



LEWES DISTRICT COUNCIL AND SOUTH DOWNS NATIONAL PARK AUTHORITY

Seaford Neighbourhood Plan Regulation 16 Consultation

July 2019

The following pages present a summary, written by the Neighbourhood Planning Officer at Lewes District Council, of the comments made during the Regulation 16 consultation on the Seaford Neighbourhood Plan, which took place between 24th May and July 5th 2019. The summary is written to provide assistance to the Examiner and to allow anyone who wishes to see some of the issues raised. It does not contain every point a consultee has made. The Examiner will read the comments of each consultee in full.

Reference	Statutory Consultees - Name/Organisation	Date	Method	Summary of representation
R1	Sport England	31/05/19	Email	<p>It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Paras 96 and 97. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in the Playing Fields Policy and Guidance document.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities.</p>
R2	Elizabeth Cleaver/ Highways England	24/06/19	Email	<p>We will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A27.</p> <p>Highways England commented on the Regulation 14 second consultation on the Seaford Town Neighbourhood Plan on 11 December 2018. We asked that in Policy SEA111, New Business Space, part (c), Highways England should be consulted on the proposals for developing this site in terms of potential impacts upon the A27 trunk road.</p> <p>Thank you for including the statement in paragraph 6.42 that "Highways England will be consulted on the proposals for this site in terms of potential impacts on the A27."</p> <p>The final sentence in section 6.42 refers to the potential need for improvements to the "local highway infrastructure". This is somewhat ambiguous as to whether it means highway infrastructure in the vicinity of the development site, or the local highway network (which excludes the SRN). Please can the text be amended to clarify that this could include improvements required to the A27.</p>
R3	Ruby Wilkinson/ Southern Gas Network	26/06/19	Email	<p>SGN broadly supports the Seaford Neighbourhood Plan and in particular allocation (SEA16) for residential development. We suggest that a design-led approach should be taken to ensure that the development potential of each site is optimised and the greatest number of homes are delivered. We consider that reference to 'minimum' yields for sites should be included within the document.</p>

R4	Charlotte Mayall/ Southern Water	28/06/19	Email	We have reviewed the Seaford Neighbourhood Plan and are pleased to note that our previous representations have been addressed. We have no further comments to make.
R5	Jim Howell/ Seaford Natural History Society	02/07/19	Email	The Section "SEA2 Design" paragraph (g) refers to "connections and linkages to green spaces and/ or the countryside", which I understand to be "green corridors". The Plan as currently written does not appear to include any reference to this. The section on verges (7.8, 7.9 and Community aspiration 3) could take this into account by adding a reference to the protection and enhancement of hedgerows and other wildlife-friendly features which provide corridors between green spaces and the open countryside. The Buckle Bypass is a "verge" as statutorily defined, but it is of a completely different nature to any other verge in the Town, and is of considerably greater biodiversity interest. This feature should be mentioned by name (Edinburgh Rd has been named, but Buckle Bypass has far greater value from a wildlife perspective).
R6	Robert Lloyd-Sweet/ Historic England	03/07/19	Email	Historic England do not have any matters to bring to the examiner's attention.
R7	Chris Flavin/ ESCC Highways Authority	05/07/19	Email	We would like to re-iterate our previous comments which ask for cycle parking to be specified (ESCC cycle provision standards) wherever there is reference to car parking. Policy SEA2 (Design) point i) on page 33 should therefore be changed accordingly. <u>Community Aspiration 9 (Transport and Air Quality) page 86</u> As previously advised, we ask that the following recommendation is used to replace the current proposed wording for point a) of the aspiration: <i>'a) It is a community aspiration that East Sussex County Council Highways consider options to address the concerns about safety on the A259 at Bishopstone/ Hill Rise and Hawth Hill and if appropriate, implement a proportionate solution subject to available funding.'</i> We would ask that the last three sentences of paragraph 7.21 of the supporting text on page 85 are deleted and replaced with something along the lines of the following: <i>'There are community concerns about safety on the A259 at Bishopstone/ Hill</i>

				<i>Rise and Hawth Hill. A study is being undertaken by East Sussex County Council to consider potential and affordable options to address these concerns.'</i>
R8	Lewes Planning Policy and Neighbourhood Planning		Internal	<p>Para 2.16, pg.8 Update the 'current stage' indication to Regulation 16 stage. It currently sits at Reg14.</p> <p>3.2, pg. 21 Update paragraph to present tense as we are currently in Reg 16.</p> <p>5.1, pg.25 Vision and Objectives This paragraph could be updated to reflect that the Plan is now in Regulation 16</p> <p>6.1 pg.27 '<i>The Neighbourhood Plan Team</i>' Should this read 'Neighbourhood Plan Steering Group' as written in the rest of the document?</p> <p>Criterion b, SEA1 SEA1 is supported but the Neighbourhood Planning Officer expressed reservations about the number of views in the Seaford's Local Landscape Character and Views in the Regulation 14 consultation.</p> <p>Pg.32 b, d, e, g, SEA2 views as per SEA1 and the following detailed comments on criteria: b) the NPO recommended at the Reg 14 consultation that the Design Guide is referenced here as it contains specific advice on this point. d&e) the NPO again recommended at the Reg 14 consultation that the Design Guide is referenced here otherwise the policy misses an opportunity to give specific design guidance to inform planning proposals. g) the Neighbourhood Planning Officer recommended at the Reg 14 consultation that this should be a separate policy.</p> <p>Pg.33 SEA3 '<i>..will be permitted..</i>' We recommend this is changed to '<i>..will be supported..</i>'</p> <p>The policy is supported. Thank you for making recommended amendments from Regulation 14 comments.</p> <p>Pg.36 SEA4 '<i>..development will be permitted..</i>' We recommend this is changed</p>

				<p>to <i>'..will be supported..'</i></p> <p>SEA5 the NPO comments from the Reg 14 consultation have been taken on board, including the inclusion of a map. Thank you.</p> <p>Pg.40 SEA6 <i>'..will not be permitted..'</i> We recommend this is changed to <i>'..will be supported..'</i></p> <p>The NPO comments from the Reg 14 consultation have been taken on board, including the inclusion of a map. Thank you.</p> <p>Pg.44 SEA7 <i>'..will not be permitted unless..'</i> We recommend changing this to <i>'...will be supported when...'</i></p> <p>Pg.50 SEA10 It has been noted that this policy was omitted from the main body of the document in the second Regulation 14 consultation, and due to this the NPO comments at Regulation 14 did not specifically address this policy. We recommend that the policy, which currently states the hub is strongly supported, could be expanded to contain guiding principles for the Health Hub development. These could include, for example, no net loss of children's play area, improvement to the sports pitches, and improvement in the quality of the provision. It could be linked more tightly with SEA7, clearly stating required re-provision of any recreational loss resulting from development of a health hub on this site.</p> <p>Para 6.38, pg.50 <i>' The Neighbourhood Plan supports the approach to the economy...'</i> We recommend changing this to <i>'The approach to the economy...in the existing planning policy framework is supported...'</i></p> <p>Pg.52 <i>'..shall..'</i> We recommend changing 'shall' to 'should' throughout the policy to be less prescriptive.</p> <p>The NPO Reg 14 comments have been taken on board. Thank you.</p> <p>Pg.54 SEA12 <i>'..will be permitted..'</i> We recommend this is changed to <i>'..will be supported..'</i></p>
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R9	Roger Batho/ LDC Regeneration	04/07/19	Email	<p>SEA6 Development on the Seaford</p> <p>LDC’s Regeneration team support the ambition to allow sensitive future development as long as it enhances the common amenity and public spaces of</p>

				<p>the area, and does not hinder other uses or functions, especially where this development would positively impact on the tourism draw of the town.</p> <p>SEA11 New Business Space at Cradle Hill & associated section on Business Space (6.40-6.42)</p> <p>We are supportive of the provision of new modern business space that will encourage new innovative businesses to the area. Protecting and enhancing the existing employment assets in the town will help to ensure Seaford does not become a dormitory commuter town in the future.</p> <p>SEA12 Visitor Accommodation in Seaford</p> <p>Regeneration team are supportive in principle of an increase in visitor accommodation in the town as long as there is a demonstrable need, market appetite from the hospitality sector and where this is not at the expense of other economic, social or environmental needs.</p> <p>SEA14 Safeguarding Future Transport Projects & associated Community Aspiration 9 (Transport and air quality)</p> <p>LDC's Regeneration team is supportive of the SNP's desire to seek improvements to local transport links which will open the town up to further opportunities for the local economy.</p> <p>SEA15 Site Allocations and Appendix C – Sustainability Objectives</p> <p>LDC's Regeneration team support the over-provision on the understanding that not all planning permissions are implemented. Regeneration is also supportive of the strong approach that the SNP has taken in assessing the sustainability of the allocated sites, ensuring that they are socially, environmentally and economically viable.</p> <p>SEA16 Dane Valley Project</p> <p>In principle Regeneration are supportive of the Dane Valley project, as this is a key allocated site for the SNP due to the contribution it makes towards affordable housing for the town.</p> <p>Regeneration are also supportive of the commitment that the Dane Valley Project has made towards replacing existing employment space that is lost across the site during the development of housing and would encourage the extension of this principle to other allocated sites in the plan.</p>
R10	Anna Woodward/ Network Rail		05/07/19	<p>Network Rail currently have a planning application being considered by the South Downs National Park Authority (ref: SDNP/19/00921/FUL). This is for the 'Closure of the pedestrian level crossing and erection of a pedestrian overbridge</p>

				<p><i>with elevated approach walkways and walkways on approach earth embankments' at the Tide Mills Level Crossing, Mill Drove, Seaford.</i></p> <p>Policy SEA8 <i>Local Green Spaces</i> of the Neighbourhood Plan identifies a portion of the application site to be within the proposed designation for Local Green Space (ref: 10, Tidemills). This plan states that within these designated spaces development will only be permitted in very special circumstances. The application is due to be determined at the Planning Applications Committee on 11th July with a current recommendation for approval.</p> <p>Safety at this crossing is a significant concern.</p> <p>Network Rail request that the 'red line' demarcating the area of the designated green space site be amended to exclude the application site of the footbridge. Please find attached to this letter, the site location plan for the application site. Or that specific provision is included in the plan that would allow for works to the railway required to ensure the safe and efficient operation of the railway.</p>
R11	Marguerite Oxley/ Environment Agency	05/07/19	Email	<p>Page 33, SEA2 Design</p> <p>We are pleased to see the following text included within the policy:</p> <p>j) the development will incorporate Sustainable Drainage Systems (SuDS which involve the integration of objectives to manage flood risks, prevent pollution but also to provide places that are good for people and wildlife and will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.</p> <p>Page 40, SEA 6 Development of the Seafront</p> <p>We are pleased to see the following text included within the policy:</p> <p>b) it is designed to be resilient to impacts from adverse weather conditions (wind damage) and flood risk, and does not prejudice the ability of relevant agencies to manage the coastal flood risk, beach management and sea defence maintenance</p> <p>d) it enhances and conserves the biodiversity of the Seafront (for example, the kittiwake colony at Splash Point and the shingle vegetation at Tide Mills);</p> <p>Page 62, SEA15 Site Allocations</p> <p>We are pleased to see that the proposed allocations have been directed to the areas at the lowest probability of flooding and that they are all located within Flood Zone 1.</p> <p>We are pleased to see occupation of sites (ii) and (viii) to be phased to align</p>

				with the delivery of sewerage infrastructure, in liaison with the service provider. Page 70, SEA16 Dane Valley Project We are pleased to see the following text included within the policy: e. Measures to investigate the extent of contaminated land and remove any contaminated material from the site; j. Occupation of the development to be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
R12	Kevin Wright/SDNPA	05/07/19		The majority of recommendations are for amendments to the text which reflect the fact that the South Downs Local Plan has now been adopted. This should also include amending the SA and HRA to reflect this fact.
Reference	Non-Statutory Consultees - Name/Organisation	Date	Method	Summary of representation
R13	Melvyn Evans	24/05/19	Email	Please seriously consider the development of Seaford. The doctors, schools and particularly the roads are already well over worked, don't make it worse just to tick boxes for council/government endorsement.
R14	Robert Blackburn	29/05/19	Email	Downs development/ health hub - I must place a strong objection to the idea of changing the purpose of the area from leisure centre to a health hub/ sports & leisure/ shop and flats conundrum. This field is well used and is very handy for people who need to exercise their dogs and for many other fresh air pursuits. I must also add my doubts as to the ability of Sutton Drove to take the added pressure of traffic and parking that the development will require.
R15	Joseph Morrell	06/06/19	Email	I am extremely concerned specifically about the proposed 'health hub' complex for Seaford. Please find attached a letter I wrote to the council in March detailing why I believe this would be a disastrous development.
R16	John Alcock	05/06/19	Email	SEA19 – Windfall development. It's not clear how Newlands School will meet Seaford's obligation to meet housing land. The NP is not allowed to include it in calculations. The development also affects SEA7 as the school playing fields are being reduced in the area. The NP could make this clearer in its final form. I think the NP is an excellent document.
R17	Vaughan Reynolds	07/06/19	Email	One of the site allocations earmarked for development (Homefield Place) has a planning application in for not 19 homes (as in the SNP) but 55 within a Care Home. If approved, I imagine this will increase the total housing allocation

				beyond the 218 given under SEA15 of the Plan.
R18	Bob Downing	07/06/19	Email	<p>I wish to register a strong protest against the inclusion of Site SS4 (Downs Leisure Centre) in the Seaford Neighbourhood Plan. The site has been well used by local people since it was acquired, as a public open space, for walking, playing a variety of sports or simply relaxing outdoors - in an area of Seaford which may be beside the busy A259 but is not within easy walking distance of the ever-more-remote Downs and SDNP. Lewes District Council, <i>without any public consultation whatsoever</i>, decided to build a "health-hub" there, and concrete over a large part of the gardens beside Sutton Corner and around to the west of the additional buildings, in the process removing a soccer pitch.</p> <p>This Site is <u>not plan-driven</u>, and has never been offered out for public consultation in its present form. LDC have made it clear that the "exhibition" mounted last February was <u>not a consultation</u>, and neither will the next one be, either..</p>
R19	Downs Development Neighbourhood Voice	14/06/19	Post	<p>We are concerned that information given by the Town Clerk and the Chair of Seaford SG to councillors and members of the public at the Extraordinary meeting of STC on 28th Feb 2019 was misleading, inaccurate and contradictory prior to councillors voting on the adoption of the Plan.</p> <p>We question whether the process by which a significant, later major change was inserted into the Plan at the latest possible stage without public notice and the 2nd Reg 14 consultation was conducted without full public disclosure.</p> <p>The proposed change of use and development of the Downs Leisure Centre is an inappropriate addition to the Plan while other site has been given LGS protection against development.</p> <p>Identifying a site for health facilities was never an objective of the Plan until the STC meeting 18/10/18.</p>

			<p><u>Consultation</u></p> <p>Since these additional plans were brought forth in the NP without consulting residents (the SA SS4 confirms this) significant amendments to the Plan were not disclosed to the public prior to the 2nd Reg 14 consultation, we strongly refute that the '<i>detailed consultation has ensured that the Plan as presented has true authenticity</i>' as stated by the town clerk on 28th Feb 2019.' This was a misleading and inaccurate statement made to councillors before voting to adopt the Plan as there was no consultation with the public over the Downs site.</p> <p><u>Re-assessment of the Downs to fit the Health Hub agenda</u></p> <p>By what means or process did the suitability of the Downs site change? Since neither the housing assessment changed nor where there any changes in the Downs leisure site itself how, without any working group recommendations or minuted steering group recommendations or participation from the public did the Downs Leisure Site enter the NP? There have not been any feasibility or impact assessments of the residents, environment or infrastructure of the area.</p> <p>The loss of the Downs site would reduce the town's existing recreational fields to 3 sports fields. There is no alternative or replacement in this locality.</p> <p>The site allocation conflicts with Core Policy 4, 6, 7 and 8.</p> <p><u>Objective imposed on the Plan</u></p> <p>It was not a NP objective to find sites to accommodate or re-develop health facilities. This objective was added in November 2018 following councillors' instructions on pg 50 of the NP.</p> <p><u>Misleading councillors about the Downs</u></p> <p>The independent professional assessment for LGS was not undertaken for the Downs site. The independent assessment was dismissed by the steering group.</p>
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R20	Penny Lower	13/06/19	Email	<p>With the current and increasing focus on climate change /global warming and escalating demands and proposals to move the country towards a zero-carbon condition, the Plan needs to have more proactive and directive policies especially with regards to new homes; house-improvements and extensions and all development plans.</p> <p>SEA2 Within the 10 criteria listed, other than mention of transport/travel alternatives to car-use, there is scant mention of design features that achieve reduction in carbon energy use.</p> <p>There should be examples of design features and technology that must be included in plans for homes and other structures to ensure that new national policies on renewable energy are being addressed. Examples of “local renewable energy production” are needed.</p> <p>Pg.. 80/81 Climate change and flooding. Should this cover other issues as well as flooding?</p> <p>p.104 9. Sustainable Design. The Indicators need to be more challenging – not useful without targets.</p> <p>Pg.85 Re-cycling. Seaford needs to make more demands on LDC with regards to its Waste Strategy.</p>
R21	Debbie Ward/Seaford Residents Voice	19/06/19	Post	<p>The SNP does not meet the basic conditions G,F, I and does not comply with section 38B para 3 of the Planning and Compulsory Purchase Act 2004.</p> <p>This relates to LDC Core Policy 4 Encouraging Development and Regeneration. The Dane Valley site will involve the loss of employment space and if the project is not deliverable due to concerns highlighted in the Aecom report the housing numbers will fall substantially. The site was not considered to be suitable by the SHLAA.</p> <p>The JCS makes it clear that employment space is a key strategic priority and loss should be avoided.</p> <p>Core Policy 6 – A recent addition to the Plan of the Health Hub will result in facilities being moved out of the town centre resulting in a detrimental effect on the business in the centre of town.</p>

				<p>Core Policy 7 – the removal of the health facilities in town will put a strain on the well being of the residents well being due to the stress of more travel.</p> <p>Sustainable development – Chyngton Way has been put forward as a LGS by local residents who have a vested interest in preserving the site as open space despite not meeting the LGS criteria and removes a viable, deliverable housing site.</p> <p>The plan is in conformity with strategic policies contained in the development plan – There is no support in the NPPF for development in the National Park. Seaford has no means of expansion other than a few parcels of land excluded from the SDNP which helped form the SHLAA capacity assessment.</p> <p>Core Policy 8 Green infrastructure – the proposed health hub development will result in loss of recreational space including a children’s play area and outdoor sports facilities.</p> <p>To allocate a LGS in order to prevent development is against NPPF policy however this has happened in the case of Foster Close, Chyngton Field and Grand Avenue Fields.</p> <p>SSSIs – A site known as North Way has not been properly assessed and should be considered for LGS designation. A review of the LGS report is attached which contains a full ecologist report and a review consultants report.</p>
R22	Rita Boswell	25/06/19	Email	<p>NPPF Chap. 2 Achieving sustainable development:</p> <p>The inclusion of a proposed Health Hub, to be sited on Downs Leisure ground (Site SS4), in the Seaford Neighbourhood Plan does not demonstrate sustainable development; it also contradicts LDC core strategies (Core Policy 4) see comments following:</p> <ul style="list-style-type: none"> (a) An economic objective. Moving the Seaford Medical Practice and the Old School Surgery from Seaford town centre will have a serious impact on the local economy from dramatically reduced footfall in the town centre (LDC Core Policy 6). (b) A social objective. Seaford already has a deficit of outdoor recreation

				<p>and sports facilities and this development would create a permanent loss of valuable green recreational space and vital outdoor sports facilities with no alternative in the locality (LDC Core Policy 8), particularly in the light of the Newlands site (SE3) now being allocated for housing.</p> <p>(c) An environmental objective The out of town centre location will create soaring levels of car dependence adding to existing traffic congestion, parking problems, more pollution and an increase in road safety hazards.</p> <p>NPPF Chap.3 Plan making (a) It was not and should not be a Neighbourhood Plan objective to find sites to accommodate or redevelop Health facilities. (b) The proposed Health Hub (Site SS4) was added retrospectively by councillors in October 2018 without public consultation and due transparency. (c) The area is registered as a Community Asset until 16.3.2020 and should continue to be so. (d) The Downs Leisure area is protected under LDC planning policies: RE1 (Provision of Sport, Recreation and Play); RES19 (Provision of Outdoor Playing Space); CP8 (Green Infrastructure), building on these grounds breaches these policies.</p> <p>NPPF Chap.5 Delivering a sufficient supply of homes The proposed housing element on the Downs site is not critical or necessary for Seaford to deliver its housing target</p> <p>NPPF Chap. 7 Ensuring Vitality of the Town Centre Moving the two GP surgeries, nursing, administrative teams and pharmacy out of the town centre is sheer madness, when half the Seaford Medical Centre building is standing empty, as is Warwick House, the former day centre for dementia, disability and over 65s.</p> <p>NPPF Chap.8 Promoting healthy and safe communities Policy SEA7, 8 and 9 protect leisure facilities that contribute to health and wellbeing. Building on the Downs Leisure Centre reduces the provision of local green space for children and adults to play safely.</p> <p>NPPF Chap. 9 Promoting sustainable transport There are currently 3 buses an hour stopping near the Downs, which are often full to capacity in the summer months with tourists. Sutton Corner is a very busy junction of three roads, plus access to the Downs close by, more traffic will</p>
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				<p>create even larger tailbacks. This, in conjunction with two pedestrian crossings, is not safe and a disaster waiting to happen.</p> <p>NPPF Chap. 11 Making effective use of land policy Building on the Downs is not an effective use of land. Parking in the area is already a serious problem and extremely dangerous on days of high activity at Downs Leisure. There is absolutely no point in having a supermarket on the site, since there are already two shops within a short walking distance.</p> <p>NPPF Chap.15 Conserving and enhancing the natural environment Increased road traffic to and from the Downs will have an impact on the local area and can hardly be called “conserving and enhancing the natural environment”.</p> <p>NPPF Chap. 16 Conserving and enhancing the historic environment Policies SEA3, 4 and 5 protecting the existing Conservation Areas and Areas of Established Character should come into play here. The Downs has a flint barn dating back to at least the 18th century, currently home to the 60+ Club, and the memorial garden, facing what was once a large open common, is the last remnant of green space from the old Saxon village of Sutton, an earlier settlement than Seaford of which it is now a suburb.</p>
R23	Laura Greppi	25/06/19	Email	<p>I am writing about the fields between Clementine Avenue and Grand Avenue. They were assessed in May 2018 by the same person who assessed other similar spaces for Local Green Space status in Seaford, and they received a high score. The Steering Group disagreed and downgraded the score not only to Medium, but to Low. How does the Steering take such a huge decision, overruling an expert’s opinion?</p>
R24	Irene Bradley	26/06/19	Email	<p>Downs Leisure Centre SEA10 - I therefore would like to state my concerns as a resident living in this area of Seaford regarding the loss of green space, increased traffic/parking problems and the loss of visitors to the town centre.</p>
R25	PJ Renville	30/06/19	Email	<p>I am concerned about the proposal to build a health hub on a much loved and constantly used playing field. Seaford is already lacking in recreational spaces and we will shortly lose the Newlands site to housing. There is no alternative green space in this area of Seaford.</p> <p>The removal of both surgeries out of the town centre will result in a loss of footfall to the town and will have a detrimental effect on businesses and cafes in Seaford.</p>

				The proposal for the hub was included at the last moment and the residents of Seaford were presented with this idea rather than consulted about it.
R26	John Rigden	28/06/19	Email	<p>I do not support the Plan and consider it does not go anywhere near meeting the targets set.</p> <p>In summary there are 35 new sites that could happen and 44 that were already identified that could also happen making a total of 79 which is far short of the minimum target of 185. Even if the site at Dane Valley was achieved this would add 74 dwellings bringing the maximum possible actual deliverable total to 153 dwellings.</p> <p>I have identified my site which is "Land adjacent to 47 Surrey Road" as suitable and available for up to 50 dwellings on a brownfield site within the current development area and it has been excluded and has been incorrectly assessed as Green Space in conjunction with another site under different ownership on the other side of the Railway track.</p> <p>I have also attached a copy of my Pre Submission Plan comments which give my more detailed comments and ask that they are also considered.</p>
	Ann Bracey	29/06/19		<p>I am concerned that a submission under the 2nd Regulation 14 Consultation may not have been received by Seaford NP.</p> <p>Attached is the covering 2nd Regulation 14 Consultation email dated 12th December to evidence the timeliness and I attach a copy of the full submission plus a "correspondence" document for background. The content of the correspondence is mainly in respect of a public document "Seaford Neighbourhood Plan Environment and Countryside Working Group Report on Local Green Spaces". There were some inaccuracies and inconsistency in respect of the Grand Avenue section.</p>
R27	Briony Player	01/07/19	Email	<p>NPPF part 2 - Achieving sustainable development - Loss of GP services in the town centre will reduce footfall. LDC CORE POLICY 6 retail and sustainable town centres.</p> <p>LDC CORE POLICY 8 Green infrastructure. Seaford has a deficit of outdoor recreational space especially in the north of the town</p> <p>NPPF part 3 - plan making - The objective for providing new health facilities was not part of the neighbourhood plan. The Downs Leisure Centre (SS4) was</p>

			<p>added to the plan at the latest stage by the council in October 2018 following its approval for public works loan funding in September 2018. No public consultation took place prior to these dates and in total secret to the wider population and local community. There was a failure to inform the public adequately of the late addition of the Downs Leisure Centre for development in the neighbourhood plan.</p> <p>The steering group never considered the Downs site for green space allocation due it's LDC policies. RE1 Provision of sport, recreation and play. CP8 Green infrastructure RES19 Provision of outdoor space. SPF12 recreation and community services, regarding it as a community asset.</p> <p>NPPF part 5 - Delivering a sufficient supply of homes - Any houses/flats built on the Downs leisure centre will be classed as windfall development. Not included as allocated housing quota. This is purely a regeneration and financial strategy to make the business case viable for public borrowing.</p> <p>NPPF part 7 - Ensuring the vitality of town centres - Moving services away from the town centre will diminish its customer base. Retail services alone are not enough to promote and sustain Seaford as a vibrant town centre.</p> <p>NPPF part 8 - Promoting healthy and safe communities - Reducing green spaces and established recreational facilities is a negative message to everyone especially the young.</p> <p>NPPF 9 - promoting sustainable transport - Currently the surgeries' location are accessible by train, local community buses and support one stop culture. Moving the surgeries away from these established routes will cause more traffic gridlock and extra transport requirements. Many of the objectives of the neighbourhood plan are being breached.</p> <p>1 - To ensure that the neighbourhood plan area has a robust, accessible and sustainable rail and road transport system for its residents and its businesses that encourage and facilitate sustainable economic development. (The current</p>
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				<p>surgeries are accessible by train for use by Bishopstone and Newhaven patients)</p> <p>4 - Promote an active community through retaining and enhancing the economic infrastructure and facilities to promote sustainable development to ensure a thriving social, cultural and community life. (People are combining their visits to the GP with shopping and socialising in the town centre).</p> <p>5 - To preserve and enhance the environment and countryside both within and around the town. Including the historic environment and heritage assets. (The Downs garden and playing field are the last remnants of green in the old area of Sutton).</p> <p>6 - To protect, preserve and expand on the local green spaces in Seaford. (The Downs leisure playing field and garden have been failed by the policies that protect it. What is the use of this neighbourhood plan objective if a vital green space such as this falls through its safety net. It fulfils every criteria for being a designated green space.)</p>
R28	Antonia Carlow/Strutt and Parker	02/07/19	Email	<p>Our objection to the draft Neighbourhood Plan is in relation to Policy SEA8 – Local Green Spaces and specifically in relation to the site referred to as ‘Land at Grand Avenue (3 fields)’... provides reasons as to why Land at Grand Avenue, as identified within Appendix B of the draft Neighbourhood Plan, should not be designated as Local Green Space.</p> <p>Similarly, we question the designation of land at Site 4: Chyngton Field and Site 11: Alfriston Road which, we believe, lack the qualities attributed to Local Green Space.</p> <p>Notably, these sites have all previously been assessed for housing through the South Downs National Park Authority (SDNPA) Strategic Housing Land Availability Assessment (SHLAA, 2016) or subject to a planning application. The revised evidence document which accompanies the second Reg 14 submission, namely the ‘<i>Seaford Neighbourhood Plan, Environment and Countryside Working Group Revised Evidence report on Local Green Spaces</i>’ (Sep 2018), is formed using the original review document from 2017 and presents the justification for the inclusion of Site 12: Land at Grand Avenue, into the emerging Neighbourhood Plan as Local Green Space. This document has</p>

				<p>been compiled by the working group and in our opinion, does not present a substantiated or evidenced argument as to why the Land at Grand Avenue should now be designated as Local Green Space.</p> <p>It is apparent that as a result of the resident's responses to the suggestion of housing by the Steering Group in July 2017, the three agricultural fields at Grand Avenue have now been put forward as Local Green Space as a 'barrier' to development, contrary to the aims of the revised NPPF. Similarly, we question the designation of land at Site 4: Chyngton Field and Site 11: Alfriston Road.</p> <p>The three agricultural fields at Grand Avenue, currently in use for crop production, are not of particular importance to the local community in terms of the beauty, historical significance, tranquillity or richness of wildlife. Their location within the South Downs National Park does not result in the need to afford protection as Local Green Space. Most importantly, the land is in private use for crop production and any use of the land by the public beyond the designated public rights of way is trespassing. This is not a public recreational area nor does it form an area demonstrably special to the local community.</p>
29	Pam & Tony Titchmarsh	03/07/19	Email	<p>We request that the Inspector review the failure to nominate the site known as Blatchington Green as a proposed designated Local Green Space with a view to it being added to the list of protected spaces in the approved Neighbourhood Plan. Residents believe that there has been a deliberate inconsistent application of the selection criteria for local green space sites in this instance and that the virtues of the site have been wilfully ignored. The handling of the drafting of the Neighbourhood Plan has been flawed, largely by failure by the site owner of Blatchington Green to submit an accurate site record as the basis for decision taking by the Neighbourhood Plan working teams. The description of SN9 in the background papers used during the drafting process of the Neighbourhood Plan omits to mention that Blatchington Green is protected by an extant Section 52 agreement. Seaford Town Council as owner of the site was fully aware of the Section 52 agreement.</p> <p>The absence of recorded wildlife by the consultant is to be expected since no proper consideration has been given to the Green. Local residents report sightings of slow worm, badger, fox, toad, and newt as well as a variety of birds and butterflies. By virtue of the orphan land, and a period of neglect by Seaford Town Council, significant areas of the Green have been undisturbed. It is</p>

				consequently a corridor to the green areas of Firle Road leading down to Blatchington Pond. Failure to designate the site will destroy this highway sanctuary.
R30	Teresa O'Brien	03/07/19	Email	With reference to sustainable transport system: I note that there is no mention of electric charging points. You understandably focus on public transport systems but the car is not going to disappear over the period of the SNP. With reference to sustainable development in connection with house and other building, there is no mention of the need for solar panels in order to move towards your objective of a low carbon economy.
R31	Celia Osbourne	03/07/19	Email	<p>I wish to protest against the planned development at the Downs Leisure Centre.</p> <p>NPPF Chap. 2 Achieving sustainable development:</p> <p>The inclusion of a proposed Health Hub, to be sited on Downs Leisure ground (Site SS4), in the Seaford Neighbourhood Plan does not demonstrate sustainable development; it also contradicts LDC core strategies (Core Policy 4) see comments following:</p> <p>(a) An economic objective</p> <p>Moving the Seaford Medical Practice and the Old School Surgery from Seaford town centre will have a serious impact on the local economy from dramatically reduced footfall in the town centre (LDC Core Policy 6). This will have a detrimental effect on local businesses, cafes and shops, with less local employment. There is also no proposal for any additional medical services at the new site and no room for further growth.</p> <p>(b) A social objective</p> <p>Seaford already has a deficit of outdoor recreation and sports facilities and this development would create a permanent loss of valuable green recreational space and vital outdoor sports facilities with no alternative in the locality (LDC Core Policy 8), particularly in the light of the Newlands site (SE3) now being allocated for housing.</p> <p>(c) An environmental objective</p> <p>The out of town centre location will create soaring levels of car dependence adding to existing traffic congestion, parking problems, more pollution and an increase in road safety hazards. The Downs Leisure Centre is a lively and at times very loud gym culture that would at some point clash with the need for a discrete and caring environment for doctors, nurses and patients.</p> <p>NPPF Chap.3 Plan making</p>

			<p>(a) It was not a Neighbourhood Plan objective to find sites to accommodate or redevelop Health facilities.</p> <p>(b) The proposed Health Hub (Site SS4) was added retrospectively by councillors in October 2018 without public consultation and due transparency.</p> <p>(c) The area is registered as a Community Asset until 16.3.2020 and should continue to be so.</p> <p>(d) The Downs Leisure area is protected under LDC planning policies: RE1 (Provision of Sport, Recreation and Play); RES19 (Provision of Outdoor Playing Space); CP8 (Green Infrastructure), building on these grounds breaches these policies.</p> <p>NPPF Chap.5 Delivering a sufficient supply of homes The proposed housing element on the Downs site is not critical or necessary for Seaford to deliver its housing target. It will also create more traffic and pressure on local parking space.</p> <p>NPPF Chap. 7 Ensuring Vitality of the Town Centre Moving the two GP surgeries, nursing, administrative teams and pharmacy out of the town centre is sheer madness, when half the Seaford Medical Centre building is standing unoccupied as is Warwick House, the former day centre for dementia, disability and over 65s. The impact on this loss of footfall will seriously damage shops in the town centre and be very inconvenient for those who combine a visit to the doctors with shopping and socialising with friends in the town's eateries. The result will be business closures and/or relocations, ultimately reducing local employment opportunities. Has no one learnt from the debacle of bypassing Newhaven town centre with a ring road?</p> <p>NPPF Chap.8 Promoting healthy and safe communities Policy SEA7, 8 and 9 protect leisure facilities that contribute to health and wellbeing. Building on the Downs Leisure Centre reduces the provision of local green space for children and adults to play safely. Also if the proposed flats are built there will be nowhere for residents and their children to play. Recent reports by doctors have found that regular users of parks and green spaces are likely to be healthier and make fewer visits to their GPs.</p>
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			<p>NPPF Chap. 9 Promoting sustainable transport There are currently 3 buses an hour stopping near the Downs, which are often full to capacity in the summer months with tourists. Sutton Corner is a very busy junction of three roads, plus access to the Downs close by, more traffic will create even larger tailbacks. This, in conjunction with two pedestrian crossings, is not safe and a disaster waiting to happen. In particular school children use these several times a day and there have already been accidents on the crossing. With an increase in traffic to and from the Downs the pollution from cars and delivery vans is going to seriously affect the local environment and put even more stress on parking in the surrounding streets (some without pavements) that are already under pressure.</p> <p>NPPF Chap. 11 Making effective use of land policy Building on the Downs, which is an existing well-used recreation ground and has been identified as having importance for the town, is not an effective use of land. Parking in the area is already a serious problem and extremely dangerous on days of high activity at Downs Leisure, and to convert what little green open space there is into car parks is just unbelievable and not acceptable. There is absolutely no point in having a supermarket on the site, since there are already two shops within a short walking distance, this will just encourage even more cars and delivery vans, with additional congestion and parking problems.</p> <p>NPPF Chap.15 Conserving and enhancing the natural environment This is a policy to protect valued landscapes and prevent new development from creating unacceptable levels of air and noise pollution, both of which will result from increased road traffic to and from the Downs. This will certainly have an impact on the local area and can hardly be called “conserving and enhancing the natural environment”.</p> <p>NPPF Chap. 16 Conserving and enhancing the historic environment The recreation grounds of the Downs Leisure Centre have been used by the local and wider community of Seaford for over 50 years. Policies SEA3, 4 and 5 protecting the existing Conservation Areas and Areas of Established Character should come into play here. The Downs has a flint barn dating back to at least the 18th century, currently home to the 60+ Club, and the memorial garden,</p>
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				facing what was once a large open common, is the last remnant of green space from the old Saxon village of Sutton, an earlier settlement than Seaford of which it is now a suburb.
R32	Claire & Mark Summers	03/07/19	Email	See Rep R29 as they are the same
R33	Mark Best/ Parker Dann	04/07/19	Email	<p><u>Housing</u></p> <p>We have concerns that the Steering Group is ‘robbing Peter to pay Paul’ as the Lewes Local Plan Part 1 identifies a windfall allowance which 10 of the 11 selected sites could otherwise contribute to. Of further concern is that some of the allocated sites appear to be in active employment generating use. We can see no evidence that confirms that these employment uses are no longer viable. In the absence of this, employment sites should not be allocated for housing. We welcome the Neighbourhood Plan “over programme” by 33 dwellings as set out at paragraph 6.60 although this should be informed by evidence of a lapse rate previously to ensure that 33 dwellings is a sufficient amount to exceed the minimum requirement by.</p> <p>To accord with the Town Council’s current approach it should be demonstrated that the lapse rate is approximately 18 per cent. In our view, deleting this paragraph would probably be easier.</p> <p>SEA17 Florence House</p> <p>We support this policy SEA17 and consider the criteria relating to archaeology and biodiversity attached to the allocation both necessary and reasonable.</p> <p>Sustainability Appraisal</p> <p>We welcome the update to the Sustainability Appraisal in respect of SS6 and the changes in the assessment criteria and the manner in which this is phrased. We maintain that the Neighbourhood Plan allocation would have a positive impact on the existing business at Florence ...this protects employment and the Town’s tourist offer.</p> <p>We are concerned about the allocation of sites that are in existing employment generating use. We appreciate this has now been scored very negatively (for example Site SC26) but the weighting to this objective does not seem to be significant enough in our view.</p>

R34	Karen Corke	04/07/19	Email	Despite previous lobbying the council has not taken this on board. Blatchington Green should be included as a green space in the Seaford Neighbourhood plan. This was voted 5 to nil not to build houses on the GREEN the councils were keen to retain it as informal play area and wanted it to remain protected this was in Oct 2018. I strongly object to the planning application being made for Three Properties . The original outline planning permission for the sit in 1983 states = The area shall remain as such in PERPETUITY and to be kept at all times as a GREEN AREA. NORTH WAY has already lost a GREEN space to a very ugly property.
R35	Graham Mansfield	04/07/19	Email	I understand that the area near 107 Northway is not In the plan as a designated green space. This is a corridor to the South Downs for wildlife and an open space for the residents of the area and would close in a vital part the area. Seaford has already lost too many green spaces to development. Lewes council voted to reject the proposal for development and this should be taken into account and put back as a protected designated green space.
R36	Richard Ford	04/07/19	Email	The Downs Leisure Centre and grounds referred to in SEA7 (Recreational Facilities) as “an outdoor sports facility of particular importance for Seaford” and Seaford, in general, known to be well short of recreational grounds. The Seaford Neighbourhood Plan Sustainability Appraisal has been recently changed (without public consultation) to imply that the Downs Leisure site already has a GP surgery and shop on site (SS4). This is a clear misrepresentation of the facts and should be corrected with the Downs Leisure recreational land redesignated as green space.
R37	Zoe Ford	04/07/19	Email	SEA7 “Recreational Facilities – Downs Leisure Centre and Grounds” “- of particular importance to Seaford” BUT it is contravened by : SEA15 “Site Allocations” (for development) Point x: Homes above new retail unit on the Downs site – 8 dwellings” And the fact Seaford is “15 Ha” short of recreation grounds (6.31 Recreation) SEA10 says “that the proposal for new health facilities on part of the Downs site (on existing green spaces and sports facilities) will be strongly supported...” SEA15 and SEA10 are in opposition to SEA7 and should not be included in the Neighbourhood Plan for future development.

R38	Hannah Pearce/Gillings Planning	05/07/19	Email	<p>These representations relate to the proposed site allocation ref: “SEA15 iii 10 Homefield Place” for 19 dwellings, to which we wish to formally lodge an objection on the following basis:</p> <ol style="list-style-type: none"> 1. The site is not available for allocation for residential (general housing) use 2. The proposed allocation for (Class C3) housing would not be viable 3. The site is suitable for care home (Class C2) use 4. The proposed allocation is not required 5. The proposed allocation does not meet strategic objectives of local and national policy 6. The proposed allocation does not meet the basic conditions, as required
R39	Ken Dijkman	05/07/19	Email	<p>1. Objection to Policy SEA8 - Local Green Spaces</p> <p>- 4. Land North of South barn (Chyngton Way Field)</p> <p>If an important green space within a town was <u>demonstrably special</u> and considered to have particular local significance there would be a far greater body of evidence to demonstrate its obvious importance and appreciation by local people. The Neighbourhood Plan has been in gestation since January 2016, it is perhaps reasonable to suggest that in view of the extensive consultations that have taken place during the past three years the fact that the consultation evidence presented in support of this designation refers to such a small number of people does in itself undermine the proposition that the designation of this field complies with the “demonstrably special to the local community” test set out in the NPPF.</p> <p><u>Significance in terms of Beauty</u> The SNP Evidence Report states unambiguously that the site which is the subject of the designation is not demonstrably special “because of its beauty”. Notwithstanding this in support of the contention that it nevertheless should be designated a letter from the National Trust which confirms that the site is highly visible from surrounding land outside the settlement. This provides the view of the National trust but does nothing to support designation in terms of the relevant test and the importance of this field to the local community.</p> <p><u>Historic Significance</u> Notwithstanding the WW1 commemorative plaque within the town’s church, which is part of the Seaford heritage trail, it is unclear what evidence is being relied upon to demonstrate that the WW1 history of this particular field makes it in any way consciously <i>demonstrably special to the local</i></p>

			<p><i>community</i> in heritage terms.</p> <p><u>Recreational value</u> - this field has no recreational value as it is not publicly accessible. It is unclear how the site can be considered significant in terms of recreational value, particularly as the public footpath which runs along its eastern boundary is outside the proposed designated area. The recreational value of the site is the same as the open arable fields which surround it which are also farmland without public access.</p> <p><u>Tranquillity</u> - In terms of tranquillity it is no different from every other field which surrounds the town. The only houses which benefit from the quite amenity of being adjacent to this particular field are the 17 houses which back and front onto it.</p> <p><u>Richness of its wildlife</u> This parcel of land has for many years been occupied by horses and comprises improved grassland. It contains the normal common species to be found in improved grassland and therefore has some potential for ground nesting birds and reptiles. In this it is no different from the many hundreds of acres of improved grassland which may be found around the town. I enclose with this statement phase 1 ecological survey which followed both a desktop study and professional site inspection; this confirms that the site may have potential as foraging for birds and reptiles and possibly bats.</p> <p><u>An Extensive Tract of Land</u> - as a 2.75 ha site this site does not technically fall into the category of an extensive tract of land. In the evidence provided in considering the question of the Beauty of the site, it is stated that this site is “not in itself of outstanding beauty”. The description given under the wildlife evidence is that “the site adjoins and is contiguous with open arable farmland and pasture within the SDNP”. In other words, it is not a distinct ‘local green space’ but rather part of the broader wider rural surroundings of the town. This is not the function accorded to Local Green Spaces within the NPPF and associated guidance which emphasise that they should be “local in character” and not “extensive tracts”. In the evidence provided in considering the question of the Beauty of the site, it is stated that this site is “not in itself of outstanding beauty”.</p> <p>2. Deliverability of Allocation Sites</p> <p>1. Dane Valley Project Area (104 - net addition of 74 dwellings). The question I believe must be asked is whether the Dane Valley allocation is deliverable or given the state of understanding of the site at present even</p>
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			<p>realistically developable. The two extensive project reports undertaken for the site recognise the complexities arising from multiple landowners coupled with on-site constraints. The problems associated with developing this complex site are identified within the 2017 AECOM report.</p> <p>The report concludes that whilst the site is an excellent location in terms of proximity to the town centre; it is in multiple ownerships and contains businesses that will need to be relocated.</p> <p><u>Site Constraints and barriers to Achievability</u></p> <p>The report also identifies potential transport and access constraints, including limited opportunities to enable walking and cycling along the existing narrow road. It identifies a high risk of contamination, particularly on site, 1,2,3,5,8,9 and 10, which will require remediation.</p> <p>All the above matters militate against the practical and financial deliverability of the site, they are all additional and unpredictable costs, and the number of owners complicates the issue of shared responsibility for dealing with those exceptional costs. The idea of phased delivery is mooted which exacerbates this potential problem.</p> <p>Subsequent to that first report a second AECOM assessment has been undertaken entitled the Dane Valley Viability Study. This is clearly a potentially important document and the Planning Practice Policy Guidance regarding Viability (updated in May 19) states that <i>the role for viability assessment is primarily at the plan making stage.</i></p> <p>This study focuses upon Drainage & Contamination issues but only as a budgeting exercise. For a contractor to commit to the works, in other words for the real costs to be established, a more detailed investigation and costing exercise would need to be undertaken.</p> <p>In the context of the consideration set out above it is not possible to describe the Dane Valley Project Site is deliverable as defined within the glossary. In simple terms it is not available now.</p> <p>2. Jermyn Ford, 10 Claremont Road – 20 dwellings 4. Brooklyn Hyundai, Claremont Road – 13 dwellings</p> <p>Both of these sites are in current commercial use for car sales and accommodate active businesses which employ people. The owner of Brooklyn Hyundai makes it clear that he does not envisage redevelopment imminently</p>
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			<p>because the business has recently been upgraded. On this basis this site cannot be considered deliverable, it is not available now. Equally Jermyn Ford has a history of past permissions for residential development that have not taken place. In both cases the owners have stated that residential development will only be possible if they're able to relocate their businesses, in this context this site cannot be described as deliverable under the terms of the glossary definition within the NPPF.</p> <p>To develop these current commercial locations for housing is to deprive Seaford of future opportunities for increased employment opportunities, tourism -related development or visitor accommodation. As such the development of both the sites runs directly contrary to the Lewis Core Strategy Strategic Policy 4 and CP 6 Towns Centres. There is no evidence that viability has been assessed in relation to either of these sites. Putting to one side the policy objection they may be described as developable, but there can be no confidence that they are <i>available now</i> or <i>deliverable</i> within the first five years of the plan period.</p> <p>7. Seven Sisters pub, Alfriston Road – 9 dwellings</p> <p>The site assessment provided in the supporting documents provides offers very little confidence that this site is available now to be developed within the first five years of the plan. The most recent comment by the asset manager of Enterprise Inns is that the expiration of the lease in 2022 means it may become available within the lifetime of the neighbourhood plan. In other words, the business that owns the site wishes to keep its options open which is entirely sensible bearing in mind the residential values exceed commercial values.</p> <p>In this context the development of this site appears directly contrary to the strategic goals of the core strategy in respect of its strategic vision for Seaford.</p> <p>8. Old House Depository, Claremont Road – 35 Dwellings</p> <p>I am genuinely at a loss as to how a windfall permission granted in 2015 and completed and occupied prior to the pre-submission version of the neighbourhood plan can be described as an allocation within that plan to count against the housing requirement. It is wholly contrary to the government's stated intention of increasing the supply of housing or the core strategy and part two local plans emphasis that the housing allocations for the town should be treated as a minimum.</p>
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R40	Karen Hall & Holger Zschenderlein		Email	Extending the area for any referendum should be a consideration to take account of the affect of SEA10 Health Facilities relocating to the eastern outskirts of the town on any GP patients living in Denton, Norton, and potentially on the east side of Newhaven.

				<p>Article 1 of the European Convention on Human Rights states 'every natural or legal person is entitled to the peaceful enjoyment of his possessions". In the absence of consultation or surveys, it has not been conclusively verified that the development SEA10 Health Facilities can only be delivered a) by the model being proposed or b) only on this site. Given the adverse environmental and nuisance impacts (congestion, pollution, noise, light, etc) of SEA10/SEA15 in respect of the SS4 on the residential locality, the balance of the community interest and requirements to protect individual fundamental right to peaceful enjoyment of possessions (in this case home/property) remains to be established.</p>
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