Seaford Neighbourhood Plan 2017 – 2030

Basic Conditions Statement

(Submission version)

May 2019

Contents

1. Introduction

1.1 This Basic Conditions Statement has been prepared to accompany the Seaford Neighbourhood Plan being submitted under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 to Lewes District Council and the South Downs National Park Authority, which are the two local planning authorities that cover the parish of Seaford.

1.2 The Neighbourhood Planning (General) Regulations 2012 states that when a plan proposal is submitted to the local planning authority it must include a statement explaining how the proposed Plan meets the requirements of paragraph 8, of Schedule 4B to the Town & Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The core basic conditions for Neighbourhood Plans are as follows:

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

1.3 The Neighbourhood Plan must also comply with the following legal requirements:
- The plan is being submitted by a qualifying body – which in a neighbourhood area that covers the whole or any part of the area of a parish only the Town or Parish Council can submit the neighbourhood plan.
- The draft neighbourhood plan sets out policies in relation to the development and use of land in the whole or any part of a neighbourhood area. A neighbourhood plan must include land use planning policies that can be used in the determination of planning applications. It must also relate to a designated neighbourhood area. The statement needs to confirm these two matters, clearly stating which designated neighbourhood area the draft plan relates to.
- The proposed neighbourhood plan states the period in which it is to have effect. This should be clearly shown on the front of the plan and confirmation of the period should also be included within the basic conditions statement.
- The policies do not relate to excluded development. For example, county matters (mineral extraction and waste development) and Nationally Significant Infrastructure Projects.

- The proposed neighbourhood plan does not relate to more than one neighbourhood area and there is no other neighbourhood plan in force for any part of the neighbourhood area.

Legal Requirements

2.1   The Seaford Neighbourhood Plan is submitted by Seaford Town Council, which, as a qualifying body, is entitled to submit a Neighbourhood Plan for its own parish. The Plan has been prepared by the Neighbourhood Plan Steering Group, which comprises volunteers and members of the Town Council and is assisted by a consultancy team led by Action in Rural Sussex.

2.2   The whole parish of Seaford has been formally designated as a Neighbourhood Area through an application made in November 2015 under the Neighbourhood Planning Regulations 2012 (part2 S6) and approved by Lewes District Council and South Downs National Park Authority on 13th January 2016.
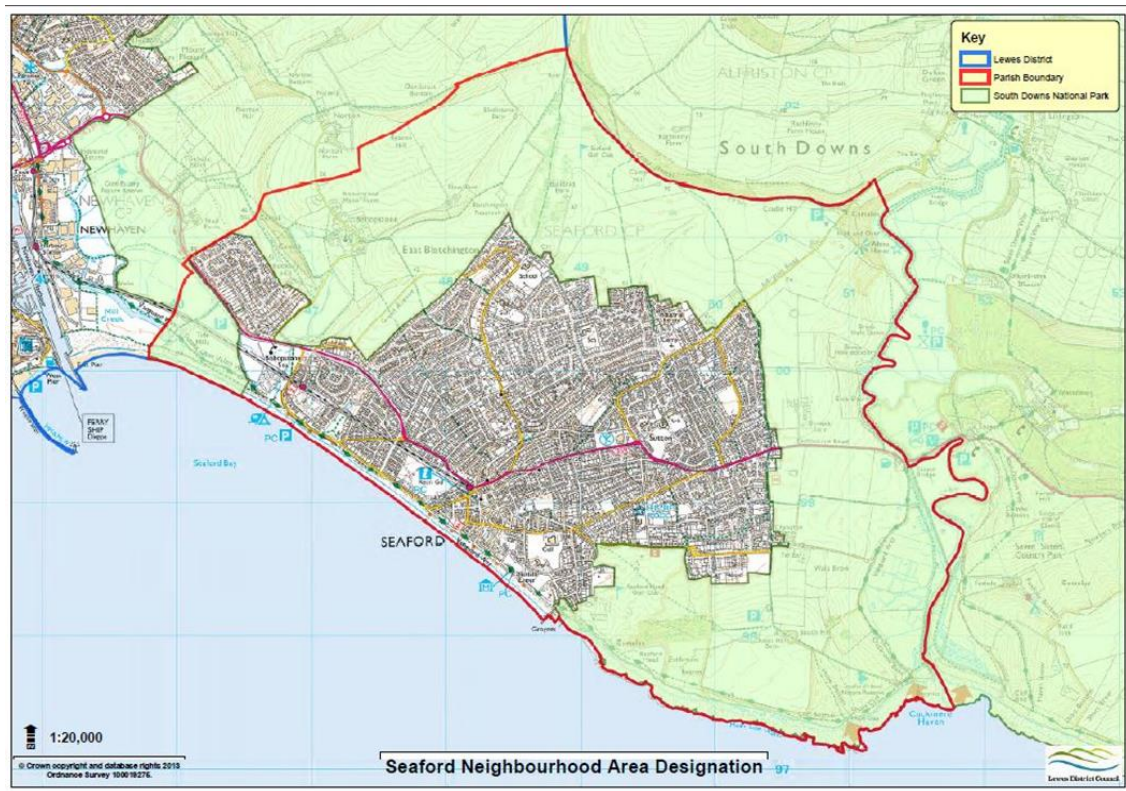
2.3   The Seaford Neighbourhood Plan contains policies relating to the development and use of land within the neighbourhood area. Proposals relating to planning matters (the use and development of land) have been prepared in accordance with the statutory requirements and processes set out in the Town and Country Planning Act 1990 (as amended by the Localism Act 2011) and the Neighbourhood Planning Regulations 2012.

2.4   The draft Plan identifies the period to which it relates as 2017 to 2030, which aligns with the end date of the Lewes District Local Plan Part 1; a Joint Core Strategy between Lewes District Council and the South Downs National Park Authority, the two Local Planning Authorities that cover the parish of Seaford. The Lewes Local Plan Part 2 and the South Downs Local Plan 2014-2033 are both currently under examination (Note: The Lewes Local Plan Part 2 does not contain strategic policies that the SNP is required to be in general conformity with).

2.5   The Seaford Neighbourhood Plan does not deal with county matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990.

2.6   The Seaford Neighbourhood Plan relates only to the parish of Seaford. It does not relate to more than one neighbourhood area. There are no other neighbourhood development plans in place within the neighbourhood area.

3.The Basic Conditions

Basic Condition 1. Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood plan.

3.1   The Seaford Neighbourhood Plan was originally prepared with regard to national policies set out in the National Planning Policy Framework (NPPF) 2012. However, the NPPF has since been updated (most recently (February 2019) and the following section only refers to the 2019 version. The Planning Practice Guidance (PPG) that sits alongside the NPPF is gradually being updated to the new NPPF. The table below sets out the chapters of the NPPF that are relevant to the Seaford Plan. If not relevant , no comments are made.

Policies in the NPPF and Guidance in the PPG	How the Seaford Neighbourhood Plan has had regard to national policies and advice.
NPPF Chapter 2. Achieving sustainable development	The vision includes to "improve the economic, environment and social wellbeing of residents and visitors alike" and the objectives seek to achieve the three arms of sustainable development. All policies and sites have been assessed by a Sustainability Appraisal to ensure that they meet sustainability objectives.
NPPF Chapter 3. Plan-making	The preparation of the Seaford Neighbourhood Plan has followed the advice in this chapter insofar as it was relevant to the role and content of the Plan.
NPPF Chapter 5. Delivering a sufficient supply of homes with accompanying PPG advice on deliverability	The Seaford Neighbourhood Plan over-provides against the Core Strategy target of 185 homes. See more detail in the section below on Delivering Homes.
NPPF Chapter 6. Building a strong, competitive economy	The Seaford Neighbourhood Plan includes policies to strengthen its business and tourism economies (SEA6, SEA11 and SEA12). Community Aspiration (CA) 1 (Seafront and Town Centre) also seeks to do this.
NPPF Chapter 7. Ensuring the vitality of town centres	It was considered that the Core Strategy policies on this were sufficient and did not need to be supplemented in the Neighbourhood Plan.CA1 seeks to help achieve this.
NPPF Chapter 8. Promoting healthy and safe communities	Policy SEA10 supports the provision of health facilities and SEA7,8 and 9 protect leisure facilities that contribute to health and wellbeing.
NPPF Chapter 9. Promoting sustainable transport	Policy SEA13 seeks provision of a new footpath link and SEA14 seeks to safeguard space for rail improvements. See CA9 (transport) and

	Appendix B which suggest various practical measures to promote sustainable development.
NPPF Chapter 10. Supporting high quality communications	It was considered that the Core Strategy and Local Plan policies on this were sufficient and did not need to be supplemented in the Neighbourhood Plan.
NPPF Chapter 11. Making effective use of land	Policy SEA2 Design includes the requirement that the design of new development makes an efficient use of land. All the allocated sites are on previously developed land.
NPPF Chapter 12. Achieving well-designed places	Policies SEA1 and SEA2 and the General Design Guidelines for Seaford seek to achieve development which contributes towards local character and distinctiveness through high quality design.
NPPF Chapter 14. Meeting the challenge of climate change, flooding and coastal change	Community Aspiration 4 suggests continuation of the present mechanisms which influence and monitor climate change, flooding and coastal change: the Flood (Sea) Defences Strategy (developed by the Environment Agency) for the long term and the practicalities of dealing with short term flood issues, including surface water as well as flooding by the sea should it occur. Sustainability objective 7 is to steer developments away from areas at risk of flooding.
NPPF Chapter 15. Conserving and enhancing the natural environment	The countryside outside of the town of Seaford is either within or in the setting of the South Downs National Park. Policy SEA1 covers development in this area and gives great weight to conserving and enhancing the landscape and scenic beauty of the area in line with paragraph 172 of the NPPF. The Statement on Seaford's Local Landscape and views is published alongside the Neighbourhood Plan and referred to in SEA1 and SEA2.
NPPF Chapter 16. Conserving and enhancing the historic environment	Policies SEA3, 4 and 5 protect the existing Conservation Areas and Areas of Established Character. Appendix A lists all of the designated heritage assets and there is a community aspiration to draw up a list of non-designated 'Locally Listed Buildings'.
NPPF Chapter 17. Facilitating the sustainable use of minerals	The Neighbourhood Plan does not include policies relating to minerals.

Delivering Homes

3.2   Some representations at Regulation 14 consultation stage raised doubts about the deliverability of the proposed allocations. NPPF paragraph 67, which sets the requirement for deliverable and developable sites, is specifically aimed at strategic policy-making authorities – i.e. in this case Lewes District Council and the South Downs National Park. It is their responsibility to maintain a rolling five-year supply of deliverable sites and plan for specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.

3.3   However, the national Planning Practice Guidance states that "If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable. The National Planning Policy Framework requires that the sites and the scale of development identified in a plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened" [Paragraph 005, Reference ID 41.005.20140306].

3.4   In respect of the Dane Valley site, it was recognised early on that this site would be challenging to deliver given the multiple ownerships and constraints including potential for flooding and contamination. Significant resource has therefore been put into determining the deliverability of the site including two detailed AECOM reports.   See https://www.seafordtowncouncil.gov.uk/Seaford-NDP-Supporting-Documents.aspx The latest of these concluded that "The viability assessment suggests that the Dane Valley sites can be allocated for development with some degree of confidence in deliverability, although some flexibility may be required as it is unlikely to generate 40% affordable housing across the whole site under a traditional development model. The modelling results indicate that an affordable housing level of around 25% could yield a viable scheme".

3.5   It has now been agreed that the Guinness Partnership, with 129 years of social housing experience, will be the development vehicle for this project with Eastbourne BC/Lewes DC acting as 'project overseer'. The principle that Guinness Trust seek to create is a wholly affordable development, with 25% affordable through planning powers, approximately 50% affordable shared ownership (grant funded) and 25% affordable rented (grant funded). The project is going to the Guinness Board for approval in April 2019 to create a new feasibility scheme that acknowledges the work already done by AECOM, to create a scheme that maximises housing gain, in order to fund the exceptional infrastructure costs identified and costed in those two reports. It is anticipated that offers to land owners will be made in early autumn 2019.

3.6   Of the remaining 10 sites identified in SEA15, one is completed (Old House Depository), one has planning approval (Elmcourt), one is part of a comprehensive development by Lewes DC (The Downs site), and the rest are sites that have all been put in by their owners. Policy SEA 15 has overprogrammed its proposal because it recognises that although working within an 11-year timescale, it is possible that many circumstances can cause delays in achieving the owners' intentions. Inclusion

in the Neighbourhood Plan and supported backed up by a thorough Sustainability Appraisal does give greater certainty of delivery to owners than to normal planning applications.

Basic Condition 2. The making of the neighbourhood plan contributes to the achievement of sustainable development.

3.7   The Seaford Neighbourhood Plan (SNP) is accompanied by a Sustainability Appraisal, incorporating the Strategic Environmental Assessment, The Sustainability Appraisal demonstrates that the Neighbourhood Plan will positively contribute to achieving sustainable development and will not have any significant adverse impacts. This has been submitted as part of the evidence base supporting the Neighbourhood Plan and should be read alongside this Basic Conditions Statement. The following text and tables are taken from the Non-Technical Summary of the Sustainability Appraisal.

The Sustainability Framework

3.8   The following sustainability objectives were used to assess the Neighbourhood Plan:

Social

1. Housing
To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future

2. Sustainable Transport (including walking/cycling)
To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.

3. Community infrastructure
To maintain and enhance community infrastructure within the Parish

Environmental

4. Green Infrastructure
To maintain and enhance green infrastructure within the parish.

5. Heritage Assets
To protect or enhance the heritage assets and historic environment of the Parish

6. Countryside, Landscape and Key Views
To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park

7. Flooding
To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere.

8. Biodiversity

To protect and enhance the biodiversity of the SNP area.

9. Sustainable Design

To encourage high quality design and layout in all new development and promote systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.

Economic

10. Local businesses and tourism

Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish.

Appraising the Vision of the SNP

3.9   The SNP vision statement would only have positive impacts on sustainability as it complies directly or indirectly with 8 of the 10 objectives and has no impact on the other two(biodiversity and sustainable design)provided that SNP objectives are implemented with regard for all sustainability framework objectives and not in isolation then there should be no adverse effects.

Appraising the Neighbourhood Plan Policies

3.10   A wide range of policy areas were included within an early Draft of the Neighbourhood Plan. These have been appraised as to whether they have a positive or negative impact on the future of the parish, using the Sustainability Framework to undertake the evaluation. The policies assessed are those that have taken on board any changes following the consideration of reasonable alternatives. Several of the policies were amended to strengthen them so they were even more sustainable. The following colours and symbols are used to assess each policy:

++	Greater positive impact on the sustainability objective
+	Possible positive or slight positive impact on the sustainability objective
?	No impact or neutral impact on the sustainability objective
-	Possible negative or slight negative impact on the sustainability objective
--	Greater negative impact on the sustainability objective

3.11   Most of the policies scored either positive or neutral against these objectives as shown below. No policies were found to have a greater negative impact on the sustainability objectives.

Table 3 Assessing the SNP policies against the Sustainability Framework Objectives

MBERS	Sustainability Framework Objectives									
	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/ cycling)	Objective j 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Country-side, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
licy SEA1	?	?	?	+	++	++	?	+	?	++
licy SEA2	?	++	?	+	++	++	?	?	++	+
licy SEA3	?	?	?	++	++	++	?	?	?	+
licy SEA4	?	?	?	?	++	++	?	?	?	+
licy SEA5	?	?	?	?	++	++	?	?	?	?
licy SEA6	?	++	?	++	+	+	?	++	?	++
licy SEA7	?	?	++	+	?	?	?	?	?	?
licy SEA8	?	?	++	++	?	+	?	+	?	?
licy SEA9	?	?	++	++	?	?	?	++	?	?
licy SEA10	?	?	++	?	?	?	?	?	?	?
licy SEA11	?	?	?	?	?	?	?	?	?	++
licy SEA12	?	?	?	?	?	?	?	?	?	++
licy SEA13	?	++	?	?	?	?	?	?	?	?
licy SEA14	?	++	?	?	-	-	?	-	?	++
licy SEA15	++	+	?	?	+	?	+	?	+	+
licy SEA16	++	++	?	++	++	?	++	?	++	++
licy SEA17	++	?	?	?	++	?	?	++	?	?
licy SEA18	++	+	?	?	?	++	?	?	?	?
licy SEA19	++	++	?	?	++	++	++	?	+	++
licy SEA20	++	?	?	?	?	?	?	?	?	++

Appraising the Sites

3.12   A number of sites have been put forward through the call for sites exercise (undertaken by the Town Council in November 2016) plus from a number of other sources. An initial sifting exercise reduced the long list to a shorter list of 60 sites. The sites were then appraised by the Town Council's independent consultants Action in rural Sussex assisted by members of the Neighbourhood Plan steering group against the Sustainability Framework objectives. Appendix 5.3 of the Sustainability Appraisal shows the detailed analysis of each site against each Sustainability Objective.

3.14   Where a site supports a Sustainability Objective it is considered a positive effect e.g. avoiding areas at risk of flooding or reusing a brownfield site. Within other criteria the distance from the feature will either be a positive or negative effect and the grading of this is set out within the SA. Although it is recognised that assessment of developments are unlikely to be so black and white, the use of measurable distances does allow comparison of the merits and constraints between potential sites for development.

3.15   The criteria assumes that developments may have either no effect e.g. not near a heritage asset, neither a positive nor a negative effect which is classified as neutral effect. Where a development is considered to have a negative effect but not one that needs mitigating it is classified as negative. Where the development would have a significant effect and mitigation is considered necessary this is classified as a constraint. A development that has a constraint may still be acceptable it just needs mitigating. Where a development is contrary to a Sustainability Objective e.g. it would result in the loss of a SSSI the development is considered unsuitable even with mitigation and should be rejected from being a selected site to include in the SNP.

Conclusion

3.16   The impact of the SNP policies on the Sustainability Framework Objectives has been considered to ensure that the policies within the Neighbourhood Plan are the most sustainable, given all the reasonable alternatives. Whilst it is predicted that many of the policies will have an overall positive or neutral/unknown impact on sustainability issues, it is inevitable that some of the options appraised will present conflicting sustainability drivers. For example, a policy promoting development will increase demand for resources and increase energy use which could be seen to conflict with part of the SNP SA framework Objective 9 to "reduce the Parish's impact on climate change". Where conflicting impacts are predicted to arise, mitigation measures have been suggested or explanation/suggestion on how to resolve the conflict. Following the assessment of 60 sites (in Appendix 5.3 of the SA), a short list of preferred sites was compiled based on their sustainability. Finally, a total of 11 sites have now been shortlisted through the SA process.

3.17   Overall it is considered that, in the absence of the draft SNP, there will be fewer opportunities to address the local issues and challenges facing Seaford. The policies and sites proposed in the Plan are those that performed the best in the Sustainability Appraisal and therefore the making of the neighbourhood plan will contribute to the achievement of sustainable development.

Basic Condition 3. The making of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.

3.18   The adopted development plan for the area containing strategic policies is the Lewes Local Plan Part 1:Joint Core Strategy 2010-2030(LPP1). However, the South Downs Local Plan 2014-2033 is at an advanced stage in the process and the Seaford Neighbourhood Plan has had regard to the strategic policies in this Plan.

3.19   There are also a number of saved policies from the Lewes District Local Plan 2003 which will be replaced either by the emerging Lewes District Plan Part 2: Site Allocations and Development Management Policies (LPP 2)or by neighbourhood plans including the Seaford Neighbourhood Plan. The Lewes Local Plan Part 2 was submitted for examination in January 2019 and will apply to the part of Lewes District that lies outside the South Downs National Park boundary. Whilst care has been taken to avoid conflict with these detailed policies, they are not considered to be strategic policies that the Neighbourhood Plan must be in general conformity with, and therefore they are not listed below.

3.20   The East Sussex, South Downs and Brighton & Hove Waste & Minerals Sites Plan also forms part of the development plan for the town of Seaford, but the Neighbourhood Plan does not include any policies relating to these areas as they are prescribed by regulations.

Lewes District Local Plan Part I, Joint Core Strategy	Seaford Neighbourhood Plan Conformity
Spatial Policy 1 - Provision of housing and employment land – sets the overall housing numbers and employment floor space for the district.	The Seaford Neighbourhood Plan contributes to achieving these numbers in policies SEA11 and 15. More detail is included below on General Conformity with Strategic Employment Policies.
Spatial Policy 2 – Distribution of Housing – sets the requirement of 185 homes in Seaford parish and an allowance for 600 dwellings to be permitted on unidentified small scale windfall sites during the plan period.	The Seaford Neighbourhood Plan over-provides against the 185-unit target in policy SEA15 and supports windfall development within the planning boundaries in SEA18 and 19. Seaford is also making a significant contribution (212 units to date through recent planning permissions) towards District wide totals which can not count towards the above 185 unit target.
Spatial Policies 3-8 – Site allocations, none of which are in Seaford	N/A
Core Policy 1 (Affordable Housing) – sets requirements for percentages and thresholds for provision of affordable housing.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy.
Core Policy 2 (Housing Type, Mix and Density) – requires a range of dwelling types, sizes and densities.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy.
Core Policy 3 – Gypsy and Traveller	The Seaford Neighbourhood Plan does not

Accommodation – sets pitch requirements for the district.	conflict with or repeat this policy. The identified need in Lewes district is dealt with in the Local Plan Part 2 with a proposed allocation at Plumpton.
Core Policy 4 (Economic Development & Regeneration)	See below on General Conformity with Strategic Employment Policies.
Core Policy 5 (The Visitor Economy) - supports high quality provision of new, and the upgrading/ enhancement of existing sustainable, visitor attractions and a wide range of accommodation types and has a presumption in favour of the retention and improvement of existing visitor accommodation stock.	The Seaford Neighbourhood Plan supports new and existing visitor accommodation in SEA12. SEA6 for the seafront and SEA1 protecting the National Park and Heritage Coast are also relevant as these are important visitor attractions. See also Community Aspiration 1 on the Seafront and Town Centre.
Core Policy 6 (Retail and Town Centres) – supports the vitality and viability of retail and town centres in the district.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy. See Community Aspiration 1.
Core Policy 7 (Infrastructure) supports the creation of sustainable communities in the district where residents enjoy a high quality of life, by protecting existing community facilities and the implementation of CIL.	Policy SEA13 seeks provision of a new footpath link and SEA14 seeks to safeguard space for rail improvements. SEA20 supports new and improved infrastructure to meet the identified needs of the community
Core Policy 8 (Green Infrastructure) – supports the provision of new green infrastructure and protects existing green infrastructure.	The Seaford Neighbourhood Plan supports this approach by identifying and safeguarding recreational facilities, Local Green Spaces and allotments in policies SEA7, 8 and 9.
Core Policy 9 (Air Quality) - seeks to improve air quality, having particular regard to any Air Quality Management Area (AQMA) designations.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy. There are no AQMAs within the parish.
Core Policy 10 (Natural Environment and Landscape) – seeks to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and the high quality and character of the district's towns, villages, and rural environment	The countryside outside of the town of Seaford is either within or in the setting of the South Downs National Park. Policy SEA1 covers development in this area and gives great weight to conserving and enhancing the landscape and scenic beauty of the area in line with paragraph 172 of the NPPF. SEA2 on Design is also relevant to the quality of development. The Statement on Seaford's Local Landscape and views is published alongside the Neighbourhood Plan and referred to in SEA1 and SEA2.
Core Policy 11 (Built and Historic Environment & Design) – seeks to secure high quality design and safeguard historic assets.	Policy SEA2 on Design supports this approach. Policies SEA3, 4 and 5 protect the existing Conservation Areas and Areas of Established Character. Appendix A lists all of the designated heritage assets and there is a

	community aspiration to draw up a list of non-designated 'Locally Listed Buildings'.
Core Policy 12 (Flood Risk, Coastal Erosion & Drainage) – steers development away from areas of flood risk where possible. Development in areas of flood risk will be required to meet the national Sequential and Exception tests.	Community Aspiration 4 suggests continuation of the present mechanisms which influence and monitor climate change, flooding and coastal change: the Flood (Sea) Defences Strategy (developed by the Environment Agency) for the long term and the practicalities of dealing with short term flood issues, including surface water as well as flooding by the sea should it occur. Sustainability objective 7 is to steer developments away from areas at risk of flooding
Core Policy 13 (Sustainable Travel) - supports development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car.	Policy SEA2 includes that new development provides good access to public transport to help reduce car dependency and support public transport use, including where appropriate, provision of better connections between bus and rail, and improved passenger information Policy SEA13 seeks provision of a new footpath link and SEA14 seeks to safeguard space for rail improvements. There is a list of Transport Improvements in Appendix B which includes better provision for cyclists and improvements in public transport
Core Policy 14 (Renewable and Low Carbon Energy) – supports the reduction of locally contributing causes of climate change, including through the implementation of sustainable construction techniques in new developments.	Policy SEA2 includes the requirement that the design incorporates energy efficiency and durable and sustainable materials. The General Design Guidelines covers the use of environmental and energy efficient solutions.
South Downs Local Plan (including Main Modifications)	**Seaford Neighbourhood Plan Policy**
Core Policy SD1: Sustainable Development – supports a positive approach to sustainable development and refers to the statutory purposes and duty of the National Park.	The vision includes to "improve the economic, environment and social wellbeing of residents and visitors alike" and the objectives seek to achieve the three arms of sustainable development. All policies and sites have been assessed by a Sustainability Appraisal to ensure that they meet sustainability objectives. The statutory purposes of the National park are referred to in the supporting text for SEA1.
Core Policy SD2: Ecosystems Services – supports development proposals that have	SEA1 and 2 and the General Design Guidelines support this approach.

an overall positive impact on the ability of the natural environment to contribute goods and services such as water, habitats etc.	
Core Policy SD3: Major Development - defines what major development will comprise in the SDNP, reiterates the exception test and sets expectations for mitigation.	The Seaford Neighbourhood Plan does not allocate major development within the National Park and all windfall development is expected to be within the planning boundaries, outside of the National Park area.
Strategic Policy SD4: Landscape Character - proposals will only be permitted where they conserve and enhance landscape character.	SEA1 requires a landscape-led approach, having regard for the setting of the National Park in terms of its landscape and visual amenity and conserving and enhancing the landscape, seascape and townscape character of Seaford. See also the Statement on Seaford's Local Landscape Character and Views.
Strategic Policy SD5: Design -supports a landscape-led approach that respects the local character, through sensitive and high quality design that makes a positive contribution to the overall character and appearance of the area.	SEA1 requires a landscape-led approach, having regard for the setting of the National Park in terms of its landscape and visual amenity and conserving and enhancing the landscape, seascape and townscape character of Seaford. SEA2 details the design requirements. See also the Statement on Seaford's Local Landscape Character and Views
Strategic Policy SD6: Safeguarding Views – identifies and protects key views in the National Park.	SEA1 and 2 refer to also the Statement on Seaford's Local Landscape Character and Views which includes those identified in the National Park Local Plan.
Strategic Policy SD7: Relative Tranquillity – requires conservation and enhancement of relative tranquillity.	SEA1 requires development to conserve and enhance tranquillity.
Strategic Policy SD8: Dark Night Skies – requires development to conserve and enhance the intrinsic quality of dark night skies and the integrity of the Dark Sky Core.	SEA1 requires development to conserve and enhance dark night skies.
Strategic Policy SD9: Biodiversity and Geodiversity – requiring development to conserve and enhance biodiversity and geodiversity, based on up-to-date ecological information.	SEA2 requires that, where appropriate the design is informed by an Ecological Impact Assessment (EcIA), in line with BS42020:2013 and CIEEM guidelines, has regard to the mitigation hierarchy in NPPF paragraph 175a, and provides a net gain in biodiversity.
Strategic Policy SD10: International Sites – policy relating to SACs and SPAs within the	None of the sites referred to are within or affected by the Seaford Neighbourhood

Park	Plan.
Strategic Policy SD12: Historic Environment – requires development to conserve and enhance the historic environment including heritage assets and their setting.t	SEA2 requires that where the development could impact on designated or non-designated heritage assets, the design is informed by a heritage assessment using the Historic Environment Record as well as archaeological work which are research-driven to answer specific questions relevant to the history and archaeology of Seaford and the plan area. See also Community Aspiration 2 (Heritage) which proposes a refresh of the list of designated heritage assets and the drawing up of 'Locally listed buildings'
Strategic Policy SD17: Protection of the Water Environment – requires development to conserve and enhance water quality and quantity and functionality of groundwater, surface water features and watercourses.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy. SEA2 requires development to incorporate Sustainable Drainage Systems (SuDS) which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and wildlife and will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.
Strategic Policy SD18 The Open Coast – protects the Sussex Heritage Coast area and undeveloped coastal zone of the National Park.	SEA1 requires proposals to protect the character of the Heritage Coast.
Strategic Policy SD19: Transport and Accessibility – requires development to be located and designed to minimise the need to travel and promote the use of sustainable modes of transport.	Policy SEA2 includes that new development provides good access to public transport to help reduce car dependency and support public transport use, including where appropriate, provision of better connections between bus and rail, and improved passenger information Policy SEA13 seeks continuation of a footpath link and SEA14 seeks to safeguard space for rail improvements. There is a list of Transport Improvements in Appendix B.
Strategic Policy SD20: Walking, Cycling and Equestrian Routes – supports development that contributes to a network of attractive and functional non-motorised travel routes.	SEA2 requires sites to be located and designed to facilitate connectivity between the site and local services by cyclists and pedestrians, having regard to the ESCC Local Cycling and Walking Infrastructure Plan for the area. This will take into account the need to provide routeways with

	sufficient informal surveillance and lighting so that people feel safe using them. SEA13 seeks continuation of a footpath link.
Strategic Policy SD23: Sustainable Tourism – supports visitor accommodation, visitor attractions and recreation facilities.	The Seaford Neighbourhood Plan supports new and existing visitor accommodation in SEA12. SEA6 for the seafront and SEA1 protecting the National Park and Heritage Coast are also relevant as these are important visitor attractions. See also Community Aspiration 1 (seafront and town centre)
Strategic Policy SD25: Development Strategy – supports the principle od development in named settlements within the Park. Sets exceptional circumstances for development outside of these settlements.	Seaford not identified in this policy because the main settlement area is outside the Park boundary. The exceptional circumstances test would be relevant and is supported by SEA18 which restricts development to within the Planning Boundaries for Seaford parish other than in those circumstances specifically referred to in other development plan policies or if it is for essential utility infrastructure where no suitable alternative sites are available.
Strategic Policy SD26: Supply of Homes – allocates specific sites within the Park.	None of these allocations are within Seaford parish.
Strategic Policy SD27: Mix of Homes – sets percentage standards for housing mix.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy.
Strategic Policy SD28: Affordable Homes – sets percentages and thresholds for the provision of affordable housing.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy.
Strategic Policy SD29: Rural Exception Sites – sets out requirements for rural exception sites.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy.
Strategic Policy SD33: Gypsies and Travellers and Travelling Show people – commits to identifying sites for 6 pitches within Lewes district part of the National Park.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy.
Strategic Policy SD34: Sustaining the Local Economy – supports development that foster the economic and social well-being of communities.	The Seaford Neighbourhood Plan does not conflict with or repeat this policy. Community Aspiration 1 seeks to enhance the local economy.
Strategic Policy SD35: Employment Land – sets employment land requirements, identifies and safeguards existing sites.	None of these existing employment sites in the Park are within Seaford parish.
Strategic Policy SD36: Town and Village Centres – identifies retail hierarchy.	There are no town or village centres within the Park part of Seaford parish.
Strategic Policy SD42: Infrastructure –	SEA20 supports new and improved

requires new infrastructure to represent the least environmentally harmful option and the design to meet National Park purposes. Requires development to be accompanied by reasonably necessary infrastructure.	infrastructure to meet the identified needs of the community
Strategic Policy SD45: Green Infrastructure – supports development that maintains or enhances green infrastructure links and network.	The Seaford Neighbourhood Plan supports this approach by identifying and safeguarding recreational facilities, Local Green Spaces and allotments in policies SEA7, 8 and 9.
Strategic Policy SD48: Climate Change and Sustainable Use of Resources – encourages sustainable design including setting specific standards.	Policy SEA2 includes the requirement that the design incorporates energy efficiency and durable and sustainable materials.
Strategic Policy SD49: Flood Risk Management – requires development to be steered away from areas of high flood risk or be subject to sequential and exception testing.	Community Aspiration 4 suggests continuation of the present mechanisms which influence and monitor climate change, flooding and coastal change: the Flood (Sea) Defences Strategy (developed by the Environment Agency) for the long term and the practicalities of dealing with short term flood issues, including surface water as well as flooding by the sea should it occur. Sustainability objective 7 is to steer developments away from areas at risk of flooding.

General Conformity with Strategic Employment Policies

3.21   Of the 11 sites allocated in the Seaford Neighbourhood Plan, 3 are currently used for business use employment. These are:

    i.   Dane Valley Project Area – the significant area of the proposed site is either vacant land, or buildings whose current use is no longer permitted. Of the remaining sites within Policy SEA 16, a number of the uses are as storage or workshops or have renewed planning permission for change of use to housing. The estimated loss of employment over the proposed housing site is approximately less than 20 persons. The Dane Valley Project intends to retain 2 significant commercial buildings (48 Brooklyn Road, and Units 1-5, 57, Blatchington Road.

    ii.   Jermyn Ford, 10 Claremont Road – this garage and car showroom employs 13 staff, but the business intends on relocation, to enlarge the business and increase its staffing establishment.

    iv.   Brooklyn Hyundai, Claremont Road – this garage and car showroom employs 13 staff, but the business intends on relocation, to enlarge the business and increase its staffing establishment.

3.22   Lewes District Local Plan (LPP1)- Provision of housing and employment land – sets the overall housing numbers and employment floorspace for the district. Based on the Employment and Economic Land Assessment, it states in the supporting text that the quantitative need is met by existing commitments and the main case for the additional employment floor space is on qualitative grounds. It sees Lewes as the most suitable location for this in the form of high quality office space.

3.23   LPP1 Core Policy 4 – Encouraging Economic Development and Regeneration includes the requirement to:

"Safeguard existing employment sites from other competing uses unless there are demonstrable economic viability or environmental amenity reasons for not doing so. This will include:
i.   A demonstrated lack of tenant/occupier interest.
ii.   A demonstrated lack of developer interest.
iii.   Serious adverse environmental impacts from existing operations.
iv.   .Where the site is otherwise unlikely to perform an employment role in the future.
v.   Where the loss of some space would facilitate further/improved employment floorspace provision".

It also states that:

"There is a presumption in favour of retaining the unimplemented employment site allocations from the Local Plan (2003) towards meeting the District's employment land requirements over the plan period. However, if there are clear economic viability or environmental amenity reasons for not doing so then such sites will be de-allocated or considered for alternative uses through the Site Allocations and Development Management Policies DPD or the SDNPA Local Plan".

The Current Situation

3.24   Since the adoption of the Joint Core Strategy, an Enterprise Zone has been developed at Newhaven   immediately to the west of Seaford, a collaboration between the Coast to Coast Local Enterprise Partnership and Lewes District Council, and one of 18 Enterprise Zone's nationally backed up by £330m of Government assistance.   Lewes District Council estimates that Enterprise Zone status will directly lead to the creation of around 55,000m2 of new commercial floor space, refurbish a further 15,000m2 of commercial floor space, and create and sustain around 2,000 jobs over the Zone's 25-year lifespan. Such a level of support from Central Government will make new commercial investment in Seaford relatively unattractive as this is within 5 km of the sites in SEA 15 that currently have employees on them. The affected businesses have taken the view that a move to Denton/Newhaven is commercially acceptable. It is also the best way to maximise the benefits derived from significant Government investment in the wider area.

3.25 Whilst Neighbourhood Plans cannot directly plan for development outside their area, their content nonetheless needs to take account of the wider context and real functional relationships between the parish and adjacent areas. The development of nearby Newhaven as a significant employment centre will inevitably have an impact on businesses within Seaford and those looking to invest in the area.

3.26 The proposed allocation for new employment space at Cradle Hill was originally in the 2003 Local Plan and therefore would have been included within the commitments in the Employment and Economic Land Assessment which informed Core Policy 4. It was intended at the time to provide additional employment floorspace for the town of Seaford. However, the development of an Enterprise Zone at Newhaven is likely to attract any new investment in that direction due to the incentives offered to new businesses relocating to that area. These include Business Rates discounts worth up to £275,000 per business over 5 years, no pre-application charges for planning enquiries and dedicated support from Coast to Capital and Lewes District Council's economic advisors, see www.newhavenenterprisezone.com .

3.27 In reality this means that the Cradle Hill site is unlikely to attract new businesses and will instead be available for the relocation or replacement of any businesses displaced by the proposed housing allocations.

3.28 It should be noted that Lewes District Council has not raised any objections to the loss of employment space in Seaford resulting from the housing allocations or raised any concerns about potential conflict with LPP1 Core Policy 4. These issues have only been raised by third parties seeking to promote alternative housing sites.

Basic Condition 4. The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

3.29   The Seaford Neighbourhood Plan has been the subject of a Sustainability Appraisal incorporating the provisions of Strategic Environmental Assessment (SEA) required by European law. A final Sustainability Appraisal report, together with a non-technical summary, is submitted alongside the Seaford Neighbourhood Plan.

3.30   Compliance with the Habitats Regulations is covered under the following section.

3.31   The preparation of the Seaford Neighbourhood Plan included opportunities for everyone in the community to contribute to its content and any outstanding matters will be considered by an independent examiner. It is considered therefore that the EU obligations relating to Human Rights and Equalities have been met.

3.32   Overall the preparation and content of the Seaford Neighbourhood Plan is considered to be compatible with EU obligations.

Basic Condition 5. Prescribed conditions are met in relation to the neighbourhood plan and prescribed matters have been complied with in connection with the proposal for the plan.

3.33   Since December 2018 prescribed conditions includes that "The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(3)" (The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which amends The Neighbourhood Planning (General) Regulations 2012(1)). This means that, if the neighbourhood development plan is likely to have a significant effect on a European protected site, even if that affect could be mitigated, a full Habitats Regulations Assessment of the plan needs to be undertaken.

3.34   Article 6 of the Habitats Directive (92/43/EEC) requires all Member States to undertake an 'appropriate assessment' of any plan or project requiring authorisation which would be likely to have a significant effect upon a European site (including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites; this is commonly referred to as a Habitats Regulations Assessment.

3.35   The nearest such sites are the Lewes Downs SAC and the Castle Hill SAC. The only site scoped in by the Core Strategy HRA as being affected from development in Lewes District was Ashdown Forest SPA and SAC. A 7km zone of influence for recreational pressure was established around the site. Seaford is well outside of this zone of influence. LDC have undertaken a HRA for the whole district which will form part of the SNP submission.