**Towards a Lewes Local Plan: Spatial Strategy and Policy Directions**

Please respond to the consultation by completing the questions below. Return by email to LocalPlan@lewes-eastbourne.gov.uk or by post to: Lewes District Council, c/o Eastbourne Town Hall, Grove Road, Eastbourne, BN21 4UG.

**Your Details**

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Name:

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| Geoff Johnson – Planning Officer  |

Organisation (if relevant):

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| SEAFORD TOWN COUNCIL |

Agent providing comments on behalf of (if relevant):

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What type of stakeholder are you / who are you representing: (place ‘x’ in against box)

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|  | Member of the public (Resident of Lewes District)  |  | Residents Association  |
|  | Member of the public (Resident elsewhere)  |  | National group / organisation  |
|  | Local business / employer  |  | Planning Consultant  |
| x | Neighbouring District / Parish Council  |  | Landowner / Developer  |
|  | Local group / organisation  |  | Infrastructure / service provider  |
|  | Other – please describe: |

**Vision and aims**

What are your views on the proposed vision and aims?

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| Before setting out the Town Council’s comments on the visions and aims we have some points to make on the presentation of the consultation document, the consultation itself and the content of the document and the long list of supporting documents.One major problem that the amount of data and information in the documents was overwhelming and that it was impossible for Council members and residents to fully absorb the information in the extended response period. A summary of the issues arising in each main section of the document would have made the whole process more user friendly.Also the framing of the questions in the response questionnaire was more restrictive than helpful. It is acknowledged that this is now the standard method of obtaining responses both in Local and Central Government but it often has the effect of excluding public response rather than encouraging it. The consultation procedure required a more considered approach. The fact that the consultation period coincided with the Christmas and New Year break was probably unavoidable but although the consultation was extended it was inevitable that consideration of the document would be mainly restricted to the period after the break. This was too short to enable the Town Council and residents to absorb all the information, not only in the document itself but in all the supporting documents feeding information into the process. There should have been more publicity given to the process from the very start in late November and local drop-in sessions firstly to announce the consultation and its implications and then towards the end of the period for interested parties to give their feedback and to ask questions. The most significant point arising was the link between the consultation and the sites in the supporting documents described in the LAA and DCS as ‘potentially developable’. The references in the LAA and DCS, understandably, gave local residents the impression that greenfield sites close to them were ‘under threat’. However the consultation document itself did not refer to any individual site and emphasised that all that was being considered was the general capacity of the District for housing growth. Responses from LDC Officers during the process only added to the confusion. For this reason concerns about a specific site at Chyngton Way and an adjoining site have been included in the Council’s general response below. As regards Housing Growth the District’s villages are likely to favour shifting the burden of housing growth on to the three coastal towns but reality suggests that the LPA will seek to spread growth over the remaining five options listed. Growth in the coastal towns would be prima facie sustainable and would enable economic prosperity and regeneration but is severely restricted by the sea, the proximity of the South Downs National Park boundary, pressure on existing infrastructure (health services in particular) and an almost total reliance on the A259 for road transport links. In addition, development of a significant proportion of the built area of Seaford close to the sea is restricted by being included in Flood Risk areas designated by the Environment Agency.Seaford, in particular, as well as being enclosed tightly to the north, east and west by the South Downs National Park, has limited scope for large allocations within its boundaries due to flood risk and the fact that the majority of the town’s green spaces are protected under policy SEA 8 of the Seaford Neighbourhood Plan. This has shifted the emphasis on to redevelopments and it has had to bear a large and disproportionate share of the District’s windfall development including the Newlands development (185 dwellings) and, more recently the Constitutional Club, Crouch Lane (40 dwellings). The existing Local Plan of 2016 failed to include the Newlands school site in its allocations even though by the time the Plan was adopted an outline application was already being prepared for that site. This led to Seaford, with its acknowledged constraints, having to bear far more housing growth than it could readily sustain in the Plan period. The District’s long-standing deficiency in housing delivery has also led to several appeals for speculative residential development being allowed. This in turn has created further pressure on essential services such as primary healthcare and has made Seaford a black-spot for the provision of care with, for example, an average six-week wait for blood tests. There must therefore a priority for growth in local healthcare facilities and an assurance that it will be in place before any further planned Housing growth in Seaford. The Call for Sites for possible allocation in the emerging Plan led to the submission of local sites which are assessed in the Interim Land Availability Assessment 2022.(LAA) The most sensitive and controversial site referred to is the Land at Chyngton Way with a stated capacity for 40 dwellings An application for residential development on this site for up to 55 dwellings, LW/16/0460, was withdrawn in 2016 after a negative response from Lewes DC. It had attracted hundreds of local objections. The inclusion and description of this site in the LAA and the possibility of this site being allocated for development is strongly opposed by local residents. It adjoins the boundary of the SDNP and the sensitivity of the area and likely adverse impact on the downland landscape is referred to in the assessment. However it is still assessed as deliverable and developable. The assessment in the LAA is lacking in detail unlike the assessment in the supporting documents to the Seaford Neighbourhood Plan where the site is described as ‘Land North of South Hill Barn’ and a far more detailed description of the constraints on development is set out. Also it has been pointed out by the residents that the Landscape Character Assessment commissioned by LDC from AECOM omits the assessment of the adjoining downland area in the section dealing with the coastal strip from Saltdean to Cuckmere Haven. It is understood that this has been acknowledged and is being investigated by LDC.The indications are that due to intense pressure on LDC to deliver more new dwellings, the favoured option for Seaford could be redevelopments similar to the scheme at the former Tudor Manor Hotel Eastbourne Road and alternatively the scheme granted on appeal for a block of 35 apartments replacing a line of four detached dwellings at 83-89 Sutton Road. These schemes would comply with the Government’s stated policy of making optimum use of brownfield sites but could also adversely affect the character and quality of amenity of many attractive residential areas of the town. An example of this can be found in the Development Capacity Study (Nov 2023) The Seaford site highlighted and illustrated in the study is at 36 South Way within an Area of Established Character and adjoining the SDNP. It is a large property adjoining the site at Chyngton Way referred to above. It is recently extended, with a large curtilage extending towards the SDNP boundary. The proposal would be to demolish the house and develop the site for housing served by a short ‘Close’ . It is likely therefore that a scheme to provide say 5 new dwellings would have to extend beyond the rear of the existing houses in South Way and therefore encroach on the open area adjoining a sensitive and popular area of the Park close to South Hill Barn. It would also encroach further south than the site at Chyngton Way. It would bring a completely new form of development to the area. Despite the obvious constraints , it is also stated in the assessment that the redevelopment c*ould* *contribute to the setting of the National Park*, a controversial view to say the least. There is currently no indication that this site will be proposed for development but it illustrates a serious potential problem with redevelopments in general on Brownfield sites in Seaford i.e that great care should be taken to protect existing Conservation Areas and Areas of Established Character, that the quality and character of existing street scenes should be retained and that densities allowed should not cause any detriment to existing neighbouring residents through loss of privacy and overlooking etc. There is a need for a specific policy, possibly an expanded version of policy SEA 17 of the Seaford Neighbourhood Plan, to regulate this form of redevelopment in Seaford. In conclusion, the line which is likely to be taken, as mentioned above, is that growth will be sought across the first five options. However, the District Council should be reminded of the particular problems that Seaford would have in absorbing further housing growth over and above the existing allocations. |
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Is there an alternative vision or aims (or parts of) that we should be considering?

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**Spatial Strategy**

Do you agree that the proposed range identified to determine the housing requirement is the correct approach? If not, please explain why.

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| Its acknowledged that the Lewes district has struggled and always will struggle to meet Government-set targets for housing delivery assessed under the Standard Method. The proposed range is therefore realistic |

Do you think there is an alternative settlement hierarchy that we should consider? If so, what is it?

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| The settlement hierarchy is accepted |

**Climate Theme**

Are there any further policies you would like to see included to respond to Climate Change? Why do you think they should they be included?

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| There should be an emphasis on new applications for housing providing all possible energy efficient and low carbon options including solar panels and, for larger developments, EVCPs. Sufficient levels of insulation for new properties should also be considered although it is acknowledged that insulation is primarily a Building Regulation issue. |

Should the new local plan require minimisation of and compensation for the loss of carbon sequestration, and if so, how should off site compensation be addressed?

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| There should be an emphasis on on-site provision. The LPA should prevent ‘green washing’ by developers simply through the planting of trees  |

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**Natural Environment Theme**

Are there any further policies you would like to see included to protect and enhance our natural environment? Why do you think they should they be included?

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Do you think the policy direction for Green and Blue infrastructure is the right one? If not, please identify how it can be changed and why?

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Do you think the policy direction for Biodiversity is the right approach? If not please identify how it can be changed and why?

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Should the local plan consider preparing an urban greening policy which requires a minimum level of greening on a development site?

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**Homes for Everyone Theme**

Are there any further policies you would like to see included to meet housing needs? Why do you think they should they be included?

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| The Dane Valley area of Seaford, as a favoured sustainable location, has been promoted by the LPA and the Town Council for the development of small affordable homes as part of a general residential/commercial scheme. This is also relevant to the Economic/Regeneration theme below. For various reasons no progress has been made in finding a potential developer. The Town Council would however still support and promote the scheme as part of its Neighbourhood Plan and would expect the LPA to continue its support through the Local Plan. |

Do you agree with the emphasis on securing two-bedroom homes through new development and retaining smaller homes in the housing stock? If not, please explain why.

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| Yes. There is an acknowledged need for this category of housing in Seaford. In areas where a higher density is appropriate the emphasis should be on the provision of smaller terraced properties  |

Do you agree with the affordable housing policy direction that is being set in the Affordable Housing policy? If not, please identify how it could be changed.

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| Yes |

Do you agree with prioritising rented affordable tenures over affordable home ownership tenures? If not, please explain why you think different tenure proportions should be sought.

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| Yes. It is considered that rental tenures are preferable to shared ownership |

Can you identify specific sites that could accommodate Gypsies and Travellers? If you can identify a site, please submit it to our call for sites using the form on the consultation portal.

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| There has been an occasional problem with the travellers using Martello Fields for short periods in the summer but it is not considered that Seaford requires a designated site |

**Economy and Regeneration Theme**

Are there any further policies you would like to see included to meet economic and regeneration needs? Why do you think they should they be included?

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| Consideration should be given to the continued promotion of the Dane Valley site in Seaford to meet local economic and regeneration needs.  |

Do you agree with the policy direction for employment and economic development? What other issues should the policy consider?

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| The Covid restrictions and the popularity of the SDNP have led to an increase in visitors to the Town in recent years. The Town Council has sought to provide additional and improved seafront facilities to deal with this. The need for overnight stays and lack of formal hotel and guest house accommodation is likely to lead to the loss of small residential accommodation to Airbnb which in turn could lead to a reduction in the type of rented housing required by younger residents. The town has minimal hotel accommodation and needs a new tourist accommodation survey to assess the level of unmet need and to justify policies to avoid the loss of further smaller dwellings.Protection of Seaford’s existing industrial estates is welcomed.Local Labour Agreements for large residential and commercial schemes are also welcomed as a direct way of reducing with local youth unemployment and boosting training and vocational education. There should be sufficient funding from developers to ensure full monitoring and enforcement particularly for commercial developments where monitoring is required beyond the development phase.  |

Do you agree with our policy direction relating to retail and leisure? If not, what would you change and why?

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| Protection of the overall viability of the Town Centre is required. It is a vital area for the prosperity of the town. While blanket protection of retail uses may not be justified or feasible, policies should aim at retaining the vitality of the area through a mix of retail and residential uses. |

**Infrastructure and Community Facilities Theme**

Are there any further policies you would like to see included to meet the need for infrastructure and community facilities? Why do you think they should they be included?

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| The pressing need for additional healthcare provision in Seaford is referred to above in relation to housing growth. Seaford also has significant under provision of infrastructure in other areas such as green space and sports provision as explained in the notes to Neighbourhood Plan policy SEA 7. Also the highways infrastructure is fragile relying on the over-capacity and often congested A259 as the only viable route in and out of town. This general issue of infrastructure deficiency should be taken into account on all major applications in Seaford. The particular infrastructure of each town or village in the District must be thoroughly assessed before allocations for each settlement are made in the draft Plan. Seaford is also lacking a Community hub/meeting facilities. The need for the provision of Community facilities is contained in the Town’s Strategic Plan 2023-2027. Currently the town is overdependent on Church Halls. For a town with the largest population in the district this kind of facility is essential. |

Should there be a separate policy on resisting the loss of playing pitches?

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|  Seaford has a long-standing under provision of sports pitches. This has been highlighted in recent years by the loss of facilities arising from the closure of Newlands School and the redevelopment of the site for 185 houses and apartments. The site’s developers were required to pay £350,000 s.106 agreement contribution towards alternative provision in Seaford but locating a potential site has been difficult. If no suitable site can be found the money may not be used to provide/improve facilities elsewhere in the Coastal Strip. Protection of existing local facilities is therefore essential. |

Should a design-led policy for parking standards be progressed and included in the next version of the local plan?

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How should we seek to manage cycle hire schemes to encourage the modal shift but at the same time avoid their potential for cluttering the street scene?

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**Design, Landscape and Built Environment Theme**

Are there any further policies you would like to see included to guide Design, Landscape and the Built Environment? Why do you think they should they be included?

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| The designation in the current Local and Neighbourhood Plans of eight areas of the town as Areas of Special Character under LP policy DM 34 has been of great benefit to retaining the character of these areas. The designations should be supported and carried over to the new LP. Also the adoption of the AECOM Seaford Design Guidelines as an appendix to the Seaford Neighbourhood Plan has been invaluable as regards responding to Householder applications. The Guidelines have been well supported by LDC’s DC Officers in determining these applications. Could the Guidelines be given additional weight through adoption as an appendix to the Local Plan? |

Do you agree with the proposed policy directions that are being considered for further development? Are there alternatives that we should be looking at?

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Do you think that having concept masterplans for all residential development sites would assist in bringing forward sites and retain the design quality of the development? If yes, what stage of the plan should these be prepared and agreed?

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**Water Theme**

Are there any further policies you would like to see included to respond to water resources and water management? Why do you think they should they be included?

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| The town’s current water supply infrastructure is fragile. There have been frequent breaks in the supply. Also the management and treatment of sewage is inadequate as evidenced by the frequent incidents of untreated sewage flowing into the sea when the system is required to cope with heavy rainfall. Policies should be included to require improvements to the system to prevent these incidents. They have a direct effect on the town as a tourist destination. Also the Dane Valley area referred to above as requiring regeneration is particularly susceptible to the sewage problems . If they were resolved it would remove one of the current barriers to the development of this area.It has already been mentioned that there is a prominent risk of sea flooding from the rise in the number of severe weather incidents. Policies should be framed to take account of this enhanced risk  |

Should the water quality policy specify standards for development for intensive livestock production?

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Should the new local plan continue with the existing policy approach set out in Policy DM18: Recreation and Rivers or go further and consider specific locations for recreational uses, and other, or more specific areas/water bodies.

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