

## Consultation Statement: Annex A

## Appendix C

### First (2017) Regulation 14 consultation: Schedule of Changes to the Plan in response to Statutory Consultees comments

<b>Cover to Chapter 1</b>	
Update	Update description of document to 'Second Pre Submission'.
Update	Update contents page in line with amendments below and new page numbers.
Update	Update Executive Summary in line with amendments below.
<b>Chapter 2 - Legislative and Planning Policy Context</b>	
Update	Paragraph 2.3 and 2.4 update references to NPPF to refer to 2018 version.
Update	Text in paragraph 2.11 to be updated with the current status of the Lewes Local Plan Part 2.
Update	Paragraph 2.5 change references to paragraphs in the NPPF to reflect 2018 version.
In response to representations from the South Downs National Park Authority	Text in paragraph 2.11 to be updated with the current status of the South Downs Local plan at the time the SNP is submitted.
<b>Chapter 3 - Consultation</b>	
Update	Add a paragraph 3.6 explaining that a Pre Submission consultation was carried out in late 2017 and approximately 200 comments were received. These comments have all been considered and as a result some allocations have been changed. This has required a further consultation as per this current document.
<b>Chapter 4 - The Parish of Seaford</b>	
In response to representations from East Sussex County Council: Historic Environment and Archaeology ESCC	Add at end of Para 4.1 "For more detailed history that has informed the Seaford Neighbourhood Plan, the 'Seaford Historic Character Assessment Report, a Sussex Extensive Urban Survey', by Dr. Roland B Harris, commissioned by English Heritage and ESCC, and published in March 2005, gives an excellent and comprehensive summary of the history of Seaford".
<b>Chapter 5 - Vision &amp; Objectives</b>	
In response to representations from the South Downs National Park	Seaford Neighbourhood Plan Vision Statement to be amended to say: "By 2030

<p>Authority; Lewes District Council: Head of Regeneration and East Sussex County Council: Ecology and Transport.</p> <p>Nb. Lewes District Council: Specialist Adviser Coastal and Flood Risk Management requested a reference to coastal defences in the Vision but this was objected to by the South Downs National Park Authority so has not been included.</p>	<p>"Seaford will have retained its strong sense of community, made greater use of its seafront and heritage assets, <u>including conserving and enhancing the character of its Heritage Coast</u>, as well as promoting sympathetic development respecting the tranquil character of its historic nature to improve the economic, environment and social wellbeing of residents and visitors alike.... " (<i>rest of Vision as per existing</i>).</p> <p>Objective 5 to be amended to  "5. To preserve and enhance the environment and countryside both within and around the town, including the historic environment and heritage assets <u>and protecting landscape character and important views as identified in the Statement on Seaford's Local Landscape Character and Views</u>".</p> <p>Objective 6 to be amended to  "6. To protect, preserve and expand on the local green spaces in Seaford <u>and to maintain and enhance connectivity for wildlife throughout the town through the conservation and enhancement of green infrastructure</u>.</p> <p>Add new objective 10:  "<u>10. To improve the existing, and develop new, walking and cycling routes which reduce reliance on vehicular use, reduce carbon emissions, and which improve the health and well-being of residents and visitors</u>".</p>
<p><b>Chapter 6 – Policies and Proposals</b></p>	
<p><b>SEA1 - Landscape, Seascape and Townscape Character of Seaford</b></p>	
<p>In response to representations from the South Downs National Park Authority and Lewes District Council: Neighbourhood Planning Officer.</p>	<p>Add map into Plan showing the views to be protected</p> <p>Add reference to Section 62 of the Environment Act 1995 into the supporting text.</p> <p>Revise SEA1 as follows:</p> <p>"SEA1 <u>Development within or affecting the South Downs National Park</u></p>

	<p>New development within <u>or affecting the South Downs National Park</u> will conserve and enhance the landscape, seascape and townscape character of Seaford. In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances:</p> <ul style="list-style-type: none"> <li>a) the landscape setting of Seaford, including meeting the purposes of the South Downs National Park and protecting the character of the Heritage Coast;</li> <li>b) the key views as identified in the <u>Statement on Seaford's Local Landscape Character and Views and shown on Map X</u>;</li> <li>c) tranquillity and dark night skies;</li> <li>d) the natural, locally distinctive and heritage landscape qualities and characteristics of Seaford including trees and hedgerows, particularly in areas which are currently deficient in such natural assets;</li> <li>e) features of biodiversity, geological and heritage interest, including appropriate management of those features; and</li> <li>f) the River Cuckmere, its margins and associated wetlands, preventing development which would adversely affect its quiet and natural character or have a direct or indirect effect on its wildlife and geological features, <u>but allowing for change that accommodates natural coastal erosion, responds to climate change and facilitates naturally functioning river systems</u>".</li> </ul>
<p><b>SEA2 - Design</b></p>	
<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer; South Downs National Park Authority; East Sussex County Council: Transport, Specialist Adviser Coastal and Flood Risk Management, Landscape, Ecologist and Heritage and Archaeology.</p>	<p>Amend supporting text to refer to design guide published for public consultation alongside the Plan and omit text relating to the design principles. Amend SEA2 as follows:</p> <p>“Policy SEA2 Design  Subject to other relevant development plan policies, <u>development which contributes towards local character and distinctiveness through high quality design will be permitted where the following criteria are met:</u>  <u>(1) the design has regard to the distinctive and attractive characteristics of Seaford and its setting and the key views identified in the Statement on Seaford's Local Landscape Character and Views;</u></p>

Representations from SDNPA concerning promoting sustainable design and mitigating impacts of climate change and from ESCC concerning water use are noted, but it is considered that these issues are already adequately addressed through Core Strategy Policies 11, 12 and 14.

- (2) the site is located and designed to facilitate connectivity between the site and local services by cyclists and pedestrians, having regard to the ESCC Local Cycling and Walking Infrastructure Plan for the area. This will take into account the need to provide routeways with sufficient informal surveillance and lighting so that people feel safe using them;
- (3) the site provides good access to public transport to help reduce car dependency and support public transport use, including where appropriate provision of better connections between bus and rail, and improved passenger information;
- (4) The design incorporates a high quality layout, building design and durable and sustainable materials of an appropriate texture, colour, pattern and appearance that will contribute positively to the landscape and townscape character and local distinctiveness of Seaford;
- (5) The design incorporates public and private spaces which are clearly defined and designed to be attractive, well managed and safe. There should be suitable private outdoor amenity space for new dwellings so passers-by respect the boundaries and residents feel their personal space is protected, and adequate, appropriately designed external storage space for bins and recycling facilities as well as for bicycles.
- (6) The design is informed by a landscape assessment that has regard to the existing topography and landscape features of the site and the townscape, landscape and seascape of the surrounding area.
- (7) The design is informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidelines, and any impacts on ecological assets will be appropriately mitigated/compensated, providing a net gain in biodiversity. Existing individual trees or tree groups that contribute positively to the area will be retained and opportunities taken to provide or improve green and blue infrastructure and habitat connections and linkages to green spaces and/or the countryside;
- (8) The design is informed by a heritage assessment using the Historic Environment Record as well as archaeological field work where appropriate, and will be accompanied by appropriate levels of archaeological work which are research driven to answer specific questions relevant to the history and archaeology of Seaford and the plan area.
- (9) Car parking or other servicing areas will meet ESCC standards and be appropriate to the context and sensitively located and designed so as not to dominate the public realm. Adequate

	<p>electric vehicle charging points will be provided to future-proof the development.</p> <p><u>(10) The development will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.</u></p> <p>will be permitted provided that its design, form and detail is of a high quality to reflect and distinguish the attractive and unique landscape, seascape and townscape character of Seaford and it incorporates best practice in sustainable design. Development must comply with the twelve design principles set out below and explained in the supporting text:</p> <ol style="list-style-type: none"> <li>1. High Quality</li> <li>2. Connections</li> <li>3. Public transport</li> <li>4. Character</li> <li>5. Site and context</li> <li>6. Creating well defined streets and spaces</li> <li>7. Easy for people to find their way around</li> <li>8. Streets for all</li> <li>9. Car parking</li> <li>10. Public and private spaces</li> <li>11. External storage</li> <li>12. Footways and paths".</li> </ol>
<b>SEA3 – Conservation Areas</b>	
Update	Paragraph 6.12 amend NPPF references to reflect new version.
In response to representations from Lewes District Council: Neighbourhood Planning Officer.	<p>Amend SEA3 as follows:</p> <p>“SEA3 Conservation Areas</p> <p>Subject to other relevant development plan policies, development within or in the setting of Conservation Areas will be permitted provided that it:</p> <p>(a) conserves or enhances the special architectural or historic character or appearance of the <del>area</del> <u>Conservation Area and its setting</u> and reinstates historic elements wherever possible;</p> <p>(b) does not require the demolition or partial demolition of any unlisted buildings which make a positive contribution to the character or appearance of the <del>area</del> <u>Conservation Area</u>;</p>

	<p>(c) uses materials which are traditional to the <del>area</del> <u>Conservation Area</u> or are otherwise sympathetic to the character of the particular building or site;</p> <p>(d) respects the design of the existing buildings of the <del>area</del> <u>Conservation Area</u>;</p> <p>(e) respects any important traditional groupings of buildings which contribute to the character of the <del>area</del> <u>Conservation Area</u>; <u>and</u></p> <p>(f) protects open spaces, trees and significant public views <u>as identified in the Conservation Area Appraisals</u>.</p> <p>(g) <del>retains, in the town centre, commercial use on the ground floor but above this level allows the conversion into domestic use.</del>retention, in the town centre, of commercial use on the ground floor will be supported and above this level, conversion to domestic use will also be supported.</p>
<b>SEA4 - Bishopstone Conservation Area</b>	
In response to representations from South Downs National Park Authority.	<p>Amend SEA4 as follows:</p> <p>“Policy SEA4 Bishopstone Conservation Area  Subject to other relevant development plan policies <u>and specifically Policy SEA3 Conservation Areas</u>, development will be permitted provided that it does not detract from the isolated character of Bishopstone village and its downland setting in the Bishopstone valley as shown on the Proposals Map at Appendix A. No further development will be allowed to intrude into the valley or <u>ridgelines around the valley</u>”.</p>
In response to community representations	Amend paragraph 6.16 to align with paragraph 14.54 of the 2003 Plan.
<b>SEA5 – Areas of Established Character</b>	
<p>In response to representations from Lewes District Council:  Neighbourhood Planning Officer.</p> <p>Nb. Some community representations requested that further AECs be added. However,</p>	<p>Add map showing AEC boundaries.</p> <p>Amend SEA5 to:  “Policy SEA5 Areas of Established Character  In considering proposals for development within Areas of Established Character, as designated on the Proposals Map (Appendix A), <del>special attention will be paid to the need to retain</del> the existing character of the area in terms of spaciousness, building heights, building size and site</p>

<p>this policy is in line with LDC's existing Local Plan policy and that proposed in the Part 2 Local Plan. There is no evidence base for adding further areas.</p>	<p>coverage, building lines, boundary treatments, trees and landscaping <u>shall be retained</u>. The Areas ... <i>(rest as per original)</i>".</p>
<p><b>SEA6 - Development on the Seafrost</b></p>	
<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer, Specialist Adviser Coastal and Flood Risk Management; South Downs National Park Authority; and East Sussex County Council: Ecologist</p>	<p>Add map showing extent of Seafrost and any landmarks/special areas within it.</p> <p>Amend SEA6 as follows:</p> <p>"Policy SEA6 Development on the Seafrost</p> <p>Subject to other relevant development plan policies, sensitive development around Seaford Seafrost will be permitted provided that:</p> <p>a) It does not detract from the natural, open, un-commercialised environment of the Seafrost;</p> <p><u>b) It is designed to be resilient to impacts from adverse weather conditions (wind damage) and flood risk, and does not prejudice the ability of relevant agencies to manage the coastal flood risk, beach management and sea defence maintenance;</u></p> <p><del>b</del>c) <u>It should be low density and low rise so</u> it does not impact significantly on the spatial or visual openness or attractiveness of the Seafrost and its vistas <u>and protects the setting of and views to and from the South Downs National Park, the Heritage Coast, the shoreline and the Seaford Head Gateways;</u></p> <p><u>e</u>d) It enhances and <del>preserves</del> <u>conserves</u> the biodiversity and amenity use of the Seafrost; and</p> <p><del>e</del>e) Opportunities are taken to enhance the public realm of the Seafrost and improve walking and cycling facilities as part of the development".</p>
<p><b>SEA7 – Recreational Facilities</b></p>	
<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer</p>	<p>Amend SEA7 as follows:</p> <p>"SEA7 Recreational Facilities</p>

<p>and Seaford Town Council.</p>	<p><del>Subject to other relevant development plan policies, development will be permitted provided that it does not result in a loss of recreational facilities, particularly the outdoor sports facilities at the following locations: <u>Development on existing open space, sports and recreational buildings and land, including playing fields, will not be permitted unless:</u></del></p> <ul style="list-style-type: none"> <li><del>• <u>an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or</u></del></li> <li><del>• <u>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</u></del></li> <li><del>• <u>the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss".</u></del></li> </ul> <p>The following outdoor sports facilities are of particular importance to Seaford:</p> <ul style="list-style-type: none"> <li>• School Playing Fields</li> <li>• Downs Leisure Centre's <del>and</del> grounds</li> <li>• The Salts Recreation Ground</li> <li>• Blatchington Bowls Club</li> <li>• Seaford Tennis Club</li> <li>• Walmer Road Recreation Ground</li> <li>• <u>The Crouch Football and Bowls Ground"</u></li> </ul> <p><del>Where contributions from new development towards recreational space are required by other development plan policies, or collected via the Community Infrastructure Levy, priority will be given to the provision of formal outdoor sports facilities to reflect the current deficit in Seaford.</del></p>
<p><b>SEA8 - Local Green Spaces</b></p>	
<p>Update</p>	<p>Paragraph 6.33 update NPPF references to new version.</p>
<p>Update</p>	<p>Update paragraph 6.34 with further work which supports Grand Avenue LGS.</p>
<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer.</p>	<p>Amend map so numbering in policy correlates and add inset maps for each green space.  Add Grand Avenue site to list of LGS in SEA8.</p>



	<p>Amend second paragraph of SEA8 as follows:</p> <p>“Proposals for any development on these Local Green Spaces will only be permitted in very special circumstances, for example <u>where</u> it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available”.</p>
<b>SEA9 - Allotments</b>	
<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer.</p>	<p>Add map showing the extent of the existing allotments. Add reference in text to the consequences of losing allotments: loss of green space, place to grow food, for mental and physical exercise and health, important wildlife spaces and flood storage areas.</p>
<b>SEA10 – Health Facilities</b>	
<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer and East Sussex County Council: Culture</p>	<p>Add at beginning of paragraph 6.37 “It has been established that there is a clear link between the health and wellbeing of a population and the use of recreation and green space facilities and access to heritage assets. However ...”.</p> <p>Delete last sentence of para 6.37 and insert the following: “A working Group called the Seaford Town Council, Health Stakeholders meets quarterly to discuss the progress on improving the health provision in Seaford.</p> <p>The Group's primary focus is to ensure that more health services are provided locally in Seaford and that the health provision copes with the Town's increase in population. Residents of Seaford have to travel to Brighton or Eastbourne for many basic outpatients treatments, the Group's aim is to ensure that where possible many of these basic outpatient services are provided locally in Seaford, this includes X-rays, Scans, more community services, having Specialists/Consultants to hold clinics in the town using premises within the existing GP's surgeries, and a minor injuries unit, this will become increasingly necessary as the population of the Town grows.</p>

	<p>There is a proposal, (still subject to negotiations but agreement has been reached in principle) to build a combined GP Health Centre in Seaford, the proposal will see both GPs surgery housed in one big building. It is anticipated that the proposed development will enable the GP's surgery to grow and cope with increase population in Seaford (i.e expanding resources to meet future requirements in the town resulting from planned developments). However this proposed combined surgery wouldn't necessarily provide new health services locally or address the need for an out-of hours GPs/minor injuries facility which will be necessary to meet the future growth arising from planned developments".</p> <p>Amend SEA10 as follows:</p> <p>"SEA10 Health Facilities</p> <p>Proposals for new or expanded health facilities, <u>(which provide basic outpatient services locally in Seaford)</u> will be permitted subject to other relevant development plan policies".</p>
<p><b>SEA11 - New Business Space</b></p>	
<p>In response to representations from Lewes District Council: Head of Regeneration and the community.</p>	<p>Amend SEA11 as follows:</p> <p>"SEA11 New Business Space</p> <p>Existing business space at Cradle Hill and other established employment sites will be safeguarded unless <u>the viability criteria set out in the Joint Core Strategy Core Policy 4 are met and an alternative use is demonstrated to provide more social, economic and/or environmental benefits to the area.</u></p> <p>Proposals for new business space to provide flexible start-up and grow-on accommodation for new and expanding businesses will be <del>permitted</del> <u>encouraged</u> subject to other relevant development plan policies. This could include a new Enterprise Centre and live/work units as well as extensions to existing employment areas such as Cradle Hill".</p>

	Amend paragraph 6.41 to note that the Newhaven Enterprise Centre was developed in partnership with Lewes District Council. The Council owns the facility and this is managed on its behalf by a third party organisation.
<b>SEA13 - Footpath to Church Lane</b>	
In response to representations from Lewes District Council: Neighbourhood Planning Officer	Amend SEA13 as follows:  "SEA13 Footpath to Church Lane  A pedestrian way <u>meeting recognised standards (minimum two metres width)</u> linking Broad Street (between Nos 17 and 25 Broad Street) to Church Lane will be protected from development... <i>(rest as per original policy)</i> ".
<b>SEA14 - Safeguarding Future Transport Projects</b>	
In response to representations from Lewes District Council: Neighbourhood Planning Officer; and East Sussex County Council: Transport	Add detailed map showing areas to be safeguarded.  Amend paragraph 6.49 to change reference to 'National Rail' to 'Network Rail'.
<b>SEA15 - Site Allocations</b>	
In response to representations from Lewes District Council: Neighbourhood Planning Officer; East Sussex County Council: Ecology, Landscape, Heritage and Archaeology, Flood Risk and Drainage; the Environment Agency; Southern Water; and the community.	Amend Map to correlate with Policy and add inset maps for each site.  The requests for Ecological Impact Assessment and archaeological investigation are noted, but these requirements would be covered by the amendments proposed to SEA2.  The requirement to provide a connection to the nearest point of adequate capacity in the sewerage network is also one that would apply to all development, not just allocations. It is therefore proposed to add this to SEA2.
<b>SEA16 - Dane Valley Project</b>	
Update	Update paragraph 6.61 with AECOM1 and timetable for AECOM2.

<p>In response to representations from Lewes District Council: Neighbourhood Planning Officer; South Downs National Park Authority; East Sussex County Council: Ecologist; the Environment Agency and Southern Water</p>	<p>Amend SEA16 as follows:</p> <p>“SEA16 Dane Valley Project</p> <p>Development of the Dane Valley Project sites shall be carried out in accordance with a comprehensive masterplan to ensure that the following requirements are met:</p> <ul style="list-style-type: none"> <li>a. The delivery of <del>about</del> 131 dwellings;</li> <li>b. The delivery of replacement employment space for that lost on the site</li> <li>c. High quality development that incorporates best practice in sustainable design;</li> <li>d. Measures to manage the potential for flooding on the site and prevent increased risk of flooding <del>off-site</del> <u>as a result of the development</u>;</li> <li>e. Measures to investigate <u>the extent of contaminated land</u> and remove any contaminated material from the site;</li> <li>f. The <u>masterplan will be informed by a Ecological Constraints and Opportunities Plan and there will be provision of open space to provide amenities for the new residents and to protect areas of biodiversity and archaeological interest; and</u></li> <li>g. Enhanced transport provision to encourage <u>users of the development</u> <del>new and existing residents</del> to access the town centre and railway station by foot, cycle and bus”. <u>The key walking and cycling links will be identified as part of the master planning process; and</u></li> <li>h. <u>The layout is planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes, and to ensure a gap of 15 metres between development and Brooklyn Road pumping station.</u></li> </ul>
<p><b>SEA17 - Seaford Planning Boundary</b></p>	
<p>In response to representations from Southern Water</p>	<p>Amend SEA17 as follows:</p> <p>“SEA17 Seaford Planning Boundary</p> <p>Proposals for development within the Planning Boundaries for Seaford parish as shown on the Proposals Map (Appendix A) will be permitted subject to other relevant development plan policies. Planning permission will not be granted for development outside the Planning</p>

	Boundaries, other than in those circumstances specifically referred to in other development plan policies <u>or it is for essential utility infrastructure where no suitable alternative sites are available.</u> ".
<b>SEA18 - Windfall Development</b>	
In response to representations from Lewes District Council: Neighbourhood Planning Officer	<p>Amend SEA18 as follows:</p> <p>"SEA18 Windfall Development</p> <p>The redevelopment of brownfield sites within the Planning Boundaries of Seaford will be permitted subject to other relevant development plan policies and <del>to meeting</del> <u>having regard to</u> the Sustainability Objectives in Appendix E. The conversion of upper storey space to housing and/or building of residential units above non-residential premises such as shops and other businesses is particularly encouraged".</p>
<b>Proposed Additional Policies</b>	
In response to representations from Southern Water	<p>Recommend including an additional policy as follows:</p> <p>"New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other relevant development plan policies".</p> <p>Add supporting text as follows:          "Southern Water has advised that although there are no current plans over the life of the Seaford Neighbourhood Plan, it is possible that the total extent of development during the period will require Southern Water to provide new or improved infrastructure to meet such growth, or to meet stricter environmental standards to ensure consistency with the NPPF. It should be noted that this policy does not cover waste water treatment works or other 'county matter' waste facilities which are precluded from inclusion in a neighbourhood plan and are instead covered by the Waste Local Plan for the area."</p>

### Responses Received from the public within the 2018 Regulation 14 Consultation

#### A. Number of Representations received on each Policy

No Comments on 8 policies, that is, SEA 1,3,5,10,12,13,17,18

Comments received on:

- Policy SEA 2 (National Park developments): 1 comment
- Policy SEA 4 (Bishopstone Conservation Area): 2 comments
- Policy SEA 6 (Seafront): 1 comment.
- Policy SEA 7 (Recreation):1 comment.
- Policy SEA 8 (Local Green Spaces): 46 comments.
- Policy SEA 9 (Allotments): 1 comment
- Policy SEA 11 (Business Space): 3 comments
- Policy SEA 14 (Transport): 1 comment
- Policy SEA 15 (Site allocations): 12 comments.
- Policy SEA 16 (Dane Valley) : 2 comments.
- 9 general comments were made on the plan including supporting the plan
- 3 comments were made on the SA/SEA

#### B. Summary of comments received on each policy.

- **SEA 6**((Seafront)– Both comments were positive, approving of amendment made after first Reg 14 consultation.
- **SEA 7**(Recreation) – Strong approval for wording change after first Reg 14 consultation.
- **SEA 8** (Local Green Spaces)– 42 of the 46 responses related to objections to one aspect of the Grand Avenue evaluation in the Local Green Spaces report, and detailed objections from the owners of 3 sites and a supportive response from Natural England.
- **SEA 9** (Allotments) – LDC Open Spaces suggested a wording change to recommendation c).

- **SEA 11** (Business space)– Natural England proposed a wording change, Highways England wanted to be consulted on and development changes to Cradle Hill Industrial Estate, and a private landowner wanted to protect existing business premises from the implications of SEA15 and SEA 16.
- **SEA 14** (Transport) – LDC needed wording changes before it could support this policy.
- **SEA 15** (Site allocations)– 2 statutory consultees wanted textual clarifications, 2 supported the proposals, the rest queried the viability of individual sites
- **SEA 16** (Dane Valley) – 1 comment in support, and one statutory consultee suggested a consultation requirement when schemes came forward for planning.
- **D. COMMUNITY ASPIRATIONS** – no comments were made on these

Second (2018) Regulation 14 consultation: Schedule of Changes to the Plan in response to Statutory Consultees comments

Schedule of Changes to Seaford Neighbourhood Plan

February 2019

Reason for Change	Proposed Change
<b>Policies Map and Inset Maps</b>	
In response to representations from LDC (Planning Policy) and SDNPA	Insert maps relating to policies within the text at appropriate points rather than in appendices. Amend references to maps accordingly through the Plan
In response to SDNPA representation	Amend the Inset Map for SEA11 to shows the area where the new policy applies, as distinct from the rest of Cradle Hill Industrial Estate.
<b>Background, policies and aspirations</b>	
Update so text remains relevant once the plan is made and ensure consistency with names of documents.	<p>First paragraph, last sentence delete 'draft' before 'Neighbourhood Plan'. Delete second paragraph.</p> <p>First bullet in list amend to “<del>Revised</del> Sustainability Appraisal which has <del>examined the revised Policies listed below (in this Non-Technical Summary and in the body of this report)</del> <b>assessed</b> to ensure the policies and site allocations in <del>this report</del> <b>the Neighbourhood Plan to ensure that they</b> are the most sustainable available... The Sustainability Objectives <b>are</b> listed in Appendix D of this Plan <del>are also a key element in assessing the suitability of sites for development.</del>”</p> <p>Second bullet amend to “Statement of <del>on</del> <b>Seaford’s Local</b> Landscape Character and Views <del>that should be conserved</del>”.</p> <p>Third bullet amend to “Character Assessment of Seaford (which has informed the <b>General</b> Design Guidelines for Seaford)</p> <p>Fourth bullet amend to “<b>General Design Guidelines for Seaford</b> <del>Design Guide for Seaford</del> which has</p>



	<p><del>now been produced</del>".</p> <p>Delete last sentence before 'Planning Policies' heading.</p> <p>Amend text of policies as per main text.</p>
<b>Chapter 1 - How to read and use the Seaford Neighbourhood Plan</b>	
	Amend paragraph 1.5 to "A <b>section called 'Background, policies and aspirations'</b> <del>Non-Technical Summary</del> has been inserted at the front of the Neighbourhood Plan..."
<b>Chapter 2 - Legislative and Planning Policy Context</b>	
Update	Para 2.10 Amend last sentence to "Lewes DC is <del>aiming to consult on Part 2 in autumn 2018 and submit</del> <b>submitted</b> the Plan for examination in January 2019.
In response to SDNPA representation.	Para 2.11 Amend text to "The South Downs National Park Local Plan was submitted for examination in April 2018, <del>an Inspector has been appointed and hearings are due to start in November 2018.</del> <b>hearings have been carried out by the Inspector and the National Park Authority is currently consulting on main modifications to the Plan</b> ".
Update in legislation	Delete previous paragraph 2.18 and replace with " <b>With regard to Basic Condition 5 above, this includes that "The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017(3)." (The Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018 which amends The Neighbourhood Planning (General) Regulations 2012(1)). This means that, if the neighbourhood development plan is likely to have a significant effect on a European protected site, even if that affect could be mitigated, a full Habitats Regulations Assessment of the plan needs to be undertaken</b> ".
<b>Chapter 5 - Vision &amp; Objectives</b>	
In response to representations	Amend Neighbourhood Plan objective 4 to "4. To promote an active community by retaining and

from Natural England	enhancing the economic infrastructure, physical infrastructure <b>including green infrastructure</b> and facilities to promote sustainable development to ensure a thriving social, cultural and community life”.
In response to representations from Natural England	Amend Neighbourhood Plan objective 5 to “5. To preserve and enhance the environment and countryside both within and around the town, including the historic environment and heritage assets and protecting landscape character and important views as identified in the Statement on Seaford’s Local Landscape Character and Views <b>and the South Downs Local Plan.</b>
In response to representations from Natural England	Amend Neighbourhood Plan objective 6 to “6. To protect, preserve and expand on the local green spaces in Seaford and to maintain and enhance connectivity for wildlife throughout the town through the conservation and enhancement of green infrastructure <b>and by seeking to achieve net-gain in biodiversity and connecting people (both residents and tourists) to the natural environment.</b>
In response to representations from Anne Fletcher	Amend Neighbourhood Plan objective 9 to “9. To ensure new housing and developments <b>and redevelopments</b> are of high quality <b>as described in the General Design Guidelines for Seaford</b> and complement and enhance the town’s built and natural heritage.
<b>Chapter 6 – Policies and Proposals</b>	
<b>SEA1 - Landscape, Seascape and Townscape Character of Seaford</b>	
In response to SDNPA representation on SEA2 and Natural England’s representation on SEA1.	Amend SEA1 as follows: “New development within or affecting the South Downs National Park <b>will be expected to have a landscape led approach to design, must have regard for the setting of the National Park in terms of its landscape and visual amenity and</b> conserve and enhance the landscape, seascape and townscape character of Seaford. In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances...”
In response to SDNPA representation on SEA11.	Amend paragraph 6.7 as follows “To ensure that the Seaford Neighbourhood Plan takes proper account of its unique landscape, seascape and townscape character, a background paper has been produced which identifies that character and its significance for future development. This is referred to as the ‘ <del>Landscape and Key Views</del> <b>Seaford’s Local Landscape Character and Views</b> ’ report. This report is published separately along with this plan. <b>Also of relevance to the design of any</b>

	<p>development within or affecting the National Park is the South Downs Integrated Landscape Character Assessment (SDILCA), specifically Landscape Type A: Open Downland, A1: Ouse to Eastbourne Open Downs <a href="http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf">http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf</a> . Development proposals in close proximity to the National Park can deleteriously impact on tranquillity for example by increases in lighting and noise as well as visual impacts, these are Special Qualities of the National Park which need to be considered. Any sites in the setting of the National Park will need to be demonstrate their contribution for biodiversity, green infrastructure, recreational value, access to the National Park protection of water resources for example. The following overarching policy emphasises the landscape-led approach of this Neighbourhood Plan, <b>that is that development should enhance, respect and reinforce the landscape through its design approach, informed by contextual analysis of the local landscape and built character.</b></p>
<p>In response to representations from LDC (Open Spaces / Parks Team)</p>	<p>In paragraph 6.8 delete 'wasps' and replace with 'moths'.</p>
<p><b>SEA2 - Design</b></p>	
<p>In response to representations from Natural England</p>	<p>Amend first part of paragraph 6.11 to "A new <del>Design Guide for Seaford</del> <b>General Design Guidelines for Seaford</b> has been produced <b>alongside this Neighbourhood Plan</b> to encourage a higher standard of design for development and for public realm (that is, public space) within the town. <del>and this is published for public consultation alongside this draft neighbourhood plan. ...</del>" and add at the end "<b>Criteria g) of the policy below requires development to take opportunities to provide or improve green and blue infrastructure and habitat connections and linkages to green spaces and/or the countryside. These include recreational fields and green spaces; gardens; public rights of way; sustainable urban drainage systems; habitat networks; allotments; green droves and cemeteries as well as watercourses and road and rail verges. Opportunities to increase and enhance green infrastructure links into the South Downs National Park will be particularly supported. Development should favour Sustainable Drainage Systems (SuDS) which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and</b></p>

	<b>wildlife”.</b>
In response to representations from LDC (Planning Policy)	Amend first sentence of SEA2 to “ <b>The design of all developments within the Plan area will have regard to the General Design Guidelines for Seaford and be</b> subject to other relevant development plan policies. Development which contributes towards local character and distinctiveness through high quality design will be permitted where the following criteria are met:
In response to representations from LDC (Planning Policy) and to delete text no longer required due to the reference to the Design Guide at the beginning of the policy.	Amend SEA2 (a) to “the design has regard to the distinctive and attractive characteristics of Seaford and its setting and the key views identified in the Statement on Seaford’s Local Landscape Character and Views and <b>shown on the inset map below</b> <del>the new Design Guide for Seaford”</del> ”:
In response to representations from Carter Jonas on behalf of Richard Swain about SEA15 and 16 and to representations from Anne Fletcher.	Amend SEA2 (d) to “The design <b>makes an efficient use of land and</b> incorporates a high quality layout, building design, <b>energy efficiency</b> and durable and sustainable materials of an appropriate texture, colour, pattern and appearance that will contribute positively to the landscape and townscape character and local distinctiveness of Seaford;
In response to representations from LDC (Planning Policy).	Amend SEA2 (f) to “ <b>Where appropriate</b> <del>the</del> design is informed by a landscape assessment that has regard to the existing topography and landscape features of the site and the townscape, landscape and seascape of the surrounding area”.
In response to representations by Natural England.	Amend SEA2 (g) to “ <b>where appropriate</b> the design is informed by an Ecological Impact Assessment (EcIA), in line with BS42020:2013 and CIEEM guidelines <del>and any impacts on ecological assets will be appropriately mitigated/compensated,</del> <b>has regard to the mitigation hierarchy in NPPF paragraph 175a, and</b> provides a net gain in biodiversity...”
In response to representations from LDC (Planning Policy).	Amend SEA2 (h) to “ <b>Where the development could impact on designated or non-designated heritage assets,</b> <del>the</del> design is informed by a heritage assessment using the Historic Environment Record...”
In response to representations from LDC (Planning Policy).	Amend SEA2 (i) to “Car parking or other servicing areas will meet ESCC standards and be appropriate to the context and sensitively located and designed so as not to dominate the public

	realm. Adequate electric vehicle charging points will be provided to future proof the development <b>Where appropriate electric vehicle charging points will be supported</b> ".
In response to representations by Natural England.	Amend SEA2 (j) to "The development <b>will incorporate Sustainable Drainage Systems (SuDS) which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and wildlife and</b> will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider".
<b>SEA3 – Conservation Areas</b>	
Correct error	Delete first part of para 6.12 which doesn't make sense, start "Seaford has a significant number...".
In response to representations from LDC (Planning Policy).	Amend criterion f) as follows "protects open spaces, trees and significant public views as identified in the Conservation Area Appraisals <b>and the Character Areas in the General Design Guidelines for Seaford</b> ".
<b>SEA6 - Development on the Seafont</b>	
In response to representations from LDC (Planning Policy).	Amend paragraph 6.28 to "Seaford's Seafont from Tide Mills through to Splash Point is a key asset both in terms of flood defence, recreation, tourism and natural beauty. <b>The RSPB have evidence that Kittiwakes are nesting at Splash Point and all the beaches at Seaford are identified in the East Sussex Vegetated Shingle Management Plan 2009 as having important species that need management...</b> "
In response to representations from LDC (Planning Policy).	Amend first sentence of SEA6 to "Subject to other relevant development plan policies, sensitive development around Seaford Seafont <b>that has regard to the General Design Guidelines for Seaford</b> will be permitted provided that..."
<b>SEA7 - Recreation</b>	
Correction	Para 6.31 remove reference to information about calculation being in the Appendices.
In response to representations from LDC (Open Spaces / Parks Team)	Amend criteria d) to "It enhances and conserves the biodiversity <del>and amenity use</del> of the Seafont (for example, the kittiwake colony at Splash Point and the shingle vegetation at Tide Mills); <del>and</del>

	<p>e) it conserves and enhances the amenity use of the seafront; and</p> <p>f) ....”</p>
<b>SEA8 - Local Green Spaces</b>	
In response to representations from LDC (Open Spaces / Parks Team)	Amend site name of 8) to 'The Old Brickfield and site adjacent to 47 Surrey Road'
<b>SEA9 - Allotments</b>	
In response to representations from LDC (Open Spaces / Parks Team)	Add criteria c) to policy as follows “ <b>and c) there is no net loss of biodiversity</b> ”.
<b>SEA10 - Health Facilities</b>	
To correct a formatting error in the second Regulation 14 Plan.	SEA10 in the first Regulation 14 consultation was accidentally missed out in the main body of the second Regulation 14 consultation Plan due to a formatting error, although it was in the list of policies at the front of the Plan. Reinstate policy as follows “ <b>SEA10 Health Facilities - Proposals for new or expanded health facilities, including the new proposal for new health facilities on part of the Downs site, will be strongly supported subject to other relevant development plan policies</b> ”.
<b>SEA11 – New Business Space</b>	
In response to representations from LDC (Planning Policy).	Delete first two sentences of paragraph 6.41 and relocate it to the beginning of paragraph 6.42. Amend paragraph 6.42 as follows: “ <b>An allocation for additional employment land was made at Cradle Hill in the Lewes Local Plan 2003 (policy SF8). Since this policy will not be saved beyond the adoption of the Part 2 Lewes Local Plan, this allocation is included within SEA11. Land at Cradle Hill Industrial Estate, as shown on the Inset Map below, is allocated for new business development (Use Classes B1, B2 and B8). The Estate is located on the edge of the town adjacent to open downland with access through residential areas. Its extension is, therefore, constrained by environmental and traffic grounds. The setting of the Estate, on the edge of open downland, requires that any extension</b>

should be well integrated into the landscape. The existing buildings have been constructed on excavated land so as not to be visually intrusive on the skyline. The land allocated for extension should, therefore, be excavated to a similar level prior to development taking place. A substantial landscape buffer will also be required along the eastern edge in order to demarcate the boundary of the town and to screen it from view from the open countryside to the east and protect the setting of the National Park. Access to the area of land allocated for extension should be provided by extending the existing estate road eastwards. Cradle Hill Road is presently too narrow to meet full adoption standards. The existing intersection of Cradle Hill Road and Vale Road junctions with Alfriston Road are not considered satisfactory. The effect of the additional traffic generated as a direct result of this development on this highway infrastructure and highway safety will be very carefully examined as part of a development proposal and Highways England will be consulted on the proposals for this site in terms of potential impacts on the A27. If it is considered that improvements are required to the local highway infrastructure in order to allow the development to proceed then the **developer/landowner will be expected to fund these improvements proportional to the requirements generated by the proposed development itself.** A policy is therefore proposed that supports the provision of new business space in the town. This may take the form of an Enterprise Centre, and/or the implementation of the Cradle Hill site but may also be met in other ways such as live/work units as part of a mixed development. The proposal to redevelop the industrial area between Blatchington and Chichester Roads known as the Dane Valley Project includes provision to replace the current employment opportunities that exist on the site with live/work units or incubator business units. A criteria based policy provides flexibility for the market to provide employment accommodation in the best location(s) to meet the need.

Amend Inset Map to only show allocation site within the red line.

Amend SEA11 as follows:

SEA11 New Business Space **at Cradle Hill**

	<p>Land at Cradle Hill Industrial Estate, as shown on the Inset Map above, is allocated for <b>industrial business</b> development (<b>Use Classes B1, B2 and B8</b>), subject to other relevant development plan policies and the following criteria:</p> <p>(a) the site of the proposed extension shall be excavated to the generally prevailing levels of the existing estate prior to the commencement of any development</p> <p>(b) the height of the development shall be no higher than the existing buildings</p> <p>(c) the scheme shall provide for any off-site highway works proportional to the additional traffic created by the development, (or a contribution to such works) if measures of this kind are demonstrated to be a pre-requisite of development</p> <p>(d) the eastern boundary of the Cradle Hill Estate extension shall be clearly demarcated with a substantial landscaped buffer of varying width, but no less than four metres, to be provided at the time of the layout of the estate roads. <del>and</del></p> <p><del>Existing business space at Cradle Hill will be safeguarded unless an alternative use is demonstrated to provide more social, economic and/or environmental benefits to the area.</del></p> <p><del>Proposals for new business space to provide flexible start up and grow on accommodation for new and expanding businesses will be encouraged subject to other relevant development plan policies. This could include a new Enterprise Centre and live/work units as well as extensions to existing employment areas such as Cradle Hill.</del></p>
<p><b>SEA12 – Visitor Accommodation</b></p>	
<p>In response to representations from LDC (Planning Policy).</p>	<p>Amend first line of policy as follows – “Subject to <del>the provisions of the Joint Core Strategy Core Policy 5</del> <del>and</del> other relevant development plan policies...”</p>
<p><b>SEA13 – Footpath to Church Lane</b></p>	
<p>In response to representations</p>	<p>Amend second sentence of policy to “<del>Developers</del> <b>Development proposals</b> will <del>be required to</del></p>



from LDC (Planning Policy).	incorporate..."
<b>SEA14 - Transport</b>	
Update following commencement of Exeat Bridge works	Delete last part of para 6.50 from "The first stage..." and replace with "This work has now commenced".
Update following commencement of Exeat Bridge works	<p>Amend SEA 14 to "Development within the Seaford Neighbourhood Plan Area will not be permitted if it would inhibit the future implementation of the following potential transport projects:</p> <ul style="list-style-type: none"> <li>• <del>Rre-dualling of the train lines through the parish; or</del></li> <li>• <del>Widening or re-siting the Exeat Bridge on the A259.</del></li> </ul> <p>The safeguarded areas from such development are delineated on the Proposals Map (Appendix Ai). The implementation of these two projects, as well as Community Aspiration (and the projects in Appendix D, should maximise opportunities for more sustainable forms of travel such as walking, cycling and access to public transport".</p>
<b>SEA15 - Site Allocations</b>	
To bring the definition in line with that in the Local Plan.	Amend paragraph 6.52, first bullet point, to "600 homes, Windfall ( <del>that is, small schemes less than 6 units which could not be identified in April 2015 but would almost certainly arise in future</del> <b>defined in the Lewes Core Strategy: Local Plan Part 1 glossary as "a site not specifically allocated for development in a development plan, but which unexpectedly becomes available for development during the lifetime of a plan. Most "windfalls" are referred to in a housing context. They tend to be small sites for a small number of homes).</b> "
In response to representations from Anne Fletcher	Amend paragraph 6.55, first bullet point, to "6.55 The Neighbourhood Plan aims to identify a range of types and tenures of high quality open market and affordable housing: <ul style="list-style-type: none"> <li>• in the most sustainable locations <b>that reduce energy consumption...</b>"</li> </ul>
In response to representations	Amend paragraph 6.57A to "6.57A There was significant support in the response to the

<p>from Anne Fletcher</p>	<p>Neighbourhood Plan Survey for considering including a Community Land Trust (CLT) within our proposals. A CLT is a form of community-led housing, set up and run by ordinary people to develop and manage homes as well as other assets. After considerable discussion by Steering Group members, <del>this it</del> is considered that, <del>despite it being successfully used elsewhere, it is inapplicable to the local Seaford context at the present time because</del> <b>whilst the principle of CLTs is supported, in practice there are a number of difficulties at the present time, which include:</b></p> <ul style="list-style-type: none"> <li>• There is insufficient land in public ownership within Seaford to enable STC or LDC to endow such a body, as such assets are currently being considered as a source of funding of other community initiatives.</li> <li>• The limited opportunities for housing identified by the Neighbourhood Plan process are all from private owners who have not expressed an interest in endowing land for a CLT, even within the context of those sites that will require an affordable content.</li> <li>• The objective of maximising the affordable housing element within the Neighbourhood Plan's policies is most effectively delivered within the context of existing structures, given that the time and resources required to set up a CLT have not become apparent since the suggestions were made.</li> </ul> <p><del>In the light of this, it is suggested that the proposers work with the Brighton &amp; Hove CLT to see if there is scope for developing a CLT organisation in the light of the three constraints outlined above</del> <b>However circumstances can change over time and any proposals for CLTs that come forward and address these problems will be supported in principle. The Sussex Community Hub, partly funded by Lewes District Council, provides support to community groups wanting to create CLTs”.</b></p>
<p>In response to Southern Water representations</p>	<p>Add text at the end of policy SEA15:</p> <p><b>“Occupation of sites (ii) and (viii) to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.</b></p> <p><b>Layout for site (ii) must be planned to ensure future access to the existing sewerage infrastructure for</b></p>

	<b>maintenance and upsizing purposes”.</b>
<b>SEA16 - Dane Valley Project</b>	
In response to ESCC Highways representations	Add a criteria as follows <b>“The masterplan must be informed by an adequate assessment of the surrounding highway network to determine the scale of specific off-site highway works required to accommodate the development”.</b>
In response to Southern Water representations	Add a criteria as follows <b>“. Occupation of the development to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider”.</b>
<b>New SEA17 – Florence House</b>	
In response to ESCC Archaeology and Natural England representations	Add a new policy as follows <b>“Development of the Florence House site will be subject to the following criteria:</b>  <ul style="list-style-type: none"> <li><b>a) This site is within a high risk archaeological zone and therefore any planning application will need to be accompanied by an archaeological assessment which includes on-site investigation works to demonstrate that the development can be implemented without causing harm to archaeology on the site; and</b></li> <li><b>b) This site is adjacent to priority habitat deciduous woodland and the design must avoid harm to this habitat where possible or mitigate any unavoidable harm in accordance with the mitigation hierarchy”.</b></li> </ul>
<b>SEA17 18 - Seaford Planning Boundary</b>	
<b>SEA18 19 - Windfall Development</b>	
<b>SEA 19 20 - Utility Infrastructure</b>	
<b>Community Aspirations</b>	
In response to SDNPA	Amend point g) in Community Aspiration 1 – (Seaford and Tourism) to <b>“Seaford Town Council and the</b>

representations	South Downs National Park Authority should continue to work closely together to deliver a joint approach to better signage <b>and fencing</b> to the National Park from the Town, <b>particularly within the Heritage Coast</b> and possibly associated tree planting and landscaping if deemed appropriate.
In response to SDNPA representations	Add to Community Aspiration 4 – (Climate Change and Flooding) <b>“When appropriate the South Downs National Park Authority (SDNPA) should be consulted on any future flood defence strategy given the impact this can have on the natural appearance of the Heritage Coast.”</b>
In response to Environment Agency representations	Add to the end of para 7.11 <b>“The lead local flood authority (East Sussex County Council) leads on surface water flooding issues”</b> .
In response to ESCC Highways representations	Amend Community Aspiration 9 – (Transport and Air Quality) part a) as follows  “(a) It is a community aspiration that <del>the policy adopted by Seaford Town Council for</del> East Sussex County Council Highways <del>to</del> deal with the severe dangers on the A259 at Bishopstone/ Hill Rise and Hawth Hill <b>and implemented an appropriate solution using available funding.</b> <del>and that all suitable Community Infrastructure Levy (CIL) funds are allocated for the construction of a roundabout in this location together with a no right turn out of Bishopstone as soon as possible.</del>
<b>Appendices</b>	
Update to reflect inclusion of maps within body of the Plan	Remove original Appendix A and re-number:  A – Heritage Assets B- Transport Improvements C – Sustainability Objectives and correct all references within the Plan.

### Responses to Main Comments (Second Reg 14 Consultation)

#### 1. Grand Avenue:

(a) **43 comments from members of the public** (who in most cases live close to Grand Avenue) made similar points, usually using identical wording saying that "recreational value" should be classified as "High" rather "Low". The most comprehensively argued comment was Number 19. Which are given below with the Steering Group response in blue

(i) *I believe that the re-evaluation by the Steering Group of the recreational value attributed to the three fields at Grand Avenue from "High" to "Low" is fundamentally flawed for the following reasons:-*

*The Steering Group has used actual land area used for recreational purposes as a criterium for evaluation. Not so. The only opportunity that paras 99-101 of the NPPF gives for area is in the issue of whether or not the proposed parcel of land is a 'tract'. We have adhered rigidly to the NPPF criteria. In a report dated 30 April 2018, presented to Steering group on 21 August 2018 in the confidential part, a complete comparison was made between the evaluation of all sites and under the criterion 'Recreational value ' it was agreed that "we use **low**, for not accessible to public, **medium** for mixed accessible/not accessible, and **high** if 100% public access." This has resulted in an inconsistent evaluation as compared with other sites. For example, the main recreational activity of that part of Old Brickfield site adjacent to the sea front is also for walking (including dog walking) but has been evaluated as "Medium" on the basis that the general public has access to the entire site. The composite evaluation for Recreational Value for the Old Brickfield and Land at Surrey Road is 'Medium because The Old Brickfield scores high as it is 100% accessible, and Surrey Road scores low, as it is privately owned land. Land north of South Hill Barn, Surrey Road, and Grand Avenue are all in private ownership, and all have perimeter public rights of way, and therefore their recreational value has been evaluated on the same basis, i.e. low. Their positive contributions to the landscape are recognised in 100 b (i) beauty, (ii) historic significance, (iv) tranquillity and (v) richness of wildlife (as numbered in LGS Report on each site)*

*Notwithstanding that, the general public does not use this entire site for walking, but only the well-worn footpaths, as in the case of the Grand Avenue site. It is the case that the general public has access to the entire site at Grand Avenue, as the owners have made no attempt to exclude the general public from any part of the site, no part is fenced off. The owners have commented in their Reg 14 response that 'there is no permissive access to this land' and 'the single footpath and bridleway which cross the site along the field boundaries do not hold any special allocation and normal rules for public rights of way apply despite the lack of fencing'. Naturally the public adhere to the well-worn footpaths as is the case at the Old Brickfield. In the case of Grand Avenue, there is a registered public footpath which crosses the site along the NE boundary of Field no. 4825 leading from Princess Drive across Churchill Road and Clementine*

Avenue giving access to Grand Avenue and to Bishopstone village beyond . There is also a registered bridleway created in 1937 which crosses the site along the NE boundary of Field no. 7148 and also provides access as described above to Bishopstone village. Also there are footpaths around the perimeter of the fields which exist due to the prescriptive rights acquired from continuous use for a period of at least 20 years. Although these pathways are not noted on the Definitive map these rights could easily be established as being protected in law. These access routes serve the residential development adjacent at Hill Rise and Princess Avenue, the population of which consists primarily of older residents who rely on the above access for dog walking, daily exercise walking and for access to the adjoining South Downs NP and Bishopstone village including access to the church in that village. In contrast, if we consider the extent of land used for recreation in Chyngton Field we note that none of the land is available for such use, or any recreational use, as access to the general public is totally denied. Using the above basis of evaluation therefore Chyngton Field should be re-evaluated as having NIL recreational value and Grand Avenue having a higher evaluation. It should also be noted as important that these rights of way across Grand Avenue site provide valuable access for local residents with mobility issues as they are flat and easily manoeuvrable for mobility scooter users.

The importance of the rights of way across the Grand Avenue site should not be underestimated. To remove them would require a Closure Order or Diversion Order which would not be granted unless they fell into total disuse for a considerable period of time which is highly unlikely or unless, should development ever be permitted on this site, the developer included within the development scheme suitable alternative rights of way which offered access equally convenient to those existing rights. Chyngton Field does not support any such rights and should therefore be downgraded to NIL recreational value.

(ii)The Steering Group has relied on qualities of land adjoining Chyngton Field to support its recreational valuation, as the site has no recreational value in itself. The report gives Chyngton Way/land north of South Hill Barn a low rating under 'recreational value' so this point is not clear. Qualities of adjoining land is taken account of in other criteria where both sites score highly. However no such qualities have been considered **in relation to recreational value** of the Grand Avenue site. If it is valid to also include the recreational value of adjoining land, it should be noted that, by way of additional support for the recreational value of the Grand Avenue site, the site contains two vital landscape elements that need protection and enhance the local environment, being Kings Hedge and the avenue of trees along Grand Avenue - two important landscape features. The open vista from this site also enhances the views across to the Bishopstone valley and village beyond. In order to maintain consistency of evaluation, the evaluation criteria should be confined to those which relate to the specific site itself and not adjoining land.

*(iii)The Grand Avenue site is within the National Park and its high recreational value is therefore inherent in this classification, whereas Chyngton Field is not in the National Park and therefore cannot claim this quality. This is taken into account in criterion (b)" demonstrably special to a local community and holds a particular local significance"*

*I note that the Steering Group (I refer to the e-mail from Keith Blackburn to the Save Seaford National Park dated 26 September 2018) states that the fields at Grand Avenue may also rely on the protection of Policy SEA4 Bishopstone Conservation Area and suggests therefore that this "additional protection" **is a good reason for not requiring a higher valuation of recreational value**. It does not appear that this criterion has been applied to any other sites for evaluation of "recreational" value - further inconsistency in evaluation. This comment is putting the highlighted words into the email that were not stated. The email used the expression "on a wider front" and referred to the purpose of the National Park and the proposed Policy SEA4 (Bishopstone Conservation Area and its reference to ridgelines and no development)*

**(b) Comments by Strutt and Parker on behalf of the owners of the Grand Avenue Fields(White/Kay/Willey families (No 9)) with Steering Group responses in blue**

*"The LGS report does not present a substantiated or evidenced argument as to why the land at Grand Avenue should now be designated as a LGS"*

*Para 100bi refers to the beauty of the site. 'The guidance requires Seaford NP to show a site is demonstrably special to a local community and holds a particular local significance, e.g. beauty, historical significance and our report goes into great lengths about both these attributes. It's importance to the local community is clearly demonstrated by the significant number of comments made by the public at Neighbourhood Plan consultation meetings, in the first Regulation 14 consultation and in the second Regulation 14 Consultation*

*Para100bii confirms the lack of access to the 3 fields. We accept these comments and have recognised the low recreational value of these sites in our evaluation.*

*Para 100biii,iv,v these are not substantiated by official Heritage, Ecology or Noise surveys to form a proven evidence base" We have carried out detailed surveys because of the local importance of these 3 fields because there have not been sufficient resources available to national or regional bodies to do this work. Our advisers are professionally competent to make the observations we have made under these headings on both the fields and the important margins of the 3 fields, and we stand by them.*

## 2. John Rigden (Owner of Land adj to 47 Surrey Road)

- a) *The sites will not be delivered. Mr Rigden does not substantiate his opinion. We provide evidence of deliverability over the life of the NP (up to 2030) including the AECOM report on Dane Valley.*
- b) *Land adj to 47 Surrey Road is brownfield not greenfield. The site was created when the railway embankment was constructed in 1862-4. Prior to that the 1844 East Blatchington Tithe map shows it in agricultural use in a valley called 'The Salts' The 1875 OS map shows it as low lying land with a rectangular pond. The quarry referred to is on the seaward side of the railway embankment. The Great Flood of 1875 is reported to have affected a brick kiln, but that was on the seaward parcel of land now called The Old Brickfields. Subsequent OS maps show no buildings on this parcel of land, hence our recognition of the site as greenfield. The reference to the brickworks on p43 of the Local Green Space report relates to The Old Brickfield part of the site, not Mr Rigden's part. The shelved parts of the valley sides reflect sea cliffs carved when the valley was a tidal estuary prior to being silted up over 1,000 years ago.*

## 3. Owner (Ken Dijkman) of Chyngton Way Fields (Land North of South Barn)

### Comment's are summarised below

- a) *SEA8 should be used for housing. We have made our case and have sufficient sites without having to consider greenfield sites*
- b) *SEA11 we should not lose employment floorspace otherwise we become a dormitory town. The SA gives the basis for applying existing policies to evaluate each site's potential and our proposals look to enhance business premises for the future rather than preserve inadequate facilities that will become decreasingly attractive during the Plan period.*
- c) *Affordable housing on allocation sites. This would be a new policy rather than working with existing policy frameworks, and therefore beyond the powers of the Seaford NP*
- d) *SEA 15 & SEA 16. Some already have planning permission and therefore do not contribute to the target. Dane Valley is not demonstrably deliverable. The identified sites have been accepted as contributing to the 185 homes target. The owners of the Dane Valley sites included in the Plan are confident their sites are deliverable, and have contributed to the survey that is exploring the ways they can be delivered. Discussions with delivery agents indicate a higher than 40% affordable housing expectation.*
- e) *There are some site assessment errors in the NP documentation. Where established these will be corrected. None are material to necessitate changes to the evaluation.*