy HW6: Healthy Local Food is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy HW6: Healthy Local Food?*

No Comment.

1. *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

1. *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.

1. *Do you think the wording of draft Strategic Policy H1: Meeting Housing Needs is appropriate?*

No.

1. *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 target percentage.
Point 4 needs to be amended to allow flexibilty 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.".

1. *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. Setting a target mandatory percentage is essential.
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.

1. *Do you think the wording of draft Policy H2: Suitable Homes for All is appropriate?*

No.

1. *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.

1. *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.

1. *Do you think the wording of draft Policy H3: Affordable Housing is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy H3: Affordable Housing?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy H3: Affordable Housing?*

No Comment.

1. *Do you think the wording of draft Policy H4: Specialist Accommodation for Vulnerable People is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy H4: Specialist Accommodation for Vulnerable People?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy H4: Specialist Accommodation for Vulnerable People?*

No Comment.

1. *Do you think the wording of draft Policy H5: New Residential Development in the Countryside is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy H5: New Residential Development in the Countryside?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy H5: New Residential Development in the Countryside?*

No Comment.

1. *Do you think the wording of draft Policy H6: Making Best Use of Existing Rural Buildings is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy H6: Making Best Use of Existing Rural Buildings?*

No Comment

1. *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.

1. *Do you think the wording of draft Policy H7: Making Best Use of the Existing Housing Stock is appropriate?*

No.

1. *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".

1. *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.

1. *Do you think the wording of draft Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy H8: Accommodation for Gypsies, Travellers and Travelling Showpeople?*

No Comment.

1. *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

1. *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.

1. *Do you think the wording of draft Strategic Policy E1: Meeting Economic Needs is appropriate?*

No Comment.

1. *If not, what should be changed about draft Strategic Policy E1: Meeting Economic Needs?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Strategic Policy E1: Meeting Economic Needs?*

No Comment.

1. *Do you think the wording of draft Strategic Policy E2: Newhaven Town is appropriate?*

No Comment.

1. *If not, what should be changed about draft Strategic Policy E2: Newhaven Town?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Strategic Policy E2: Newhaven Town?*

No Comment.

1. *Do you think the wording of draft Policy E3: Newhaven Port is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy E3: Newhaven Port?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy E3: Newhaven Port?*

No Comment.

1. *Do you think the wording of draft Policy E4: Rural Economy is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy E4: Rural Economy?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy E4: Rural Economy?*

No Comment.

1. *Do you think the wording of draft Policy E5: Town Centres is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy E5: Town Centres?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy E5: Town Centres?*

No Comment.

1. *Do you think the wording of draft Policy E6: Town Centre Uses is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy E6: Town Centre Uses?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy E6: Town Centre Uses?*

No Comment.

1. *Do you think the wording of draft Policy E7: Visitor Economy is appropriate?*

No.

1. *If not, what should be changed about draft Policy E7: Visitor Economy?*

The first two points in Policy E7 only deal with visitor accommodation, attractions, and recreational facilities which is not supported. Point 3 is however is supported.

Seaford Town Council urges Lewes District Council to put in place a similar policy to the proposed South Downs Local Plan - SD23 Regenerative Tourism - which states to move from sustainable tourism where tourism is doing less harm to regenerative tourism and aims for tourism to help give back more than it takes.

 There needs to be an understanding by Lewes District Council and SDNPA and guidance for hotspots and honeypots - 'Honeypots' being areas considered to attract tourists, 'Hotspots' being areas considered to be under pressure from tourist and related activities.

In addition, the Local Plan states Seaford has coastal tourism - however it must be acknowledged that Seaford has rural tourism, and in fact possibly more rural tourism than coastal - a large number of rural tourists in the District come through Seaford.

Seaford Town Council is also 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.

1. *What evidence do you have to support the change you have suggested to draft Policy E7: Visitor Economy?*

 A Visitors Survey is essential as requested by Seaford Town Council in last year's feedback.

 Seaford is suffering due to tourism - most of the parking and access routes to popular visitor spots in the District are via Seaford land and public transport and not SDNP land. The tourism in Seaford has dramatically increased since Covid and the rising popularity of the National park due to advertising, filming and social media campaigns. Travel trends have changed significantly since the 2012 SDNP Visitor Study (pre Covid), an up to date study must be carried out to get a more accurate picture.

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

1. *Do you think the wording of draft Policy E8: Equestrian Development is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy E8: Equestrian Development?*

No Comment.

1. *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

1. *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

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

1. *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

1. *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.

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

No.

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

Seaford Town Council would like to see the evidence and/or guidelines that determine if infrustructure is sufficient.

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

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

Seaford Town Council needs to know how Lewes District Council decided on Policy IC1 by seeing what evidence or guidance there is to determine sufficient infrustructure.

The suggested removal of wording in point 2 - It is essential that all infrastructure is in place to meet the needs of existing and proposed development.

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

No Comment.

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

No Comment.

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

No Comment.

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

No Comment.

1. *If not, what should be changed about draft Policy IC3: Digital Infrastructure and Communications?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy IC3: Digital Infrastructure and Communications?*

No Comment.

1. *Do you think the wording of draft Policy IC4: Non-commercial Community Facilities is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy IC4: Non-commercial Community Facilities?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy IC4: Non-commercial Community Facilities?*

No Comment.

1. *Do you think the wording of draft Policy IC5: Commercial Community Uses is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy IC5: Commercial Community Uses?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy IC5: Commercial Community Uses?*

No Comment.

1. *Do you think the wording of draft Policy IC6: Sustainable Transport and Movement is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy IC6: Sustainable Transport and Movement?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy IC6: Sustainable Transport and Movement?*

No Comment.

1. *Do you think the wording of draft Policy IC7: Parking Standards is appropriate?*

No.

1. *If not, what should be changed about draft Policy IC7: Parking Standards?*

Remove point 1.e. Local car ownership levels.

1. *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.

1. *Do you think the wording of draft Policy IC8: Former Lewes to Uckfield Railway Line is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy IC8: Former Lewes to Uckfield Railway Line?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy IC8: Former Lewes to Uckfield Railway Line?*

No Comment.

1. *Do you think the wording of draft Policy IC9: Public Rights of Way is appropriate?*

No Comment.

1. *If not, what should be changed about draft Policy IC9: Public Rights of Way?*

No Comment.

1. *What evidence do you have to support the change you have suggested to draft Policy IC9: Public Rights of Way?*

No Comment.

1. *Do you think the wording of draft Policy IC10: Development Viability?*

No Comment.

1. *If not, what should be changed about draft Policy IC10: Development Viability?*

No Comment.

1. *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.*