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**Seaford Town Council Response to**

**Lewes Local Plan Consultation February 2025**

**Supporting Arguments**

**Housing Densities**

Seaford and Newhaven have both been identified in the draft local plan as District Centres. Policy H1 specifies simply that in District Centres a housing density of 50 dwellings per hectare will be **required.** The definition of ‘District Centre’ is elsewhere in policy SDS3 and clearly is intended to cover the whole of the town.

This statement was raised with Lewes District Council officers, and it was stated that it has to be read with other policies in the Plan (this Plan or future phases) specifying environmental and other constraints that proposed densities in new schemes will also be ‘subject to’. This assurance from Lewes District Council officers directly contradicts the statements in the appraisals of the two main allocated sites for Seaford that a density of 50 dwellings per hectare of the developable area will be sought as per Policy H1.

The Town Council, and members of the public, deserve confirmation of which assertion is correct.

The requirement in Policy H1, as it stands, may make sense in other towns where recent and/or proposed developments are characterised by high density, flatted developments on regenerated brownfield sites. However, in Seaford, the policy is wholly inappropriate as the two main allocated sites, (as explained in the Town Council’s response per site allocation at Appendix B), are not suitable for such intensive development.

The Town Council strongly objects to an unqualified requirement in the principal housing policy. The policy must include suitable provisos, and/or refences to constraints specified in other policies should be incorporated for clarification.

**Infrastructure**

*Health*
The health service provision in Seaford is over capacity. There are only two GP practices in Seaford, both of which are not taking on new patients, and no minor injuries unit. The estimated forecast registered practice population growth for Seaford PCN is 28,252 an increase of 2.5% by 2032.

Seaford is the largest town in the District, and The East Sussex Joint Strategic Needs Assessment’s: Lewes District Area Profile states that Seaford town centre and Seaford North are some of the most deprived areas in the District. Additional high-density housing development will have a detrimental impact on already struggling healthcare provision.

The Town Council already has major concerns regarding the lack of health services available for current residents. Some are having to travel a significant distance to access routine services and those with mobility and/or mental health difficulties are struggling to get the support they require.

The Ambulance Service in Seaford is already overwhelmed as a result of residents being unable to access primary and secondary care, which is having a catastrophic impact on ambulance waiting times.

There is similarly a shortage of dentist services in Seaford, with new NHS patients not having been accepted for a significant period of time.

*Roads*All roads serving Seaford are over capacity, which is already causing major disruption to traffic and most alarmingly, having a devastating impact on emergency services.

In reality, Seaford is only accessible via 3 roads. The road to the north through Alfriston to the A27 is regularly flooded and inaccessible and even when it is fully open the size of Alfriston village is clearly unsuitable for modern sized vehicles or the level of traffic that passes through it. The road to the east over the Exceat Bridge is a causeway and therefore not future proof, it is also a bottleneck which suffers from significant tailbacks on a daily basis. To the west, the new bus lane in Newhaven is bound to lead to further traffic disruption. Whenever there are blockages on the A259, all roads are gridlocked in and out of Seaford, which is dangerous for all emergency services, and as a coastal town this includes HM Coastguard and RNLI.

East Sussex County Council’s Local Trasport Plan Policy D1 states: “The A259 between Brighton and Eastbourne serves as an alternative in the event of disruption on the A27 corridor. However, disruption means traffic is diverted onto this coastal road which is ill-equipped for the high volume of traffic and affects its function of carrying both intra- and inter-urban trips for the communities of Telscombe Cliffs, Peacehaven, Newhaven, Seaford, East Dean, Friston and Eastbourne along the A259 which also traverses through the protected landscape of the South Downs National Park.”

Seaford is already not able to offer the road services required for its residents, visitors and those passing through to connect to other towns and attractions in the District without adding the extra burden of additional housing, residents and vehicles.

*Sewerage and Water Supply*
The Newhaven Water Treatment Plant is at capacity, indicating that it is unable to accommodate increased demand.

There is also local concern over clean water supply, security and its protection.

*Schools*
The schools in Seaford are oversubscribed, and there is only one secondary school for the whole town, resulting in some secondary school students having to travel to attend Seahaven Academy in Newhaven.

**Tourism & Visitor Economy**
Seaford Town Council strongly urges that Seaford is recognised by Lewes District Council as a national and international tourist destination. Tourism is covered within several of the supporting documents. However, these do not accurately reflect the current situation relating to Seaford.

The Visitor Economy is based on figures from 2018/19 which was pre-Covid. One consultation document states: “tourism data demonstrates that the tourism economy continues to be a significant contributor to the overall economy of the district and therefore should be appropriately planned for and considered within the plan area”. However, tourism for Seaford is not recognised significantly in the consultation documents.

It also should be recognised that Seaford significantly contributes to rural as well as urban visitor economy. Seaford Head and the associated views of the Seven Sisters are actively promoted worldwide and are a world-famous attraction. In addition, Seaford has, or is the gateway to, the following nationally important tourist attractions widely publicised: South Hill Barn; the Sussex Heritage Coast at Seaford Head to the Seven Sisters and Beachy Head; the King Charles III England Coast Path National Trail; the National Cycle Network; Vanguard Way; and the new Avenue Verte. This is not given due regard.

It is important to note that the Lewes GBI Study Map Catalogue has ignored swathes of Seaford Head, including the area around South Hill Barn, the view of the Seven Sisters, the Coastguard Cottages and parts of the local and national nature reserve.

Seaford Head (and surrounding areas) is also a popular destination for people to enjoy the International Dark Skies Reserve.

There are many maps referring, amongst other things, to the notable habitats, accessible open space, outdoor visitor attractions and woodland coverage. These maps relate to all areas within Lewes District, but unfortunately, they miss out on the key areas of Seaford. The Town Council concludes that this part of Seaford was inexplicably not included within the site survey.

Another very concerning comment made states that Seaford is not in an international or national designated area. This is incorrect, as parts of Seaford are within, or are a gateway to, the nationally designated South Downs National Park.

A Visitors Survey is essential as requested by Seaford Town Council in last year's feedback. Travel trends have changed significantly since Covid and an up to date study must be carried out to get a more accurate picture.

Just the data for Seaford Train Station alone (available here - <https://www.railwaydata.co.uk/stations/overview/?NLC=5333#google_vignette> ) shows that in 2023/2024, Seaford had 613,980 entries and exits, making it the 739th most used, out of 2,581 stations in Great Britain. This shows a daily average of 1682.14 passengers starting or ending their journey in Seaford and the Town Council is confident that a Visitor Survey will evidence that the majority of these passengers are coming through Seaford to visit the popular rural visitor attractions as listed above.

**Landscape Character Assessment**

One of the key documents that feeds into important policies contained within the draft Local Plan is the Landscape Character Assessment (LCA).

Unfortunately, the current LCA for the draft Local Plan does not appear to consider the rural margins of Seaford which constitute the boundary between the town and the National Park. This leaves the margins of Seaford at risk from inappropriate and possibly high-density developments.

It appears from the report produced by the consultant AECOM that Seaford has been included within the LCA classed as B1 which relates to Peacehaven, Newhaven, Seaford and Saltdean Downland. They have only considered the urban area of Seaford and have completely failed to have regard to the boundary of Seaford stretching into the National Park to the east and north.

The areas of Seaford within the National Park are indeed covered by an LCA commissioned by the National Park Authority. Lewes District Council makes fleeting reference to the existence of this document but appears to draw no information from it. This information is critical to any proposed development on the boundary between Seaford and the National Park.

The failure to consider the iconic and historic characteristics and influences of the downland landscape of these areas of Seaford puts them at serious risk. This will likely impact many of the assessments regarding sites that have been or will be submitted for development in the future.

The National Park LCA, when referring to South Hill / Seaford Head states: “views east towards the cliffs of the Seven Sisters with cottages at Cuckmere Haven in the foreground are available from South Hill. This location provides views of some of the most iconic landscape features of the South Downs and is a popular location used for photography and paintings. This view is considered to be one of the best views in England”. This evidence is critical in determining whether sites close to the boundary of the National Park are to be developed, the density of the development, and whether the provision of a buffer zone between new development and the iconic landscape should be provided.

**Affordable Housing**

The Town Council is concerned that developers are unlikely to provide the affordable housing requirement stated in Policy H3.

The land prices in Seaford, being a highly sought-after seaside destination town, are high, making affordability almost impossible.

**Brownfield Land Availability**

Seaford Town Council encourages Lewes District Council to lobby central government to grant greater powers to penalise landowners that ‘landbank’ and, if necessary to prosecute, so Seaford (and local authorities nationally) can protect open spaces and use land identified in accordance with planning permissions granted.

In 2022, the Campaign to Protect Rural England (CPRE) identified “Largest number of brownfield sites ever recorded – enough for 1.2 million homes –lying dormant”. Something must be done to recognise that appropriate brownfield sites have been ‘banked’ and must be released and put to use.