

Seaford Neighbourhood Plan Housing & Development Focus Group Draft Evidence Report



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1. Executive Summary

- 1.1 Lewes District Council has allocated a minimum of 185 homes to be delivered in Seaford over the next 14 years (see detailed breakdown below) to meet a projected population increase of approximately 1,523 by 2027¹. The locations and nature of those 185 new dwellings can be influenced by a robust Neighbourhood Plan for the town.
- 1.2 This document sets out how the Housing & Development Focus Group plans:
- To identify a range of types and tenures of high quality open market and affordable housing:
 - in the most sustainable locations
 - accessible to local services and facilities
 - complementing and enhancing the built and natural environment
 - that meets the needs of the individuals and families seeking housing in Seaford
 - to catalogue all potential sites for development
 - to assess and categorise those sites according to the criteria set out in Annexes F, G and H
 - to thereby optimise the construction of additional housing in Seaford
- 1.3 The information and evidence included in this report will be presented on the 30th November at the major consultation evening to get even more input from Town Residents.

2. Introduction and background

- 2.1 Seaford is in a unique setting bordered on all sides by either the South Downs National Park or the sea. The town has seen extensive development and growth over the past few decades noticeably as a result of the closure of private schools with their land being used to build housing estates and other development opportunities. Seaford has seen a doubling of its population since the 1960's making it the largest town within Lewes District by some margin. There is now very limited space available for new building.
- 2.2 The Neighbourhood Plan survey has revealed that Seaford's housing is subject to a fair amount of comment. It is generally thought to be too expensive for younger households and too large for pensioner households. Local opinion is mixed over the design quality of new housing; most think it could be better. Existing older areas are valued, and green spaces are welcomed. There is some attractive historic housing which should be protected.
- 2.3 "Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their local area. They are able to choose where they want new homes, shops and offices to be built, have their say on what those new buildings should look like and what infrastructure should be provided."²
- 2.4 This report sets out the aim, objectives and recommendations of the Housing & Development Focus Group on how we propose to deliver Seaford's housing

¹ <http://www.eastsussexinfofigures.org.uk>

² <http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/what-is-neighbourhood-planning/>

allocation. The accompanying Design Guide sets out proposals regarding design standards.

- 2.5 "Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan."³ Residents of Seaford can expect Lewes District Council decision makes to determine applications for planning permission in accordance with Seaford's Neighbourhood plan, unless material considerations indicate otherwise.

- 2.6 The Lewes District Joint Core Strategy sets the minimum amount of dwellings expected to be completed in the District in the period 2010 – 2030. The planned level of housing growth for Seaford over this period is a minimum of 553 units. Of this 553, homes built between April 2010 and April 2015 will be taken into account (**216 homes**). Committed developments as at 1st April 2015 (**153 homes**) will also be taken into account. This therefore leaves a minimum of **184 net additional units** that will need to be delivered through future allocations such as the Neighbourhood Plan. Lewes District Council has rounded this number to 185 units in its documentation.

The planned growth in the Core Strategy (2016)	Seaford allocations: 553 (minimum)
Completions April 2010 – April 2015	216
Commitments as at April 2015	153
Total remaining (does not include reference to Newlands School)	184

- 2.7 If the Neighbourhood Plan decides not to allocate sites, then Lewes District Council will control this allocation through the Local Plan Part 2. The 106 units that have obtained planning permission since 1st April 2015 to date and units that obtain planning permission between now and when the Neighbourhood Plan is in place will be considered as windfall and cannot be counted against the 184 figures at this stage. The definition of a windfall site as described on page 138 of the Core Strategy is *"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."*
- 2.8 However, the situation regarding windfall sites within neighbourhood plans is complex. The general principle is that Strategic Housing and Economic Land Availability Assessment (SHELAA) sites will be considered as windfall if they obtain planning permission before the Neighbourhood Plan gains sufficient weight. In addition, sites outside of the Neighbourhood Plan that obtain planning permission will also be considered as windfall.

³ Para 185 of the National Planning Policy Framework
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

3. Aim and Objectives

3.1 The Focus Group's aim and objectives are based upon a strong foundation of evidence from the following 5 bullet points:

- Responses given in the Neighbourhood Plan, Housing Needs and Young People's surveys;
- Input from the Neighbourhood Plan Steering Group and Focus Groups
- Input from Neighbourhood Plan workshops;
- Input from local stakeholder groups;
- Evidence from the sources listed in Annex D.

3.2 The Focus Group's aim is: Within the constraints of the limited space available, to meet the demand from and needs of the local community for high quality, well designed new market and affordable homes within sustainable locations whilst conserving and enhancing the natural and historic environment. We will do this by setting out specific proposals in the Neighbourhood Plan that complement the existing national and district policies.

3.3 In delivering this aim, the Focus Group has the following objectives:

1. To meet the needs and expectations of local people by allocating high quality new open market and affordable homes on previously developed land within the planning boundary.
2. In accordance with local and national policy, to provide for a range of housing mix, types and tenures in the most sustainable locations that are accessible to local services and facilities.
3. To set out design specifications to ensure that new homes and developments complement and enhance the town's built and natural heritage.

4. Strengths, Weaknesses, Opportunities and Threats

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

SWOT Analysis for Group

Strengths:	Weaknesses:
<ul style="list-style-type: none">• Active housing market• Small amount of dereliction• High proportion of existing housing is accessible to public transport• National Park provides some protection of green field sites given the South Downs National Park Authority's objectives are set out in Parliamentary legislation• Attractive for commuters to Brighton, Eastbourne, Lewes• House prices lower than county and regional average⁴⁵	<ul style="list-style-type: none">• Inadequate number of 1 & 2 bedroom dwellings and bungalows• Need for more affordable open market and rented accommodation• Adequacy of current housing stock (some too large)• Lack of Infrastructure (e.g. doctors and schools), particularly local amenity in the South East corner of the parish and uncertainty over future train services.• Geographic constraints mean limited space available for building

⁴ <http://www.rightmove.co.uk/house-prices-in-East-Sussex.html> and

⁵ http://www.home.co.uk/guides/house_prices_menu.htm?location=seaford

<p>Opportunities:</p> <ul style="list-style-type: none"> • To maximise opportunities for identifying potential brownfield sites for redevelopment over the next 14 years • The opportunity to maximise residential accommodation in the town centre by re-using or converting vacant upper floors above shops and offices • To ensure opportunities to sub-divide larger dwellings into smaller units are identified • The opportunity to create design specifications that complement and enhance the town's built and natural environment 	<p>Threats:</p> <ul style="list-style-type: none"> • Decreasing amount of amenity open space, which any further development may impact • Demand from pensioners who retire to Seaford from outside the area • Ageing population structure • Loss of young people who cannot afford to stay in the town • Risk of flooding, both from sea and surface water • Some archaeologically sensitive areas • Potential impact of any development on the South Downs National Park Authority's statutory objectives
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5. Objectives and Evidence

- 5.1 The remainder of this report sets out evidence against our three objectives, which combined will deliver the aim we have set for this Focus Group, and also the wider Neighbourhood Plan vision. It also sets out the proposed next steps of the Focus Group.
- 5.2 The Focus Group has also been very aware of the fact that our role is to look at where we think the Neighbourhood Plan can make recommendations which **add** to the policy framework, which at this stage we refer to as our key proposals. As a result, we have undertaken a review of what we see as the key current policy framework – this is set out fully in Annex E, but overall covers:
- The National Planning Policy Framework⁶
 - Lewes District Local Plan Part 1 – Joint Core Strategy 2010 - 2030⁷
 - Lewes District Council saved policies⁸, listed below:
 - Policies and Proposals specific to the town of Seaford
- 5.3 The report also sets out where we think an issue is important, but where additional recommendations are not needed. An example of this is Core Policy 1 – Affordable Housing, where Lewes District Council already has a robust policy.

5.4 Objective 1

To meet the needs expectations of local people by allocating high quality new open market and affordable homes on previously developed land within the planning boundary.

National Planning Policy Framework (NPPF)

- 5.4.1 One of the Core Planning Principles set out in Paragraph 17 on page 6 of the NPPF is to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.”

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

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

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

Core Strategy

5.4.2 Seaford is very fortunate that Lewes District Council adopted its Joint Core Strategy Local Plan Part 1 in May 2016⁹, which sets out very clear strategies and policies promoting sustainable development and protecting and enhancing the distinctive character of the built and natural environment.

5.4.3 One of the key paragraphs of this strategy, which this focus group has reviewed and supports is paragraph 6.39 on page 54 which states:

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

Proposal 1	The Focus Group fully supports the Core Strategy and recognises the approach that it takes towards planning and development across the district.
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5.4.4 The Core Strategy also sets out the planning boundary, which "has been drawn largely to reflect the edge of the existing built-up area. To the north, west and east of the town the Sussex Downs Area of Outstanding Natural Beauty closely follows the line of the Planning Boundary."¹⁰ The Core Strategy also includes a series of maps and the Seaford map, setting out the planning boundary, is included in Annex A.

5.4.5 According to paragraph 7.22 on page 87 of the Lewes District Joint Core Strategy "The Local Housing Needs Assessment has identified that the main growth in demand to 2030 will be for dwellings for older people and small homes for single person households and couples with no dependents. However, there will also be a need for family homes, particularly due to the level of under-occupation of larger family homes in the district, creating pressures of demand (and therefore on affordability) for homes of this type." Paragraph 7.6 on page 82 confirms "there is still significant evidence of a considerable need for affordable housing in the district."

5.4.6 The Focus Group is aware of Policy E4¹¹, which relates to Town Centre development and, as stated in the SWOT analysis, we would like to explore the potential opportunity to maximise residential accommodation in the town centre by re-using or converting vacant upper floors above shops and offices. The Policy states in Paragraph 6.17 that "An increase in residential accommodation in town centres will be encouraged in the interests of their vitality out of business hours and increasing security. Vacant upper floors above shops and offices are an important source of housing and the Council will encourage their re-use or conversion into flats."

Proposal 2	To work with the Economy & Facilities Focus Group to explore the potential opportunity to maximise residential accommodation in the town centre by re-using or converting vacant upper floors above shops and offices.
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⁹ http://www.lewes.gov.uk/Files/plan_Adopted_JCS_with_front_cover.pdf

¹⁰ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/written/written_frame.htm?cpt14.htm&top

¹¹ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/written/written_frame.htm?cpt6.htm&e3

Land and Site Assessment Schedule

- 5.4.7 The Focus Group is very aware that we have a significant challenge to identify suitable sites within the planning boundary for at least 184 homes. In order to meet this objective, sufficient previously developed land and buildings need to be identified and put forward to the Neighbourhood Plan by land/property owners and/or their agents.
- 5.4.8 A Call for Sites (see Annex B) was launched on 1 June 2016 and advertised in the following places:
- Seaford Town Council website
 - Seaford Neighbourhood Plan website
 - Seaford Town Council Facebook page
 - Seaford Residents Voice Facebook page
 - Seaford Notice Board Facebook page
 - Seaford Notice Board 2 Facebook page
 - I love Seaford Facebook page
 - Seaford Information Station Facebook page
 - Seaford Open Noticeboard Facebook page

As at 9am on 30th November 2016, this has resulted in a total of ten sites being submitted.

- 5.4.9 The Focus Group is aware of the recent Henfield Judgement¹² and that *"It is essential that the authority responsible for the adoption of the planas well as the authorities and the public consulted, are presented with an accurate picture of what reasonable alternatives there are and why they are not considered to be the best option."*¹³
- 5.4.10 In order to achieve this objective, we recognise it is necessary to review all sites and have undertaken a Land and Site Assessment (see schedule in Annex C). The Focus Group used all available data from the sources cited below to create an initial list of 226 potential sites, both within and outside the planning boundary:
- The Lewes District Strategic Housing and Economic Land Availability Assessment (SHELAA)
 - Neighbourhood Plan Survey Response
 - List of Seaford Town Council owned sites – for sale or being considered for sale
 - List of other Seaford Town Council owned sites
 - List of Lewes District Council owned sites
 - List of East Sussex County Council owned surplus sites
 - Call for sites
 - Brownfield sites
 - Larger dwellings with the potential to be sub-divided into smaller units
 - Local knowledge
- 5.4.11 As already mentioned in paragraph 2.8 above, establishing what can and cannot be included in a neighbourhood plan is complex. Initially, we were hopeful that the Newlands site could be included within the Plan as this would have contributed significantly towards Seaford's housing allocation. However, we have been informed by Lewes District Council that due to the timing of the Newlands site becoming available after the submission and proposed modifications of the Core Strategy, it was not considered to form part of Seaford's allocation of 184 units. Consequently

¹² [http://cornerstonebarristers.com/cmsAdmin/uploads/r-\(stonegate\)-v-horsham-dc-final.pdf](http://cornerstonebarristers.com/cmsAdmin/uploads/r-(stonegate)-v-horsham-dc-final.pdf)

¹³ http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf

Newlands is a windfall site. Had the Newlands site been considered at the time of the Core Strategy, it would have met the criteria to be considered as a Strategic Site and 140 units would have been added to Seaford's allocation.

- 5.4.12 However, with Seaford's capacity being so limited, the Neighbourhood Plan Steering Group continues to be in discussion with Lewes District Council regarding windfall sites. As the Neighbourhood Plan moves forward, we would like to establish a point where sites that obtain planning permission will cease to count as windfall and will be deducted from the number of units that need to be allocated.
- 5.4.13 To ensure that the Neighbourhood Plan is as robust as possible, we carried out an initial assessment of all 226 potential sites. To be eligible for consideration within the Neighbourhood Plan, sites must be able to accommodate at least 6 dwellings, therefore, the 48 sites that were unable to meet this number were excluded.
- 5.4.14 We carried out a further assessment of the remaining 178 sites, of which 8 had already received planning permission and, therefore, cannot be counted towards Seaford's allocation so were excluded.
- 5.4.15 The Focus Group then carried out a more detailed assessment of the remaining 170 potential sites and identified the following policies within the Core Strategy that would not support development on the site: E8(b), D13, E15, H2, RE3, RE9, RE10, SF8, SF10. This resulted in a further 42 sites being removed from the list - these included heritage assets, churches, commercial and tourist assets.
- 5.4.16 Of the remaining 128 potential sites, it is a requirement that we assess all the brownfield and green field sites. Lewes District Council already has a policy framework in place and the Focus Group is aware of the "*shortfall of outdoor sports and recreation facilities within the town*"¹⁴. However, bearing in mind the Henfield Judgement referred to in paragraph 5.4.9 above, we have begun a dialogue with owners of these potential sites to establish whether or not their site will become available between now and 2030.
- 5.4.17 Following confirmation from Lewes District Council that they had no surplus commercial property or housing sites they wanted consideration given to for development, 5 sites have been removed from the list we should evaluate. In addition, the owners of 10 other sites have confirmed that there are no plans for their site to become available, therefore these have also been removed. This leaves 113 sites to take forward for further assessment, including the 10 sites that have come forward following the Call for Sites – please see the Call for Sites list and Land and Site Assessment Schedule and map in Annex C.
- 5.4.18 The Focus Group is aware that only a small number of these sites have been or ever will be submitted to the Plan, however, to demonstrate that all reasonable alternatives have been considered, following the consultation on 30th November 2016 the Focus Group proposes to continue our dialogue with the owners of these sites to establish whether or not their sites will become available between now and 2030 and, if so, whether they can be put forward to the Plan.
- 5.4.19 The Focus Group is keen to emphasise that by being listed as a potential site, it does not mean that the site has been designated for development. It means that, given the evidence we have collected so far, the site has not been excluded from further assessment and wider consultation. The evidence may demonstrate that some potential sites are more suitable as community assets, open spaces or for commercial

¹⁴ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/written/written_frame.htm?cpt14.htm&sf12

use. We will be working with the other Focus Groups to ensure the Neighbourhood Plan looks at a range of local needs and issues.

- 5.4.20 Where sites do not come forward to be considered for development now, the Neighbourhood Plan can still control their future use by proposing site specific policies for the benefit of the community that can be applied should the site become available within the plan period (ie up to 2030). Site specific policies could be for housing, infrastructure, tourism, leisure, business use etc. If the Neighbourhood Plan does not do this, sites that become available will be counted as windfall and Seaford will have no control over what gets built there.
- 5.4.21 The Focus Group would like to work with site owners, who have not put their land forward, in order to consider potential future development and possible site specific policies. That way the community would have control, through the Neighbourhood Plan, as to how the site could be used in the future.

Proposal 3 That, following the consultation on 30th November 2016, the Focus Group continues its dialogue with owners of potential sites to establish whether or not the site can be put forward to the Neighbourhood Plan for consideration.

Proposal 4 That, following the consultation on 30th November 2016, the Focus Group works with site owners, who have not put their land forward, in order to consider potential future development and possible site specific policies.

Proposal 5 The Focus Group commences the Site Assessment Criteria and takes forward to wider consultation the sites put forward to the Neighbourhood Plan.

East Sussex in Figures¹⁵

- 5.4.22 According to East Sussex in Figures, the following table shows the 2011 Census figures for Seaford, with the percentage of the population aged 65 and over. The Office for National Statistics (ONS) population estimates for 2015 show that while Seaford's population grew by 3.25% between 2011 and 2015, the percentage of the population aged 65 and over grew by 13%. It is important, therefore, that housing suitable for the needs of this demographic is addressed.

	2011	2015
Seaford Total Population	23,571	24,338
Seaford population 65 and over	7,154	8,086
% aged 65 and over - Seaford	30.4%	33.2%
% aged 65 and over - Lewes District	22.7%	24.8%
% aged 65 and over - East Sussex	22.7%	24.9%
% aged 65 and over - South East	17.2%	18.8%
% aged 65 and over - England	16.4%	17.7%

- 5.4.23 East Sussex County Council has population projections from 2014 to 2027 based on population estimates, births, deaths and migration released by ONS but constrained to reflect the number of extra dwellings being planned. The total population for Lewes District in 2027 is projected to increase from 100,229 in 2014 to 106,997 in 2027, an increase of 6.75%. The number of people aged 65 and over in the District is projected to increase from 24,452 in 2014 to 31,127, an increase of 27.3%. From these figures we can extrapolate a projected population for Seaford in 2027 of approximately 25,861 with a very significant proportion aged 65 and over.

¹⁵ <http://www.eastsussexinfigures.org.uk>

Housing Needs Survey

- 5.4.24 The Housing Needs Survey found that 58 households were identified and assessed as being 'in need' of affordable housing. Of these, *"The greatest number of households classified as being 'in need' of affordable housing (29) were single adults (aged 18+), which constituted 50.0% of all identified 'in need' households. The other significant household type identified by the study were families with children, of which 20 were identified (34.5% of 'in need' households)." This is not entirely consistent with the Local Housing Needs Assessment referred to in paragraph 6.1.5. This may be due to the fact that only 377 responses were received to this, part 2, of the survey – a response rate of 3.5%.*
- 5.4.25 20% of all respondents to the survey (127 households) had a family member that had moved away from the area to find more affordable housing.
- 5.4.26 The survey also identified a significant demand for additional market housing in Seaford, mainly by older people over 65 (60%) who wish to downsize to smaller (42%) or more manageable (30%) accommodation. Many of these households also require some form of specialist housing or at least housing on the ground floor (30 households).
- 5.4.27 The Group recognises that of the 10,794 survey forms distributed, a total of 1,100 were returned within the required period, representing an overall response rate of 10.2%. Therefore, further consultation is being undertaken to reach some of the remaining 90%, whose needs may not have been reflected in the survey results.

Further Consultation

- 5.4.28 A Young People's workshop was held on 19th October 2016 and publicised via Seaford Head School and the Youth Forum. A Young People's survey (see Annex K) was published on the Neighbourhood Plan website on 8 November 2016 and publicised on the Neighbourhood Plan and Seaford Notice Board Facebook pages. An assembly was held for year 8 at Seaford Head School on 11th November and the results and feedback from the workshop, survey and assembly are being collated.

Proposal 6	That the existing policy framework relating to providing a range of dwelling types and sizes to meet the identified local need continues to be given full weight and consideration as part of the planning process. Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to this.
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5.5 Objective 2

In accordance with local and national policy, to provide for a range of housing mix, types and tenures in the most sustainable locations that are accessible to local services and facilities.

National Planning Policy Framework

- 5.5.1 Two Core Planning Principles set out in Paragraph 17 on page 6 of the NPPF are to: *"actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs."*

Core Strategy

- 5.5.2 Paragraph 3.2 on page 29 of the Core Strategy states that *"Although growth options are limited, due to significant environmental constraints, there is still a need to ensure that new development is provided in the most sustainable locations."*
- 5.5.3 In addition, Lewes Strategic Plan Core Policy 7 on page 108 has one key objective – *"To work with other agencies to improve the accessibility to key community services and facilities and to provide the new and upgraded infrastructure that is required to create and support sustainable communities."*
- 5.5.4 Core Policy 7 continues on page 110 to say *"The creation of sustainable communities in the district where residents enjoy a high quality of life will be achieved by: 4. Ensuring that land is only released for development where there is sufficient capacity in the existing local infrastructure to meet the additional requirements arising from the proposed development. Where development would create the need to provide additional or improved community facilities, services or infrastructure, a programme of delivery will be agreed with the relevant infrastructure providers to ensure that these improvements are provided at the time they are needed."*

Proposal 7	That the existing policy framework relating to development in sustainable locations and creating and supporting sustainable communities continues to be given full weight and consideration as part of the planning process. Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to this.
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Neighbourhood Plan Survey

- 5.5.5 In the Focus Group SWOT analysis one of the weaknesses identified was a lack of infrastructure¹⁶, particularly local amenity in the South East corner of the parish and uncertainty over future train services. Inadequate infrastructure was also highlighted in the Neighbourhood Plan Survey, which reported numerous comments from residents about existing infrastructure in Seaford being unable to sustain further development. In particular comments were made about medical services, schooling, roads, parking, policing, shops and utilities.
- 5.5.6 When asked 'What type of accommodation would any members of your household seek to obtain within the foreseeable future?' the preferences were as follows:

Bungalows	237
1-2 bedrooms	208
Detached	166
Retirement housing units	156
Flats	150
Semi-detached	136
3-4 bedrooms	120
Terraced	99
5+ bedrooms	19

- 5.5.7 As mentioned in Paragraph 5.4.20, further consultation is being undertaken to ascertain the preferences of younger people.

¹⁶ By infrastructure this Focus Group means the economic and physical infrastructure and facilities to promote sustainable development. We aim to align ourselves to the work of the Local Economy & Facilities Focus Group.

5.6 Objective 3

To set out design specifications to ensure that new homes and developments complement and enhance the town's built and natural heritage.

National Planning Policy Framework

- 5.6.1 A Core Planning Principle set out in paragraph 17 on page 5 of the NPPF states *"always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings."* The NPPF continues in paragraph 6 on Page 14 *"Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people."*
- 5.6.2 One of the Core Planning Principles set out in Paragraph 17 on page 6 of the NPPF is to *"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations."* In addition to heritage assets, the NPPF continues in Paragraph 109 on page 25 to state that *"The planning system should contribute to and enhance the natural and local environment"*.
- 5.6.3 The Focus Group is developing comprehensive policies that set out the quality of development that will be expected for the area based on stated objectives for Seaford's future and an understanding and evaluation of the town's defining character. The NPPF sets out the following checklist for design, which will inform our policies:
Planning policies and decisions should aim to ensure that developments:
- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
 - *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
 - *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
 - *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
 - *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
 - *are visually attractive as a result of good architecture and appropriate landscaping.*

Core Strategy

- 5.6.4 The Lewes District Core Strategy Proposal Map for Seaford identifies Conservation Areas in the town centre, Chyngton Lane, Bishopstone and East Blatchington, which are subject to Policies CP11, H4, H5, H7, ST25 and ST29.
- 5.6.5 There are 68¹⁷ entries on the National Heritage List for England for Seaford, covering 89 listed buildings, structures and scheduled monuments. In addition, there are Areas of Established Character covering Firle Road, Firle Grange, Firle Close, St Peter's Road, part of Blatchington Road, Glebe Drive, Belgrave Road, Beacon Road and Westdown

¹⁷ <http://www.britishlistedbuildings.co.uk/england/east+sussex/seaford>

Road, Chyngton Road, Chyngton Way, Cuckmere Road (between Arundel Road and Rodmell Road), and Corsica Hall, which are subject to Policy H12.

- 5.6.6 Core Policy 11 highlights the objective of respecting the historic environment, and enhancing local character and distinctiveness whenever the opportunity arises. Paragraph 7.105 on page 120 of the Core Strategy goes on to state:

“Buildings and areas of architectural or historic interest are particularly important to protect since, by definition, they are impossible to replace. Lewes District has a rich and valued legacy of listed buildings and conservation areas, as well as historic parks and gardens, scheduled ancient monuments, and sites of archaeological importance. Such assets contribute to the district's cultural identity and unique sense of place and they need to be protected and treated with due sensitivity and care.”

- 5.6.7 Core policy 10 states on page 118 of the Core Strategy that *“The natural environment of the district, including landscape assets will be conserved and enhanced by: ii. Ensuring that new development will not harm nature conservation interests, unless the benefits of development at that location clearly outweigh the harm caused. In such cases appropriate mitigation and compensation will be required;”*

- 5.6.8 The policies referred to in this report are not exhaustive - the full list of retained policies, in addition to the core strategy part 1, that relate to this Focus Group are on the Lewes District Council website.¹⁸

Neighbourhood Plan Survey

- 5.6.9 Many in the Neighbourhood Plan Survey complained about the loss of historic buildings and the impact of this on the character of the town. The need to preserve what is left is highlighted in the Seaford Town Centre Conservation Area Appraisal¹⁹ of 2005 from Lewes District Council.
- 5.6.10 66.30% (716) respondents felt it was very important for the Neighbourhood Plan to protect and preserve the heritage and character of Seaford with 20% (216) indicating it was important. 55.72% (599) felt it was very important to preserve and create more publicly accessible open spaces for recreation with 20.47% (220) indicating it was important, and 51.56% (546) felt it was very important to influence design and architecture quality with 24.83% (263) indicating it was important.

Proposal 8	That the existing policy framework relating to the preservation of the Historic and Natural Environment and amenity open spaces ²⁰ continues to be given full weight and consideration as part of the planning process. Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to this.
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Proposal 9	The Focus Group acknowledges the additional retained policies which Lewes District Council uses to support planning and development proposals within the town. We also recognise that the South Downs National Park Authority is developing its own core strategy and our work will need to recognise this.
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¹⁸ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/contents_written.htm

¹⁹ http://www.lewes.gov.uk/Files/plan_CAA_SeafordTownCentre.pdf

²⁰ By amenity open space this Focus Group means open green space, play, recreation and sport that is important to the community as a result of its recreational, historic, beauty, wildlife or tranquillity qualities. We aim to align ourselves to the work of the Environment & Countryside Focus Group.

Design Guide

5.6.11 The Focus Group has drafted a Design Guide (see Annex L), the overall purpose of which is to encourage a higher standard of design for development within the town. It consists of:

- An assessment of the design of existing buildings in the town
- A toolkit to ensure that future development will contribute positively to the future of Seaford and to preserve and enhance the town and its qualities.

5.6.12 The document is written to help people who are in the process of carrying out development such as landowners, architects, their clients and householders. It seeks to provide advice and guidance for local planning purposes and, in order to reflect the desires of the residents of Seaford, it is available for consultation on 30th November 2016. We wish, for example, to influence the:

- location, mass and placement of buildings, so they do not compromise existing character and sightlines
- design of buildings and materials used so that they are in keeping with the buildings, historic and otherwise typical of Seaford parish and its wider area.

5.6.13 These guidelines can also apply to changes brought about by smaller day-to-day adjustments to homes and gardens, open spaces, walls, hedges and fences which can alter the look and feel of the whole town.

Proposal 10	That, following consultation on 30 th November 2016, the Focus Group takes forward the draft Design Guide to wider consultation in order to create a supplementary planning document setting out clear basic principles of good and bad design for Seaford.
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6. Proposals

Set out below are the Focus Group's general recommendations to meet our objectives:

- Proposal 1** The Focus Group fully supports the Core Strategy and recognises the approach that it takes towards planning and development across the district.
- Proposal 2** To work with the Economy & Facilities Focus Group to explore the potential opportunity to maximise residential accommodation in the town centre by re-using or converting vacant upper floors above shops and offices.
- Proposal 3** That, following the consultation on 30th November 2016, the Focus Group continues its dialogue with owners of potential sites to establish whether or not the site can be put forward to the Neighbourhood Plan for consideration.
- Proposal 4** That, following the consultation on 30th November 2016, the Focus Group works with site owners, who have not put their land forward, in order to consider potential future development and possible site specific policies.
- Proposal 5** The Focus Group commences the Site Assessment Criteria and takes forward to wider consultation the sites put forward to the Neighbourhood Plan.
- Proposal 6** That the existing policy framework relating to providing a range of dwelling types and sizes to meet the identified local need continues to be given full weight and consideration as part of the planning process. Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to this.
- Proposal 7** That the existing policy framework relating to development in sustainable locations and creating and supporting sustainable communities continues to be given full weight and consideration as part of the planning process. Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to this.
- Proposal 8** That the existing policy framework relating to the preservation of the Historic and Natural Environment and amenity open spaces²¹ continues to be given full weight and consideration as part of the planning process. Following stakeholder and public consultation the Focus Group will consider if further policy is needed in relation to this.
- Proposal 9** The Focus Group acknowledges the additional retained policies which Lewes District Council uses to support planning and development proposals within the town. We also recognise that the South Downs National Park Authority is developing its own core strategy and our work will need to recognise this.
- Proposal 10** That, following consultation on 30th November 2016, the Focus Group takes forward the draft Design Guide to wider consultation in order to create a supplementary planning document setting out clear basic principles of good and bad design for Seaford

²¹ By amenity open space this Focus Group means open green space that is important to the community as a result of its recreational, historic, beauty, wildlife or tranquillity qualities. We aim to align ourselves to the work of the Environment & Countryside Focus Group.

7. Next Steps

On 30th November 2016 this report, alongside the reports from the other Neighbourhood Plan Focus Groups, will be consulted upon at a public meeting.

The Call for Sites list and Land and Site Assessment Schedule (see Annex C) allows Seaford residents to provide their input and feedback on potential sites for consideration and to encourage any owners of the land and sites to put these forward to the Plan.

In order for the community to have control, through the Neighbourhood Plan, as to how sites could be used in the future, we would like residents to tell us what would benefit the community. This will help us determine future potential development and possible site specific policies.

Following the consultation the sites that have been put forward will be reviewed according to the Site Assessment criteria covering suitability, achievability, availability and acceptability (see Annexes F, G and H). A Strategic Environmental Assessment and Sustainability Appraisal will also be carried out (see Annex I).

The Focus Group must endeavour to ensure that all our assessments are based on evidence, with no predetermined views and that an accurate picture of the alternatives must be presented so that they could be considered on a comparable basis. The Office of the Deputy Prime Minister's Practical Guide to Strategic Environmental Assessment Directive²² states that:

5.B.10 "Hard data may enable Responsible Authorities or expert advisers to make detailed quantitative predictions, and this can be particularly useful where a plan's or programme's effects are uncertain, close to a threshold, or cumulative. However quantification is not always practicable, and qualitative predictions can be equally valid and appropriate."

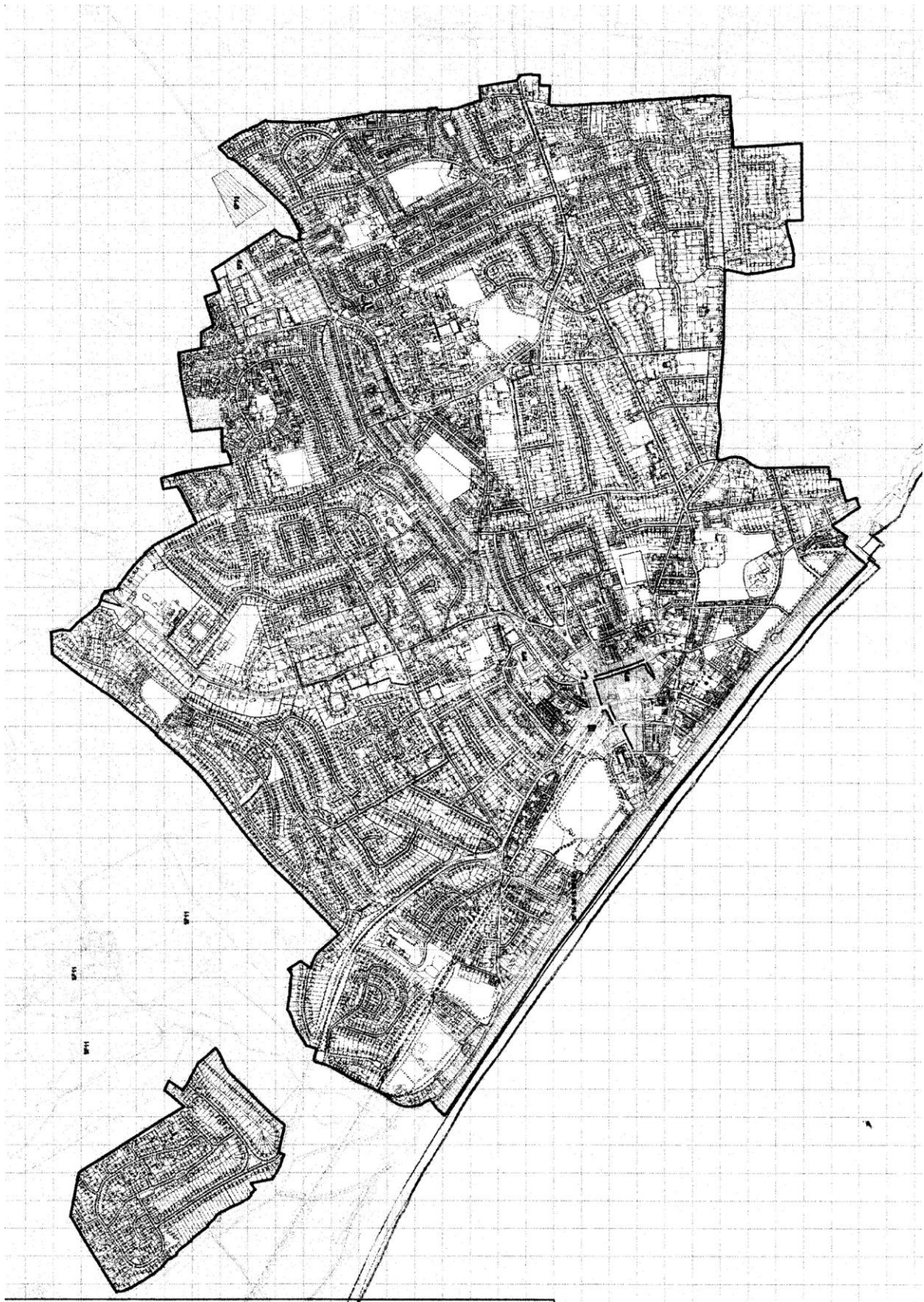
5.B.11 "However, qualitative does not mean 'guessed'. Predictions need to be supported by evidence, such as references to any research, discussions or consultation which helped those carrying out the SEA to reach their conclusions."

The draft Design Guide report (Annex L) provides advice and guidance for local planning purposes about the style, appearance and materials for new development within the Seaford area. This will ensure that future development will contribute positively to the future of Seaford and to protect and enhance the town and its qualities. This document is also available for consultation at the public meeting on 30th November.

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https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

ANNEX A - Seaford Planning Boundary Map



Annex B – Call for Sites

Seaford Town Neighbourhood Plan

CALL FOR DEVELOPMENT SITES

Seaford Town Council is preparing a Neighbourhood Plan for the Seaford area under the provisions of the Localism Act 2011.

The Steering Group aim to assess future housing and other development needs and is calling for Landowners agents/managers, developers, businesses and local interest groups within the Seaford area to submit expressions of interest for potential development sites to be considered for possible inclusion in the Neighbourhood Plan for future development.

At this stage the Steering Group is not committed to allocate a proposed site to the Neighbourhood Plan. This exercise will not in itself decide whether a site would be allocated for development by the neighbourhood plan nor will it commit the proposer(s) to applying for planning consent, but it will enable the steering group to better understand the needs and wishes of the electors within its Parish area.

The site suggestions received by us will be used to guide and inform the preparation of the Allocations of Land and Site Development section of the Neighbourhood Plan.

If you want a site/s to be considered for development by the Neighbourhood Plan, we should like to hear from you. The sites need not be in your ownership if you have a responsibility for managing them and they can be proposals for a wide range of development uses.

Please supply the following information

- Location shown (supply map where possible showing site boundary)
- Current use of site
- Any known and anticipated constraints to developing site
- Proposed type and tenure of development (market, affordable, starter homes, downsizers, family homes, retail, office, etc.)
- The scale of proposed development (numbers)

If you would like a site to be considered, please send all relevant information including your name and full contact details no later than 29th July 2016 to admin@seafordtowncouncil.gov.uk

Please head your submission
"Seaford Neighbourhood Plan Call for Sites"

Alternatively you can submit by post to
Seaford Town Council, Seaford, East Sussex.
BN25 1HG

Thank you

Annex C – Land and Site Assessment Schedule and Map

Sourced from:

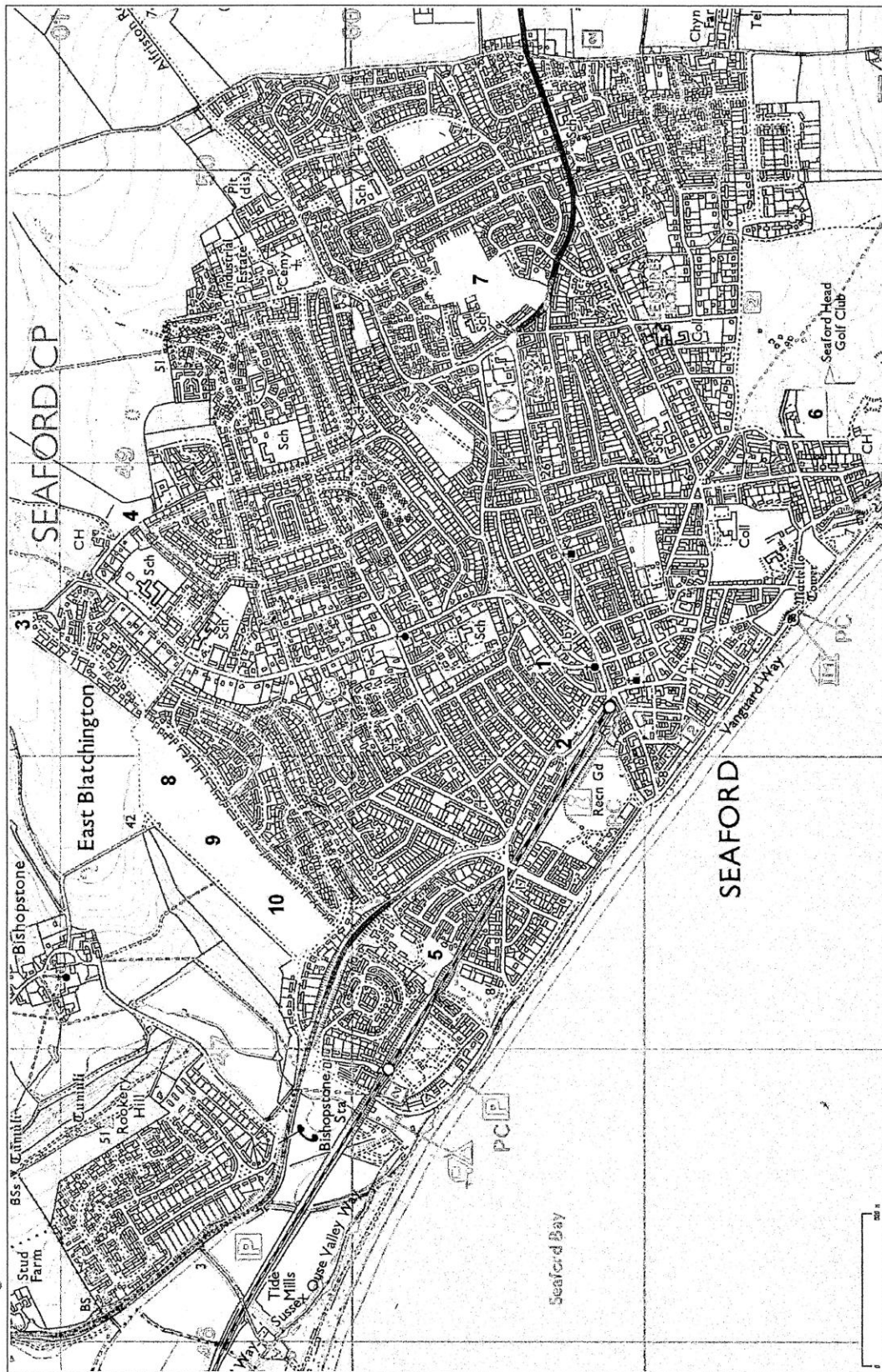
- The Lewes District Strategic Housing and Economic Land Availability Assessment (SHELAA)
- Neighbourhood Plan Survey Response
- List of Seaford Town Council owned sites – for sale or being considered for sale
- List of other Seaford Town Council owned sites
- List of Lewes District Council owned sites
- List of East Sussex County Council owned surplus sites
- Call for sites
- Brownfield sites
- Larger dwellings with the potential to be sub-divided into smaller units
- Local knowledge

Sites put forward by owners for consideration by the Neighbourhood Plan following the Call for Sites – received by the Focus Group by 6pm, 29th November 2016

No	Site	Size - Hectares
1	Old Dairy site, 51-53 Blatchington Road, Seaford	0.11
2	Brooklyn Hyundai, Claremont Road, Seaford	0.14
3	Land at the top of Crown Hill, Seaford	0.3
4	Land to the north east of Firle Road, Seaford (between the club house and Abundant Grace)	0.6
5	Land north of the railway track at Surrey Road, Seaford	1.2
6	Land at Florence House, Southdown Road, Seaford	2.4
7	Newlands School, Eastbourne Road, Seaford*	6.35
8, 9 & 10	3 parcels of land off Grand Avenue, Seaford	Parcel 1 – 5.04 Parcel 2 – 4.21 Parcel 3 – 5.25

**According to Lewes District Council, Newlands cannot be counted towards Seaford's allocation of 185 dwellings*

See map below.



Sites being carried forward for further assessment against policies and site availability

	Site Name
1	Alfriston Road – The Seven Sisters Pub car park
2	Alfriston Road / Landsdown Road – land in between
3	Alfriston Road woodland and field on north side
4	Alfriston Road - High and Over car park
5	Beacon Road – Threeways Nursing Home
6	Belgrave Road – Nova House Residential Care Home
7	Belgrave Road – Tennis club
8	Bishopstone Downs - land
9	Bishopstone Road – Rookery Shaw - land
10	Bishopstone Road / Newhaven Road - land
11	Blatchington Road – Mend All Autos and other industrial units
12	Blatchington Road - Old Gasworks
13	Blatchington Road – St James' Trust
14	Blatchington Road – Trek club
15	Bowden Rise - land
16	Bramber Lane – Martello Cottage
17	Brooklyn Road – Hamptons Yard
18	Brooklyn Road – Able Autos
19	Brooklyn Road - Swindells
20	Brooklyn Road – Johnson's Glass
21	Brooklyn Road - WI
22	Brooklyn Road - vets
23	Brooklyn Road – Fixall Autos
24	Chichester Road – land & scout hut
25	Church Street – Doctors and nursery
26	Church Street – No 37 Police Station / Town Council / Tourist Info / CAB
27	Church Street – Post Office
28	Chyngton Road – land being considered by STC
29	Chyngton Road / Southdown Road – land being considered by STC
30	Chyngton Way - land
31	Claremont Road – Claremont House Rest Home
32	Claremont Road – Clifden House Dementia Care Centre
33	Claremont Road – Holmes Lodge Guest House
34	Claremont Road - Jermyn & Sons
35	Claremont Road – Mardon
36	Clementine Avenue / Katherine Way open space
37	College Road – land
38	College Road – Hillersdon Court Residential Care Home
39	College Road / Ringmer Road - land
40	Cornfield Road – Cornfield House Residential Care
41	Corsica Road – Westerleigh Nursing Home
42	Coxwell Close - land
43	Cradle Hill Road - Fire station
44	Cradle Hill School fields
45	Cradle Valley
46	Cricketfield Road – Beachside Residential Care Home
47	Crouch Gardens and football ground

48	Crouch Lane – garage
49	Cuckmere Estuary (West Side of river from Exceat Bridge to coast)
50	Cuckmere Valley (from Alfriston to Exceat Bridge)
51	Dane Road – Freshford Cottage Nursing Home
52	Dane Road – Morrisons & roof space
53	East Street - Telephone exchange
54	East Street / Sutton Road – above shops
55	Eastbourne Road - Cuckmere House School fields
56	Eastbourne Road – Texaco garage
57	Esplanade / land next to Hardwicke House being considered by STC
58	Firle Close
59	Firle Road – Abundant Grace Nursing Home
60	Firle Road – land near golf club
61	Firle Road – St John's School playing fields
62	High Street – land behind Lucky House / Grumpy Chef
63	Homefield Road, Homefield Place
64	Katherine Way / Princess Drive - land
65	Surrey Road, Litlington Court land
66	Marine Parade – Buckle car park
67	Marine Parade – By Buckle Court Nursing Home
68	Marine Parade – Old Brickfields land
69	Marine Parade - Windy Gap house and garden
70	Martello Fields
71	Micklefield Way - land
72	Millberg Road, Chyngton School playing fields
73	Normansal Park Avenue – STC land
74	Normansal Park Avenue – South Downs National Park Land
75	Princess Drive / Grand Avenue - land
76	Rookery Way - land
77	Salts
78	Salts – behind rugby club building
79	Saxon Lane – behind Talland Parade
80	Saxon Lane / Crouch Lane – car park
81	Seaford Golf Course
82	Seaford Head Golf Course
83	Seaford Head Nature Reserve
84	South Hill Barn
85	South Hill Barn car park
86	Southdown Road – Burdyke Lodge Residential Care Home
87	St Peter's Road – Blatchington Court Retirement Home
88	Station Approach - Morrisons petrol station
89	Station Approach - Rowland Goringe building and roof
90	Steyne Road - Mardon Motors
91	Steyne Road – Seaford Head Retirement Home
92	Steyne Road - Timber Requirements
93	Sutton Avenue - Annecy School fields
94	Sutton Croft Lane – car park
95	Sutton Drove / East Albany Road - land
96	Sutton Road – Horder Centre
97	Sutton Road / East Street – car park

98	The Peverels/Raymond Close Play Area
99	The Ridings / Lexden Road – land being considered by STC
100	Tide Mills
101	Walmer Road green and playpark
102	West Street car park
103	Westdown Road – house and garden

Annex D - Sources of Evidence

In addition to guidance from Action in rural Sussex, input from the Neighbourhood Plan Steering Group and Focus Groups, workshops and meetings with stakeholders, evidence was obtained from the following sources:

1	2011 Census
2	www.ancientmonuments.info/monuments/seaford-east-sussex
3	Bishopstone Conservation Area Appraisal 2003
4	www.britishlistedbuildings.co.uk
5	Call for Sites by Seaford Town Council
6	Chyngton Lane Conservation Area Appraisal 2003
7	Design Council Building for Life 12.0 – The Sign of a Good Place to Live http://www.designcouncil.org.uk/sites/default/files/asset/document/Building%20for%20Life%2012_0.pdf
8	East Blatchington Conservation Area Appraisal reviewed 2005
9	www.eastsussexinfigures.org.uk managed by East Sussex County Council
10	English Heritage Research Department Report Series 27/2011 Kitchener's Camps at Seaford: A First World War Landscape on aerial photographs. Archaeological Report by Robert Skinner
11	English National Parks and the Broads. UK Government Vision and Circular 2010 by DEFRA
12	https://flood-warning-information.service.gov.uk
13	Guidance on the Implementation Of Directive 2001/42 On The Assessment Of The Effects Of Certain Plans And Programmes On The Environment http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf
14	www.home.co.uk/
15	Housing Needs Survey Report 2016 in Seaford, Lewes District by Action in rural Sussex
16	www.legislation.gov.uk Natural Environment and Rural Communities Act 2006
17	Lewes District Local Plan Part 1 Joint Core Strategy 2010 – 2030, May 2016
18	Lewes District Council District Wide Saved Policies
19	Lewes District Informal Recreational Space Study October 2005 and Appendices
20	Lewes District Outdoor Playing Space Review 2004

21	www.Lewes.gov.uk Planning Application Documents
22	Lewes District Council and South Downs National Park Authority Strategic Housing and Economic Land Availability Assessment (SHELAA) and appendices
23	www.magic.gov.uk managed by Natural England
24	https://data.nbn.org.uk/ National Biodiversity Network's Gateway - Natural Environment and Rural Communities Act 2006 - Species of Principal Importance in England (sec : birds)
25	Natural England Designated Sites of Scientific Interest https://designatedsites.naturalengland.org.uk/
26	Neighbourhood Plan Survey Report 2016 carried out for Seaford Town Council by Action in rural Sussex
27	Office of the Deputy Prime Minister's Practical Guide to Strategic Environmental Assessment Directive https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf
28	http://planningguidance.communities.gov.uk/ Planning Practice Guidance
29	Questionnaire to Young People
30	www.rightmove.co.uk
31	Seaford Historic Character Assessment Report from the Sussex Extensive Urban Survey by Roland B Harris
32	Seaford Local Plan – February 1988
33	Seaford Museum
34	Seaford Town Centre Conservation Area Appraisal reviewed 2005
35	Seaford Town Council
36	www.southdowns.gov.uk South Downs Local Plan: Evidence and Supporting Documents, Viewshed Analysis
37	South Downs Local Plan: Preferred Options Consultation September - October 2015
38	Stonegate Homes Limited, Littleworth Properties Limited (Claimants) versus Horsham District Council and Henfield Parish Council http://cornerstonebarristers.com/cmsAdmin/uploads/r-(stonegate)-v-horsham-dc-final.pdf
39	Sussex Heritage Coast – A Strategy and Action Plan 2016 – 20
40	www.Sustrans.org.uk

Annex E – Existing Policy

The policies applicable to Housing & Development are:

1. The National Planning Policy Framework²³
2. Lewes District Local Plan Part 1 – Joint Core Strategy 2010 - 2030²⁴
3. Lewes District Council saved policies ²⁵, listed below:

CT1 – Planning Boundary and Key Countryside Policy
CT2 & CT3 – Landscape Conservation and Enhancement
CT4 – Protection of Agricultural Land
CT5 – Institutional Sites
CT6 & CT7 – Coastal Policies
CT8 – Heritage Coast
E2 – Working from Home
E3-E5 – Town and Local Centres and Retail Development
E8 – Neighbourhood Shops/Public Houses
E9 – Re-use of Rural Buildings
E11, E12 & E13 – Hotels, Guest Houses and other Serviced Accommodation
E15 - Existing Camping/Touring Caravan Sites
H1 – Stewardship of the Historic Environment
H2 – Listed Buildings
H3 – Buildings of Local, Visual or Historic Interest
H5 – Development within of affecting Conservation Areas
H6 – Commercial Activities and Conservation
H7 – Traffic in Conservation Areas
H9, H10 & H11- Archaeological Sites
H12 – Areas of Established Character
RE1 – Provision of Sport, Recreation and Play
RE2 – Existing Recreational Open Space
RE3 – Indoor Recreational Facilities
RE4 – New Recreational and Leisure Development in the Countryside
RE5 – Public Rights of Way
RE8 – Equestrian and Related Activities
RE9 – Allotments
RE10 – Community Infrastructure
RES4 – Density of Residential Development
RES5 – Unidentified Residential Sites
RES6 – Residential Development in the Countryside
RES7 – Residential Conversions in the Countryside
RES8 – Replacement Dwellings in the Countryside
RES9 – Affordable Housing
RES10 – Affordable Homes Exception Sites
RES11 & RES12 – Housing for People with Limited Mobility
RES16 – Residential Conversions within the Planning Boundary
RES19 – Provision of Outdoor Playing Space
RES20 – Provision of Educational Facilities
ST3 & ST4 – Design, Form and Setting of Development
ST6 – Access for People with Limited Mobility
ST11 – Landscaping of Development

²³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

²⁴ http://www.lewes.gov.uk/Files/plan_Adopted_JCS_with_front_cover.pdf

²⁵ http://www.lewes.gov.uk/coun/planning/lewes_local_plan/contents_written.htm

ST13 – Noise and Development
ST14 – Water Supply
ST21 – Recycling and Re-use of Materials
ST31 – Renewable Energy
T1 – Travel Demand Management
T2 – Buses
T7 – Provision for Cyclists
T8, T9 & T10 – Pedestrian Routes and Traffic Calming
T11 & T12 – Roads in New Development
T13 & T14 – Vehicle Parking

4. Policies and Proposals Specific to the Town of Seaford:

SF5 – Gas Works Blatchington Road
SF8 – Cradle Hill Industrial Estate
SF9 – Footpath to Church Lane
SF10 – Car Parking
SF11 – Bishopstone Conservation Area
SF12 – Land North of Alfriston Road
SF13 – Land at the Brickfield
SF14, SF15 & SF16 – The Seafront

5. South Downs National Park Preferred Options – September 2015²⁶ Policies as amended:

SD1 - Sustainable Development in the South Downs National Park
SD2 - Ecosystems Services
SD3: Major Development in the South Downs National Park
SD4/ DS - The Dip Slope
SD5 - Landscape Character
SD6 - Design
SD7 - Safeguarding Views
SD8 - Relative Tranquillity
SD9 - Dark Night Skies
SD10 - The Open Coast
SD11 - Historic Environment
SD12 - Biodiversity and Geodiversity
SD14 - Green Infrastructure
SD16 - Rivers and Watercourses
SD17 - Flood Risk Management
SD18 - Transport and accessibility
SD19 - Walking, Cycling and Equestrian Routes
SD20 - Sustainable Tourism
SD21 -Development Strategy
SD22 -Housing
SD23 - Affordable Housing Provision
SD30: Climate Change and Sustainable Construction
SD34: Provision and Protection of Open Space
SD36: Trees, Woodland and Hedgerows
SD38: Conservation Areas
SD41: Archaeology
SD42: Sustainable Drainage
SD43: Public Realm and Highway Design
SD44: Car and Cycle Parking Provision

²⁶ https://www.southdowns.gov.uk/wp-content/uploads/2015/08/Local_Plan_Master_240815_Whole_Document.pdf

SD53: New and Existing Community Infrastructure
SD54: Supporting Infrastructure for New Development
SD56: Renewable Energy

6. Policies and Proposals Specific to the Town of Seaford:

SD-DS02: Land at Normansal Park Avenue, Seaford

Annex F – Site Assessment Criteria

A thorough and fair assessment of all sites will be undertaken to ensure the most sustainable options are identified. The site assessment will focus on the four elements below:

- 1) **Suitability** - an objective assessment against clearly identified criteria (see Suitability Assessment below and Annex F)
- 2) **Achievability** - an assessment of the viability of development
- 3) **Availability** – confirmation of the availability of the site for development
- 4) **Acceptability** - a more subjective element factoring in community feedback

We aim to follow the Site Assessment Template in Annex E.

Suitability Assessment

Clearly Identified Criteria

An assessment of the suitability of individual sites will be undertaken. The National Planning Practice Guidance²⁷ states that this assessment should be done against clearly identified criteria. An example of these criteria is set out in Annex F.

Weighting

In some instances it may be appropriate for certain criteria to be weighted such as Acceptability criteria based on community feedback.

Consultation

Consultation with the community and key statutory consultees will be carried out on individual sites prior to the final selection being decided. This evidence will feed into the site assessments.

²⁷ <http://planningguidance.communities.gov.uk/blog/guidance/neighbourhood-planning/preparing-a-neighbourhood-plan-or-order/>

Annex G – Site Assessment Template

Site Name	
Background Information	<p>This section can include background information to add context to the site assessment. For example:</p> <ul style="list-style-type: none"> • Site location • Site Area (Ha) • Existing use • Proposal
Suitability	<p>This section forms an objective assessment of social, environmental and economic criteria. This should form a summary of the Suitability Assessment Table (Annex F)</p> <p>If any issues are identified, an explanation must be given of how could they be overcome</p>
Achievability	<p>A summary on whether development of the site is likely to be viable. Information provided by landowners/site proponents and consultees should feed into this section.</p> <p>If any issues are identified, an explanation must be given of how could they be overcome</p>
Availability	<p>Confirmation of the availability of the land and may include the following information:</p> <ul style="list-style-type: none"> • the intention of the landowner/site proponent to develop • when the site is available • any legal or ownership problems <p>If any issues are identified, an explanation must be given of how could they be overcome</p>
Acceptability	<p>This section will feed community aspirations into the site assessment provided there is clear evidence in support</p>
Strategic Environmental Assessment	<p>A Strategic Environmental Assessment (SEA) is required for all neighbourhood plans allocating development sites</p>
Conclusion	<p>This section will form a balanced conclusion of whether the site should be developed based on the criteria above.</p>

Annex H – Suitability Assessment Table

Suitability Assessment			
Criteria		Questions to Consider	Outcome
Social	Housing	<ul style="list-style-type: none"> Would development provide affordable housing provision? 	
	Transport/accessibility	<ul style="list-style-type: none"> How would developing the site impact on the highway network? Is a suitable access point achievable? Would it exacerbate congestion? Is the site in walking distance (800m) of community services and facilities? Can safe pedestrian access be provided to and from the site? 	
	Communities	<ul style="list-style-type: none"> Could development bring about additional/improved community facilities? 	
Environmental	Brownfield / Greenfield	<ul style="list-style-type: none"> Is the site located on Brownfield or Greenfield land? 	
	Vacant Land	<ul style="list-style-type: none"> Would the site bring vacant units back into use? 	
	Biodiversity	<ul style="list-style-type: none"> Is development likely to impact on biodiversity designations? Is development likely to impact on Ancient Woodland? 	
	Landscape	<ul style="list-style-type: none"> Would development of the site have a detrimental impact on a valued landscape? 	
	Historic Environment	<ul style="list-style-type: none"> Could development of the site have a detrimental impact on listed buildings or conservation areas, including their setting? 	
	Flood Risk	<ul style="list-style-type: none"> Is the site located in Flood Zone 2 or 3? Is the site prone to surface water flood risk? 	
	Infrastructure	<ul style="list-style-type: none"> Is there sufficient local infrastructure capacity to accommodate development on the site (utilities, highway etc)? If not, is there evidence to say that additional/new provision can come forward? 	
Economic	Local business	<ul style="list-style-type: none"> Would development of the site support local businesses? Is the site within walking distance of local businesses? Would development involve the loss of business premises? Would development facilitate the provision of additional/new/upgraded business premises? 	

Annex I – Strategic Environmental Assessment (SEA) Criteria

In line with recent planning guidance, Lewes District Council now require a Strategic Environmental Assessment to be prepared for all neighbourhood plans allocating development sites.

A SEA ensures that a neighbourhood plan identifies likely environmental implications of options considered for the plan, as well as the plan itself. In turn it will help to identify potential mitigation measures if any negative environment impacts are identified. It will assess the various options (for policies and development sites) against a set of environmental objectives to ensure that there are no consequential significant environmental effects. The outcomes of the appraisals will feed into the neighbourhood plan.

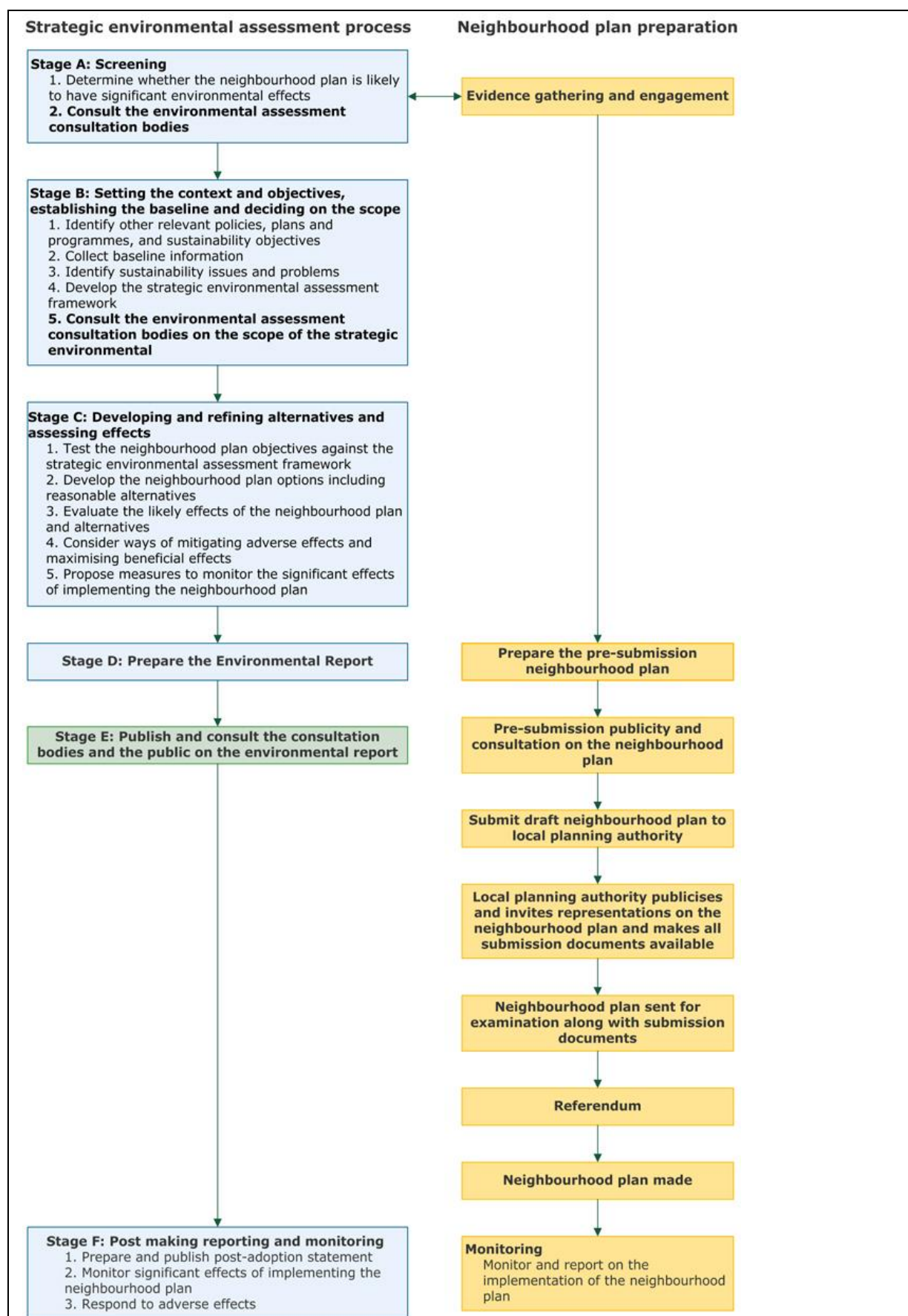
There are a number of stages to the SEA process – see diagram below.

The SEA Regulations require plan-makers to assess 'reasonable alternatives'. Therefore, various options for development in the neighbourhood plan (including sites considered for housing allocations) will be appraised through the SEA. The findings of these appraisals will help to inform the sites allocated.

Sustainability Appraisal

A Sustainability Appraisal is wider in scope and includes an assessment of social and economic objectives in addition to environmental. Although not a legal requirement for a neighbourhood plan, it is a useful way to demonstrate to an examiner that the plan "contributes to the achievement of sustainable development".

SEA Process Diagram



Annex J - Consultees

1	British Telecom
2	East Sussex County Council – Archaeology Department
3	East Sussex County Council – Highways Department
4	East Sussex County Council – Rights of Way
5	East Sussex County Council – Sustainable Drainage
6	East Sussex Fire & Rescue Service
7	Environmental Health
8	Environment Agency
9	Lewes District Council
10	National Trust
11	Natural England
12	Seaford Residents – via workshops, press, social media and formal public consultations
13	Seaford Town Council
14	South Downs Society
15	Southern Gas Networks
16	Southern Water
17	South East Water
18	South Downs National Park Authority
19	Sussex Police
20	Sussex Wildlife Trust

Annex K - Young People's Survey for people age 16 -35

1. Do you want to continue living in Seaford when you leave school / leave home OR if you have left Seaford, do you want to move back?

No – please explain why. Then continue to question 5.

Yes – please explain why. Then continue to question 2.

2. What type of accommodation/property would you be looking for?

Type	1 bed	2 bed	3 bed	4 bed	5+ bed
Flat/Bedsit/Maisonette					
House					
Bungalow					
Caravan/Mobile Home/Temporary structure					
Other (please specify)					

3. Which ownership would you prefer and expect to achieve (if different)?

	Renting from a Housing Association or Local Authority	Shared Ownership (Part own/part rent)	Renting from a private landlord	Buying on the open market
Prefer				
Expect to achieve				

4. When do you think you would need to move to this accommodation?

Within the next 2 years	Between 2 and 5 years from now	In 5 or more years

5. What is your age range?

Age 16 to 21	Age 22 to 35