**SEAFORD TOWN COUNCIL**

**LEWES LOCAL PLAN – ISSUES AND OPTIONS CONSULTATION - JULY 2021**

**RESPONSE TO LEWES DISTRICT COUNCIL**

**1.INTRODUCTION AND BACKGROUND**

1.1 The Town Council considered reports on the Issues and Options consultation document at the Planning and Highways Committee meeting on 28th July and at Full Council on 25th August.

1.2 The full Consultation document had been circulated to all members shortly after the start of the consultation period.

1.3 The main issue underlying the Council’s response is the recent increase in the Housing Delivery requirement from 345 dwellings to 782 dwellings per year and the fact that the new Local Plan will have to provide allocations to meet this requirement.

1.4 The other prominent issue is the uncertainty caused by the Government proposals to introduce a completely new system for drawing up Local Plans, a fast-track system involving zoning. This and other proposals to make sweeping changes to the current planning system were put forward for consultation in a White Paper last year and plans for the necessary legislation announced in the Queen’s Speech in April. Since then there has been no sign of the anticipated Planning Bill and no information on transitional provisions so Local Planning Authorities and other Authorities involved in the process are ‘in limbo’ with no idea as to whether the Plan they are working on will be completed and no idea whether the work being carried out on the Plan and the responses being made will ever be relevant.

1.5 The Town Council therefore fully supports the District Council’s Full Council resolution of 15th July 2021 regarding the Planning Bill, the Housing Delivery assessment, Neighbourhood Plans and related matters.

**2.NEIGHBOURHOOD PLANNING**

2.1 The Town Council is proud of its Neighbourhood Plan which was the result of years of hard work on the part of the local Steering Group. Its policies have the broad support of the town’s residents.

2.2 The new Local Plan should acknowledge that these plans reflect local residents’ aspirations and they should be fully supported at District level.

2.3 Although current Government policy could have the effect of undermining Neighbourhood Plans where there is a shortfall in housing delivery , the Local Plan should still seek to uphold prominent NP policies e.g compliance with agreed local Design Guidelines and protection locally designated greenspaces.

**3. ACCOMMODATING and DELIVERING GROWTH**

3. 1 The consultation document sets out the options for delivering growth. As far as growth in Seaford is concerned the constraints, as set out in the document, are obvious. The town is situated between the sea and the South Downs National Park. Significant areas of open space close to the seafront are alleviation areas within flood risk areas. Many other areas of open space in the town are protected by the policies of the Neighbourhood Plan.

3.2 Para 176 of the NPPF requires consideration of the impact of any proposed development adjoining the Park boundary on the setting of the National Park which give extra protection to many potential sites on the edge of the town.

3.3 The A259 as the single east-west route through the town has very little spare capacity and suffers from severe congestion at peak times.

3.4 The major new development at Newlands will create a significant increase in traffic flows and the occupiers of the 184 new dwellings will stretch existing over-burdened health and education services. There is, for example, no additional capacity in local Primary Care. This lack of adequate local infrastructure was a particular concern of the many local residents objecting to the Newlands scheme. Also, Seaford has a significant under-provision of recreational green space and therefore what space there is deserves special protection.

3.5 All these factors combine to effectively limit new residential development to the sites allocated in the existing Local and Neighbourhood Plans and to small-scale redevelopments.

3.6 The other options for delivering growth are also unacceptable. The constraints of outward development in all four towns in the District rule out any significant growth in those areas.

 3.7 The villages in the District outside the National Park similarly cannot absorb any significant growth without destroying their character and the County’s rural road and transport network could not absorb the increase in traffic. Many of the Low Weald villages including the few that can be described as sustainable are also within the setting of the National Park.

3.8 The option of a new settlement or settlements in the Low Weald is also completely unacceptable. The proposal for the inclusion in the Plan of a 3,000 dwelling development at East Chiltington has attracted widespread opposition. The details which have been submitted show how damaging this would be for the setting of the adjoining National Park , for the sub-standard road infrastructure in the area and for the existing small villages swallowed up by the new ‘settlement’.

3.9 The only remaining viable option is therefore the urban extension of Haywards Heath and Burgess Hill in the north-west corner of the District where, given that the roads and transport infrastructure is adequate, the level of sustainability is significantly higher than the rest of the District.

**4. AFFORDABLE HOUSING**

4.1 The Town Council supports the provision of affordable housing for all residential developments even those of less than 10 dwellings, subject to viability.

4.2 The Government’s viability test, by favouring developers, has led to a significant shortfall in provision and the coverage of all residential developments, even if the contribution is a commuted sum rather than actual units of accommodation, will be beneficial.

4.3 The split between rented accommodation and other forms of tenure should remain at 75%/25%.

**5. HOUSING MIX AND DENSITY**

5.1 An ageing population in Seaford gives rise to the need for more accessible housing including bungalows to allow the elderly to downsize from under occupied family dwellings and remain in the town and single-storey accommodation for the disabled.

5.2 It is acknowledged that the need for sustainability should mean higher density levels for redevelopments in towns within development boundaries. Very few of the rural villages however, other than large settlements such as Ringmer, have the degree of sustainability to support even the lower density levels.

5.3 New dwellings should also comply with the national space standards which have applied in Eastbourne for several years.

**6. THE VISITOR ECONOMY**

6.1 The visitor economy in Seaford has been boosted by the designation of the National Park and its bus and rail links but it still lacks tourist accommodation and is reliant to a large extent on e.g Airbnb. The Local Plan could therefore specifically identify the need for increases in the full range of tourist accommodation including a new budget hotel in the town and suitable sustainable overnight accommodation close to the National Park for walkers/cyclists to fill this gap in the town’s tourism offer.

**7. CLIMATE CHANGE**

7.1 The Town Council supports the District Council’s objective of a net zero carbon District by 2030.

7.2 The need for a cleaner greener District should be a common thread linking all the policies of the new Local Plan

7.3 All new small and large scale developments should be required to consider an element of on-site energy generation.

7.4 Modal shift should be encouraged by the provision of EV Charging Points in all new developments

7.5 Green Travel Plans promoting car sharing and incentives to use public transport should be used where appropriate i.e for new retail and employment schemes generating a specified number of new jobs.

**8. DESIGN CODES**

8.1 Developers of new blocks of flats/apartments above a specified no. of floors should be required to provide a roof garden for the leisure use of residents

**9 RETAIL SPACE and TOWN CENTRES**

In response to question 5.14 in the Consultation, the Local Plan should include a policy requiring consideration of using Article 4 directions to protect the essential retail mix in town centres where newly extended permitted development rights are threatening to undermine the viability of these areas.

Geoff Johnson

Planning Officer 31st August 2021