



Seaford Town Council Planning & Highways Agenda – Thursday 19th September 2024

To the Members of the Planning & Highways Committee

Councillors L Wallraven (Chair), L Boorman (Vice Chair), R Buchanan, R Clay, O Honeyman, R Honeyman and J Lord.

A meeting of the **Planning & Highways Committee** will be held at the **Council Chambers, 37 Church Street, Seaford BN25 1HG** on **Thursday 19th September 2024** at **7.00pm**, which you are summoned to attend.

A handwritten signature in black ink, appearing to read 'A M Chugg', written over a light blue grid background.

Adam Chugg
Town Clerk

13th September 2024

- **Public attendance at this meeting will be limited due to the size of the meeting, so public will need to register to guarantee a place**
- **The meeting will be video recorded and uploaded to the Town Council's YouTube channel after the meeting**
- **See the end of the agenda for further details of public access and participation**

AGENDA

1. Apologies for Absence

To consider apologies for absence.

2. Disclosure of Interests

To deal with any disclosure by Members of any disclosable pecuniary interests and interests other than pecuniary interests, as defined under the Seaford Town Council Code of Conduct and the Localism Act 2011, in relation to matters on the agenda.

3. Public Participation

To deal with any questions, or brief representations, from members of the public in accordance with relevant legislation and Seaford Town Council Policy.

In accordance with Town Council policy, members of the public wishing to speak on individual planning applications may do so immediately before each planning application.

[4. Proposed Reforms to the National Planning Policy Framework & other changes to the Planning System – Seaford Town Council’s response to the consultation](#)

To consider report 82/24 presenting a draft response to the National Planning Policy Framework consultation (pages 6 to 25).

5. Planning Applications – For Comment

The planning and/or tree works applications for the Committee to consider and comment on as a statutory consultee are as follows:

Lewes District Council Planning Applications received in week commencing Monday 19th August 2024

[LW/24/0504](#) - 66 Cuckmere Road - Single storey first floor rear extension over existing flat roof ground floor extension and alterations to fenestration for Mr & Mrs Halls.

[LW/24/0544](#) - 4 Church Street - Addition of shower space to ground floor bathroom, addition of kitchen door, en-suite W.C. on first floor and making good joists/plasterboard in the basement for M Bryon.

NOTE: The Committee previously supported a similar application for this property which went on to be withdrawn. The Committee however objected to applications for this property for change of use from residential to holiday let – however the change of use was approved.

[LW/24/0548](#) - Rodmell House, Rodmell Road - New outbuilding for M Jemison.

[LW/24/0552](#) - 4 Sutton Park Road - Retrospective change of use from class A3 to Sui Generis (Description change) for Mr S Abbas.

[LW/24/0559](#) - 14 Meads Road - Single storey rear extension and alterations to existing rear fenestration for J Del Aguila.

Lewes District Council Planning Applications received in week commencing Monday 26th August 2024

[LW/24/0431](#) - Arlington House, 4 Firle Road - For the replacement of 2No. chimneys (AMENDED SCHEME) for Mr S Murray.

NOTE: The Committee resolved on 18th July 2024 to support the original application which was to remove the chimneys. The application has now been amended to replace the chimneys.

[LW/24/0484](#) - 57 Blue Haze Avenue - Replacement of existing conservatory with a single storey extension at the rear for Mr D Dray.

NOTE: This application was on the 29th August agenda, however no plans or drawings were uploaded to Planning Portal so the Committee requested that full plans and drawings were uploaded before it made comment.

Lewes District Council Planning Applications received in week commencing Monday 2nd September 2024

[LW/24/0506](#) & [LW/24/0526](#) - 17 Pelham Place, Pelham Road – Application one: Change of use from bank (basement floor) to basement floor flat for Mr D Parkinson; Application two: Convert basement and ground floor into x2 maisonettes with external stair access and fenestration alterations for Mr D Parkinson.

[LW/24/0507](#) - 14 Pitt Drive - Rear conservatory enlargement for Mrs Zena Maher.

[LW/24/0527](#) - 77 Sutton Road - Two storey side extension, single storey front and rear extension with fenestration alterations for Mr J Burrill.

[LW/24/0580](#) - 46 Kingston Way - Loft conversion with installation of velux roof windows to the rear roof slope for Mrs J Hunt.

Lewes District Council Planning Applications received in week commencing Monday 9th September 2024

Tree Works Applications

[TW/24/0068/TPO](#) - 32 Barn Close - T1 - Holm Oak - Crown reduction by 2m and pruning of branches by 3m for Mr J Lambert.

[6. Road Closure Application – Seaford Bonfire – Saturday 12th October](#)

To consider report 83/24 on the Road Closure Order issued to Seaford Bonfire Society for bonfire celebrations on 12th October 2024 (pages 26 to 29).

[7. Update Report](#)

To consider report 79/24 on the Lewes District Council decisions received since the last meeting on applications previously considered by the Committee (pages 30 to 32).

AGENDA NOTES

For further information about items on this Agenda please contact:

Adam Chugg, Town Clerk, 37 Church Street, Seaford, East Sussex, BN25 1HG

Email: meetings@seafordtowncouncil.gov.uk

Telephone: 01323 894 870

Circulation:

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Public Access:

Members of the public looking to access this meeting will be able to do so by:

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Spaces will be assigned on a first come, first served basis.

Please note that if you don't register and just attempt to turn up at the meeting, this could result in you not being able to attend if there is no space.

OR

2. Watching the recording of the meeting on the [Town Council's YouTube channel](#) , which will be uploaded after the meeting has taken place.

Public Access to the Venue:

If you are attending the meeting in person, please arrive for 6.45pm where you will be shown into the meeting for a 7.00pm start.

Please note that the front door of the building will be locked at 7.00pm and remain locked during the meeting for security reasons. As such, if you arrive after this time, you will not be able to access the meeting.

When members of the public are looking to leave, they must be escorted out of the building by a Town Council officer. There is also a signposted back door which can be exited through if required.

Public Participation:

Members of the public looking to participate in the public participation section of the meeting must do so in person, by making a verbal statement during the public participation section of the meeting.

Below are some key points for public participation in the meeting:

1. Your statement should be regarding business on the agenda for that meeting.
2. You will only be able to speak at a certain point of the meeting; the Chair of the meeting will indicate when this is.
3. You do not have to state your name if you don't want to.
4. If you are unsure of when best to speak, either query this with an officer/councillor ahead of the meeting or raise your hand during the public participation item of the meeting and ask the Chair – they will always be happy to advise.
5. When the Chair has indicated that it is the part of the meeting that allows public participation, raise your hand and the Chair will invite you to speak in order.
6. Statements by members of the public are limited to four minutes and you don't automatically have the right to reply. The Chair may have to cut you short if you overrun on time or try to speak out of turn – this is just to ensure the meeting stays on track.
7. Where required, the Town Council will try to provide a response to your statement but if it is unable to do so at the meeting, may respond in writing following the meeting.
8. Members of the public should not speak at other points of the meeting.
9. A summarised version of your statement, but no personal details, will be recorded in the minutes of the meeting.

Public Comments

Members of the public looking to submit comments on any item of business on the agenda can do so in writing ahead of the meeting and this will be circulated to all committee members. Comments can be submitted by email to planning@seafordtowncouncil.gov.uk or by post to the Town Council offices.

Health & Safety Measures:

While Covid restrictions are no longer mandated the Town Council wishes to stay vigilant and mindful of the health and safety of its meeting participants by upholding the requirement that you should not attend the meeting if you are displaying any Covid-19 symptoms (or have tested positive) as identified on the [NHS website](#) or symptoms of any similarly contagious illness.



Report No:	82/24
Agenda Item No:	4
Committee:	Planning & Highways
Date:	19th September 2024
Title:	Seaford Town Council's response to the proposed reforms to the National Planning Policy Framework
By:	Geoff Johnson, Planning Consultant
Purpose of Report:	To present the Committee with a draft response to the consultation on proposed reforms to the National Planning Policy Framework and other changes to the planning system.

Recommendations
<p>The Committee is recommended:</p> <ol style="list-style-type: none"> 1. To consider and agree Seaford Town Council's response to the Government's consultation on the proposed reforms to the National Planning Policy Framework and other changes to the planning system.

1. Information

- 1.1** As members are aware, the Government is carrying out a formal consultation on the proposed amendments to the National Planning Policy Framework.
- 1.2** The amendments were the subject of an announcement in Parliament by the Deputy Prime Minister. The consultation started on 30th July 2024 and runs to the 24th of September 2024.
- 1.3** Responses are invited through a 19-page survey document which also summarises the main content of the proposed amendments.
- 1.4** Steve Tilbury, of Steve Tilbury Consulting, has prepared detailed notes for Parish and Towns Councils in East and West Sussex explaining the

changes and suggesting responses. These notes have been forwarded to members.

- 1.5 Steve Tilbury's responses are based on his own expertise in local authority planning issues but are not area specific.
- 1.6 Responses are requested to 106 questions. Normally, faced with a questionnaire of this length and complexity, the practical response would be by way of a general statement.
- 1.7 However, as Steve Tilbury points out, the Government favours a response based on its own questionnaire and this would carry more weight.
- 1.8 Officers have therefore worked local issues into Steve Tilbury's common-sense responses to the more general issues to make a suggested draft response for members to adopt, delete, expand or amend as appropriate.
- 1.9 Officers have also included the views of concerned residents made at the meeting on 29th August 2024, the residents' concerns related to:

- Assessment of housing targets and the environmental impact of having to meet the targets
- Development of brownfield sites
- Removal of the reference to 'beauty' in provisions relating to design
- Protection of natural water sources
- High-rise development

- 1.10 The draft response for consideration and finalising can be found at Appendix A.

2. Financial Appraisal

- 2.1 There are no direct financial implications of this report.

3. Contact Officer

- 3.1 The Contact Officer for this report is Isabelle Moulard, Assistant Town Clerk.

82/24 APPENDIX A

Seaford Town Council's response to the proposed reforms to the National Planning Policy Framework

Q1

Do you agree that we should reverse the December 2023 changes made to paragraph 61?

The Council's concerns are unaffected by the method of calculation as any method adopted would take into account the 'hard constraints' as described in the proposed amendments when arriving at an appropriate requirement. These constraints in Seaford and the Lewes District are the fact that so much of the District is taken up by the designated South Downs National Park in the south and the High Weald AONB in the north. Any new development in these areas should be restricted. Also the necessary infrastructure for housing growth through the entire District, particularly the highway network, is seriously deficient.

Due to these constraints Lewes District has, understandably, never been able to achieve the various targets set based on housing need however these are calculated. The option of forming a new settlement to accommodate the significant need which is having to be adopted by many other Districts throughout the country has been discarded in the Lewes District. Any location for such a settlement in the narrow band of undesignated land in the centre of the District would be seriously prejudicial to the character and setting of the adjoining specially designated areas. The 'constraints' in question are not therefore based on a reluctance by the LPA to plan for the housing delivery targets set or on public objections but on valid justifiable environmental and amenity concerns and the need to protect the character and settings of specially designated areas.

There would also be less pressure on 'targets' if there were more pressure on developers to release sites with planning consent which have been 'banked' The LGA has calculated that 1.1 million (over 3 years-worth) of land is in this category.

Q2

Do you agree that we should remove reference to the use of alternative approaches to assessing housing need in paragraph 61 and the glossary of the NPPF?

The *method* of calculation is not strictly relevant to the Council's concerns, The target set would always be unachievable in practice due to the constraints referred to above in the response to Q1.

Q3

Do you agree that we should reverse the December 2023 changes made on the urban uplift by deleting paragraph 62?

It is agreed that urban areas should provide the additional housing required wherever possible due to their existing infrastructure and the need to protect specially designated and rural areas

Q4

Do you agree that we should reverse the December 2023 changes made on character and density and delete paragraph 130

No

Para 130 was never intended to prevent, for instance, a small development of new homes being allowed in a village just because it had a different density to other parts of a community. It might however have had the benefit of reducing pressure to significantly increase density in or around parts of a larger settlement which have a particular character. Seaford in a case in point.

It is a larger settlement sandwiched between the South Downs National Park to the north and the sea to the south with only one major road giving access/egress from and to the east and west. It is largely developed with an acknowledged deficiency of green spaces for its 27,000 population. There is therefore pressure to release the few undeveloped 'greenfield' sites for development and to apply appropriate densities. The major hurdle is that these sites tend to adjoin the National Park boundary and therefore should be treated as being within the NP The principles in Para 130 should be retained.

In such cases the emphasis should be in basing decisions on the impact on the open land beyond the proposed development rather than looking back to the urban area to assess the appropriate density

Q5

Do you agree that the focus of design codes should move towards supporting spatial visions in local plans and areas that provide the greatest opportunities for change such as greater density, in particular the development of large new communities? Yes We agree

Q6

Do you agree that the presumption in favour of sustainable development should be amended as proposed? Yes We agree

Q7

Do you agree that all local planning authorities should be required to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status?

No certainly not, for the reasons stated in the answer to Q1 above.

The modifications introduced by the December 2023 amendments making the targets a 'starting point' were welcomed by the Council as they went a small way towards acknowledging the constraints on development in the Council's area and the areas adjoining.

Although the 5 years supply issue is not directly related to the housing delivery target it contributes to the pressure to identify sites in the Local Plan and this in turn could lead to pressure to release sites for development within or adjacent to specially designated areas

Q8

Do you agree with our proposal to remove wording on national planning guidance in paragraph 77 of the current NPPF? Yes we agree

Q9

Do you agree that all local planning authorities should be required to add a 5% buffer to their 5-year housing land supply calculations?

No we do not. The 5% figure is arbitrary It takes no account of 'hard constraints' and for reasons stated in the answer to Q1 above it is strongly opposed

Q10

If yes, do you agree that 5% is an appropriate buffer, or should it be a different figure? No. See previous answer

Q11

Do you agree with the removal of policy on Annual Position Statements?

No specific comment

Q12

Do you agree that the NPPF should be amended to further support effective co-operation on cross boundary and strategic planning matters?

Yes. Many District boundaries are arbitrary and do not take into account close connections between neighbouring towns and areas. Cross boundary planning makes sense

Q13

Should the tests of soundness be amended to better assess the soundness of strategic scale plans or proposals?

Yes. The tests should ensure that co-operation between LPAs is given more emphasis when plans are examined as per the response to Q12

Q14

Do you have any other suggestions relating to the proposals in this chapter?

We have given some general comments on housing delivery specific to our District in the response to Q1.

Q15

Do you agree that Planning Practice Guidance should be amended to specify that the appropriate baseline for the standard method is housing stock rather than the latest household projections?

If the aim of a policy is to more accurately reflect housing need in an area there is a good case for using the existing stock as a baseline rather than household projections.

Q16

Do you agree that using the workplace-based median house price to median earnings ratio, averaged over the most recent 3 year period for which data is available to adjust the standard method's baseline, is appropriate?

The change appears sensible

Q17

Do you agree that affordability is given an appropriate weighting within the proposed standard method?

Seaford and the Lewes District are areas where house prices outstrip average income. There is an acute need for affordable housing but this must be balanced against the 'hard constraints' already referred to. Figures derived from the standard method have to be given due weight but have to be set against previous housing delivery figures achieved and the reasons for the shortfall.

Q18

Do you consider the standard method should factor in evidence on rental affordability? If so, do you have any suggestions for how this could be incorporated into the model?

The level of local rents should also be taken into account especially in areas such as Seaford where rents are artificially high due to many potential rentals being used for holiday accommodation. The Government should devise a formula based on national mean rental levels for the various categories of accommodation.

Q19

Do you have any additional comments on the proposed method for assessing housing needs? No

Q20

Do you agree that we should make the proposed change set out in paragraph 124c, as a first step towards brownfield passports? Yes

Q21

Do you agree with the proposed change to paragraph 154g of the current NPPF to better support the development of PDL in the Green Belt?

There is no designated Green Belt close to our area so any policy changes would not have any direct effect, but the principle of the policy is supported.

Q22

Do you have any views on expanding the definition of PDL, while ensuring that the development and maintenance of glasshouses for horticultural production is maintained? No specific comment

Q23

Do you agree with our proposed definition of grey belt land? If not, what changes would you recommend?

The release of some Green Belt land is necessary, and that it is possible and useful to create such a distinction.

Q24

Are any additional measures needed to ensure that high performing Green Belt land is not degraded to meet grey belt criteria? No specific comment

Q25

Do you agree that additional guidance to assist in identifying land which makes a limited contribution of Green Belt purposes would be helpful? If so, is this best contained in the NPPF itself or in planning practice guidance?

No specific comment

Q26

Do you have any views on whether our proposed guidance sets out appropriate considerations for determining whether land makes a limited contribution to Green Belt purposes? No specific comment

Q27

Do you have any views on the role that Local Nature Recovery Strategies could play in identifying areas of Green Belt which can be enhanced?

Green Belt land which has an important role (or potential role) in promoting biodiversity should receive a higher level of protection

Q28

Do you agree that our proposals support the release of land in the right places, with previously developed and grey belt land identified first, while allowing local planning authorities to prioritise the most sustainable development locations? Yes

Q29

Do you agree with our proposal to make clear that the release of land should not fundamentally undermine the function of the Green Belt across the area of the plan as a whole? Yes

Q30

Do you agree with our approach to allowing development on Green Belt land through decision making? If not, what changes would you recommend?

No specific comment

Q31

Do you have any comments on our proposals to allow the release of grey belt land to meet commercial and other development needs through plan-making and decision. No specific comment

Q32

Do you have views on whether the approach to the release of Green Belt through plan and decision-making should apply to traveller sites, including the sequential test for land release and the definition of PDL? No specific comment

Q33

Do you have views on how the assessment of need for traveller sites should be approached, in order to determine whether a local planning authority should undertake a Green Belt review?

No specific comment

Q34

Do you agree with our proposed approach to the affordable housing tenure mix?

No specific comment

Q35

Should the 50 per cent target apply to all Green Belt areas (including previously developed land in the Green Belt), or should the Government or local planning authorities be able to set lower targets in low land value areas

It is noted that developers have claimed that a 50% requirement would make most if not all schemes unviable so an element of flexibility in the targets set may be beneficial

Q36

Do you agree with the proposed approach to securing benefits for nature and public access to green space where Green Belt release occurs? Yes

Q37

Do you agree that Government should set indicative benchmark land values for land released from or developed in the Green Belt, to inform local planning authority policy development? No comment

Q38

How and at what level should Government set benchmark land values?

No specific comment

Q39

To support the delivery of the golden rules, the Government is exploring a reduction in the scope of viability negotiation by setting out that such negotiation should not occur when land will transact above the benchmark land value. Do you have any views on this approach? No specific comment

Q40

It is proposed that where development is policy compliant, additional contributions for affordable housing should not be sought. Do you have any views on this approach? Agree

Q41

Do you agree that where viability negotiations do occur, and contributions below the level set in policy are agreed, development should be subject to late-stage viability reviews, to assess whether further contributions are required? What support would local planning authorities require to use these effectively?

Agree

Q42

Do you have a view on how golden rules might apply to non-residential development, including commercial development, travellers sites and types of development already considered 'not inappropriate' in the Green Belt?

No specific comment

Q43

Do you have a view on whether the golden rules should apply only to 'new' Green Belt release, which occurs following these changes to the NPPF? Are there other transitional arrangements we should consider, including, for example, draft plans at the regulation 19 stage? No specific comment

Q44

Do you have any comments on the proposed wording for the NPPF (Annex 4)?

No specific comment

Q45

Do you have any comments on the proposed approach set out in paragraphs 31 and 32? No specific comment

Q46

Do you have any other suggestions relating to the proposals in this chapter?

No

Q47

Do you agree with setting the expectation that local planning authorities should consider the particular needs of those who require Social Rent when undertaking needs assessments and setting policies on affordable housing requirements?

Yes. All forms of affordable housing should be considered. It should be a requirement rather than a mere expectation.

Q48

Do you agree with removing the requirement to deliver 10% of housing on major sites as affordable home ownership?

Yes LPAs should be free to determine a local priority for the number and nature of the affordable housing provided on a site.

Q49

Do you agree with removing the minimum 25% First Homes requirement?

Agree as it will increase flexibility and local choice.

Q50

Do you have any other comments on retaining the option to deliver First Homes, including through exception sites? It should be retained

Q51

Do you agree with introducing a policy to promote developments that have a mix of tenures and types?

There should be the flexibility in policy to have a mix of tenures and types

Q52

What would be the most appropriate way to promote high percentage Social Rent/affordable housing developments? No specific comment

Q53

What safeguards would be required to ensure that there are not unintended consequences? For example, is there a maximum site size where development of this nature is appropriate? No specific comment

Q54

What measures should we consider to better support and increase rural affordable housing? No specific comment

Q55

Do you agree with the changes proposed to paragraph 63 of the existing NPPF?

Yes, in principle as 'Looked After Children' would benefit from being part of the community but issues such as additional parking requirements would have to be addressed

Q56

Do you agree with these changes? Agree

Q57

Do you have views on whether the definition of 'affordable housing for rent' in the Framework glossary should be amended? If so, what changes would you recommend?

The definition should be extended to include small community-led organisations

Q58

Do you have views on why insufficient small sites are being allocated, and on ways in which the small site policy in the NPPF should be strengthened?

No specific comment

Q59

Do you agree with the proposals to retain references to well-designed buildings and places, but remove references to 'beauty' and 'beautiful' and to amend paragraph 138 of the existing Framework?

Yes. 'Beauty' is too subjective to have any real meaning in a planning system. What the policy should be saying is that good design should be a priority rather than an assumption for all proposed developments.

Q60

Do you agree with proposed changes to policy for upwards extensions?

Agree. The proposed change is minimal i.e the removal of the reference to mansard roofs as an example and this makes sense. There is concern about the general policy but it is acknowledged that this remains unchanged.

Q61

Do you have any other suggestions relating to the proposals in this chapter?

No

Q62

Do you agree with the changes proposed to paragraphs 86 b) and 87 of the existing NPPF?

The area this Council covers would not normally be considered as a suitable location for this class of development

Q63

Are there other sectors you think need particular support via these changes?

What are they and why? No specific comment

Q64

Would you support the prescription of data centres, gigafactories, and/or laboratories as types of business and commercial development which could be capable (on request) of being directed into the NSIP consenting regime?

No specific comment

Q65

If the direction power is extended to these developments, should it be limited by scale, and what would be an appropriate scale if so? No specific comment

Q66

Do you have any other suggestions relating to the proposals in this chapter?

No

Q67

Do you agree with the changes proposed to paragraph 100 of the existing NPPF? No specific comment

Q68

Do you agree with the changes proposed to paragraph 99 of the existing NPPF? Yes

Q69

Do you agree with the changes proposed to paragraphs 114 and 115 of the existing NPPF?

Traffic issues are an important consideration on all major developments in this area in view of the deficient highway network and infrastructure. Any changes to policy in this area of development would need to be realistic and practical rather than fanciful . It is not clear what is meant by a 'vision-led approach'.

Q70

How could national planning policy better support local authorities in (a) promoting healthy communities and (b) tackling childhood obesity?

Encourage for the provision of 'trim trails' and exercise apparatus for adults and teenagers in the play areas and green spaces required in major developments through s.106 Agreements.

Q71

Do you have any other suggestions relating to the proposals in this chapter?

No further comments

Q72

Do you agree that large onshore wind projects should be reintegrated into the NSIP regime?

No. Decisions should remain with LPAs

Q73

Do you agree with the proposed changes to the NPPF to give greater support to renewable and low carbon energy?

Agree in principle but subject to ensuring that that installations do not harm irreplaceable habitats.

Q74

Some habitats, such as those containing peat soils, might be considered unsuitable for renewable energy development due to their role in carbon sequestration. Should there be additional protections for such habitats and/or compensatory mechanisms put in place? Yes

Q75

Do you agree that the threshold at which onshore wind projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50 megawatts (MW) to 100MW?

Decisions should be made by LPAs

Q76

Do you agree that the threshold at which solar projects are deemed to be Nationally Significant and therefore consented under the NSIP regime should be changed from 50MW to 150MW?

Yes Decisions should remain with LPAs where feasible

Q77

If you think that alternative thresholds should apply to onshore wind and/or solar, what would these be? No specific comment

Q78

In what specific, deliverable ways could national planning policy do more to address climate change mitigation and adaptation? No specific comments

Q79

What is your view of the current state of technological readiness and availability of tools for accurate carbon accounting in plan-making and planning decisions, and what are the challenges to increasing its use?

No specific comments

Q80

Are any changes needed to policy for managing flood risk to improve its effectiveness?

Seaford has areas subject to flood risk at the highest risk level. Policies appear to work reasonably well in conjunction with the Environment Agency.

Q81

Do you have any other comments on actions that can be taken through planning to address climate change? No

Q82

Do you agree with removal of this text from the footnote?

As this question is tied to Q83 and relates primarily to food production its relevance to the local area is limited. The importance of retaining agricultural land in the Seaford area is that it often acts as a buffer between the built area and open

Downland. In most cases however it already has protection through designation as part of the National Park

Q83

Are there other ways in which we can ensure that development supports and does not compromise food production? See answer to Q82 above.

Q84

Do you agree that we should improve the current water infrastructure provisions in the Planning Act 2008, and do you have specific suggestions for how best to do this?

The importance of improvement of the current water supply infrastructure could justify bringing more projects within the NSIP regime

Q85

Are there other areas of the water infrastructure provisions that could be improved? If so, can you explain what those are, including your proposed changes? No specific comments

Q86

Do you have any other suggestions relating to the proposals in this chapter?

No

Q87

Do you agree that we should we replace the existing intervention policy criteria with the revised criteria set out in this consultation?

Intervention, if it is to be retained, should be a remedy of last resort. The Government should concentrate on providing sufficient funding to LPAs to enable them to obtain the necessary specialist input to LPs and to retain the staff necessary to keep the process moving forward efficiently rather than considering sanctions.

Q88

Alternatively, would you support us withdrawing the criteria and relying on the existing legal tests to underpin future use of intervention powers?

See answer to Q87 above. If intervention is to be retained the criteria should be clearly published

Q89

Do you agree with the proposal to increase householder application fees to meet cost recovery?

Planning is a core service of District Councils but it can be argued that as the applicant is bound to benefit from an application (if granted) then they should cover the costs of providing the service. Care should be taken to ensure however that the system does not develop into an alternative method of raising funds. Any increase should be phased

Q90

If no, do you support increasing the fee by a smaller amount (at a level less than full cost recovery) and if so, what should the fee increase be? For example, a 50% increase to the householder fee would increase the application fee from £258 to £387.

The full costs should be covered but current discounts and concessions should be retained

Q91

If we proceed to increase householder fees to meet cost recovery, we have estimated that to meet cost-recovery, the householder application fee should be increased to £528. Do you agree with this estimate?

Yes

No – it should be higher than £528

No – it should be lower than £528

no - there should be no fee increase

Don't know

If No, please explain in the text box below and provide evidence to demonstrate what you consider the correct fee should be.

Agree with the estimate

Q92

Are there any applications for which the current fee is inadequate? Please explain your reasons and provide evidence on what you consider the correct fee should be. No specific comments

Q93

Are there any application types for which fees are not currently charged but which should require a fee? Please explain your reasons and provide evidence on what you consider the correct fee should be. No specific comments

Q94

Do you consider that each local planning authority should be able to set its own (non-profit making) planning application fee? Please give your reasons in the text box below.

Yes it should be considered. There is an argument that , as the costs of employing and retaining adequate qualified planning staff fluctuates from region to region the fee structure should be more flexible.

Q95

What would be your preferred model for localisation of planning fees?

Simple reflection of the costs of processing and determining the particular type of application with the breakdown of the costs published for transparency.

The level of the fee would be an average of the actual costs of an appropriate number of previously decided applications in that category. Figures and calculations would be made available to the public

Q96

Do you consider that planning fees should be increased, beyond cost recovery, for planning applications services, to fund wider planning services?

Not generally although it could be reasonable to add a small proportion of the costs of drawing up a Local Plan to application fees.

Q97

What wider planning services, if any, other than planning applications (development management) services, do you consider could be paid for by planning fees?

See above Also the cost of pursuing enforcement prior to a retrospective application under section 73A being submitted could be added to the normal fee for the application. If standard fees are used there should be a supplement added to s.73A fees

Q98

Do you consider that cost recovery for relevant services provided by local authorities in relation to applications for development consent orders under the Planning Act 2008, payable by applicants, should be introduced?

No specific comment

Q99

If yes, please explain any particular issues that the Government may want to consider, in particular which local planning authorities should be able to recover costs and the relevant services which they should be able to recover costs for, and whether host authorities should be able to waive fees where planning performance agreements are made. No specific comment

Q100

What limitations, if any, should be set in regulations or through guidance in relation to local authorities' ability to recover costs? No specific comment

Q101

Please provide any further information on the impacts of full or partial cost recovery are likely to be for local planning authorities and applicants. We would particularly welcome evidence of the costs associated with work undertaken by local authorities in relation to applications for development consent. See above This is probably a question only an LPA or applicant is able to answer in any detail, but you might wish to make general observations if you have experience of a DCO process. No specific comment

Q102

Do you have any other suggestions relating to the proposals in this chapter?

No specific comment

Q103

Do you agree with the proposed transitional arrangements? Are there any alternatives you think we should consider?

The transitional arrangements would require the emerging Lewes District Local Plan to be reviewed immediately thus delaying the process and continuing a period of uncertainty in the consideration of major applications. If however the Government is determined to apply the revised Standard Method in any event it is as well that the issue is tested sooner rather than later

Q104

Do you agree with the proposed transitional arrangements?

Primarily for LPAs and developers/landowners to comment but the long-term uncertainty over the changes to local plan procedures is not helping the general public and Town /Parish Councils to engage with the process

Q105

Do you have any other suggestions relating to the proposals in this chapter?

No further comments

Q106

Do you have any views on the impacts of the above proposals for you, or the group or business you represent and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact identified?

No specific comments



Report No:	83/24
Agenda Item No:	6
Committee:	Planning & Highways
Date:	19th September 2024
Title:	Road Closure Application – Seaford Bonfire
By:	Isabelle Mouland, Assistant Town Clerk
Purpose of Report:	To present details of the road closure order for Seaford Bonfire, for this Committee to note

Recommendations
The Committee is recommended: 1.To note the contents of the report.

1. Information

- 1.1** The Town Council has been notified of a Road Closure Order issued by Lewes District Council for Seaford Bonfire Society between 6am and 11.30pm on Saturday 12th October.
- 1.2** The map and timings are overleaf and the Road Closure Order can be found at Appendix A:

Phase One

Seaford Bonfire Society Operations Team



Phase Two

Seaford Bonfire Society Operations Team



2. Recommendations

2.1 The Committee is recommended to note the Road Closure Order.

3. Financial Appraisal

3.1 There are no direct financial implications of this report.

4. Contact Officer

4.1 The Contact Officer for this report is Isabelle Moulard, Assistant Town Clerk.

LEWES DISTRICT COUNCIL

THE DISTRICT OF LEWES (TEMPORARY STREET CLOSURE) (NO 42) ORDER 2024

TOWN POLICE CLAUSES ACT 1847 (AS AMENDED)

The Council of the District of Lewes in exercise of their powers under Section 21 of the Town Police Clauses Act 1847, as amended by Section 28 of the East Sussex Act 1981 and all other enabling powers, and after consultation with, or with the consent of, as may be required by statute, the County Council of East Sussex and the Chief Officer of Police, hereby make the following Order:

1. For the purposes of facilitating the holding of a Seaford Bonfire Celebrations and Fireworks Display in Seaford, the lengths of roads set out in the Schedule to this Order shall be closed to vehicular traffic between the hours of **06:00** and **23:30** on **Saturday, 12 October 2024** as provided by the above-mentioned provisions.
2. Nothing in this Order shall prevent a Police Officer from suspending for any period the provisions of this Order in respect of any highway closed by virtue of this Order or prohibit any act done at the discretion or with the consent of a Police Officer.
3. Should the event be cancelled then the provisions of this Order shall not take effect.
4. The making of this Order does not authorise or otherwise make lawful the obstruction of the highway nor shall it be interpreted as giving such authorisation.
5. This Order may be cited as "the District of Lewes (Temporary Street Closure) (No 42) Order 2024".
6. The Interpretation Act 1978 shall apply for the interpretation of this Order as it applies for the interpretation of an Act of Parliament, as if this Order were an Act of Parliament.

SCHEDULE

Details of roads and length of roads in Seaford to be affected by the Order

Esplanade and Seaford Promenade from The Causeway to Splash Point; College Road from Steyne Road to Corsica Road; Martello Road from Esplanade to College Road; Cricketfield Road from Steyne Road to Corsica Road; Corsica Road from College Road to Fitzgerald Avenue; Cliff Gardens from College Road to Esplanade; Westdown Road from Belgrave Road to Wilmington Road; A259 from Claremont Road Shops to Sutton Corner roundabout; Belgrave Road from Wilmington Road to A259; Avondale Road from Stafford Road to A259; Broad Street from A259 to High Street; High Street from Broad Street to Steyne Road; Steyne Road from the causeway to Crouch Lane Seaford.

THE COMMON SEAL of LEWES DISTRICT COUNCIL

was hereunto affixed in the presence of:

Authorised Signatory HELEN MONAGHAN

Job Title Lawyer

Date 9 September 2024





Report No:	79/24
Agenda Item No:	7
Committee:	Planning & Highways
Date:	19th September 2024
Title:	Update Report
By:	Isabelle Mouland, Assistant Town Clerk
Purpose of Report:	To notify the Committee of decisions taken by Lewes District Council on applications previously considered by the Committee

Recommendations
The Committee is recommended: 1.To note the report and the decisions set out in the Schedule.

1. Information

- 1.1 The attached schedule lists the decisions taken by Lewes District Council since the last Committee meeting on applications previously considered by the Committee.

2. Financial Appraisal

- 2.1 There are no direct financial implications of this report.

3. Contact Officer

- 3.1 The Contact Officer for this report is Isabelle Mouland, Assistant Town Clerk.

Report 79/24 Appendix A

Schedule of Lewes District Councils Decisions received since the Committee's last meeting on 29th August 2024

Approvals – No Objections from Seaford Town Council

LW/24/0464 – Questover, Eastbourne Road - Single storey front/side infill extension.

LW/24/0440 - 25 - 35 Church Street - Replacement of existing windows to flats 25-35.

LW/24/0460 & LW/24/0461 - Sutton Place, Eastbourne Road - Re-roofing, insertion of roof access hatch and solar panel fixing brackets, re-covering of roof fabric to outbuilding and neighbouring stable cottage.

Approvals - Objection from Seaford Town Council

LW/24/0298 - 13 Hillside Avenue - Single storey rear extension to replace existing conservatory, hip to gable roof extension with creation of 2no. side dormers, and addition of 3no. rooflights to existing roof.

Seaford Town Council's grounds for objection: Given the current modest size and character of the property, the provision of the proposed side dormers would make the property too bulky and have a generally unacceptable impact on its character and appearance and on the street scene, contrary to policy DM 25 of the Lewes Local Plan.

Reasons for approval: Based on an assessment against relevant policies, including the Seaford Design Guide, and noting the amount of works that could be carried out under householder permitted development rights, it is considered that a refusal on the grounds set out by Seaford Town Council would not be sustainable at appeal.

Refusals – No Objection from Seaford Town Council

None.

Refusals – Objection from Seaford Town Council

None.

Appeals

APP/P1425/D/24/3347371 – 72 Katherine Way – Section 73A retrospective application for timber decking and associated landscaping at the existing rear garden. An appeal has been lodged against the Refusal to Grant planning consent. The appeal will be determined based on Written Representations. There is no opportunity for Seaford Town Council to submit further comments at this stage.

APP/P1425/D/24/3350061 – Fieldings, 18 Firle Road - Rebuilding of the front garden wall, relocation of vehicular and pedestrian access points including associated landscaping. An appeal has been lodged against the Refusal to Grant planning consent. The appeal will be determined based on Written Representations. There is no opportunity for Seaford Town Council to submit further comments at this stage.

Tree Works Applications

SDNP/24/03370/TCA - Dog Kennel Barn, Annexe Manor Yard, Bishopstone

Village - T1 - Sycamore - reduce crown by 1m and thin by 20% - reduce light restriction and T2 - White Beam - reduce crown by 1m and thin by 20% - reduce light restriction – **APPROVED**

SDNP/21/05422/TCA - Bishopstone Village Green, The Street, Bishopstone -

Reduce two sycamore, one cherry and two hawthorne to maintain stability of tree, remove one ash tree suffering ash die-back, reduce six sycamore trees hindering access/parking – **APPROVED**

Withdrawn Applications

None.