



SEAFORD NEIGHBOURHOOD PLAN 2017-2030

Seaford Town Council

SUSTAINABILITY APPRAISAL

(INCLUDING STRATEGIC ENVIRONMENTAL ASSESSMENT)

Pre-Submission Version for Second Regulation 14 Consultation

October 2018

Contents

NON-TECHNICAL SUMMARY	1
1.INTRODUCTION	11
WHAT IS A SUSTAINABILITY APPRAISAL (INCLUDING STRATEGIC ENVIRONMENTAL ASSESSMENT)?	11
WHAT IS SUSTAINABLE DEVELOPMENT?	12
HOW TO COMMENT ON THE SUSTAINABILITY APPRAISAL	13
STRUCTURE OF THE SA.....	13
COMPLIANCE WITH ENVIRONMENTAL ASSESSMENT OF PLANS AND PROGRAMMES REGULATIONS.	14
HABITATS REGULATIONS ASSESSMENT.....	14
2. SEAFORD NEIGHBOURHOOD PLAN	16
NEIGHBOURHOOD PLANNING AREA	16
NEIGHBOURHOOD PLAN VISION	17
NEIGHBOURHOOD PLAN OBJECTIVES.....	17
NP POLICIES	18
SITES CONSIDERED.....	19
SUSTAINABILITY FRAMEWORK	19
RELATIONSHIP WITH OTHER PLANS	21
STATUS OF THE SEAFORD NEIGHBOURHOOD PLAN.....	21
3. PARISH PORTRAIT	22
LOCATION AND GENERAL CHARACTERISTICS	22
DEMOGRAPHICS.....	23
NATURE CONSERVATION	24
LANDSCAPE.....	29
RISK OF FLOODING	31
HERITAGE.....	36
SOIL QUALITY	39
AIR.....	40
ROADS AND TRANSPORT.....	40
VEHICLE OWNERSHIP	42
HOME OWNERSHIP AND PROVISION	42
HEALTH AND WELLBEING	46
COMMUNITY INFRASTRUCTURE	47
ECONOMIC CHARACTERISTICS.....	48
RECREATION SPACES WITHIN THE TOWN AREA.....	51
GYPSY, TRAVELLER COMMUNITIES AND TRAVELLING SHOWPEOPLE ACCOMMODATION	52
4. METHODOLOGY	54
STAGES OF SA PROCESS	54
SIGNIFICANCE CRITERIA	56
POLICY APPROACHES AND OPTIONS FOR SITE ALLOCATIONS	60
LIMITATIONS AND BIAS	60
5. WHAT HAS THE SNP AND SA INVOLVED UP TO THIS POINT?	61
NATIONAL PLANNING POLICY FRAMEWORK.....	61
THE NATIONAL PARK PURPOSES	61
LOCAL PLANNING CONTEXT	61
SOUTH DOWNS LOCAL PLAN	62
SCREENING	63

SCOPING	63
IDENTIFYING SUSTAINABILITY ISSUES FACING THE PARISH.....	64
SUSTAINABILITY FRAMEWORK OBJECTIVES.....	71
ALTERNATIVES TO THE SUSTAINABILITY FRAMEWORK OBJECTIVES.....	74
FRAMEWORK OPTIONS FOR SITE ALLOCATIONS	75
<u>6.. ASSESSMENT OF THE SEAFORD NEIGHBOURHOOD PLAN</u>	<u>78</u>
ASSESS SNP VISION.....	78
ASSESS SNP OBJECTIVES.....	78
ASSESS SNP POLICIES	79
MONITORING.....	86
SUMMARY.....	87
<u>7..WHAT ARE THE NEXT STEPS?</u>	<u>88</u>

MAPS

Map 1 Parish and Neighbourhood Plan boundary.....	16
Map 2 Statutory ecological designations in and around the SNP area.....	24
Map 3 Map of SNCI, Ancient Woodland, National Park and Environmentally Sensitive Areas.....	26
Map 4 Sussex Heritage Coast.....	27
Map 5 Flood risk from rivers and sea.....	33
Map 6 Flood risk from surface water.....	34
Map 7 Flood risk from reservoirs	35
Map 8 Heritage Assets Future Evolution of the Heritage Baseline within the SNP.....	38
Map 9 Agricultural Land Classification	40

TABLES

Table 1 Comparing regulation requirements and location of information within the SA.....	14
Table 2 Latest list of selected sites in the SNP area	19
Table 3 Sustainability Framework Objectives	20
Table 4 Vehicle ownership within households in the SNP area and District.	42
Table 5 House tenure within the SNP area and District	42
Table 6 Type of Dwelling houses in he SNP area and District	43
Table 7 Health characteristics of the population in the SNP area and District.....	46
Table 8 Economic activity of the population in the SNP area and District	48
Table 9 Occupation types within SNP area and District	49
Table 10 Industry types within SNP area and District	50
Table 11 Gypsy, traveller and travelling showpeople accommodation needs.....	52
Table 12 SA Stages and tasks and progress to date	54
Table 13 Policy, objective or alternative assessment criteria colour codes and symbols	56
Table 14 Assessment criteria for sites	56
Table 15 Assessment criteria rational for sites.....	58
Table 16 Summary of questions responses.....	69
Table 17 Sustainability Framework Objectives	72

Table 18 Comparing SNP with the Sustainability Framework objectives.....	78
Table 19 Comparing sustainability issues and priorities within Lewes District and Seaford areas.	81
Table 20 Overall contribution of the Neighbourhood Plan towards sustainable development.....	85

APPENDICES

Appendix 3.1 Age structure of the population across the SNP area as recorded in the 2011 census	75
Appendix 3.2 List of nature conservation designations	77
Appendix 3.3 List of Section 41 / Priority Habitats.....	79
Appendix 3.4 List of Statutory Heritage Assets	82
Appendix 3.5 List of Items of Historical Significance to the Parish	85
Appendix 5.1 Responses to consultation on Scoping Report.....	95
Appendix 5.2 Results of SWOT Analysis	105
Appendix 5.3 Sites assessment against Sustainability Framework Objectives.....	109
Appendix 6.1 Assessment of Core Strategy Policies Against Sustainability Framework Objectives	138
Appendix 6.2 Amended Neighbourhood Plan Policies	158
Appendix 6.3 Assessment of all policies as amended.....	166

Non-Technical Summary

Introduction

This chapter is a summary of this Sustainability Appraisal (SA) document without reference to technical terms, known as a Non-Technical Summary (NTS). The other chapters in this document form the SA of the current iteration of the Seaford Neighbourhood Plan (SNP) and contain full explanations of the process and terms used.

A **Neighbourhood Plan**, once adopted, becomes a formal part of the planning system meaning any planning application for development in the parish needs to be considered against the objectives of the plan. This means the SNP is an important planning tool for shaping the development and growth of the Parish.

As sustainability is an important consideration in land use planning, a SA is required by legislation. The **Sustainability Appraisal** is an iterative process that considers the environmental, social and economic consequences of a plan and its policies and seeks to identify ways of achieving a proper balance between these three considerations.

Seaford Neighbourhood Plan

Map 1 shows the Neighbourhood Plan boundary.



Map 1 Parish and Neighbourhood Plan boundary.

One of the key challenges for the Neighbourhood Plan is to identify land to deliver at least 185 new homes in that period. Without the SNP, the local planning authority, not the local community, would identify where the housing land should be allocated.

The objectives for the SNP are as follows:

1. To ensure that the Neighbourhood Plan area has robust, accessible and sustainable rail and road transport systems for its residents and businesses that encourage and facilitate sustainable economic development.
2. To promote sustainable tourism utilising the town's natural assets and regenerating the seafront.
3. To promote a balanced local economy by supporting local businesses and new economic floor space.
4. To promote an active community through retaining and enhancing the economic infrastructure, physical infrastructure and facilities to promote sustainable development to ensure a thriving social, cultural and community life.
5. To preserve and enhance the environment and countryside both within and around the town, including the historic environment and heritage assets and protecting landscape character and important views as identified in the Statement on Seaford's Local Landscape Character and Views.
6. To protect, preserve and expand on the local green spaces in Seaford and to maintain and enhance connectivity for wildlife throughout the town through the conservation and enhancement of green infrastructure.
7. To encourage the provision of a mix of housing of different types and tenures in sustainable locations accessible to local services and facilities, and particularly to support housing aimed at younger people.
8. To facilitate the provision of affordable housing to meet the needs of local people, particularly younger residents who cannot afford open market rents or house prices.
9. To ensure new housing and developments are of high quality and complement and enhance the town's built and natural heritage.
10. To improve the existing, and develop new, walking and cycling routes which reduce reliance on vehicular use, reduce carbon emissions, and which improve the health and well-being of residents and visitors.

To achieve these objectives 18 policies have been developed:

Policy SEA1	Landscape, Seascape and Townscape Character of Seaford
Policy SEA2	Design
Policy SEA3	Conservation Areas
Policy SEA4	Bishopstone Conservation Area
Policy SEA5	Areas of Established Character
Policy SEA6	Development on the Seafront
Policy SEA7	Recreational Facilities
Policy SEA8	Local Green Spaces
Policy SEA9	Allotments
Policy SEA10	Health Facilities
Policy SEA11	New Business Space
Policy SEA12	Visitor Accommodation in Seaford
Policy SEA13	Footpath to Church Lane
Policy SEA14	Safeguarding Future Transport Projects
Policy SEA15	Site Allocations
Policy SEA16	Dane Valley Project
Policy SEA17	Seaford Planning Boundary
Policy SEA18	Windfall Development
Policy SEA19	Utility Infrastructure

Methodology

The policies of the SNP and the sites selected are assessed for what affect they will have on achieving sustainable development by comparing them to a Sustainability Framework (see **Table 2**).

Table 2: Sustainability Framework Objectives

Objective
SOCIAL
<p>1. Housing</p> <p>To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future</p>
<p>2. Sustainable Transport (including walking/cycling)</p> <p>To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.</p>
<p>3. Community infrastructure</p> <p>To maintain and enhance community infrastructure within the Parish</p>
ENVIRONMENTAL
<p>4. Green Infrastructure</p> <p>To maintain and enhance green infrastructure within the parish.</p>

Objective
5. Heritage Assets To protect or enhance the heritage assets and historic environment of the Parish
6. Countryside, Landscape and Key Views To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park
7. Flooding To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere
8. Biodiversity To protect and enhance the biodiversity of the SNP area.
9. Sustainable Design To encourage high quality design and layout in all new development and promote systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.
ECONOMIC
10. Local businesses and tourism Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish

In addition the relationship of the SNP to other planning documents is made.

Baseline Conditions in the Parish

The sustainability effect of the SNP is considered against the baseline conditions of the parish:

Overall development level - overall the SNP Area has a high level of development in proportion to its land area, with approximately 60% of the land area being built-up. This is concentrated in the settlement Seaford itself, with the area to its north, east and south east being in the South Downs National Park. There is an additional concentration of development located around Bishopstone and its adjacent railway station in the west of the town.

Demographics - the Office for National Statistics (ONS) population estimates for 2015 show that while Seaford's population grew by 3.25% between 2011 and 2015, the percentage of the population aged 65 and over grew by 13%. There is a projected population for Seaford in 2027 of approximately 25,861 with an increasingly significant proportion aged 65 and over.

Nature Conservation - the Parish contains three statutory protected areas for nature conservation Seaford Head Local Nature Reserve, Seaford to Beachy Head Site of Special Scientific Interest and Beachy Head West Marine Conservation Zone.

Landscape - the Parish is surrounded by the South Downs National Park. The Heritage Coast stretches along the Iconic Chalk Cliff of Beachy Head, past the Cuckmere Estuary and Seaford Head to Splash Point at Seaford and the Seven Sisters Country Park is on the south eastern boundary of the Parish. Both of these areas are protected from development.

Flood Risk - there are areas of flood risk in Seaford from the sea, rivers and rainfall that is unable to drain away quickly enough. The eastern edge of the Parish is at risk of flooding from an overflowing reservoir.

Heritage – there are seven sites (including Martello Tower) considered to be of national heritage importance (known as Scheduled Monuments) within the Parish. In addition there are listed buildings and many items of historical significance within the Parish. Four areas are designated for their special architectural and historic interest (known as Conservation Areas) within Seaford town centre, Bishopstone, East Blatchington and Chyngton Lane.

Climate change and adaptation – the whole of Lewes District has pledged to tackle the causes of climate change eg reduce the use of fossil fuels and prepare for its consequences eg designing buildings to withstand the effects of climate change.

Soils – there are good quality productive agricultural soils within the Parish but also areas of contamination from historical industrial use.

Air Quality – the air quality across the SNP area is good.

Transport infrastructure - there are good direct transport links to Lewes and Brighton by train and bus but travel beyond to Gatwick and London or to the east requires changes. Road connections are good with A roads running east, west and north.

Housing provision - there are 11,293 dwellings located within the Parish with 45% detached, 19% semi-detached, 13 % terraced and 23% flats.

Health and Wellbeing – the 23,571 usual residents of the Parish are recorded as having a typical range of health statuses but there was 5% less people of very good health status between Seaford and the wider District. In addition poor mental health rates were slightly higher than for the rest of the District. GP surgeries report that their facilities cannot be extended and are at full capacity. Dental practices do have capacity.

Community Infrastructure – the Parish contains a range of community facilities but there is a current shortfall in primary places and also predicted to be a future shortfall. East Sussex County Council is working a solution to this shortfall.

Employment - Lewes town itself is the main employment centre with over 36% of all jobs, followed by Newhaven with 16%. Seaford despite having the largest populations in the Lewes District, has respectively only 14% of all jobs. There is felt to be a shortage of good quality industrial space, particularly for slightly larger units that would allow local firms to expand or upgrade their premises as well as inadequate provision for start-up firms. As well as a lack of small office premises. There is previously commercially used land (known as brownfield) within the Parish that could be redeveloped for housing but the employment capacity displaced needs to be provided elsewhere and of a type appropriate to the employment needs of the population.

Recreation - Seaford has a deficit of recreation space equivalent to about 80% of the space occupied by The Salts Recreation Ground. There is a deficit of recreation space for outdoor sports including pitches, courts and bowling greens. There is also an unequal distribution of such spaces within the town with areas to the North being particularly poorly provided.

Gypsy, traveller communities and travelling showpeople accommodation - at present there are no sites within Seaford provided for for gypsy, traveller and travelling showpeople.

Waste – about 27% (and increasing) of the collected waste is recycled. There no household waste landfill sites within East Sussex and so most of the unrecycled waste goes to the Newhaven Energy Recovery Facility.

Surveys were conducted using questionnaires to understand the communities view of what sustainability issues were important. Four Focus Groups were set up to produced a report on the following issues and suggested recommendations for the SNP to take forward:

- Environment and Countryside
- Local Economy and Facilities
- Transport and Travel
- Housing and Development

Strength, weaknesses, opportunities and threat analysis was also undertaken.

The baseline data highlighted the following as issues that could have an influence on sustainability. Where a suitability framework objective (SO) has been set that covers this issue this is highlighted in the list:

- the ageing population will require access to health care facilities and specialist housing (not specifically covered but part of SO 1 refers to meeting the housing needs of the whole community);
- not significantly affecting designated biodiversity sites, SDNP and heritage coast areas (specifically covered in SO 8);
- protection of landscape views especially from the SDNP (specifically covered in SO 6);
- avoiding areas of coastal, river, reservoir and surface flooding and reducing runoff from hard standing areas and maintaining runoff from greenfield areas (specifically covered in SO 7);
- not significantly affecting on designated heritage assets (specifically covered in SO 5);
- limiting the distances people need to travel to work and for services (mostly covered in SO2);
- need for increased percentage of affordable homes (specifically covered in SO1);
- access to GP services is under pressure (mostly covered by SO3);
- pressure on primary school places (not specifically covered by could be considered part of SO3 to enhance community infrastructure);
- lack of industrial employment space (not specifically covered but part of SO10 to support business in the area);
- deficit of natural green space/recreation spaces especially sports pitches (specifically covered in SO3);
- a commitment to reduce energy consumption (part of SO9 to encourage resource efficiency and promote local renewable energy production);
- need to preserve the best agricultural soils (not specifically covered but part of SO1 directing development towards brownfield site and away from greenfield sites, SO4 to preserve green infrastructure and SO6 to maintain countryside);
- requirement to provide sufficient land in the District for gypsy, traveller and travelling showpeople (not specifically mention but part of SO1 to provide homes for the whole community);

Appraising of Sites

A number of sites have been put forward through the call for sites exercise (undertaken by the Town Council in November 2016) plus from a number of other sources. An initial sifting exercise reduced the long list to a shorter list of 60 sites. The sites were then appraised by the Town Council's independent consultants Action in rural Sussex assisted by members of the Neighbourhood Plan steering group against the Sustainability Framework objectives.

Where a site supports a Sustainability Objective it is considered a positive effect e.g. avoiding areas at risk of flooding or reusing a brownfield site. Within other criteria the distance from the feature will either be a positive or negative effect and the grading of this is set out within the SA. Although it is recognised that assessment of developments are unlikely to be so black and white, the use of measurable distances does allow comparison of the merits and constraints between potential sites for development.

The criteria assumes that developments may have either no effect e.g. not near a heritage asset, neither a positive nor a negative effect which is classified as neutral effect. Where a development is considered to have a negative effect but not one that needs mitigating it is classified as negative. Where the development would have a significant effect and mitigation is considered necessary this is classified as a constraint. A development that has a constraint may still be acceptable it just needs mitigating. Where a development is contrary to a Sustainability Objective e.g. it would result in the loss of a SSSI the developments is considered unsuitable even with mitigation and should be rejected from being a selected site to include in the SNP.

Following this assessment, a short list of preferred sites was compiled. Finally, a total of 11 sites have now been shortlisted through the SA process.

Appraising the Neighbourhood Plan Policies

A wide range of policy areas were included within an early Draft of the Neighbourhood Plan. These have been appraised as to whether they have a positive or negative impact on the future of the parish, using the Sustainability Framework to undertake the evaluation.

The Table below summarises all of the drafted policies and assesses these against the sustainability objectives. The policies assessed are those that have taken on board any changes following the consideration of reasonable alternatives. Several of the policies were amended to strengthen them so they were even more sustainable.

The following colours and symbols are used to assess each policy:

++	Greater positive impact on the sustainability objective
+	Possible positive or slight positive impact on the sustainability objective
?	No impact or neutral impact on the sustainability objective
-	Possible negative or slight negative impact on the sustainability objective
--	Greater negative impact on the sustainability objective

For each negative impact there may be mitigation available that would reduce the effect either from a major impact to a possible impact or from a possible impact to a negligible impact and if available this is stated in the appraisal. Conversely there may be enhancements that could mean that a positive impact is made even better.

Table 3 Assessing if the SNP policies against the Sustainability Framework Objectives

NUMBERS	Sustainability Framework Objectives									
	Obj 1 Housing	Obj 2 Sustainable Transport (including walking/ cycling)	Obj 3 Community Infrastructure	Obj 4 Green Infrastructure	Obj 5 Heritage Assets	Obj 6 Country- side, Landscape and Key Views	Obj 7 Flooding	Obj 8 Biodiversity	Obj 9 Sustainable Design	Obj 10 Local businesses and tourism
Policy SEA1	?	?	?	+	++	++	?	+	?	++
Policy SEA2	?	++	?	+	++	++	?	?	++	+
Policy SEA3	?	?	?	++	++	++	?	?	?	+
Policy SEA4	?	?	?	?	++	++	?	?	?	+
Policy SEA5	?	?	?	?	++	++	?	?	?	?
Policy SEA6	?	++	?	++	+	+	?	++	?	++
Policy SEA7	?	?	++	+	?	?	?	?	?	?
Policy SEA8	?	?	++	++	?	+	?	++	?	?
Policy SEA9	?	?	++	++	?	?	?	++	?	?
Policy SEA10	?	?	++	?	?	?	?	?	?	?
Policy SEA11	?	?	?	?	?	?	?	?	?	++
Policy SEA12	?	?	?	?	?	?	?	?	?	++
Policy SEA13	?	++	?	?	?	?	?	?	?	?
Policy SEA14	?	++	?	?	-	-	?	-	?	++
Policy SEA15	++	+	?	?	+	?	+	?	+	+
Policy SEA16	++	++	?	++	++	?	++	?	++	++
Policy SEA17	++	+	?	?	?	++	?	?	?	?
Policy SEA18	++	++	?	?	++	++	++	?	+	++
Policy SEA19	AiRS to provide the assessment details for this policy but this will not alter any other aspect of the Sustainability Appraisal.									

Appraising the Vision of the SNP

The SNP vision statement would only have positive impacts on sustainability as it complies directly or indirectly with 8 of the 10 objectives and has no impact on the other two. Provided that SNP objectives are implemented with regard for all sustainability framework objectives and not in isolation then there should be no adverse effects.

Conclusion

In the absence of the draft SNP, it is considered there will be fewer opportunities to address the local issues and challenges facing Seaford.

The impact of the SNP policies on the Sustainability Framework Objectives has been considered to ensure that the policies within the Neighbourhood Plan are the most sustainable, given all the reasonable alternatives. Whilst it is predicted that many of the policies will have an overall positive or neutral/unknown impact on sustainability issues, it is inevitable that some of the options appraised will present conflicting sustainability drivers. For example, a policy promoting development will increase demand for resources and increase energy use which could be seen to conflict with part of the SNP SA framework Objective 9 to “reduce the Parish’s impact on climate change”. Where conflicting impacts are predicted to arise, mitigation measures have been suggested or explanation/suggestion on how to resolve the conflict.

As expected the SNP’s sustainability priorities focus on the issues particular to Seaford and so differ from Lewes District priorities that needs to provide sustainability objectives to cover all rural and urban areas within the District. For example, water quality of rivers is an issue across the District but in Seaford the focus is on bathing water quality (due to its importance to the tourist trade). Some differences are due to the inability of the SNP to influence the issue. For example, SNP can highlight where development is more likely to be acceptable to the community but will have minimal influence over the strain on health and social care, congestion on roads outside the SNP area or increase the levels of educational attainment, that are all a priority issues within the District.

The SA has identified the environmental effects of the SNP and concluded that the SNP has been undertaken in a manner to allow the sustainability merits appropriate for the Parish to be maximised when considering reasonable alternatives.

1. Introduction

- 1.1. This Environment Report forms the Pre-Submission Sustainability Appraisal of the Pre-Submission Seaford Neighbourhood Plan. A neighbourhood plan, once adopted (or 'made'), becomes part of the statutory development plan for the area. The Seaford Neighbourhood Plan (hereafter referred to as the 'SNP') is an important planning tool for shaping the development and growth of the town and wider parish.

What is a Sustainability Appraisal (including Strategic Environmental Assessment)?

- 1.2. A Strategic Environmental Assessment is a requirement of the EC Directive 2001/42/EC (the 'SEA Directive') on the assessment of the effects of certain plans and programmes on the environment. This is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations 2004, which introduced environmental assessment as a requirement for most planning documents in the UK.
- 1.3. In addition only a draft neighbourhood Plan that meets each of a set of basic conditions as outlined below can be put to a referendum and be made:
- a. having regard to national policies and advice contained in guidance issued by the Secretary of State;
 - b. contributes to the achievement of sustainable development;
 - c. neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area); and
 - d. the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.
- 1.4. While a Strategic Environmental Assessment is concerned with environmental effects, the Sustainability Appraisal (SA) is more comprehensive as it considers the environmental, social and economic effects of plans and its policies. An SA seeks to identify ways of achieving a proper balance between these three considerations. For simplification, this report is referred to as the Sustainability Appraisal or SA throughout. By undertaking a SA of the SNP, the requirements of the SEA Directive are fulfilled.
- 1.5. Sustainability Appraisal is not legally required for neighbourhood plans because they are not 'Local Plans' or development plan documents as defined by the 2004 Planning and Compulsory Purchase Act. The Neighbourhood Plan Steering Group has chosen to undertake a SA nonetheless as it demonstrates how the SNP "contributes to the achievement of sustainable development", which is one of the 'basic conditions' for neighbourhood plans.

- 1.6. A SA of a neighbourhood development plan is a systematic process to promote sustainable development by assessing the extent to which a neighbourhood development plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. It is also a means of identifying and mitigating any potential adverse impacts that the neighbourhood development plan might have. This can ensure that the policies in the plan are the most appropriate, given the reasonable alternatives. The product of a sustainability appraisal is an Environmental Report in this case named the 'Pre-submission Sustainability Appraisal (including Strategic Environmental Assessment)'.

What is Sustainable Development?

- 1.7. Sustainable development is defined as “development that meets the needs of the present without compromising the ability of future generations to meet their own needs”. It is about ensuring a better quality of life for everyone, now and for generations to come. In doing so, social, environmental and economic issues and challenges should be considered in an integrated and balanced way.
- 1.8. The 2018 National Planning Policy Framework (NPPF) states the Government’s intentions with regards to sustainable development¹, in particular the need for the planning system to perform a number of roles:

ECONOMIC ROLE – contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land and the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure

SOCIAL ROLE – support strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being

ENVIRONMENTAL ROLE – contribute to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

¹ Paragraph 7 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

How to comment on the Sustainability Appraisal

- 1.9. An important part of the SA process is consultation with statutory environmental bodies, wider statutory consultees and members of the community. This SA will be subject to consultation alongside the Neighbourhood Plan.
- 1.10. This document and SNP can be commented on by contacting:
Seaford Neighbourhood Plan
c/o James Corrigan (Town Clerk)
Seaford Town Council
37 Church Street,
Seaford,
East Sussex,
BN25 1HG
Email: neighbourhoodplan@seafordtowncouncil.gov.uk

Structure of the Sustainability Appraisal

- 1.11. This document is split into eight chapters as outlined below:
 - Chapter 1 Introduction – introduces Sustainability Appraisal, defining sustainability, how to comment on the SA and signposts which chapters comply with the regulations.
 - Chapter 2 Seaford Neighbourhood Plan – an outline of the latest iteration of the SNP, Sustainability Framework and its relationship to other plans.
 - Chapter 3 Parish Portrait – description of the environment, social and economic baseline information for the area and how this might affect a planning application.
 - Chapter 4 Methodology – description of how a sustainability appraisal is undertaken.
 - Chapter 5 What has the Plan Making and SA involved to date – outline of the work undertaken to date, such as SA screening, SA scoping, reviews of pertinent information and policies, outline of the reasons for selecting the preferred approach in the SNP.
 - Chapter 6 Assessment of the Seaford Neighbourhood Plan – assessment of the SNP vision, objectives, policies and suggested sites.
 - Chapter 7 What are the next steps?
- 1.12. Many of the chapters rely on significant background information and can contain lists of information and to improve the readability of the document this information is in the appendices. The appendices are numbered corresponding with the chapter they refer to e.g. **Chapter 3** has Appendices 3.1 through to 3.5.

Compliance with Environmental Assessment of Plans and Programmes Regulations

- 1.13. Schedule 2 of the Environmental Assessment of Plans and Programmes Regulations 2004 lists the information that must be contained in a SA report. **Table 1** below sign posts which parts of this SA contains the necessary information.

Table 1 Comparing regulation requirements and location of information within the SA

1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.	Chapter 2 outline of the contents and main objectives Chapter 5 relationship with other plans
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	Chapter 3
3. The environmental characteristics of areas likely to be significantly affected.	Chapter 3
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.	Chapter 2 HRA Chapter 3 other issues
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Chapter 5
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects,	Chapter 5 previous iteration assessments Chapter 6 latest iteration
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Chapter 5 previous iteration assessments Chapter 6 latest iteration
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 5 and Appendix 6.1
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	Chapter 6
10. A non-technical summary of the information provided under paragraphs 1 to 9.	Non-Technical Summary

Habitats Regulations Assessment

- 1.14. Article 6 of the Habitats Directive (92/43/EEC) requires all Member States to undertake an 'appropriate assessment' of any plan or project requiring authorisation which would be likely to have a significant effect upon a European site² (including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites; this is commonly referred to as a Habitats Regulations Assessment (HRA).

² Also known as Natura 2000 sites

September 2018

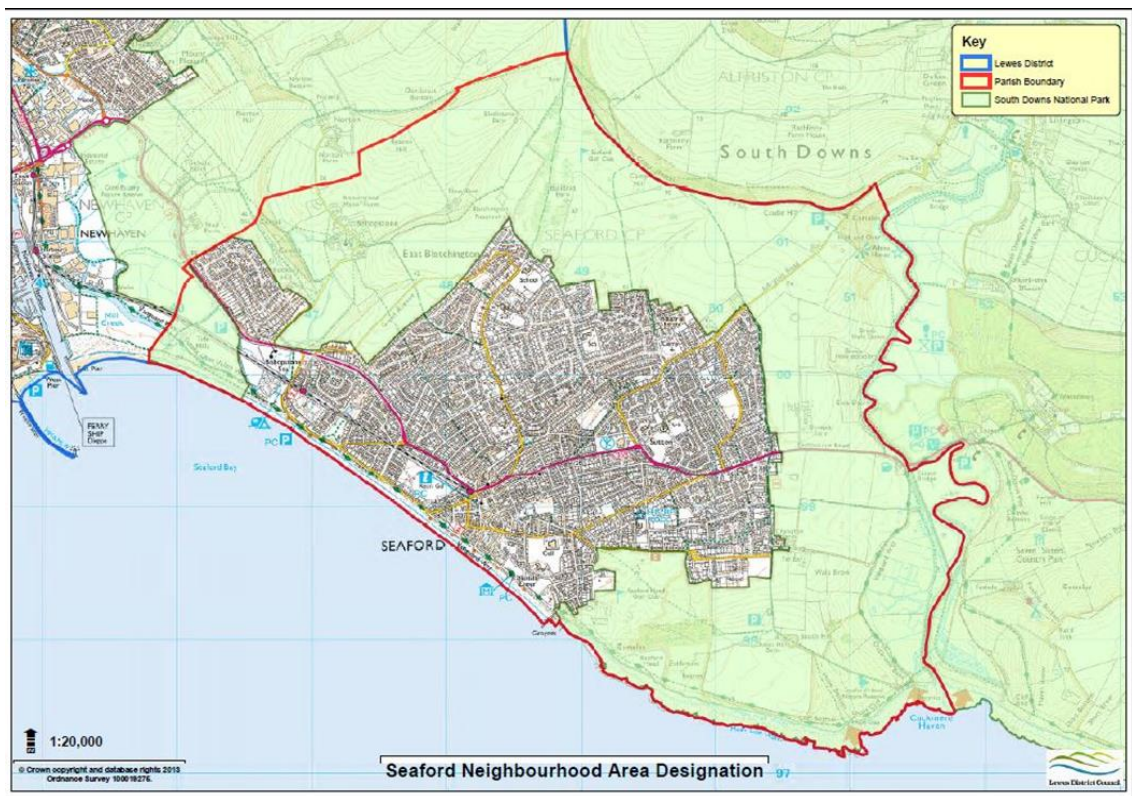
- 1.15. The nearest Site is the Lewes Downs SAC at over 7km north of the SNP area. A direct impact from the policies or objectives of the SNP at this distance is not expected. The South Downs Local Plan HRA (2015) and Lewes Local Plan Part 2 & Neighbourhood Plans HRA (2018) both concluded no adverse effect upon the integrity on Lewes Downs SAC would result alone or 'in combination' with other projects and plans as a result of air quality emissions and scoped the site out from further consideration within these two documents. Similarly, the SNP is unlikely to cause an effect on the integrity of this site.
- 1.16. The only site scoped in by the Core Strategy HRA as being affected from development in Lewes District was Ashdown Forest SPA and SAC. A 7km zone of influence for recreational pressure was established around the site. This site is 24km north of the SNP area. Following a legal challenge of the assessment of air quality emissions effect on the Ashdown Forest SPA and SAC, South Downs National Park Authority and Lewes District Council undertook an HRA addendum in September 2017 that concluded that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from development provided by the Core Strategy, even in combination with other plans and projects including the Seaford Neighbourhood Plan. Therefore, the SNP and its associated development can also be screened out of the Habitats Regulations Assessment.

2. Seaford Neighbourhood Plan

- 2.1. This chapter outlines the current iteration of the Seaford Neighbourhood Plan. The plan has been developed through consultation with statutory consultees, the community, focus groups, reviewing existing plans and policies and considering the environmental, social and economic needs of Seaford. **Chapter 4** outlines what work has been undertaken to date on the SNP including the consultation and outlines the reasons why the Neighbourhood Plan looks the way it does.

Neighbourhood Planning Area

- 2.2. Lewes District Council and the South Downs National Park have designated Seaford Parish as a neighbourhood area in order to allow the Town Council the opportunity to produce a Neighbourhood Development Plan. Map 1 shows the Neighbourhood Plan boundary.



Map 1 Parish and Neighbourhood Plan boundary.

- 2.3. The SNP sets out a vision and the objectives for future development in Seaford up to 2030. One of the key challenges for the Neighbourhood Plan is to identify land to deliver at least 185 new homes in that period. Without the Neighbourhood Plan, the local planning authority, not the local community, would identify where the housing land should be allocated.

Neighbourhood Plan Vision

- 2.4. The SNP Steering Group has developed a draft Vision Statement
- 2.5. By 2030
 - Seaford will have retained its strong sense of community, made greater use of its seafront and heritage assets, including conserving and enhancing the character of its Heritage Coast, as well as promoting sympathetic development respecting the tranquil character of its historic nature to improve the economic, environment and social wellbeing of residents and visitors alike.
 - Seaford's location as a gateway to the South Downs National Park with its green open spaces, seafront and spectacular views will have been retained, protected, enhanced and promoted, to benefit future generations. An improved transport infrastructure will have made the seafront, town centre, railway stations and outlying areas of the town readily accessible for all.
 - Expanding the rich and diverse mix of independent shops, light industrial services, businesses, community and tourist facilities, while simultaneously addressing the shortfall in visitor accommodation, will have widened the town's economic base.

Neighbourhood Plan Objectives

- 2.6. The draft SNP sets out a number of strategic objectives. These state what the Neighbourhood Plan is aiming to achieve through its overall strategy and policies. An assessment has been made as to whether the ten Neighbourhood Plan objectives are consistent with the ten objectives of the sustainability appraisal. This exercise helps identify where potential areas of conflict lie and where mitigation may be required.
- 2.7. The objectives for the SNP are as follows:
 1. To ensure that the Neighbourhood Plan area has robust, accessible and sustainable rail and road transport systems for its residents and businesses that encourage and facilitate sustainable economic development.
 2. To promote sustainable tourism utilising the town's natural assets and regenerating the seafront.
 3. To promote a balanced local economy by supporting local businesses and new economic floor space.
 4. To promote an active community through retaining and enhancing the economic infrastructure, physical infrastructure and facilities to promote sustainable development to ensure a thriving social, cultural and community life.

September 2018

5. To preserve and enhance the environment and countryside both within and around the town, including the historic environment and heritage assets and protecting landscape character and important views as identified in the Statement on Seaford's Local Landscape Character and Views.
6. To protect, preserve and expand on the local green spaces in Seaford and to maintain and enhance connectivity for wildlife throughout the town through the conservation and enhancement of green infrastructure.
7. To encourage the provision of a mix of housing of different types and tenures in sustainable locations accessible to local services and facilities, and particularly to support housing aimed at younger people.
8. To facilitate the provision of affordable housing to meet the needs of local people, particularly younger residents who cannot afford open market rents or house prices.
9. To ensure new housing and developments are of high quality and complement and enhance the town's built and natural heritage.
10. To improve the existing, and develop new, walking and cycling routes which reduce reliance on vehicular use, reduce carbon emissions, and which improve the health and well-being of residents and visitors.

Neighbourhood Plan Policies

- 2.8. The policies in the SNP are:

Policy Number	Title
Policy SEA1	Landscape, Seascape and Townscape Character of Seaford
Policy SEA2	Design
Policy SEA3	Conservation Areas
Policy SEA4	Bishopstone Conservation Area
Policy SEA5	Areas of Established Character
Policy SEA6	Development on the Seafront
Policy SEA7	Recreational Facilities
Policy SEA8	Local Green Spaces
Policy SEA9	Allotments
Policy SEA10	Health Facilities
Policy SEA11	New Business Space
Policy SEA12	Visitor Accommodation in Seaford
Policy SEA13	Footpath to Church Lane
Policy SEA14	Safeguarding Future Transport Projects
Policy SEA15	Site Allocations
Policy SEA16	Dane Valley Project
Policy SEA17	Seaford Planning Boundary
Policy SEA18	Windfall Development
Policy SEA19	Utility Infrastructure

Sites Considered

- 2.9. A series of assessments were undertaken following a call for sites within the SNP area and a short list of preferred sites has been compiled. The environmental constraints and requirements of Lewes District's Joint Core Strategy constrained the sites that could be selected. The short-listed sites are in **Table 2** (together with suggested yields for each site):

Table 2 Latest list of selected sites in the SNP area

Site Number	Address	Yield
SITE SC1 48 Brooklyn Road SITE SC2 48A - C Brooklyn Road SITE SC5 Gasworks site, Seaford SITE SC6 land adj to Water Pumping Station, 37 Brooklyn Road SITE SC7 Yard at 66 A & B Chichester Road SITE SC8 Old Dairy, 51-53 Blatchington Road, SITE SC9 The Trek 2000 Club, Blatchington Road	Dane Valley Project Area	74
SITE SC13	Brooklyn Hyundai, Claremont Road	13
SITE SC16	Holmes Lodge, 72 Claremont Road	12
SITE SC21	Station Approach/Dane Road	12
SITE SC26	Jermyn Ford Garage, 10 Claremont Road	20
SITE SN5	10 Homefield Place, Seaford	19
SITE SS13	Seven Sisters pub, Alfriston Road	9
	Old House Depository Site, Claremont Rd	35
	Elm court, Blatchington Road	9
SITE SS4	Homes above new retail unit on the Downs site	8
SITE SS6	Florence House	7
TOTAL YIELD		218

- 2.10. Thus, the SNP proposal is for 218 homes.

Sustainability Framework

- 2.11. The policies of the SNP and the sites selected are assessed for what affect they will have on achieving sustainable development. The assessment is made by comparing the policies and sites proposed in the SNP to a Sustainability Framework, which is the

environmental, economic and social objectives selected in consultation with the SNP Steering Group and LDC (see **Table 3**).

Table 3 Sustainability Framework Objectives

Objective
SOCIAL
<p>1. Housing</p> <p>To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future</p>
<p>2. Sustainable Transport (including walking/cycling)</p> <p>To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.</p>
<p>3. Community infrastructure</p> <p>To maintain and enhance community infrastructure within the Parish</p>
ENVIRONMENTAL
<p>4. Green Infrastructure</p> <p>To maintain and enhance green infrastructure within the parish.</p>
<p>5. Heritage Assets</p> <p>To protect or enhance the heritage assets and historic environment of the Parish</p>
<p>6. Countryside, Landscape and Key Views</p> <p>To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park</p>
<p>7. Flooding</p> <p>To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere</p>
<p>8. Biodiversity</p> <p>To protect and enhance the biodiversity of the SNP area.</p>
<p>9. Sustainable Design</p> <p>To encourage high quality design and layout in all new development and promote systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.</p>
ECONOMIC
<p>10. Local businesses and tourism</p>

Objective
Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish

Relationship with other plans

- 2.12. The SNP should support the strategic development needs set out in the Core Strategy and plan positively to support local development (as outlined in paragraph 16 of the 2018 National Planning Policy Framework). As well as take account of the emerging South Downs Local Plan and the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies (consultation draft as of September 2018).
- 2.13. The SNP takes account of relevant national requirements, including:
- The National Planning Policy Framework 2018
 - The National Park's Purposes in the Environment Act 1995
- 2.14. The plans, policies and programmes that have influenced the content of the SNP are set out in **Chapter 5**.

Status of the Seaford Neighbourhood Plan

- 2.15. The SNP can be used to address the development and use of land within the SNP area. This is because if successful at examination and referendum the SNP comes into force as part of the statutory development plan. Applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise (see section 38(6) of the Planning and Compulsory Purchase Act 2004).
- 2.16. The emerging SNP may be a material consideration in any planning application. Paragraph 212 of the 2018 National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. Factors to consider include the stage of preparation of the plan and the extent to which there are unresolved objections to relevant policies. Whilst a referendum ensures that the community has the final say on whether the neighbourhood plan comes into force, as part of the development plan, decision makers should respect evidence of local support prior to the referendum when seeking to apply weight to an emerging neighbourhood plan. The consultation statement submitted with the draft SNP should reveal the quality and effectiveness of the consultation that has informed the plan proposals. And all representations on the proposals should have been submitted to the local planning authority by the close of the local planning authority's publicity period.

3. Parish Portrait

Introduction

- 3.1. This chapter outlines the existing relevant environmental, social and economic baseline for the SNP area.
- 3.2. The following statistics and evidence are primarily drawn from the 2011 Census. These are used to provide an overview of the current status of the community. Other sources of data or information are acknowledged where applicable. In some instances, other areas have been included for comparison and earlier statistics have been utilised so that trends can be identified.
- 3.3. In order to be able to identify the impact the Neighbourhood Plan will have on sustainable development, it is important to have an understanding of the baseline conditions that exist within the Parish and the trends that may continue if there were no Neighbourhood Plan prepared.
- 3.4. Baseline data has been obtained from a variety of sources, including Census data, environmental designations and an analysis of the evidence base that has been prepared and collated to support the development of the Neighbourhood Plan.
- 3.5. The information has been structured using a series of environmental topics, which are predominantly influenced and derived from those set out in the SEA Regulations 2004, in particular Schedule 2 plus other social or economic topics.

Location and General Characteristics

- 3.6. The SNP area comprises the large coastal town of Seaford (including Bishopstone) under the authority of Seaford Town Council and is located in the southern portion of the Lewes District in East Sussex between the English Channel and South Downs. It is located approximately four miles to the east of the port and town of Newhaven, 13 miles to the east of the coastal City of Brighton & Hove and ten miles to the west of the coastal resort of Eastbourne. Lewes, the administrative centre of the Lewes District and the County Town of East Sussex, is located approximately 11 miles to north, further along the Ouse Valley.
- 3.7. Overall the SNP Area has a high level of development in proportion to its land area, with approximately 60% of the land area being built-up. This is concentrated in the settlement of Seaford itself, with the area to its north, east and south east being in the South Downs National Park. There is an additional concentration of development located around Bishopstone and its adjacent railway station in the west of the town.

Demographics³

- 3.8. The usual resident population of the Parish as at 2011 is 23,571 people and of these:
- 3,370 people aged 15 and under (14.3% of Parish population compared to 17.4% across the Lewes District and 19% across England).
 - 13,047 people aged 16 to 64 (55.4% of Parish population compared to 59.9% across the Lewes District and 65% across England).
 - 7,154 people aged 65 and over (30.4% of Parish population compared to 22.7% across the Lewes District and 16% across England).
 - When compared with the National statistics (for 2011), Seaford has a relatively low proportion aged 15 years and under, with a relatively high proportion aged 65 and over.
- 3.9. The detailed split is as in **Appendix 3.1**.
- 3.10. The Office for National Statistics (ONS) population estimates for 2015 show that while Seaford's population grew by 3.25% between 2011 and 2015, the percentage of the population aged 65 and over grew by 13%. It is important, therefore, that housing suitable for the needs of this demographic is addressed by the SNP.
- 3.11. East Sussex County Council has produced population projections from 2014 to 2027 based on population estimates, births, deaths and migration released by ONS but constrained to reflect the number of extra dwellings being planned. The total population for Lewes is projected to increase from 100,229 in 2014 to 106,997 in 2027, an increase of 6.75%. The number of people aged 65 and over in the District is projected to increase from 24,452 in 2014 to 31,127 in 2027, an increase of 27.3%. From these figures, we can extrapolate a projected population for Seaford in 2027 of approximately 25,861 with an increasingly significant proportion aged 65 and over.

Future Evolution of the Demographics Baseline without the SNP

- 3.12. The future demographics mix are expected to remain the same as the existing with or without the SNP. Population growth can be expected to grow as outlined above with or without the SNP.

³ Office of National Statistics data is accessible from:

<https://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128269&c=seaford&d=16&e=62&g=6421312&i=1001x1003x1032x1004&m=0&r=1&s=1460968436141&enc=1&dsFamilyId=2474>

Nature Conservation

3.13. Information from the Sussex Biodiversity Record Centre⁴, shows that within the search radius (Seaford Parish) there is:

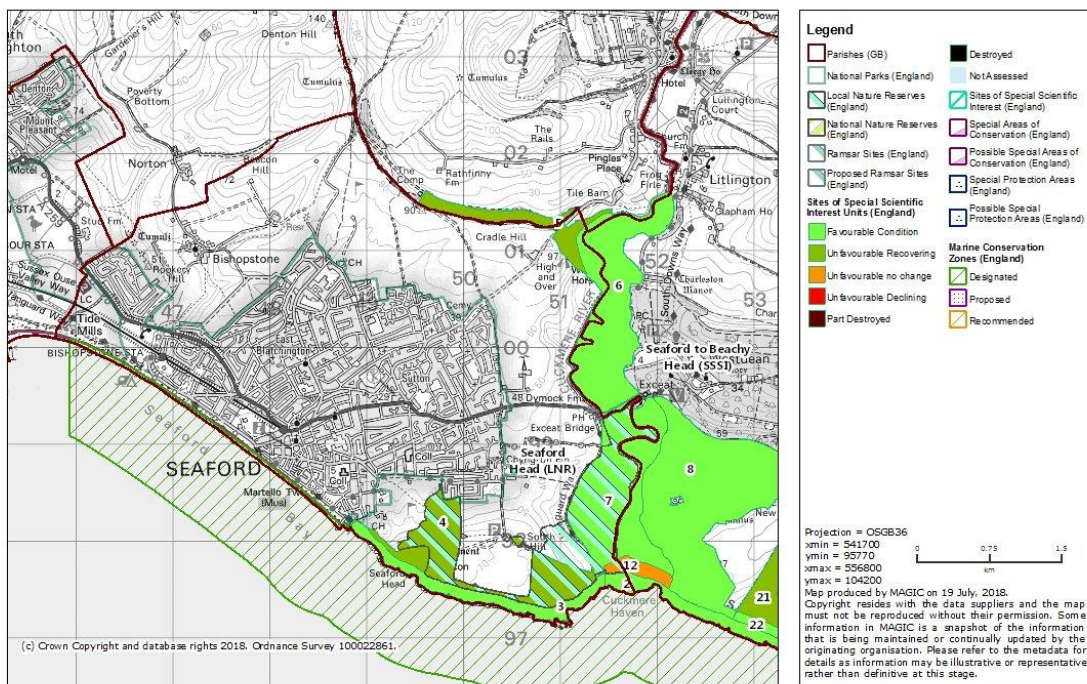
- one Site of Special Scientific Interest (SSSI) - Seaford to Beachy Head
- one National Park - South Downs
- one Local Nature Reserve (LNR) - Seaford Head
- one County Park - Seven Sisters
- seven Local Wildlife Site
- two local geological sites
- thirteen priority habitats
- three notable road verges

3.14. All of these sites are listed in Appendix 3.2

Statutory Site Designations

3.15. Map 2 illustrates the location of the statutory ecological designations

MAGiC 2 Statutory ecological designations in the SNP area



Map 2 Statutory ecological designations in and around the SNP area

⁴ Ecological data search for land at Seaford Parish On behalf of Diane Bushell (Seaford Neighbourhood Plan) Report reference SxBRC/17/171 Prepared on 16/06/2017. Note - this report must not be distributed or published for an external or public audience, for example within the appendix of a report. However, data from within this report may be referenced as long as the Sussex Biodiversity Record Centre is acknowledged.

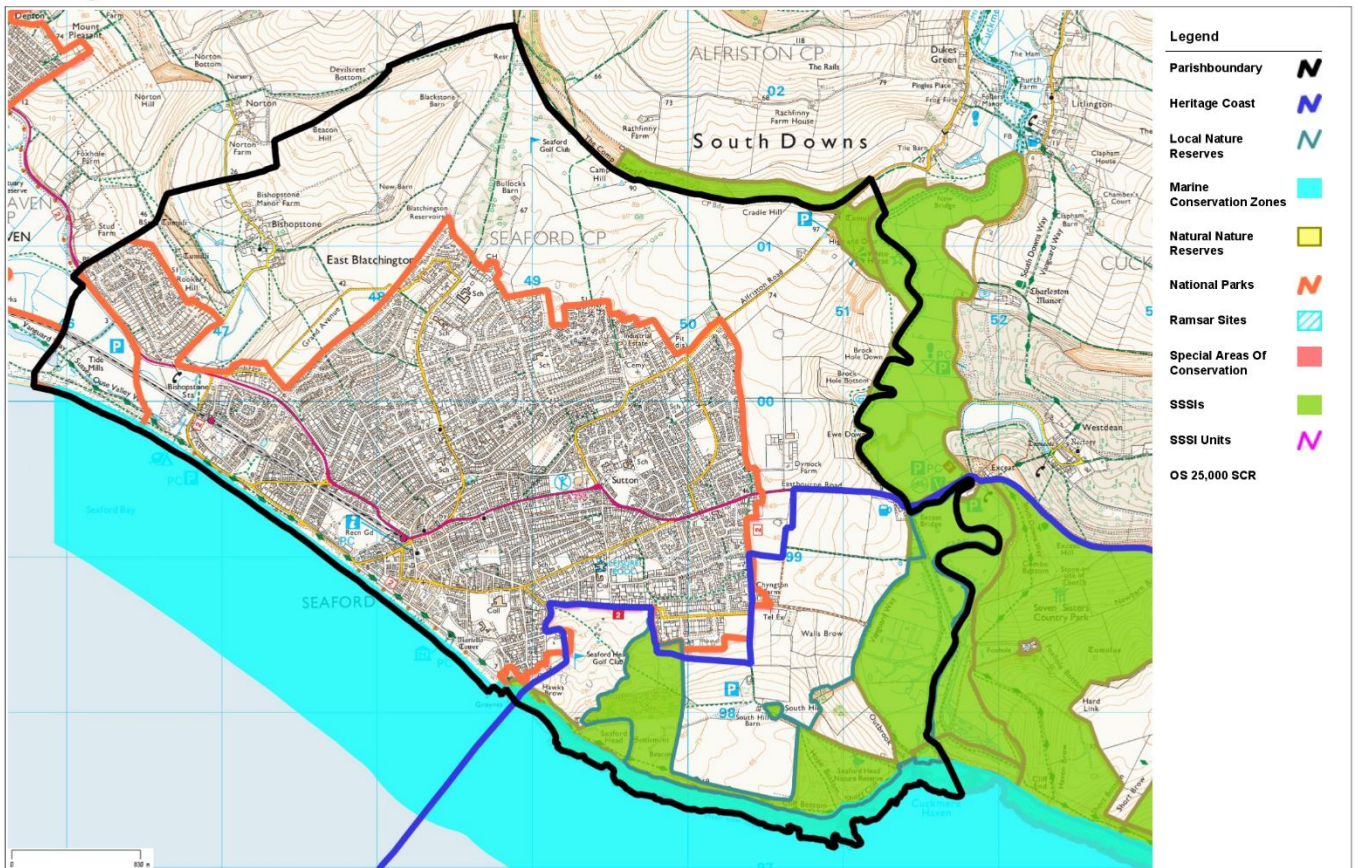
3.16. The Parish contains three statutory areas for nature conservation:

- **Seaford Head Local Nature Reserve** which includes unimproved chalk grassland, scrub, maritime cliff slope, vegetated shingle beach, a small amount of saltmarsh, a pond and a wave cut platform. It is recognised for wildlife including birds and great crested newts.
- **Seaford to Beachy Head Site of Special Scientific Interest (SSSI)** of favourable to unfavourable (no change) condition. It is a herb-rich chalk grassland, chalk heath, maritime grassland, foreshore and chalk cliffs, river meanders and Greensand reef. Together, these habitats support a number of nationally rare, nationally scarce and nationally significant plants, invertebrates and birds. The cliffs and chalk platform beneath, the Greensand reef, and the chalk escarpment at Cow Gap are identified in the Geological Conservation Review as outstanding for their geological and geomorphological interest.
- **Beachy Head West Marine Conservation Zone** designated for its intertidal, subtidal and littoral zones.

3.17. None of these areas would be suitable for development.

South Downs National Park

3.18. The South Downs National Park (SDNP) was set up to conserve and enhance the natural beauty, wildlife and cultural heritage of the area and to promote opportunities for the understanding and enjoyment of the Park's special qualities by the public. Part of the Parish is located in the SDNP area. This represents approximately 50% of the Parish land area and includes all of the land outside of the settlement boundary of the town of Seaford itself. The town of Seaford (including Bishopstone) is located outside of the SDNP area. The boundary of the National Park is shown on Maps 1 and 3. Development within or near the SDNP would need to carefully consider and assess the possible impacts a proposal could have on the landscape, wildlife and cultural heritage of the South Downs National Park.



Date Created: 19-7-2018 | Map Centre (Easting/Northing): 549310 / 99748 | Scale: 1:31491 | © Crown copyright and database right. All rights reserved (100038065) 2018

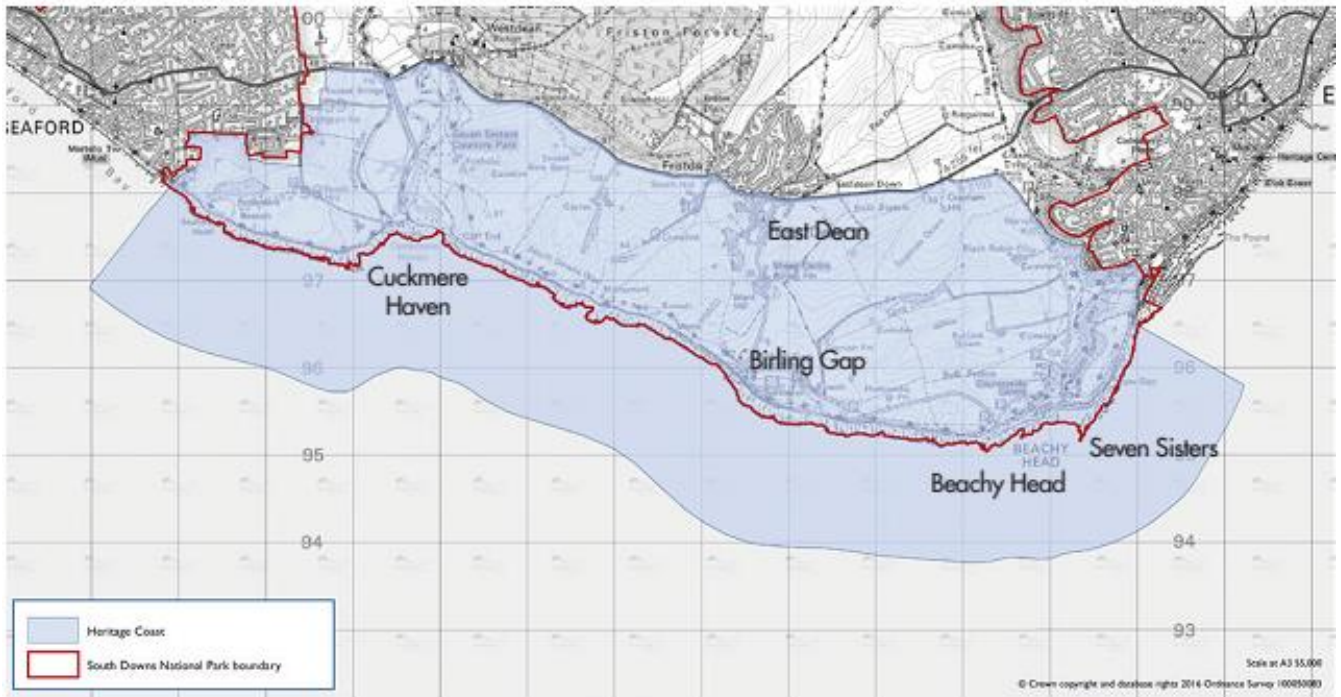
Map 3 Map of SNCI, Ancient Woodland, National Park and Environmentally Sensitive Areas

Heritage Coasts

3.19. Heritage Coasts were established to protect and conserve the best stretches of undeveloped coast in England. The land section of the Sussex Heritage Coast (see Map 4) sits entirely in the SDNP, and parts of the parish are situated in this boundary. The defined Heritage Coast stretches along the Iconic Chalk Cliff of Beachy Head, past the Cuckmere Estuary and Seaford Head to Splash Point at Seaford. The inland boundary is technically the A259. Similar to the SDNP, development in this area is possible but needs to carefully consider and assess the possible impacts. The SDNP Authority wants to develop a partnership and plan for the effective protection and management of this defined and heavily visited area. This links the Core Strategy and South Marine Plan⁵.

⁵ Marine Management Organisation (2016) South Marine Plan Draft for consultation November 2016

SUSSEX HERITAGE COAST



Map 4 Sussex Heritage Coast⁶

Country Park

3.20. Country Parks are statutorily declared and managed by local authorities. They are primarily intended for recreation and leisure opportunities close to population centres and do not necessarily have any nature conservation importance. Nevertheless, many are in areas of semi-natural habitat and so form a valuable network of locations at which informal recreation and the natural environment coexist. The Seven Sisters Country Park is made up of 280 hectares of chalk cliffs, meandering river valley and open chalk grassland.

Site of Nature Conservation Importance / Local Wildlife Sites

3.21. Site of Nature Conservation Importance (SNCI) are non-statutory areas of local conservation interest and a material⁷ consideration in planning applications. The boundary of the SNICs are on Map 3.

⁶ Sussex Heritage Coast – a Strategy and Action Plan 2016-2020 South Downs National Park

⁷ When a decision is made on a planning application, only certain issues are taken into account; these are often referred to as ‘material planning considerations’.

Local Geological Site

- 3.22. There are two coastal section local geological sites identified in the SNP area:
- Seaford Head a 2.3km stretch of chalk cliffs (up to 85 m high) and wave cut chalk platform extending east from Seaford to Hope Gap Steps.
 - Hope Gap Steps-Cuckmere Haven a 450 m of chalk cliffs (up to 25 m high) and wave cut chalk platform extending east from Hope Gap Steps to the Coastguard cottages.

Ancient Woodland

- 3.23. The importance of ancient woodlands as an irreplaceable habitat is set out in paragraph 1181 of the National Planning Policy Framework, which states: *'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.'* The boundary of the Ancient Woodland within the SNP area is marked on Map 3.

Section 41/Priority Habitats

- 3.24. The Parish contains areas identified by Natural England as Priority Habitats (under Section 41 of the Natural Environment and Rural Communities Act) and are subject to Habitat Action Plans. These include coastal, grassland and woodland areas and are listed in Appendix 3.3.
- 3.25. Normally, development which would adversely affect SNCI, LGS, Ancient Woodland or Priority Habitats is not acceptable. Only in special cases, where the importance of a development outweighs the impact on the feature, would an adverse effect be permitted. In such cases, planning conditions or obligations would be used to mitigate the impact. Where a development has the potential to impact on a local site, or a priority habitat or species, a biodiversity survey and report will be required; in some circumstances an Environmental Impact Assessment may be needed.

Notable Road Verges or Designated Wildlife Verges

- 3.26. 'Designated Wildlife Verge' is a non-statutory designation which identifies highway verges in East Sussex that have wildlife habitat significance.

Environmentally Sensitive Areas

- 3.27. Environmentally Sensitive Areas have been renamed as Stewardship Schemes which is an agri-environment scheme run by the Department for Environment, Food and Rural Affairs which aims to secure widespread environmental benefits through paying land

owners/managers to manage land for the benefit of the environment. The boundary of these areas are marked on Map 3. The areas include:

- Multiple areas covering all of the land area east and north east of the beacon at Seaford Head to just short of the A259 road;
- land either side of the Alfriston road in the north of the Parish, extending east to the Parish boundary and west as far as Seaford Golf Club at East Blatchington;
- land at the Brickfield to the east of Buckle Close in the south west of the Parish (this is also a designated Site of Nature Conservation Importance); and
- land designated as Seaford Head Nature Reserve (25.9 Hectares) located in the south-east corner of the Parish.

Future Evolution of the Nature Conservation Baseline without the SNP

- 3.28. Upper tier policies may not include the details of local biodiversity areas or seek to protect/enhance areas of local value identified in the SNP. Opportunities to improve the biodiversity of the SNP area through the implementation of enhancement measures in these local area may well be overlooked. There is potential for loss of valuable habitats as a direct result of development which have yet to be designated for nature conservation however, it is likely that this risk would be lessened as a result of the implementation of the South Downs National Park Partnership Management Plans⁸.

Landscape

- 3.29. The Sussex Downs Area of Outstanding Natural Beauty designation was replaced in April 2011 by the South Downs National Park designation.
- 3.30. A Landscape Capacity Study 2012⁹ was undertaken that summarises the quality and characteristics of the landscape character around Seaford. “The town of Seaford is located on a gentle downland dip slope, at the eastern end of an expansive and exposed shingle beach which bridges the gap in the cliff-face between Newhaven and Seaford Head. The seafront is notably under developed.” The seafront is included in a Seafront Development Plan which is the subject of an ongoing public consultation by Seaford Town Council. The study goes on to state “Isolated from the western edge of Seaford is the Bishopstone estate which is very visible from Newhaven but is contained to the north and north-west by Rookery Hill, a ridgeline that screens the development from the north.” The Study notes that “in landscape terms there is very little scope for the landscape surrounding Seaford to accommodate change due to the exposed character

⁸ <https://www.southdowns.gov.uk/wp-content/uploads/2015/01/SDNP-Partnership-Management-Plan-2014-19.pdf>

⁹ Lewes District Council And South Downs National Park Authority (2012) Landscape Capacity Study

September 2018

of the landscape or the topography. Any development should, ideally be limited to areas outside of the designated National Park as landscape impacts from significant development on urban fringes would be difficult to mitigate against.”

3.31. In Appendix E - Table 6 of the Landscape Capacity Study it highlights that all areas are of good and most of high value and sensitivity and concludes the capacity of the landscape to accommodate development even with mitigation would be none or negligible/low, as below:

• Area at Rookery Hill	None
• Bishopstone/Norton Valley	None
• Land north of Cradle Hill Industrial Estate	None
• Valley floor either side of A259	None
• Blatchington Golf Club	Negligible/Low
• Area east of Chyngton Lane South	None
• North of South Hill Barn	None/Negligible
• Seaford Head	None
• South of Chyngton Road	Negligible/Low

3.32. The study goes on to say “However, it is considered that there are pockets of land on the urban edge, outside of the designation that management could improve, thereby strengthening the character of the landscape. The landscape surrounding Seaford to the north and north east is dominated by the Firlie and Bishopstone Downs and is designated National Park. This valued and visually sensitive landscape, due to its openness, is predominately in agricultural use. Formal recreation uses have resulted in some degradation of this identified landscape character and that to the south of Seaford. These uses should be carefully managed to ensure the surrounding landscape character is not further impacted upon.

3.33. Seaford lies between Cuckmere valley to the east and Ouse valley to the west. The open downland between Seaford and the Cuckmere valley provides a natural ridge which development should not breach. Any change in this area would be highly visible and impact on the character of both the immediate and surrounding landscape. North-west of Seaford another ridge which follows the path of Grand Avenue provides an established and defensible boundary to development.”

3.34. Within the South Downs Integrated Landscape Character Assessment¹⁰, Seaford is identified within the Ouse to Eastbourne Open Downs Character Area and contains

¹⁰ South Downs Joint Committee (2011) South Downs Integrated Landscape Character Assessment

September 2018

some small areas of Cuckmere Valley and Floodplain. Breath-taking views and diverse, inspirational landscapes are one of the seven Special Qualities of the SDNP. The National Park Authority has undertaken research in order to protect and conserve these views and others like them through the Viewshed Study. This takes 120 of the most widely known views and landmarks in the National Park and maps them using computer modelling to a 35 kilometre distance. These plots of views are called Zone of Theoretical Visibility (ZTVs). There are a number of prominent viewpoints near to Seaford which could be sensitive to visible change from development. These include White Horse, Seaford Head and Seven Sisters Country Park. There are likely to be other views in and around Seaford which will be sensitive to change from development. These will be taken into account in the Sustainability Appraisal (SA).

Future Evolution of the Landscape Baseline without the SNP

- 3.35. The main landscape character areas are those associated with the SDNP which would be protected by the SDNP designation without the SNP. However, reliance on higher tier policies may not provide adequate protection or sufficient encouragement to both retain and deliver new areas of open space or protect natural green spaces of value to the local community.
- 3.36. Reliance on higher tier policies may not provide adequate consideration and protection of Parish identity (as outlined in the Landscape, Seascape and Townscape Character of Seaford and Areas of Established Character policies) and matters of interest to the local community (e.g. development on the seafront).

Risk of Flooding

- 3.37. Maps 5 - 7 illustrates the areas of risk of flooding from the sea, rivers, surface water and reservoirs within the SNP area. Significant areas within the SNP area are at risk of flooding from the River Ouse and Cuckmere and its tributaries, or inundation from the sea.
- 3.38. The Beachy Head to Selsey Bill Shoreline Management Plan First Review (SMP2) updated in 2006 contains high level policy for the district's coastline and aims to continue the protection of the coast around the populated areas. The Lewes District coastline extends across eight flood management cells from Saltdean in the west to Seaford Head in the east. A long-term policy of 'hold the line'¹¹ applies to Newhaven Harbour and Seaford to protect residential and commercial properties. However, managed realignment of the low-lying Tide Mills area between the River Ouse and

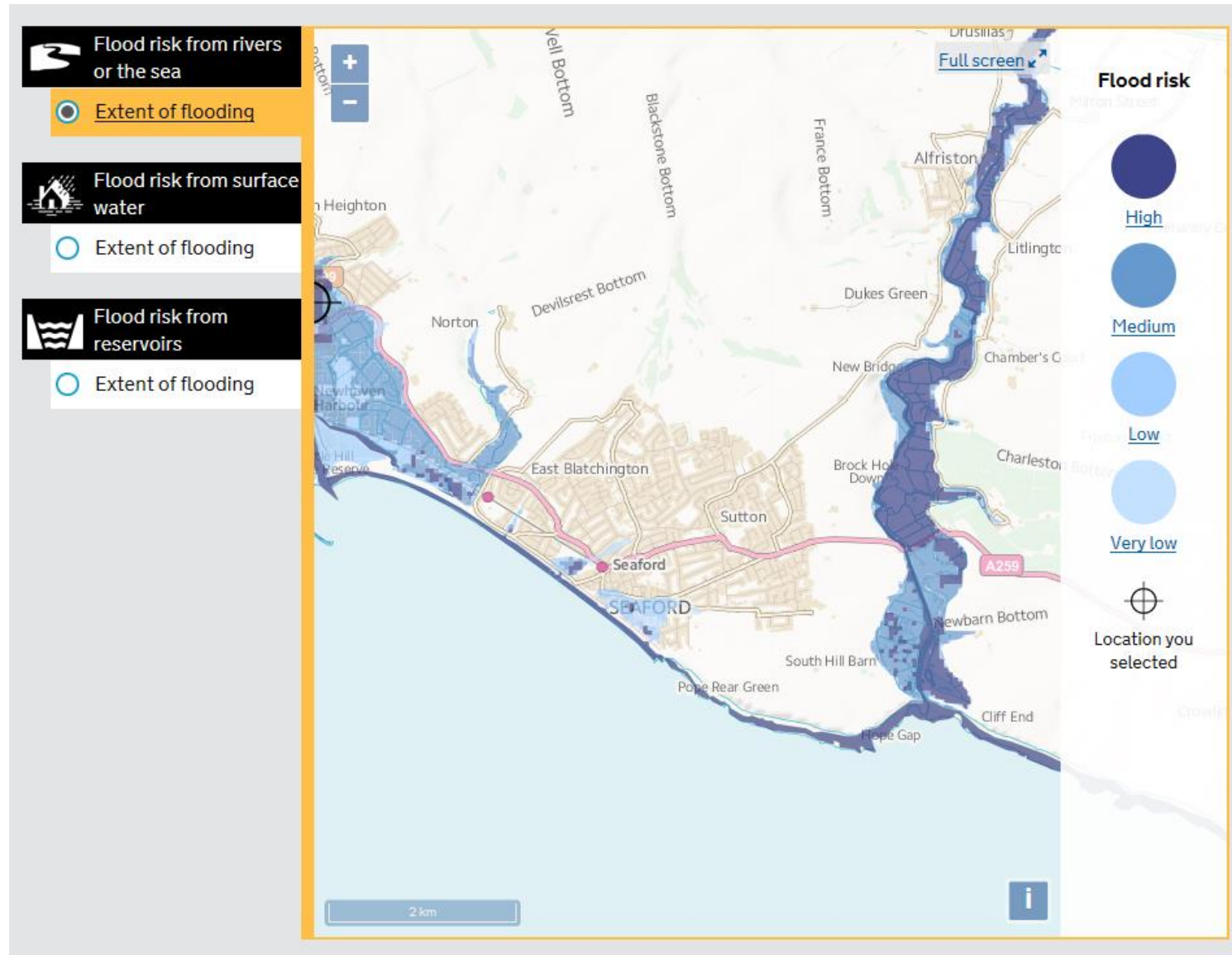
¹¹ hold the line means that a defence will be built to maintained to protect the coast from erosion.

September 2018

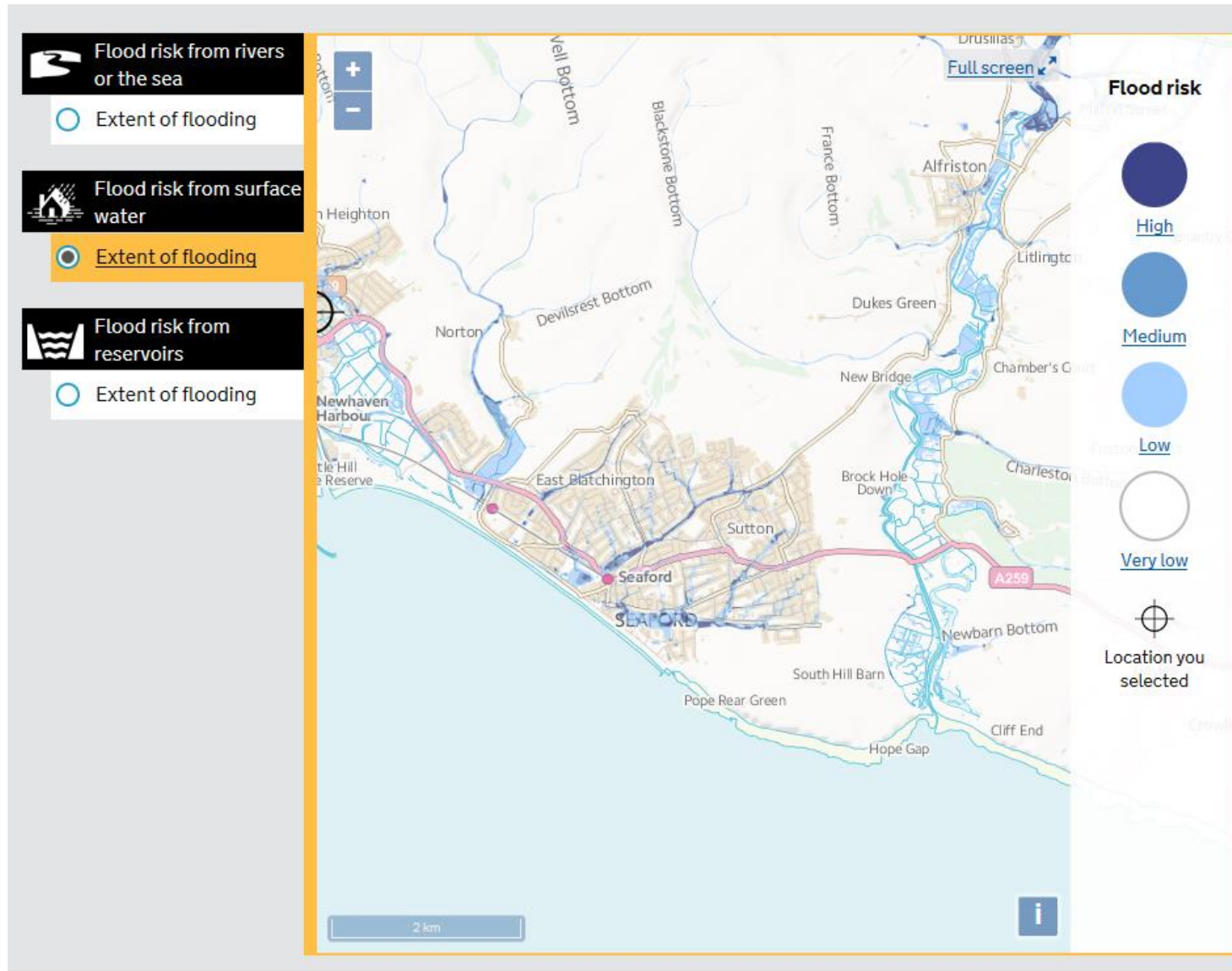
Seaford is planned for the long term. For the short to medium term a policy of no active intervention is being applied to the chalk cliffs at Seaford Head¹².

- 3.39. In addition, there are many locations elsewhere in the Lewes District and within Seaford (see Environment and Countryside's Focus Group report for details) that have areas prone to surface water flooding and ground water flooding during times of intense rainfall (see Map 6 of the Environment Agency's records).
- 3.40. Map 7 outlines that the risk of flooding from reservoirs, this could only affect the eastern edge of the SNP area.

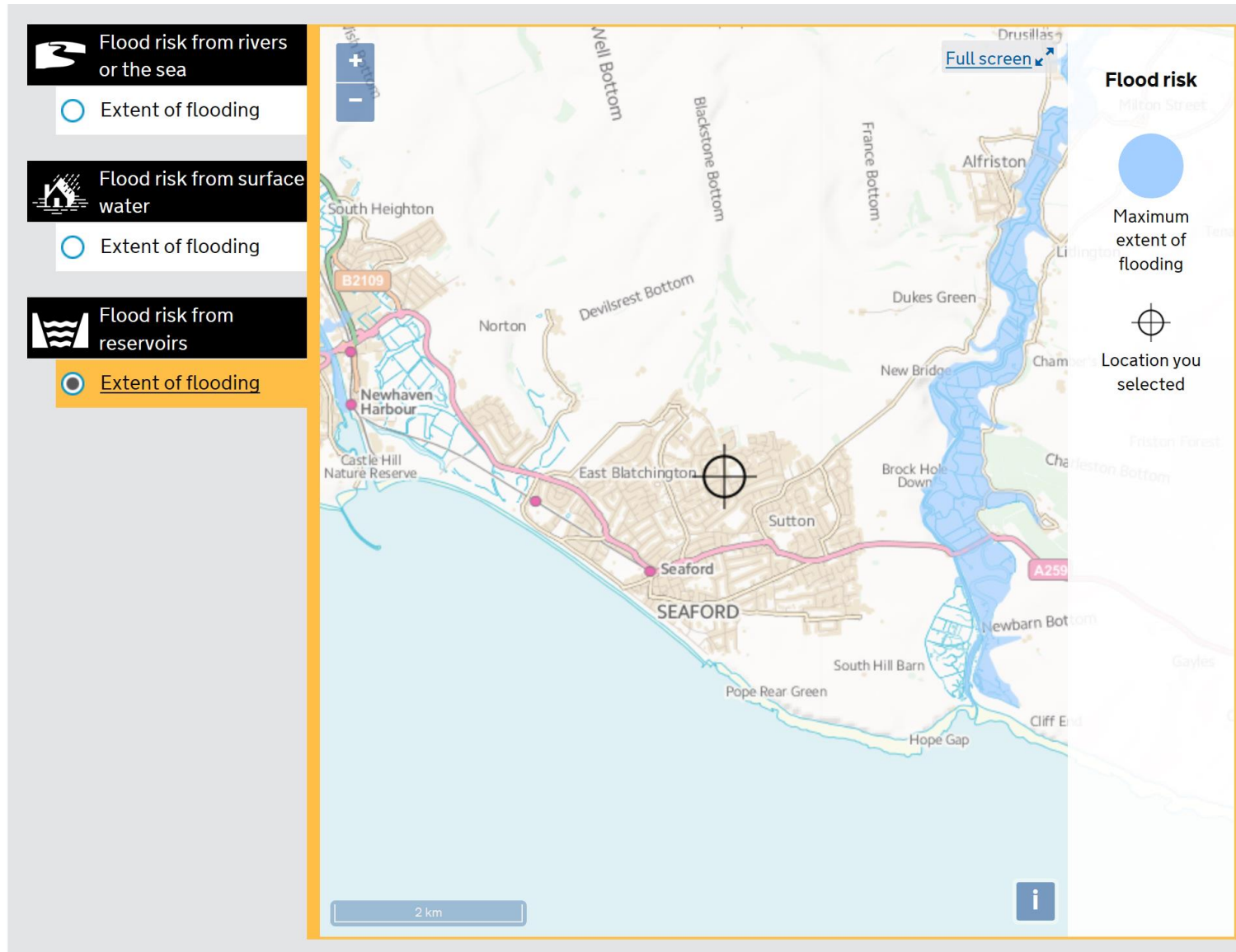
¹² Information and mapping on flood risk areas can be found at <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?map=RiversOrSea>



Map 5 Flood risk from rivers and sea



Map 6 Flood risk from surface water



Map 7 Flood risk from reservoirs

Future Evolution of the Flood Risk Baseline without the SNP

- 3.41. Without the SNP knowledge of local flooding potential e.g. those smaller areas not identified by the flood risk modelling undertaken by the Environment Agency or not of sufficient scale yet to be recorded as flooding incidents, could mean some new homes could be proposed in areas subjected to the risks of localised flooding.

Heritage

- 3.42. The NPPF states that a heritage asset is ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing)’
- 3.43. Map 8 illustrates heritage assets within the SNP boundary. Seaford has a diverse range of buildings of all ages, the earliest dating back to the 11th and 12th centuries, which provide a wide variety of built form within the streetscape in both the town centre and outlying areas. The Parish has 89 listed buildings, structures and scheduled monuments and some fine examples of flint cottages, 18th and 19th century houses as well as Arts and Craft style houses. There are several houses designed by the architect, Alwyn Underdown, with his signature bottle end incorporated into the apex of the eaves.

Scheduled Monuments

- 3.44. A scheduled monument is a historic building or site that is considered to be of national importance. Development that directly affects a Schedule Monument is unlikely to gain planning permission. Below is a list of the monuments within the SNP area:

- Medieval crypt, Church Street, Seaford, Lewes, East Sussex
- Bowl barrow on High and Over, Seaford, Lewes, East Sussex
- Two bowl barrows, the south easternmost pair of a group of six bowl barrows, forming part of a linear round barrow cemetery on Rookery Hill, Seaford, Lewes, East Sussex
- A pair of bowl barrows forming part of a linear round barrow cemetery, and a hlaew on Rookery Hill, Seaford, Lewes, East Sussex
- Bowl barrow forming part of a linear round barrow cemetery on Rookery Hill, Seaford, Lewes, East Sussex
- Bowl barrow, the north westernmost barrow of a group of six bowl barrows, forming part of a linear round barrow cemetery on Rookery Hill, Seaford, Lewes, East Sussex
- Hillfort and a bowl barrow on Seaford Head, Seaford, Lewes, East Sussex
- Martello Tower no 74 on Seaford Esplanade, Seaford, Lewes, East Sussex

- 3.45. The English Heritage classification of Listed Buildings¹³ shows that the Parish of Seaford contains two Grade I listed Buildings, 56 Grade II listed Buildings/structures and one Grade II* Listed buildings as outlined in **Appendix 3.4**.
- 3.46. **Appendix 3.5** offers a list (not exhaustive) of items of historical significance to the Parish. Some may be a part of buildings already listed. They may or may not be privately owned but their preservation should be considered if potentially compromised by future development plans. This has been compiled by Kevin Gordon (18th March 2017).

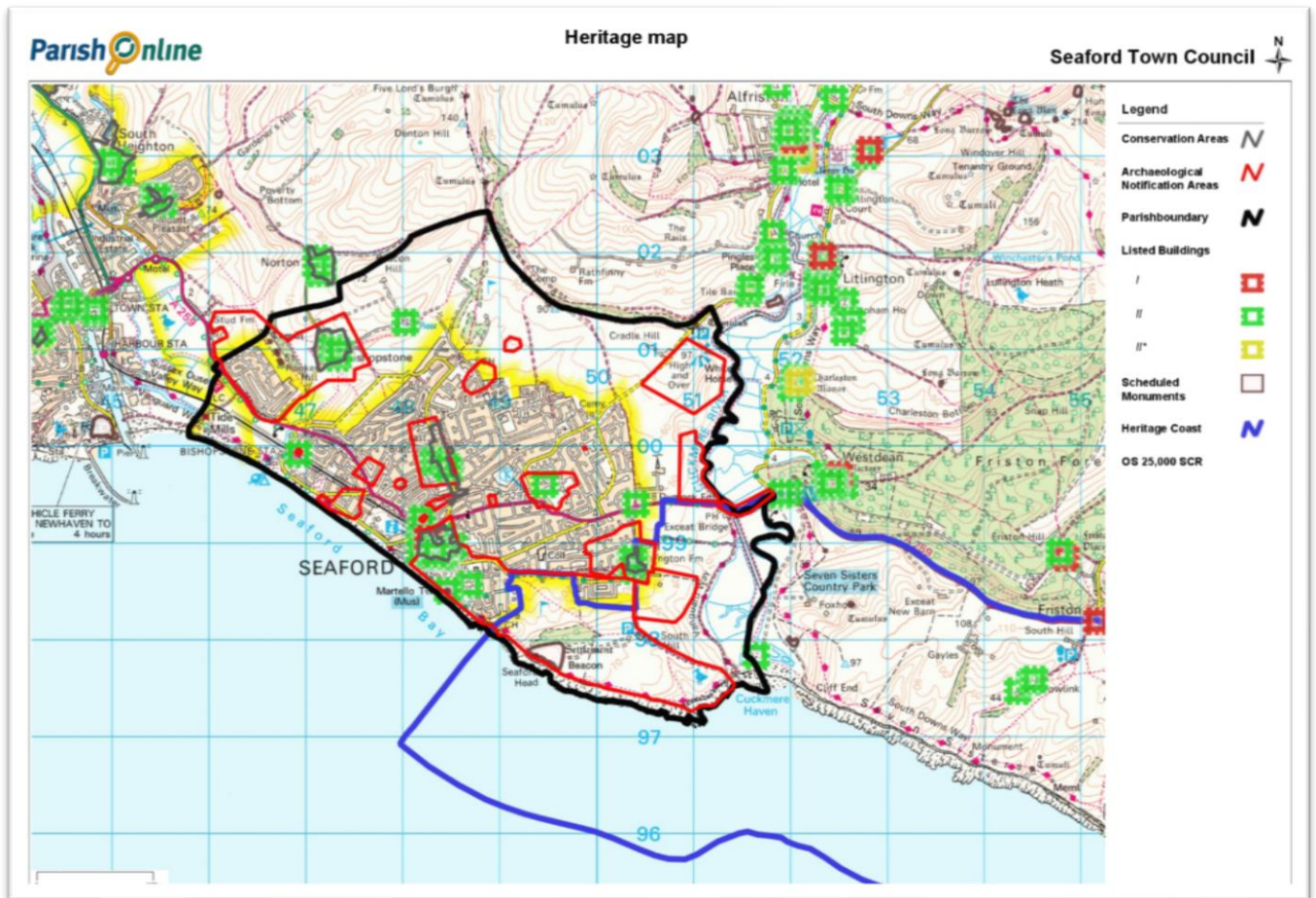
Listed Buildings

- 3.47. Listed Buildings are categories as follows:
- Grade I buildings are of exceptional interest;
 - Grade II* buildings are particularly important buildings of more than special interest; and
 - Grade II buildings are of special interest.
- 3.48. Listing is not a preservation order, preventing change. It does not freeze a building in time, it simply means that listed building consent must be applied for in order to make any changes to that building which might affect its special interest.

Conservation Areas

- 3.49. Conservation areas are designated for their special architectural and historic interest. There are four conservation areas within the SNP area including the old town of Seaford itself and three downland hamlets:
- Seaford town centre conservation area
 - Bishopstone conservation area
 - East Blatchington conservation area
 - Chyngton Lane conservation area
- 3.50. Changes to existing buildings and features within the curtilage may need permission from the Council and the designation will be a material consideration in a planning application.

¹³ <http://list.english-heritage.org.uk/advancedsearch.aspx>



Map 8 Heritage Assets Future Evolution of the Heritage Baseline without the SNP

Future Evolution of the Risk to Heritage Environment without the SNP

- 3.51. Designated heritage assets would be protected but reliance on higher tier policies may not provide adequate local level awareness and consideration of the varied heritage assets of the Parish and may not provide the level of protection requested by the local community. Without the SNP there may be development proposed or built on sites which may damage the local non-designated built heritage of the town, this could have subsequent impacts on the town's tourist economy.

Climate Change and Adaptation

- 3.52. Climate change is the change in global or regional climate patterns, attributed largely to the increased levels of greenhouse gases especially atmospheric carbon dioxide produced by the use of fossil fuels. While climate adaptation is the changes we have to make to adapt to the changing climate. Information on energy use and air quality has been taken from the SA Scoping Report for the Core Strategy 2010¹⁴ and the Sustainability Appraisal 2014. Lewes District Council is a signatory of the Nottingham

¹⁴ http://www.lewes.gov.uk/Files/plan_SAscopingreport.pdf

Declaration on Climate Change and has thus pledged to tackle the causes of climate change and prepare for its consequences. The generation of energy from non-renewable sources releases greenhouse gases and thus the District's consumption of energy contributes to climate change. Climate change would have a potentially significant effect on the SDNP. Policies for energy and materials efficiency in development design would support the District's pledge of tackling the causes of climate change. Note that both the consumption of energy resources and carbon dioxide emissions in the District are falling.

- 3.53. By steering development away from areas at risk of flooding the SNP is adapting development to the consequences of climate change. By encouraging development in areas where there is a reduced need to drive a car to access community infrastructure, schools or employment the SNP supports policy to reduce greenhouse gas emissions.

Future Evolution of the Climate Change and Adaptation Baseline without the SNP

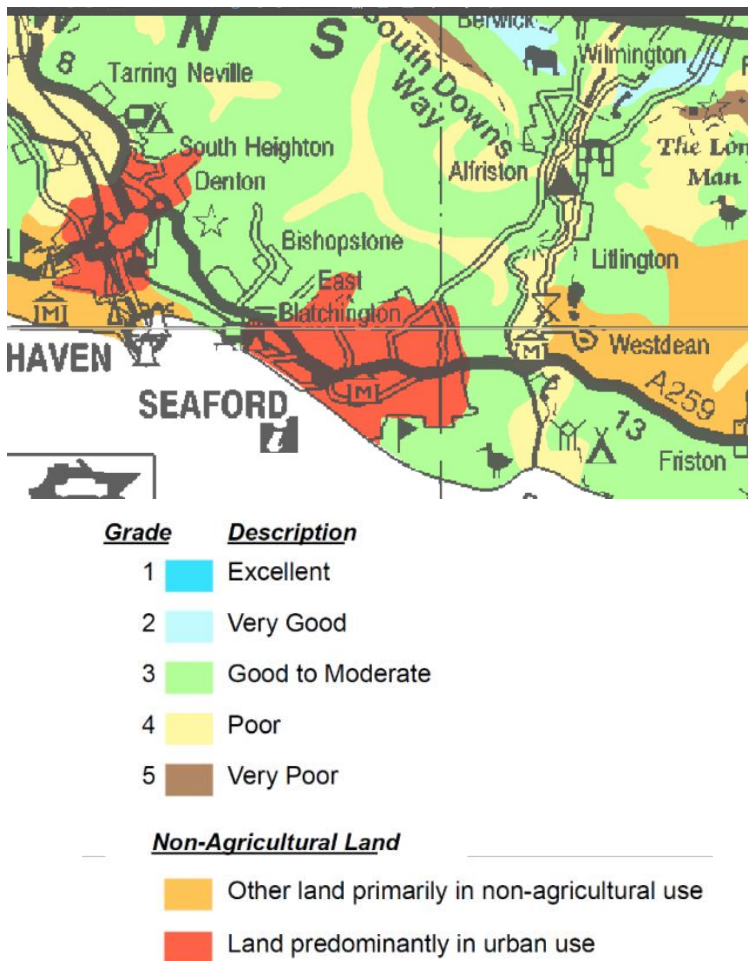
- 3.54. Climate change and adaption are influenced and managed by higher level policy however with the SNP sustainability objectives for promoting sustainable transport, enhancing green infrastructure, steering development away from flood zones and promoting efficiency in design these district and national policies are emphasised locally.

Soil Quality

- 3.55. Lewes District has a high standard of soil, the majority of which is considered to be "Good to Moderate Quality" (Grade 3) agricultural land in the Agricultural Land Classification (Map 9). There is some history of heavy industry in the area and therefore there are some contaminated sites which can present problems to future development and degrade the soil quality. The SNP seeks to allocate sites that are either within the urban area or on brownfield land to preserve the best quality agricultural soils.

Future Evolution of the Soil Quality Baseline without the SNP

- 3.56. Development in areas of local flooding not identified by higher policy may increase surface runoff to areas of good quality soil which could wash contaminants into the soil and degrade them. Without the SNP to steer development towards brownfield sites in the first instances there could be the unnecessary loss of greenfield and valuable agricultural land/soil.



Map 9 Agricultural Land Classification

Air

3.57. There are no Air Quality Management Areas (AQMA) in Seaford and in general, air quality across the SNP area is good. However, an AQMA does exist in Lewes town centre, with motor vehicles comprising the main source of pollution. Also, levels of nitrogen in the area of South Way, Newhaven have reached maximum acceptable levels. Seaford residents could commute for work or leisure to these areas by car.

Future Evolution of the Air Quality Baseline without the SNP

3.58. Without the SNP there may be more development in locations in Seaford where commuting within and outside of Seaford is easier by car than by public transport.

Roads and Transport

3.59. Seaford railway station is located in the centre of the town and is the terminus for the Brighton to Seaford line. It provides rail connection via Lewes to Brighton in the west, to Eastbourne in the east and in the north to London Victoria. A station on the same line is

also located in the SNP Area at Bishopstone and provides additional access to these services.

- 3.60. A number of bus services provide linkages to, from and around Seaford. These include circular routes around both the Ouse and Cuckmere valleys and to the District General Hospital, town centre routes linking outlying estates, together with mainstream bus services along the coast to Newhaven, Brighton and Eastbourne.
- 3.61. There are good transport links to Lewes and Brighton by train from the town's two stations but travel beyond to Gatwick and London requires a change on most trains at Lewes or Brighton. Links to the east via Lewes are not as convenient as additional changes may be required. Coastal bus services to Brighton are very frequent during the day and adequate in evenings. Bus services to and from Eastbourne are frequent during the day but drop to half-hourly in the evenings and return services from Eastbourne to Seaford finish earlier than Brighton to Seaford services in the evenings.
- 3.62. There are three-night buses from Brighton to Seaford (Sunday excluded) and one continues to Eastbourne. Town centre routes serve outlying estates, daytime only - Monday to Saturday. Country villages are linked to Seaford by return journeys up to 4 times a day. (not Sundays). There is a country route which also serves the District General Hospital in Eastbourne on Sundays but not the Conquest Hospital in Hastings. One National Express Coach a day serves Seaford with connections through to Cornwall.
- 3.63. In terms of its connectivity to other locations, the primary A road running through the Parish is the A259 which provides linkages to Newhaven and Brighton to the west and Eastbourne to the East. An accident black spot in the town is the A259 junction with Marine Parade and Hill Rise. A 50 mph. speed limit has recently been introduced but a roundabout would be the best solution. Access to the A26 is also close by and this provides direct access to the arterial A27 road which connects to the M23 and M27 in the west, as well as onward travel to Lewes and also further north to the M25 west to London, Gatwick and Heathrow Airport and east to the Dartford Crossing.

Future Evolution of the Road Baseline without the SNP

- 3.64. The SNP supports district and national measures to promote sustainable travel and reduce the need for cars. Without the SNP opportunities to promote development that take account of the public transport options available and locally used footpaths may be missed. Without the SNP policies like the one to protect the footpath to the church would not be in place.

Vehicle Ownership

- 3.65. Of the 10,794 households in Seaford¹⁵ the split of the number of vehicles per household is outlined in **Table 4** below.

Table 4 Vehicle ownership within households in the SNP area and District.

Cars or Vans in Household	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
No cars or vans in household	2,256	20.9	8,488	20.1
1 car or van in household	5,047	46.8	19,216	45.6
2 cars or vans in household	2,712	25.1	10,986	26.0
3 cars or vans in household	575	5.3	2,585	6.1
4 or more cars or vans in household	204	1.9	906	2.1
TOTAL	10,794	100.0	42,181	100.0

Future Evolution of Vehicle Ownership Baseline without the SNP

- 3.66. Without the SNP opportunities to encourage development in areas that do not require car for access to community facilities, schools and employment may be less.

Home Ownership and Provision

- 3.67. There are 10,794 households* located within the Parish and these have a variety of tenures as outlined in **Table 5**.

Table 5 House tenure within the SNP area and District

Tenure type	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
Owned outright	5,212	48.29	16,797	39.82
Owned with mortgage or loan	3,177	29.43	13,851	32.84
Shared ownership	50	0.46	285	0.68
Social Rented from Council (Local Authority)	562	5.21	3,196	7.58
Social Rented: Other Social Rented	273	2.53	1,413	3.35
Private Rented Total	1,421	13.16	6,108	14.48
Living Rent Free	99	0.92	531	1.26
TOTAL	10,794	100.0	42,181	100.0

¹⁵

<https://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128269&c=seaford&d=16&r=1&e=62&f=33217&o=362&g=6421312&i=1001x1003x1032x1004x1005&l=2483&m=0&s=1460968653391&enc=1&adminCompId=33217&printTable=Print+this+table>

*A household is defined as one person living alone, or a group of people (not necessarily related) living at the same address who share cooking facilities and share a living room, sitting room or dining area. As defined by ONS (2014).

3.68. There are 11,293 dwellings* located within the Parish and their type is defined in **Table 6:**

Table 6 Type of Dwelling houses in the SNP area and District

Dwelling type	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
Detached	5,136	45.48	15,397	35.08
Semi-Detached	2,190	19.39	11,629	26.50
Terraced	1,474	13.05	8,364	19.06
Purpose built flat, maisonette or apartment	1,843	16.32	6,255	14.25
Flat, maisonette or apartment - part of converted/shared house	487	4.31	1,430	3.26
Flat, maisonette or apartment - in commercial building	161	1.43	574	1.31
Caravan or Other Mobile or Temporary Structure	2	0.02	241	0.55
TOTAL	11,293	100.0	43,890	100.0

*A dwelling is a unit of accommodation with all rooms, including kitchen, bathroom and toilet behind a door that only that household can use. As defined by ONS (2014).

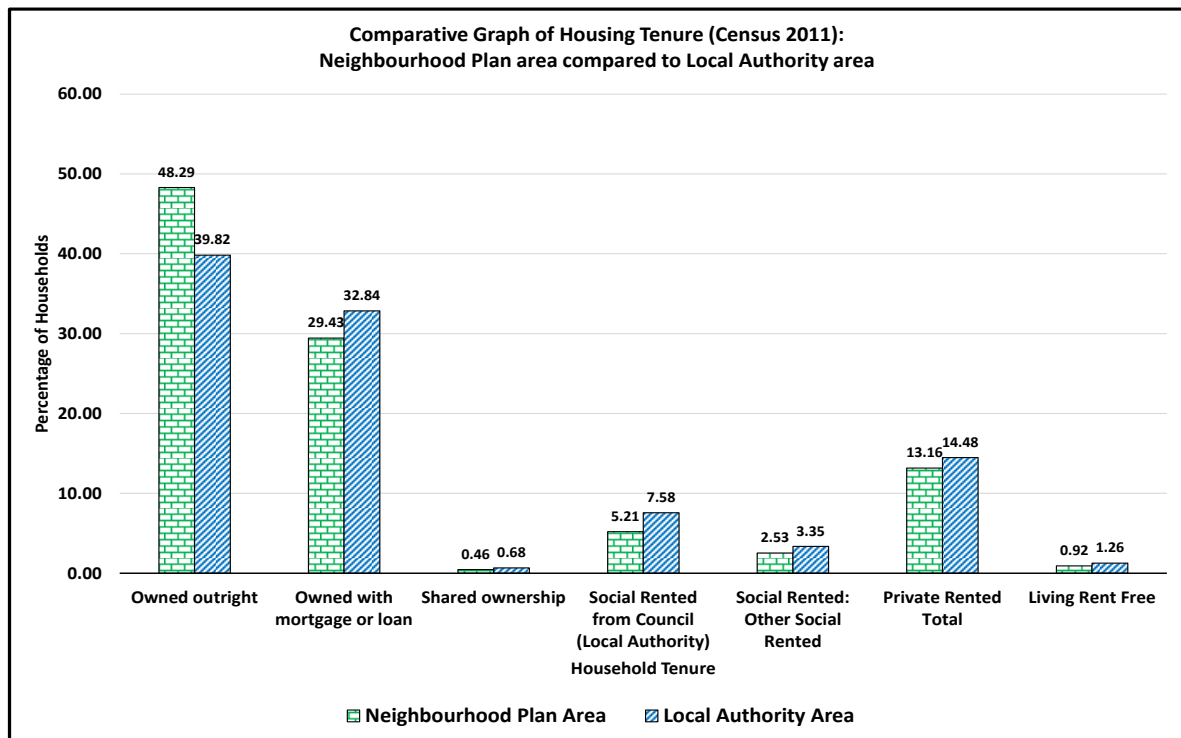


Figure 1 - Graph comparing Tenure of Households in Neighbourhood Plan Area with Local Authority Area

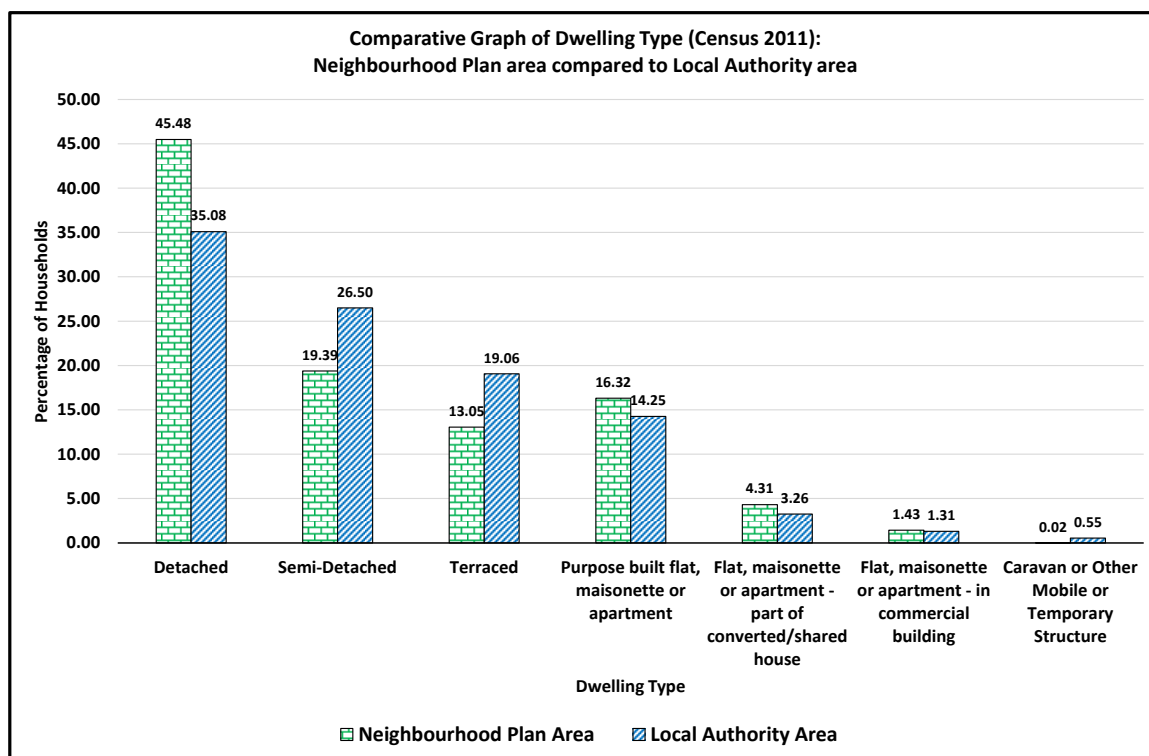


Figure 2 - Graph comparing Dwelling Type of resident households in Neighbourhood Plan Area with Local Authority Area

- 3.69. Seaford has a relatively high proportion of properties that are owned outright, and relatively low proportion of social housing rented from the Local Authority. The number of people on the Housing Register in Seaford was 273 in 2015. This figure was expected to rise by 5% each year based on the findings of the Affordable Housing Needs Assessment 2013 – 2018 for Lewes District, however the introduction of ‘right to buy’ for housing association tenants will have reduced if not reversed this increase.
- 3.70. Lewes District is one of the local authorities in East Sussex with relatively high house prices mostly driven by commuting and people retiring from the big cities seeking a quieter life in the countryside. Nonetheless, house prices in Seaford are significantly lower than in Lewes itself because commuting from Seaford is significantly more time consuming and costly. Although market conditions have favoured stabilising house prices in recent years, the pressure still remains on affordability and supply. The need for affordable housing, to downsize to bungalows, and for first time buyers a requirement for 1-2 bedroomed flats, was identified in the 2016 Seaford Housing Needs Survey.
- 3.71. Opportunities for building new homes within the Parish, being a built-up area will rely largely on brownfield opportunities and so small scattered sites that are unable to support affordable housing are the likely source of the new housing starts within the SNP period. For example, there is a cluster of sites between Blatchington Road and Chichester Road

with a history of industrial use that could be considered for housing use if issues of industrial contamination, archaeology, flood attenuation and co-ordinated development were to be addressed.

- 3.72. In 2016 most property sales in Seaford involved detached properties which sold for on average £419,008. Flats sold for an average price of £178,136, while semi-detached properties fetched £301,879. Seaford, with an overall average price of £313,396 was more expensive than nearby Newhaven (£246,585) but was cheaper than Alfriston (£671,412) and East Dean (£473,626). During the last year, sold prices in Seaford were 4% up on the previous year and 17% up on 2014 when the average house price was £267,057¹⁶.
- 3.73. The Core Strategy states that there is still significant evidence of a considerable need for affordable housing in the district. Migration pressures have been a contributing factor to property prices in the district, which are significantly higher than national and regional averages. This is reflected in Lewes District having one of the highest house price to income ratios (the 'affordability gap') in the country, which is having a marked impact upon the availability and affordability of housing for those on low to modest incomes who wish to live locally. Both the Strategic Housing Market Assessment (2008) and the Assessment of the Local Need for Housing (2011) recognise this situation. The Strategic Housing Market Assessment, produced in 2008, found that the district had an annual requirement for affordable housing, after allowance was made for re-lets, of 230 units per annum. More recently (Autumn 2013) an Affordable Housing Needs Assessment has been undertaken for Lewes District. This demonstrates that in order to meet the level of affordable housing need in the district over the next 5 years (both current backlog and newly arising need) an additional 389 affordable homes would need to be provided per annum, on top of those already expected to be delivered.

Future Evolution of Home Ownership and Provision Baseline without the SNP

- 3.74. The emerging Affordable Housing Supplementary Planning Document (AHSPD) makes the construction of affordable and shared ownership homes a material planning consideration (e.g. has to be considered in any relevant planning application). However, without the SNP there would not have been the same level of local consultation on the amount, type and tenure of housing believed to be required. The AHSPD may lead to provision of the right number of houses but without the SNP's local understanding of the specific needs of the community, then they may not be the right type. Allocation of sites

¹⁶ <http://www.rightmove.co.uk/house-prices/detail.html?country=england&locationIdentifier=REGION%5E1181&searchLocation=Seaford> [accessed 11/7/17]

through higher tier policies like the AHSPD will not be influenced by the local community and could therefore lead to the local community feeling that the decisions were 'out of their hands'. Local level impacts may not have been recognised by higher level policies, leading to housing provision that does not meet the local community's criteria of housing need and may result in more challenges of planning applications.

- 3.75. Reliance on higher tier policies may not strike the necessary balance between meeting the housing needs of the Parish and respect of environmental constraints that will gain the support of the local community.

Health and Wellbeing

- 3.76. The 23,571 usual residents of the Parish were classified as having the health status¹⁷ as outlined in Table 7.

Table 7 Health characteristics of the population in the SNP area and District

General Health	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
Very Good Health	9,405	39.9	43,719	44.8
Good Health	8,812	37.4	34,634	35.5
Fair Health	3,936	16.7	13,900	14.3
Bad Health	1,110	4.7	4,066	4.2
Very Bad Health	308	1.3	1,183	1.2
TOTAL	23,571	100.0	97,502	100.0

- 3.77. Seaford had a slightly lower figure for those in good and very good health than Lewes District as a whole. Priorities in Lewes include cancers and circulatory diseases in order to address the life expectancy gap between the most and least deprived areas.¹⁸
- 3.78. GP reported prevalence rates for mental health are highest in East Sussex in Bexhill and Seaford. About 1 in 10 adults aged 18-69 who are in contact with secondary mental health services are in employment. In the Seaford area 1 in 4 of them are in employment, significantly higher than the East Sussex value. Seaford locality also has the highest percentage of adults in contact with secondary mental health services who live independently.

¹⁷

<https://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128269&c=seaford&d=16&e=62&g=6421312&i=1001x1003x1032x1004&m=0&r=1&s=1460968436141&enc=1&dsFamilyId=2480>

¹⁸ <http://www.eastsussexjsna.org.uk/JsnaSiteAspx/media/jsna-media/documents/nationalprofiles/profileassests/health/2017%20Profiles/HealthProfile2017Lewes.pdf>

- 3.79. Both GP surgeries report that their facilities cannot be extended and are at full capacity. The level of GP per patient is at the upper end of the scale to maintain safe patient care, but the surgeries have difficulty recruiting new clinicians as there is a national shortage. Whilst the surgeries would not turn new patients away it could mean unacceptable deterioration in the service, jeopardise patient safety and longer and longer waits to receive an appointment or treatment.
- 3.80. Dental treatment is adequate with four dental practices in the town.

Future Evolution of Health and Wellbeing Baseline without the SNP

- 3.81. The provision of health care will be unaffected by the SNP but by promoting community infrastructure and public recreational spaces in walking distances of new development and encouraging allotments the SNP can have a positive influence on the health of the community.
- 3.82. Without the SNP there would not be a community promoted policy to support expanding health facilities.

Community Infrastructure

- 3.83. The range of services available in the Parish reflects the size of the population. They are wide ranging and include: Golf Club/Course (x2), Museum, Martello Tower, Recreation Grounds, Places of Worship, a Leisure Centre & Sports Ground, Allotments, Caravan Site & Camping Park, Bishopstone Place Cemetery, Industrial Estate and various independent shops and businesses.
- 3.84. There are eight nursery schools catering for approximately 400 early years' children. There are three special needs schools catering for 114 pupils - one of which is owned by the London Borough of Tower Hamlets. There are four mainstream primary schools, one of which is Roman Catholic, serving 1,528 children between them. Cradle Hill School has recently been extended to three form entry as part of the plans to increase its number of places by 150 between 2014 and 2021. There is one secondary school with a recently added sixth form with 1,238 pupils. East Sussex County Council, which is the commissioning body, is aware of the current shortfall in primary places and also predicting a future shortfall, both of which will be tackled when necessary.

Future Evolution of Community Infrastructure Baseline without the SNP

- 3.85. Higher tier policies will not be able to highlight all of the key facilities within Seaford. Without the SNP there would not be policy to protect or replace specific community infrastructure such as the Sutton Drove Allotments, natural green spaces or outdoor

recreational facilities. In addition, upper tier policies may not highlight the provision of requisite level of community facilities and services.

Economic Characteristics

- 3.86. Economic status of residents¹⁹. The most striking feature of the analysis below is Seaford's relatively high inactive figure retired (at nearly 24%) compared to Lewes District figure of nearly 18%.

Table 8 Economic activity of the population in the SNP area and District

Economic Activity	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
Economically Active - Full Time Employee	5,232	32.06	23,792	34.35
Economically Active - Part Time Employee	2,471	15.14	10,626	15.34
Economically Active - Self-Employed	1,945	11.92	9,611	13.87
Economically Active - Unemployed	489	3.00	2,319	3.35
Economically Active - Full Time Student	436	2.67	1,846	2.66
Economically Inactive - Retired	3,894	23.86	12,184	17.59
Economically Inactive - Student (including Full-time students)	529	3.24	2,545	3.67
Economically Inactive - Looking After Home or Family	520	3.19	2,676	3.86
Economically Inactive - Long-Term Sick or Disabled	556	3.41	2,448	3.53
Economically Inactive - Other	246	1.51	1,222	1.76
TOTAL	16,318	100.0	69,269	100.0

- 3.87. Of the 23,571 usual residents of the Parish, 16,318 were aged between 16 and 74 and of these:

- 10,573 (64.8%) were economically active²⁰;
- 5,745 (35.2%) were economically inactive*:

- 3.88. Of the 10,011 residents in the Parish in employment and aged between 16 and 74²¹:

¹⁹

<https://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128269&c=seaford&d=16&e=62&g=6421312&i=1001x1003x1032x1004&m=0&r=1&s=1460968436141&enc=1&dsFamilyId=2484>

²⁰ *Economically Active - All people usually resident in the area at the time of the 2011 Census aged 16 to 74 and who were economically active (either in employment, or not in employment but seeking work and ready to start work within two weeks, or waiting to start a job already obtained). As defined by ONS (2014).

*Economically Inactive - All people usually resident in the area at the time of the 2011 Census aged 16 to 74, who were economically inactive (anyone who was not in employment and did not meet the criteria to be classified as unemployed). As defined by ONS (2014).

²¹

<https://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128269&c=seaford&d=16&e=62&g=6421312&i=1001x1003x1032x1004&m=0&r=1&s=1460968436156&enc=1&dsFamilyId=2541>

Table 9 Occupation types within SNP area and District

Occupation	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
Managers, Directors & Senior Officials	1,197	11.96	5,294	11.63
Professional Occupations	1,621	16.19	8,202	18.01
Associate Professional & Technical Occupations	1,333	13.32	6,162	13.53
Administrative & Secretarial Occupations	1,138	11.37	4,843	10.64
Skilled Trade Occupations	1,271	12.70	5,863	12.88
Caring, Leisure and Other Service Occupations	1,222	12.21	4,975	10.93
Sales and Customer Service Occupations	779	7.78	3,446	7.57
Process, Plant and Machine Operatives	561	5.60	2,630	5.78
Elementary Occupations	889	8.88	4,117	9.04
TOTAL	10,011	100.0	45,532	100.0

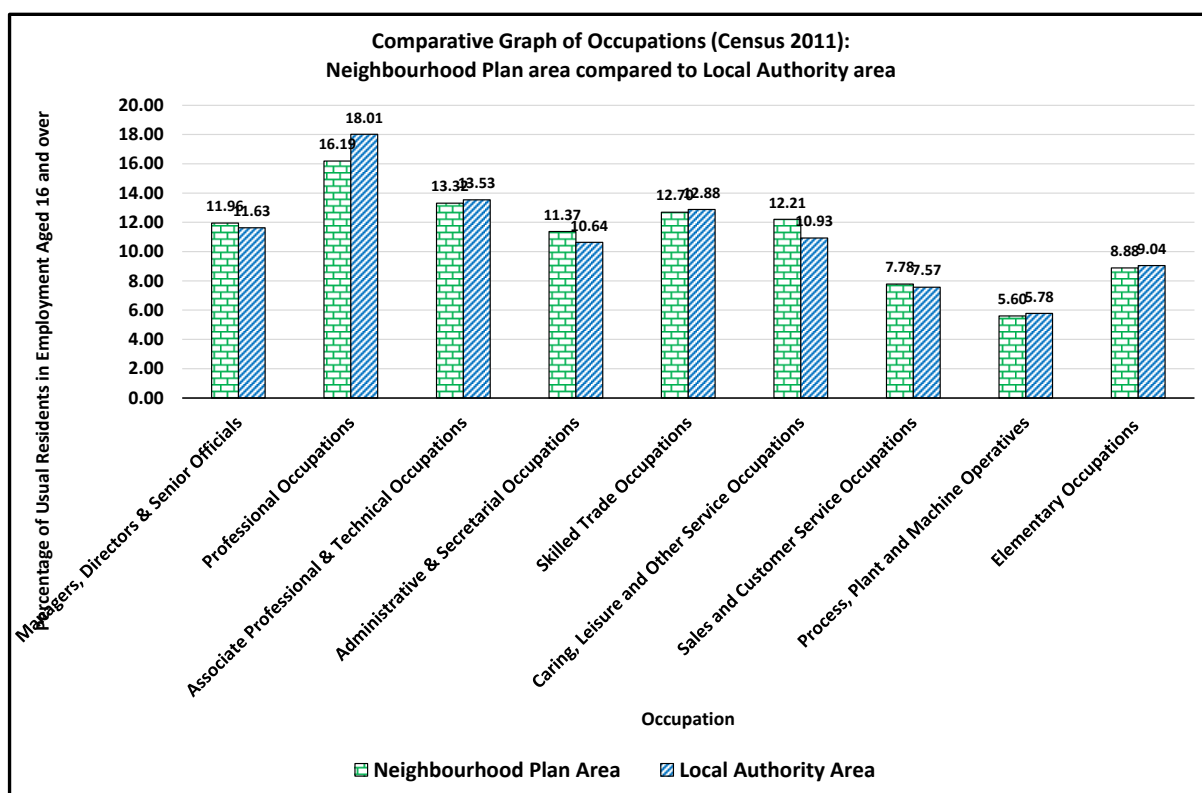


Figure 7 - Graph comparing Occupations of residents in Neighbourhood Plan Area with Local Authority Area

- 3.89. The 10,011 usual residents aged between 16 and 74 in employment are employed in the following industries²²:

Table 10 Industry types within SNP area and District

Industry of Employment	Parish/NP Area		District/Local Authority Area	
	Number	%	Number	%
Agriculture, Forestry & Fishing	28	0.28	386	0.85
Mining & Quarrying	4	0.04	20	0.04
Manufacturing	671	6.70	2,771	6.09
Electricity, Gas, Steam & Air Conditioning	25	0.25	151	0.33
Water supply, sewerage, waste management and remediation activities	88	0.88	444	0.98
Construction	906	9.05	3,947	8.67
Wholesale and Retail Trade; Repair of Motor Vehicles and Motor Cycles	1,544	15.42	6,657	14.62
Transport and storage	458	4.57	2,203	4.84
Accommodation and Food Service Activities	518	5.17	2,267	4.98
Information and Communication	285	2.85	1,577	3.46
Financial and Insurance Activities	392	3.92	2,111	4.64
Real Estate Activities	180	1.80	748	1.64
Professional, Scientific and Technical Activities	567	5.66	2,957	6.49
Administrative and Support Service Activities	393	3.93	2,048	4.50
Public Administration and Defence	661	6.60	2,799	6.15
Education	1,187	11.86	5,359	11.77
Human Health and Social Work Activities	1,518	15.16	6,267	13.76
Arts, Entertainment and Recreation; Other Service Activities	574	5.73	2,712	5.96
Activities of Households as Employers - Undifferentiated Goods and Services	10	0.10	92	0.20
Activities of Extraterritorial Organisations and Bodies	2	0.02	16	0.04
TOTAL	10,011	100.0	45,532	100.0

- 3.90. The Employment & Economic Land Assessment Report²³ states that Lewes town itself is the main employment centre with over 36% of all jobs, followed by Newhaven with 16%. Seaford despite having one the largest populations in the Lewes District, has respectively only 14% of all jobs.

²²

<https://www.neighbourhood.statistics.gov.uk/dissemination/LeadTableView.do?a=7&b=11128269&c=seaford&d=16&e=62&g=6421312&i=1001x1003x1032x1004&m=0&r=1&s=1460968436141&enc=1&dsFamilyId=2538>

²³ Nathaniel Lichfield and Partners (2010) Employment & Economic Land Assessment CL/12141/MS/JR

- 3.91. Cradle Hill Industrial Estate in Seaford is one of the main centres of economic activity and employment in the Lewes District. The Industrial Estate has grown to become a medium-sized estate but remains dominated by smaller units.
- 3.92. Overall, Lewes District has a relatively modest supply of employment space compared with larger centres nearby such as Brighton & Hove. The vast majority of space in Lewes District is industrial, with a relatively small amount of office space which is concentrated in the town of Lewes. In contrast, factory and warehousing space are heavily concentrated in Newhaven, although there is significant factory and warehousing space in Lewes and Seaford towns also.
- 3.93. The Employment & Economic Land Assessment Report states that based on discussions with some firms and business organisations in Seaford, there is felt to be a shortage of good quality industrial space, particularly for slightly larger units that would allow local firms to expand or upgrade their premises as well as inadequate provision for start-up firms. There was also a view that Seaford needs more and better industrial provision for a town of its size while some small office premises would be desirable. Some firms had reportedly relocated from the area due to lack of space. For any new provision subject to any SDNP or Lewes District planning restrictions, a site on the western side of the town beside the A259 was seen as better than expansion of the less accessible Cradle Hill estate. Local business consultees considered that ideally providing new land would lead to new employment opportunities and premises being built, whether by developers or by the firms themselves. However, any such provision would require access to, and availability of sites, suitable for industrial development. Where the SNP proposes a preference for brownfield redevelopment for housing this needs to ensure that employment capacity displaced needs to be provided elsewhere and of a type appropriate to the employment needs of the population.

Future Evolution of Economic Baseline without the SNP

- 3.94. Without the SNP the existing business space at Cradle Hill and other established employment sites could be lost without alternative use of more benefit to the community being demonstrated. Also the local support for flexible start-up and expansion of business may not be recognised. Upper tier policies will most likely be general economic ones and not consider the local tourism options for areas of Seaford.

Recreation spaces within the town area

- 3.95. Many of the greenfield sites within the built-up area of Seaford theoretically have potential for housing development. To test this out, Seaford Town Council put all forward for evaluation against the 10 Sustainability objectives, particularly green infrastructure, and

the Lewes DC policy RE1 on the amount of recreation space per head of population. The Neighbourhood Plan Steering Group conducted an assessment of recreation space which confirmed that Seaford has a deficit of recreation space equivalent to about 80% of the space occupied by The Salts Recreation Ground. There is a particular deficit on recreation space for outdoor sports including pitches, courts and bowling greens. There is also an unequal distribution of such spaces within the town with areas to the North being particularly poorly provided.

Future Evolution of Recreation Space Baseline without the SNP

- 3.96. The Core Strategy may set criteria for the provision of natural green infrastructure and recreation space but without the SNP the specific existing recreational facilities may not be recognised as valuable to the community. Without the SNP the 11 proposed Local Green Spaces would not have been identified and recognised as worthy of protection.

Gypsy, traveller communities and travelling showpeople accommodation

- 3.97. The SDNP undertook research into the demand for gypsy, traveller and travelling showpeople accommodation needs in 2015 and produced **Table 11** for East Sussex.

Table 11 Gypsy, traveller and travelling showpeople accommodation needs

Current supply	Number
Socially rented pitches	0
Private authorised pitches	5
Total authorised supply	5
Current need (2013/14 – 2017/18)	
End of temporary permissions	1
Concealed households	0
New household formation	0
Unauthorised developments	0
Net movement from housing to sites / sites to housing	0
Closure of sites	0
Transit households / unauthorised encampments	5
Movement between areas	0
Total current need	6
Future need	
2018/19 – 2022/23	1
2022/23 – 2027/28	1
Total need	8

3.98. At present there are no sites within Seaford but the 2016 research paper highlights two possible sites in Seaford:

- Land north of Alfriston Road, Seaford
- Normansal Park Avenue, Seaford

Future Evolution of Gypsy, Traveller communities and Travelling Showpeople Baseline without the SNP

3.99. Gypsy and Traveller communities and Travelling Showpeople is seen as a strategic issue because it requires cooperation across LPA boundaries. In this case it is being dealt with through the Lewes Local Plan Part 2 and the South Downs National Park Local Plan and so the provision without the SNP would be the same.

Waste

3.100. There are about 32,000 tonnes of waste produced in Lewes District of which about 50% is recycled. The Seaford household waste recycling site is at the Cradle Hill Industrial Estate. There are no household waste landfill sites within East Sussex and so most of the unrecycled waste goes to the Newhaven Energy Recovery Facility.

3.101. Seaford Town Council supports the Plastic Free Coastlines campaign through committing to plastic free alternatives and supporting plastic free initiatives within the Town of Seaford; a movement spearheaded by Surfers Against Sewage's (SAS) and their Regional Representative. Furthermore, Lewes District Council has introduced new recycling arrangements for most types of waste in the town and consequently there has been a massive increase in the amount of re-cycling in Seaford and the rest of the District.

Water

3.102. Potable water and sewerage undertaking is provided by Southern Water.

4. Methodology

- 4.1. The SA process has been undertaken in accordance with the requirements of the SEA Regulations. The process of SA is also set out in the national planning practice guidance which sets out a number of stages to the SA.

Stages of SA process

- 4.2. The diagram below describes the different stages in the SA process and how they relate to the stages of SNP production. The steps in Stage A relate to the SA Scoping Report which has been consulted on. This environment report forms stages B and C and is known as the Pre-submission SA (including SEA). This process is set out in more detail after **Table 12**.

Table 12 SA Stages and tasks and progress to date

STAGE	TASKS	COMPLETED?
A	Setting the context and objectives, establishing the baseline and deciding on the scope Identifying other relevant plans and programmes Collecting baseline information Identifying problems Developing objectives and the Sustainability Framework	Sustainability Framework determined and set out in the Scoping Report. Baseline and Framework updated following feedback and comments.
B	Developing the alternatives and assessing effects Testing the plan objectives against SA/SEA objectives Developing alternatives Testing policy options against the SA/SEA objectives Considering mitigation Proposing measures to monitor effects	Plan objectives, strategy and policies, plus all reasonable alternatives at this stage are set out and appraised within this SA.
C	Prepare the Sustainability Appraisal Report	This document forms the first stage of Stage C
D	Consult on the SA Report	To be completed
E	Monitor implementation of the plan	To be completed

STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope**Sustainability Appraisal of the Seaford Neighbourhood Plan – Scoping Report (July 2017)**

- 4.3. Many of the tasks outlined in Stage A were undertaken during the Scoping report stage. This included collecting the baseline information for Seaford and developing the Sustainability Appraisal framework. These areas of work have been updated to take into account the responses received during the consultation period on the Scoping Report.

STAGE B: Developing the alternatives and assessing effects**Predicting Sustainability Effects of the Draft Neighbourhood Plan**

- 4.4. Stage B is the main focus of this Report. This stage uses the Framework set out in the Scoping Report to appraise the planning policy options/reasonable alternatives considered as a part of developing the Neighbourhood Plan.
- 4.5. The process of appraising the options/reasonable alternatives will highlight which option is the most sustainable and also how, if necessary, it can be improved. Symbols are used to record the performance of each option/alternative against each objective in the sustainability framework.
- 4.6. The assessment and predictions of the effect of policy options on the sustainability objectives is set out within the SA. These predictions and judgements have been made based on the background baseline information and the comments/feedback provided by the Steering Group on behalf of Town Council through their discussions with the residents and local community.

STAGE C Prepare the Sustainability Appraisal Report

- 4.7. This stage is similar to Stage B, it appraises the preferred planning policy and will state if the policy could be improved to be more sustainable. This is set out in this SA Report.

STAGE D Consulting on the plan and the SA Report

- 4.8. At this stage, the Lewes DC will consult on the SA.

STAGE E Monitoring the implementation of the plan

- 4.9. It is important for planning policies to be monitored, to make sure they are sustainable and to check if there are any unforeseen negative impacts., that these are addressed.

Significance Criteria

- 4.10. For each policy or objective appraised against the sustainability objective framework a rating of if it has a positive or negative impact and if that is a minor or major impact is made. To represent the impacts, colour coding and symbols as set out in **Table 13**, have been used.

Table 13 Policy, objective or alternative assessment criteria colour codes and symbols

++	Major positive impact on the sustainability objective e.g. it enhances/ increases an area for biodiversity, heritage or transport node
+	Possible positive or slight positive impact on the sustainability objective e.g. contributes to protecting/maintaining an area for biodiversity, heritage or transport node.
#	No impact or negligible impact on the sustainability objective is expected
-	Possible negative or slight negative impact on the sustainability objective e.g. restricts access to community services or restricts resources for future generations
--	Major negative impact on the sustainability objective e.g. prevents access to community services or permanently reduces resources for future generations

- 4.11. For each negative impact there may be mitigation available that would reduce the effect either from a major impact to a possible impact or from a possible impact to a negligible impact and if available this is stated in the appraisal. Conversely there may be enhancements that could mean that a positive impact is made even better. In **Appendix 6.3** alternative policy options have been assessed.
- 4.12. For each site appraised against the sustainability objective a slightly different rating has been used. As in **Table 14** the assessment is based on travel distance from a feature that the SNP either wishes to preserve or a facility that it would be advantageous for a development to be near e.g. train station, primary school or natural green space. Some considered sites are actually on the feature which means that they will damage the feature and so the site is likely to be rejected e.g. development is a natural green space.

Table 14 Assessment criteria for sites

SO	Sustainability Measure	REJECT (X)	Constraint (- -)	Negative (-)	Neutral (#)	Positive (+)
SO1	Is it a brownfield site	n/a	n/a	no	n/a	yes
SO2	Proximity to railway and bus services or employment	n/a	>2km	800m-2km	500m to 800m	<500m

SO	Sustainability Measure	REJECT (X)	Constraint (---)	Negative (-)	Neutral (#)	Positive (+)
SO2	Proximity to primary school	n/a	>2km	800m-2km	500m to 800m	<500m
SO3	Proximity to community infrastructure	on site	>2km	800m-2km	500m to 800m	<500m
SO4	Proximity to natural green space	on site	>1km	800m to 1km	250m to 800m	<250m
SO5	Proximity to heritage asset	National designation on site	local asset on site	adjacent to asset	site visible from heritage asset	Not near heritage asset
SO6	Proximity to SDNP	on site	outside planning boundary	on planning boundary	within planning boundary	n/a
SO7	Proximity to area of flooding	n/a	flood zone 3- high risk	flood zone 2 - medium risk	flood zone 1 - low risk	very low risk
SO8	Proximity to nationally designated nature conservation site	on site	<0.4km	<1km	>1km	n/a
SO8	Proximity to locally designated nature conservation site	n/a	on site	<0.1km	>0.1km	n/a
SO10	Existing business on site	n/a	yes	n/a	No and not within 500m	<500m

- 4.13. Below is a rational for the criteria above. Where a site supports a Sustainability Objective it is considered a positive effect e.g. avoiding areas at risk of flooding or reusing a brownfield site. Within other criteria the distance from the feature will either be a positive or negative effect and the grading of this is set out. Although assessment of developments are unlikely to be so black and white. For example just because a development is close to a Listed Building, does not guarantee that it will result in a negative impact. The detail required to assess the setting of a heritage asset would require design information of the actual development. The measure of distance in this case is only to highlight the risk of harm to a heritage asset. The use of measurable distances does allow comparison of the merits and constraints between potential sites for

development. Where distance is quoted in an assessment of a site it is walking distance not “as the crow flies”.

- 4.14. The criteria assumes that developments may have either no effect e.g. not near a heritage asset, neither a positive nor a negative effect which is classified as neutral effect. Where a development is considered to have a negative effect but not one that needs mitigating it is classified as negative. Where the development would have a significant effect and mitigation is considered necessary this is classified as a constraint. A development that has a constraint may still be acceptable it just needs mitigating. Where a development is contrary to a Sustainability Objective e.g. it would result in the loss of a SSSI the developments is considered unsuitable even with mitigation and should be rejected from being a selected site to include in the SNP.
- 4.15. The SEA directive directs assessments to consider the short, medium and long term impacts. For site assessments these are almost always the same impact eg the impacts will not vary with time if developing near a nationally designated conservation site.

Table 15 Assessment criteria rational for sites

SO	Sustainability Measure	REJECT (X)	Constraint (- -)	Negative (-)	Neutral (#)	Positive (+)
SO1	Brownfield	If the site is brownfield then this complies with SO1. If not brownfield then this is a negative effect as must be greenfield.				
SO2	Proximity to railway and bus services or employment	Distance to railway station, bus services or larger employer will reduce the likelihood of people commuting by car. At <500m it is assumed that almost everyone would walk this distance – positive effect. At 500m to 800m it is assumed that most people would walk this distance so has a neutral effect. At between 800m-2km is assumed that most people would drive so negative effect. At greater than 2km it is assumed that almost everyone would drive this distance so a constraint that the development should provide some form of mitigation to encourage people to walk or cycle or car share e.g. free commuter bus, a cut through walk/cycling route etc.				
SO2	Proximity to primary school	The statutory limit for under 8s to walk to school is 3.2km however at much shorter distances people will drive the children to primary school. At <500m it is assumed that almost everyone would walk this distance – positive effect. At 500m to 800m it is assumed that most people would walk this distance so has a neutral effect. At between 800m and 2km is assumed that most people would drive so negative effect.				

SO	Sustainability Measure	REJECT (X)	Constraint (- -)	Negative (-)	Neutral (#)	Positive (+)
						At greater than 2km it is assumed that almost everyone would drive this distance, so a constraint that the development should provide some form of mitigation to encourage people to walk or cycle or car share.
SO3	Proximity to community infrastructure					At <500m it is assumed that almost everyone would walk this distance – positive effect. At 500m to 800m it is assumed that most people would walk this distance so has a neutral effect. At between 800m and 2km is assumed that most people would drive so negative effect. At greater than 2km it is assumed that almost everyone would drive this distance, so a constraint that the development should provide some form of mitigation to encourage people to walk or cycle or car share. If the development is actually on the site of a community facility e.g. shops, GP surgery or post office then the loss of this would be considered a reason to reject the proposed development.
SO4	Proximity to natural green space					Within Natural England's <i>Green space access, green space use, physical activity and overweight guidance</i> a development with access within 250m of a natural green space is considered a positive, as almost everyone is expected to utilise the area once a week. Also, 250m or less is considered an acceptable distance to walk (especially for children) to a natural green space.
SO5	Proximity to heritage asset					Development on a nationally designated site would be unacceptable. A development directly affecting a local asset e.g. Listed Building would require mitigation. Indirectly affecting a heritage asset would be negative.
SO6	Proximity to SDNP					Development within the SDNP is considered unlikely to be acceptable to the SDNP planning body so these developments are typically rejected. Those adjacent /on the existing Planning Boundary would be considered negative. Those outside the Planning Boundary would require mitigation e.g. screening of buildings from views to and from the SDNP.
SO7	Proximity to area of flooding					Flood zone risk is as defined by the Environment Agency for flooding from either groundwater, surface water runoff, river, reservoir or tidal eg zone 3 – high risk, zone 2 is medium risk and zone 1 is low risk. These are considered a constraint, a negative or neutral respectively. Or if there is no or very low risk it is considered a positive location.
SO8	Proximity to nationally designated nature conservation site					Direct impact on a nationally designated site is considered unacceptable. And the closer the development “ as the crow flies” the higher the risk of direct impact.
SO8	Proximity to locally designated nature conservation site					Similar to above the closer the development the higher the risk of direct impact but it would be possible for some locally designated nature sites to be mitigated if directly affected e.g. compensatory/enhanced habitat provided on site or linking areas to create a wildlife corridor.

SO	Sustainability Measure	REJECT (X)	Constraint (- -)	Negative (-)	Neutral (#)	Positive (+)
SO10	Existing business on site					

It is considered undesirable for a development to mean the loss of a business. A development could be positive under SO1 as on brownfield but considered unacceptable due to the loss of a business. Development near (<500m) a business may be positive as may provide more customers for the business but outside of this the affect would be neutral.

Policy Approaches and Options for Site Allocations

- 4.16. An important part of the SA process is the appraisal of different options (alternatives) for policy areas to help identify the most sustainable approaches to be taken forward in the Neighbourhood Plan. For some of the policy areas, a number of approaches were developed and appraised against the sustainability framework to identify the preferred one. This exercise has followed the format adopted in the Lewes District Local Plan Part Joint Core Strategy 2010-2030 (May 2016)²⁴ (hereafter referred to as the 'Core Strategy') and the Submission Document Sustainability Appraisal September 2014²⁵ and modifications (hereafter referred to as the 'Core Strategy SA').

Limitations and Bias

- 4.17. The SNP SG consider there to have been very few limitations, as the evidence collected covered all aspects of information required to the required level of detail to inform the SNP and SA. In many cases they were able to access legal documents (e.g. s106 agreements, Title searches) previous planning decisions including public responses to planning consultations. They have also spoken with or corresponded with landowners, to capture as much information as about sites as was necessary. The information about the sites was collected for use by an independent assessor. By having the collection and assessment done by separate people removed the issue of biases and so demonstrate the objectivity of the assessment.

²⁴ <http://www.lewes-eastbourne.gov.uk/planning-policy/lewes-core-strategy-local-plan-part-1/>

²⁵ http://www.lewes.gov.uk/Files/plan_SA_Submission.pdf
http://www.lewes.gov.uk/Files/plan_SA_Submission_Mods_v1.pdf

5. What has the SNP and SA involved up to this point?

- 5.1. The SNP has been influenced by the existing national and local planning documents and by the result of identifying sustainable issues for the SNP area.

National Planning Policy Framework

- 5.2. The 2018 National Planning Policy Framework sets out the Government's planning policies for England and how they are expected to be applied. At its heart is a presumption in favour of sustainable development. The application of the presumption has implications for how communities should engage in neighbourhood planning. Critically, it means that neighbourhoods should:
- develop plans that support the strategic development needs set out in Core Strategy's, including policies for housing and economic development;
 - plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Core Strategy; and
 - identify opportunities to enable developments that are consistent with their neighbourhood plan to proceed.
- 5.3. NPPF paragraph 172 sets out guidance on development within National Parks and further detail is provided in the 2010 Circular 'English National Parks and the Broads'. In summary, all development in the National Park must give great weight to conserving and enhancing natural beauty, and major development should not take place there except in exceptional circumstances.

The National Park Purposes

- 5.4. The Government has provided two statutory purposes for National Parks in England. All public bodies and utility companies, when undertaking any activity which may have an impact on the designated area, have a duty to have regard to these purposes.
- Purpose 1: To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
 - Purpose 2: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public.

Local Planning Context

- 5.5. Neighbourhood plans should reflect the strategic needs and priorities of the wider local area and plan positively to support them. As the Parish is located across the boundaries of two Local Planning Authorities, the Plan needs to be in general conformity with both the

policies of Lewes District Council and South Downs National Park Authority (SDNPA), the key documents are:

- The Lewes District Local Plan Joint Core Strategy 2010 -2030 Part 1 and emerging Part 2; and
- The emerging South Downs National Park Local Plan.

- 5.6. The Core Strategy was adopted by both local planning authorities in 2016. The Core Strategy sets the strategic policies for Seaford including housing numbers.
- 5.7. The Lewes District Local Plan was adopted in March 2003. Some of its policies have now been replaced by the policies of the Core Strategy. However, there are a number of saved policies that are relevant to Seaford. The retained Local Plan (2003) policies will be reviewed through the emerging Local Plan Part 2 or the South Downs Local Plan as appropriate. Those that are specific to Seaford will also be reviewed as part of the Seaford Neighbourhood Plan.
- 5.8. The Lewes District Local Plan Part 2 (update on Core Strategy) will allocate sites for specific land uses, such as housing, employment and recreation, and set out detailed development management policies. Local Plan Part 2 when adopted will allocate land for different types of development (including housing, gypsy and traveller pitches and employment), as well as land to be protected.

South Downs Local Plan

- 5.9. The South Downs National Park Authority (SDNPA) is currently preparing a new Local Plan, which is being developed in the context of the statutory purposes and duty for national parks as specified in the Environment Act 1995, the National Planning Policy Framework (2012) and the Vision and Circular on English National Parks and the Broads (2010). The plan is being prepared at the same time as the planning documents of the surrounding local authorities in accordance with the statutory Duty to Cooperate. The key cross-boundary strategic issues identified by the Authority for the purpose of fulfilling the duty to cooperate are:
- conserving and enhancing the natural beauty of the area;
 - conserving and enhancing the region's biodiversity including green infrastructure issues;
 - the delivery of new homes, including affordable homes and pitches for Gypsies and Travellers and Travelling Showpeople;
 - the promotion of sustainable tourism;
 - development of the local economy; and

- improving the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and promoting policies which reduce the need to travel
- 5.10. The new Local Plan, which will cover the period to 2033, will be the key planning policy document for the National Park and will guide decisions on the use and development of land.

Screening

- 5.11. Lewes District Council was consulted on the need to undertake a Strategic Environmental Assessment for the SNP and Lewes District Council concluded, in a Screening Opinion dated 15th February 2017 (see **Appendix 5.1**), that the Parish Council does need to undertake a Strategic Environmental Assessment as part of the Neighbourhood Development Plan process. This decision was based on the following Statement of Reasons:

- “The SNP is likely to plan for development, including the allocation of housing development sites.
- As a precautionary measure to ensure that the requirements of the SEA Directive are met which is a key component of meeting the basic conditions against which a neighbourhood plan is examined.
- To ensure the Plan has regard to National Planning Practice Guidance¹⁷
- To ensure that all environmental aspects are considered effectively within the SNP policy and plan-making process, that all the reasonable alternatives are assessed, and that integration of environmental considerations is optimised, particularly in light of the sensitive landscape setting, heritage and ecological assets of the town.
- A Strategic Environmental Assessment of the Lewes District Local Plan Part 2 has not yet been prepared.²⁶”

Scoping

- 5.12. Subsequently a Scoping Report was undertaken to identify a number of social, environmental and economic sustainability issues facing the neighbourhood plan area. It is considered that these issues have not changed since the Scoping Report was consulted upon. The Scoping Report is available from the Town Council or online²⁷. A number of sections from the Scoping Report are included within this SA and therefore to save repetition – the Scoping Report is not attached as an appendix.
- 5.13. The Scoping Report was consulted on for a period of 6 weeks from 30th March 2017. This included consulting with statutory bodies with environmental responsibilities – The

²⁶ subsequent to the guidance being issued a sustainability Appraisal was published on 6 September 2018

²⁷ <http://www.seafordnp.uk/images/April2017/ScopingReportMarch2017.pdf>

Environment Agency, Heritage England and Natural England. It was also placed on the Town Council's website²⁸.

- 5.14. All the responses were collated and those that are of relevance to the SA have been considered and incorporated within this document. A summary of the comments made and responses are set out in the table attached as **Appendix 5.2**.

Identifying Sustainability Issues Facing the Parish

- 5.15. As part of the Scoping Report it was necessary to identify the key sustainability issues facing the Parish. These have been informed and updated through a review of the following sources:

- Core Strategy policies;
- Southern Coastal Towns Accessibility Strategy Local Assessment;
- Ouse to Seaford Head Coastal Defence Strategy;
- Bathing Water Quality results;
- Core Strategy Sustainability Appraisal;
- baseline data (Section 3 of this report);
- community view of sustainability issues;
- Part 2 Housing Needs Survey; and
- SNP Focus Group SWOT analysis and reports.

Lewes District Core Strategy

- 5.16. The Neighbourhood Plan takes into account the assessments made for Seaford within the Core Strategy SA. The document appraised options for the distribution of housing (taking account of available land) in Seaford, against the sustainability framework. Within the consultation draft of the emerging Lewes Local Plan Part 2 there are no new strategic policies that would amend the SNP.
- 5.17. The Core Strategy SA explains that Seaford is the District's most populated town and is regarded as a District Centre in terms of the services that it provides²⁹. Ideally therefore, the town would receive a significant amount of the District's housing requirement. However, the town is highly constrained by the environment within which it sits. The built-up area (defined by the Planning Boundary) is almost entirely surrounded by the South Downs National Park to the north, east and west, whilst the southern boundary of the

²⁸ <http://www.seafordnp.uk>

²⁹ Section 10.47a) 'Consideration of development in Seaford' on page 71 of the Local Plan SA

town meets the English Channel³⁰. The Core Strategy SA says, 'In light of these constraints the Strategic Housing and Economic Land Availability Assessment (SHELAA)³¹ found very limited capacity for additional housing'.

- 5.18. Within the Core Strategy SA as a result of the SHELAA findings, when generating approaches for the Proposed Submission Core Strategy (January 2013), it was viewed that there was only one option for housing delivery at Seaford – to have a housing delivery target that reflected the SHELAA capacity for the town. Given the low levels of potential development identified by the SHELAA and the large population of the town it was not considered that a lower target would be a reasonable alternative. As such, the generated option was never assessed against the sustainability framework.
- 5.19. An alternative not initially assessed at the Proposed Submission stage was whether the housing target for Seaford should allow for an extension or extensions into the National Park in order to deliver a higher number of homes for Seaford. As such the following options have now been appraised against the sustainability framework. These were:
- Option A – To identify a planned housing target for Seaford that reflects the capacity identified in the SHELAA.
 - Option B – To have a planned housing target for Seaford that would allow for extensions into the National Park in order to deliver a greater amount of homes than option A.
- 5.20. The options were appraised against the sustainability framework. Option A was appraised to be the most sustainable option. Although it did not perform as highly with regards to the housing, deprivation and certain economic objectives as Option B, it performs far better with regards to some of the environmental objectives and is likely to be better for tourism, which is a key contributor to the economy in this area. Furthermore, Option B is likely to cause a significant environmental effect by allowing development in sensitive landscape areas located in the National Park, which Option A will not. The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Submission document.
- 5.21. Due to adoption of the Core Strategy Local Plan Part 1 2016 (reference Spatial Policy 2 – Distribution of Housing) and the accompanying Sustainability Appraisal, it is not considered necessary to assess and appraise options regarding the development ranges

³⁰ The Planning Boundary has been drawn largely to reflect the edge of the existing built-up area. To the north, west and east of the town the Sussex Downs Area of Outstanding Natural Beauty closely follows the line of the Planning Boundary

³¹ The Strategic Housing and Economic Land Availability Assessment (SHELAA) was undertaken to help inform forthcoming planning policy work on housing and economic land availability.

and levels of residential growth for Seaford. Spatial Policy 2 refers to a minimum of net 185 units in Seaford.

- 5.22. The SHELAA identified 14 sites as suitable and an additional six as suitable but with a constraint/s. Subsequently some of these sites highlighted in the SHELAA as suitable, deliverable and available were found by LDC, in working up detailed proposals as not to fulfil these criteria. The unsuitability was due to a variety of reasons including lack of opportunity to replace lost car parking spaces, existence of covenants and Section 106 agreements on the land that prevented or restricted development.
- 5.23. Core Policy 6 – Retail and Sustainable Town and Local Centres in the Core Strategy reinforce the Seaford town centre for retail provision, while encouraging more diverse uses in the peripheral area around the shopping core to help increase vitality beyond the central area, particularly uses that would help Seaford to exploit its potential as a visitor destination more fully (while having regard to its understated seaside character).

Other Local Policies, Strategies and Assessments

- 5.24. In addition, there are other local policies, strategies and assessments that could influence the SNP SA as outlined below.

The Southern Coastal Towns Accessibility Strategy Local Assessment 2010

- 5.25. The Southern Coastal Towns Accessibility Strategy Local Assessment 2010 assesses the levels of accessibility to key services, facilities, jobs and educational without the requirement for major investment in new public transport services or other sustainable transport infrastructure. North western parts of Seaford consistently experience longer non-car journey times to these destinations, than the centre and south of Seaford. The study highlights poor connectivity between local public transport services, local facilities and other, longer distance transport services such as rail, as well as poor connectivity between public transport access points and pedestrian and cycle links. Journey times between Seaford and Eastbourne District General Hospital are also longer during the morning time period than in the afternoon, while the opposite occurs for journey times to Royal Sussex County Hospital and Lewes Victoria Hospital. Seaford is particularly reliant on rail services when accessing the more distant destinations such as employment sites and the major centres of Brighton and Eastbourne.

Seaford Head Coastal Defence Strategy

- 5.26. As a significant proportion of Seaford population resides in coastal areas, it is important that the SNP takes into account documents which relate to plans for coastal management. Ouse to Seaford Head Coastal Defence Strategy (Environment Agency,

2011) sets out plans to maintain current river embankments on the Ouse and build them higher as tidal river levels rise over time. The strategy also recommends that the shingle defences on the coast are maintained.

- 5.27. The cliffs at Seaford Head, do not have any coastal defences, nor are any proposed. At these locations, as there is little or no development to protect, the cliffs will continue to erode naturally.

Bathing Water Quality

- 5.28. The beach at Seaford is rated in the top category ('best') for bathing quality and has consistently achieved this score for over a decade.

Baseline Data and what influence it could have on sustainability issues

- 5.29. The baseline data highlighted the following as issues that could have an influence on sustainability. Where a suitability framework objective (SO) has been set that covers this issue this is highlighted in the list:
- the ageing population will require access to health care facilities and specialist housing (not specifically covered but part of SO 1 refers to meeting the housing needs of the whole community);
 - not significantly affecting designated biodiversity sites, SDNP and heritage coast areas (specifically covered in SO 8);
 - protection of landscape views especially from the SDNP (specifically covered in SO 6);
 - avoiding areas of coastal, river, reservoir and surface flooding and reducing runoff from hard standing areas and maintaining runoff from greenfield areas (specifically covered in SO 7);
 - not significantly affecting on designated heritage assets (specifically covered in SO 5);
 - limiting the distances people need to travel to work and for services (mostly covered in SO2);
 - need for increased percentage of affordable homes (specifically covered in SO1);
 - access to GP services is under pressure (mostly covered by SO3);
 - pressure on primary school places (not specifically covered by could be considered part of SO3 to enhance community infrastructure);
 - lack of industrial employment space (not specifically covered but part of SO10 to support business in the area);
 - deficit of natural green space/recreation spaces especially sports pitches (specifically covered in SO3);
 - a commitment to reduce energy consumption (part of SO9 to encourage resource efficiency and promote local renewable energy production);

- need to preserve the best agricultural soils (not specifically covered but part of SO1 directing development towards brownfield site and away from greenfield sites, SO4 to preserve green infrastructure and SO6 to maintain countryside);
- requirement to provide sufficient land in the District for gypsy, traveller and travelling showpeople (not specifically mention but part of SO1 to provide homes for the whole community);

Community View of Sustainability

- 5.30. Set out below is a summary of the key issues identified by the local community which were identified through the SNP Survey (2016). The steering group also undertook a Housing Needs Survey.
- 5.31. The surveys were both conducted using a questionnaire consisting of both closed and open-ended questions. This mix allows questions to focus on obtaining specific pieces of information tailored at responding to certain issues or themes (closed questions), whilst allowing a degree of freedom in the responses which people provide (open questions). The full reports of the SNP and Housing Needs Surveys are available on the SNP website at <https://www.seafordtowncouncil.gov.uk/Neighbourhood-Plan.aspx>

Key findings of Neighbourhood Plan Survey

- 5.32. The survey received 1,100 responses – a response of 10.2% based on property numbers. Based on the 1,100 respondents, **Figure 3** and **Table 15** summarises some of the key issues.

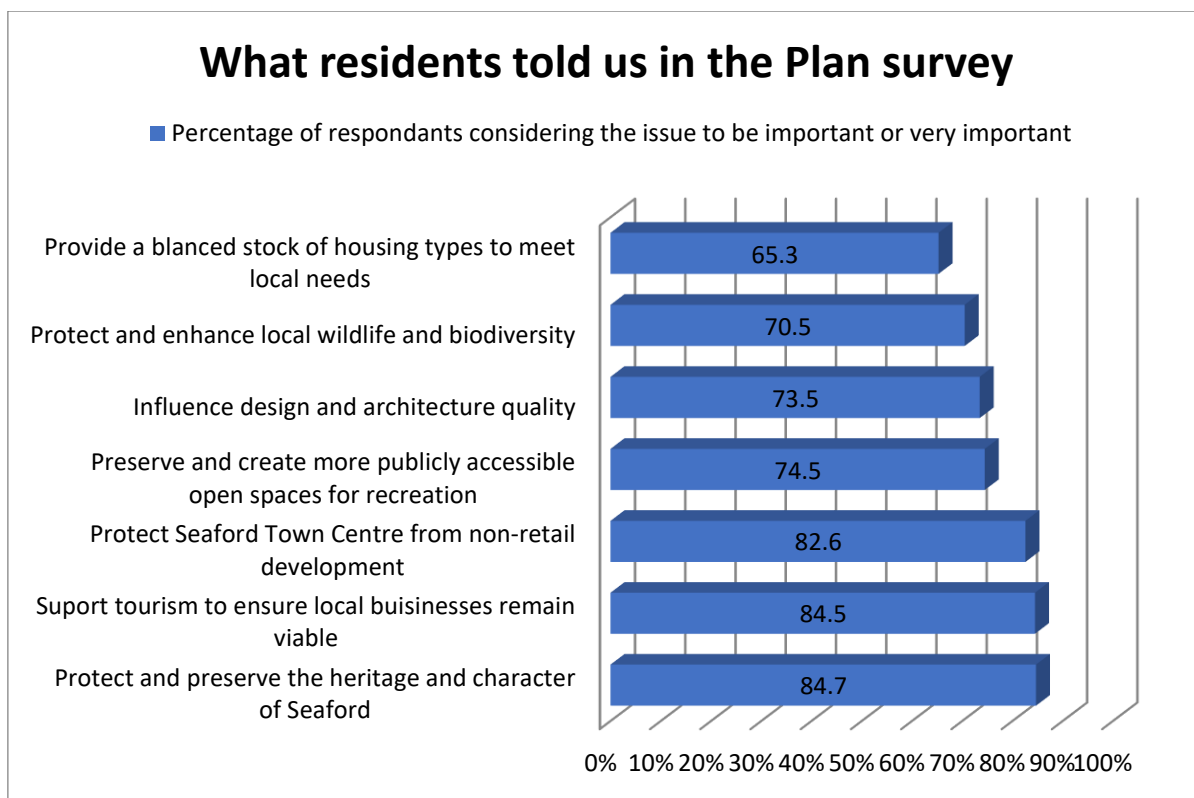


Figure 3 Graph of which issues residents considered important

Table 16 Summary of questions responses

- 66.30% of respondents felt it was very important for the SNP to protect and **preserve the heritage and character** of Seaford with 20% indicating it was important.
- 55.72% of respondents felt it was very important for the SNP to preserve and create **more publicly accessible open spaces** for recreation with 20.47% indicating it was important,
- 52.73% of respondents felt it was very important for the SNP to **protect and enhance local wildlife and biodiversity** with 19.06% indicating it was important,
- 51.56% of respondents felt it was very important for the SNP to **influence design and architecture quality** with 24.83% indicating it was important
- 49.35% of respondents felt it was very important for the SNP to provide a **balanced stock of housing** types to meet local needs with 17.76% indicating it was important.
- In response to the question ‘Do you **run a business** (or are self-employed) working from home?’ 73.5% answered “no” with only 1.0% indicating “yes”. However, 9.1% of responses were made to ‘if working from home, what type of business?’ question.
- With regards to the question ‘Are you **satisfied with the design and layout of recent developments** in the town?’ 32.2% respondents had no opinion, 26.0% indicated “no” with 25.7% respondents indicating “yes”.
- 82.6% of respondents agreed that, the **Town Centre area of Seaford should be protected from non-retail development** to preserve it as a viable Town Centre with 10.9% of respondents disagreeing.
- 84.6% of respondents agreed that, **Tourism is vital to the local economy** to ensure local businesses remain viable and therefore open for all to use. Accordingly, the **provision of Bed**

and Breakfast and other tourist accommodation should be encouraged in Seaford with 9.7% of respondents disagreeing.

- In response to giving **reasons why members of households have moved away** from the town, the following were cited - 15.4% to begin job/course of study, 13.2% to improve access to jobs, 11.5% for affordable housing to rent/buy, 6.1% for suitable market housing to buy, 5.5% to meet retirement housing needs, 5.2% to improve access to shops/ leisure facilities and 4.2% (to be closer to health care).
- With regards to question ‘What **type of accommodation would any members of your household seek to obtain** within the foreseeable future?’ the preferences were as follows: Bungalows 18.4%, 1-2 bedrooms 16.1%, Detached 12.9%, Retirement housing units 12.1%, Flats 11.6%, Semi-detached 10.5%, 3-4 bedrooms 9.3%, Terraced 7.7% and 5+ bedrooms 1.5%.
- Slightly over half of respondents (52.8%) to the question ‘would you like to see **housing and other community assets delivered via Community Land Trust?**’ said “yes”, while 14.5% said “no” (and 32.7% respondents had no opinion).

5.33. These views have all been taken into account in the Sustainability Framework.

Key findings of the Part 2 Housing Needs Survey

5.34. The following summarises some of the key issues of a housing needs survey undertaken in June 2016. There were 377 responses and of these:

- A total of 15.4% households were identified as being in need of affordable housing. This was due to their current housing requirements not being met, their local connection to Seaford and because their income and personal circumstances meant that they could not afford a suitable market property (in the town).
- 58.6% responses to Part 2 of the survey were excluded from the subsequent analysis on the basis that their current home was adequately meeting their current housing requirements.
- 26.0% households that completed Part 2 of the survey expressed a need to obtain alternative market housing to that which they currently occupied and were deemed to be ineligible for affordable housing based on their personal circumstances and income/equity being sufficient to purchase or rent on the open market.

Focus Groups

5.35. Four Focus Groups were set up at the start of the process of developing the SNP. Workshops were held during 2016 to bring together all members to share updates, emerging issues and propose solutions. Each Focus Group has produced a report on its findings and suggested recommendations for the SNP to take forward. The four groups are:

- Environment and Countryside
- Local Economy and Facilities
- Transport and Travel
- Housing and Development

- 5.36. Full versions of the Focus Groups' Working Papers and Work in Progress Evidence Reports are available on the SNP website www.seafordnp.uk.
- 5.37. The Strengths, Weaknesses, Opportunities and Threats (SWOT) Analysis for each topic area are set out in **Appendix 5.3**. The aims and objectives of each Focus Group are set out within the individual focus group reports which were an appendix to the SA Scoping Report.
- 5.38. The weaknesses, and opportunities identified in the SWOT analysis are reflected in the Sustainability Framework. However, there were some issues identified that are not specifically reflected and these were:
- need for better community facilities especially for the youth of the town;
 - pressure on NHS services;
 - need for business incubator centres to encourage start-up businesses; and
 - not limiting the future development of increased transport capacity.

Sustainability Framework Objectives

- 5.39. This SA seeks to test the contribution the SNP will make towards achieving sustainable development, through the identification of a number of objectives and indicators, known as the Sustainability Framework. These are used to assess the sustainability impacts of the policies within the SNP. The objectives are based on the three strands of sustainability; i.e. social, economic and environmental. The indicators are chosen to quantify and measure the achievement of each objective. The Sustainability Framework has emerged through all of the information gathered to date including appraisal of relevant National, Regional, District and Local Plans and Programmes, the collection of baseline data and local knowledge of sustainability challenges faced in the town.
- 5.40. The Sustainability Framework as outlined in **Table 16** was the subject of consultation at the Scoping Report stage. The objectives chosen represent the issues and challenges facing Seaford. The sustainability objectives and their corresponding indicators are set out below. These include those within the Scoping Report plus amendments that were taken on board following the consultation feedback.
- 5.41. The group developed a series of monitoring indicators for the sustainability objectives. These indicators have been discussed with the District Council and are considered to be at a level that can be easily monitored by Seaford Town Council in association with LDC.

Table 17 Sustainability Framework Objectives

Objective	Questions	Indicators	SEA/SA Topic ³²
SOCIAL			
<p>1. Housing</p> <p>To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future</p>	<p>Does the SNP:</p> <ol style="list-style-type: none"> 1. support the number of homes required by LDC in the Parish? 2. help meet affordable housing needs? 3. include brownfield land that is not in economic use? 4. accommodate population growth, while also conserving resource land needs to serve both the existing and future population? 5. allocated sites that respect the Parish's setting within the National Park? 	<ul style="list-style-type: none"> • Number of new homes completed? • Number of affordable dwellings completed? • Hectares of brownfield land redeveloped for housing? • Number of people on the housing register? • Percentage of new homes within the existing The Planning boundary? 	Housing / Health / Community
<p>2. Sustainable Transport (including walking/cycling)</p> <p>To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.</p>	<p>Does the SNP:</p> <ol style="list-style-type: none"> 1. encourage and support the use of sustainable modes of transport? 2. allocate sites within walking or cycling distance of a school, convenience store, a GP surgery, an existing transport stop – e.g. bus stop or railway station? 	<ul style="list-style-type: none"> • Number of retained and/ or new sustainable and public transport facilities provided in the SNP area. • Number of households /dwellings proposed within a 10-minute walk (approximately 800m) of a transport stop – i.e. bus stop or railway station. • Number of new cycling facilities. 	Roads and Transport
<p>3. Community infrastructure</p> <p>To maintain and enhance community infrastructure within the Parish</p>	<p>Does the SNP:</p> <ol style="list-style-type: none"> 1. retain and/or enhance the provision of community services and facilities? 2. allocate sites within walking (800m) or cycling distance of a community facility such as a GP surgery, a dentist, a community hall, a place of worship, a sports facility. 	<ul style="list-style-type: none"> • Quantum of new and/ or retained community infrastructure proposed in the Parish. • Number of existing community facilities improved or enhanced 	Housing/ Health/ Community

³² As set in in paragraph 5.6 of this report

Objective	Questions	Indicators	SEA/SA Topic ³²
ENVIRONMENTAL			
<p>4. Green Infrastructure</p> <p>To maintain and enhance green infrastructure within the parish.</p>	<p>Does the SNP:</p> <ol style="list-style-type: none"> 1. enhance and preserve key green spaces within the SNP area? 2. retain and/or improve access to green areas such as open space and recreational facilities, woodlands, ponds, allotments and hedgerows? 3. improve, create or maintain green infrastructure links to the South Downs national Park? 	<ul style="list-style-type: none"> • Number of households within a 10-minute walk (approximately 800m) of public recreational space and open space and/or other public green infrastructure such as allotments, woodlands and ponds. • Number of Local Green Spaces allocated within the SNP area and supported by the community. 	<p>Nature Conservation. Landscape. Housing/ Health/ Community.</p>
<p>5. Heritage Assets</p> <p>To protect or enhance the heritage assets and historic environment of the Parish</p>	<p>Does the SNP:</p> <ol style="list-style-type: none"> 1. take account of listed buildings in the SNP area and respect the historic character? 2. take account of conservation areas and any locally designated assets, as well as areas known for being rich in archaeological interest in the SNP area? 	<ul style="list-style-type: none"> • Number of heritage assets and their setting enhanced and/ or preserved as part of an overall development scheme. • Number of positive features of local character identified through the character statement protected or enhanced as part of any development proposals. 	<p>Heritage.</p>
<p>6. Countryside, Landscape and Key Views</p> <p>To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park</p>	<ol style="list-style-type: none"> 1. Will the SNP enhance and preserve the valued landscape of the SNP area? 2. Is development in keeping with the landscape and existing features, including the setting of the National Park? 3. Does the SNP take account of the key views in and around the SNP area? 4. Does the SNP minimise impact on the countryside? 	<ul style="list-style-type: none"> • Number of sites allocated for development beyond the defined Planning boundary. • Number of landscaping masterplans delivered as part of new development. 	<p>Nature Conservation. Landscape.</p>
<p>7. Flooding</p> <p>To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere</p>	<ol style="list-style-type: none"> 1. Does development avoid areas at risk of flooding (as defined by the Environment Agency). 2. Does development encourage the removal/ not adversely affect surface water? 3. Does the combination of sites ensure that it will not exacerbate the risk of flooding? 	<ul style="list-style-type: none"> • Number of properties at risk of flooding within the Parish/SNP area, as defined by the Environment Agency Flood Maps. • Number of flood improvement schemes incorporated within development proposals. 	<p>Air and Climate</p>

Objective	Questions	Indicators	SEA/SA Topic ³²
8. Biodiversity To protect and enhance the biodiversity of the SNP area.	1. Does the SNP enhance and preserve locally, nationally and internationally designated areas as well as local wildlife sites and priority habitats and species?	<ul style="list-style-type: none"> Number of enhancement schemes incorporated into new development. Number of designated sites within the SNP area boundary. 	Nature Conservation
9. Sustainable Design To encourage high quality design and layout in all new development and promote systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.	1. Does the SNP promote energy efficiency and the use of renewables within the plan area? 2. Does the SNP promote water efficiency within new development?	<ul style="list-style-type: none"> Number of new developments that incorporate renewable energy systems. Number of new development incorporating sustainable drainage systems (SuDS). Number of new schemes where measures to ensure the sustainable use of water and energy form part of the overall design 	Heritage. Air and Climate
ECONOMIC			
10. Local businesses and tourism Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish	1. Will the SNP support local retail and employment opportunities? 2. Will the SNP support tourism initiatives and development?	<ul style="list-style-type: none"> Net amount of employment floor space maintained and/or created in the SNP area. Number of vacant business spaces Number of new tourist facilities. Number of employment and tourist facilities/floorspace lost to new development. 	Economic Characteristics

Alternatives to the Sustainability Framework Objectives

- 5.42. The initial sustainability objectives were derived from the Lewes District's Joint Core Strategy. The development of the Sustainability Objectives was an iterative process that started with workshops that focused on the SNP's aims and objectives. The SA Scoping Study (March 2017) was commented on by statutory consultees. Rather than disregarding objectives, additional objectives were added and the scope of other objectives widened.

Framework Options for Site Allocations

- 5.43. A number of sites have been put forward through the call for sites exercise (undertaken by the Town Council in November 2016) plus from the following sources:
- The LDC Strategic Housing and Economic Land Availability Assessment (SHELAA)
 - The South Downs National Park Strategic Housing Land Availability Assessment (SHLAA)
 - Neighbourhood Plan Survey Response
 - List of Seaford Town Council owned sites – for sale or being considered for sale
 - List of other Seaford Town Council owned sites
 - List of Lewes District Council owned sites
 - List of East Sussex County Council owned surplus sites
 - Brownfield sites
 - Large dwellings with the potential to be sub-divided into smaller units
 - Large buildings with the potential to convert into residential
 - Large plots of land
 - Feedback from 30 November 2016 consultation
 - Housing & Development Focus Group members
 - Google maps
 - Local knowledge
- 5.44. In total 306 were included on the initial list³³. Sites were eliminated if:
- Unable to accommodate at least 6 dwellings (on the advice of Lewes DC). Individual sites that were part of a larger area e.g. Dane Valley have been considered.
 - Planning permission for housing development had recently been obtained or was about to be given.
 - Information from land owners that the site would not be available between now and 2030.
 - Sites were duplicated because of being given different names which subsequent detailed analysis showed were the same sites. After removal of duplicate sites 193 separate sites were examined.

³³ <http://www.seafordnp.uk/images/July17/8.%20SITES%20LIST%20-%20FULL.pdf>

- 5.45. This initial sifting exercise reduced the long list to a shorter list of 60 sites³⁴. Detailed evidence was collected for the sites including:
- Ownership, location, size, current and previous uses, planning history, flood risk, accessibility, biodiversity, landscape, historical environment, infrastructure, community asset register, ability to provide affordable housing, impact on local businesses and community facilities, comments from the SHELAA and SHLAA, applicable LDC planning policies, distance to amenities, number of traffic accidents at or close to the site and site availability.
- 5.46. Further work was required on any site constraints³⁵ such as contamination or access. **Chapter 6** assess all of the SNP policies against the Sustainability Objectives including housing allocation policies.
- 5.47. Subsequent to completing the initial sifting work above a further comprehensive scheme – Grand Avenue – has been assessed following the owner’s response to the Call for Sites. The initial scheme considered was for development on the three fields between Grand Avenue and Kings Hedge (which backs on to the properties in Clementine Avenue). The overall impact on the Sustainability Objectives was assessed as being more negative than other sites proposed within the SNP (See **Appendix 5.3**, Sites SW5-7), because the sites are green fields in the SDNP.
- 5.48. At the time this assessment was done, the Housing Focus Group were unable to find enough brownfield sites within the Planning Boundary to meet the Target of 185 Homes (see Paragraph 8.7 above). The Steering Group therefore considered whether a more limited Grand Avenue scheme would be positive when assessed against the Sustainability Objectives. The more limited scheme developed was for housing on the lower part of one field with the other fields kept as open spaces for recreation (and possibly, in the long term, considered for designation as a Local Green Space). Such a scheme produced a more positive impact on the Sustainability Objectives.
- 5.49. However, at a late stage, more brownfield sites were put forward for development by their owners. These all had more positive impacts on the Sustainability Objectives. Consequently, it should be possible to achieve the 185 target without building on any of the Grand Avenue fields within the South Downs National Park.

³⁴ This includes two comprehensive development sites – Dane valley and Grand Avenue which are a combination of smaller sites included within the 60 sites.

³⁵ Technical work is currently being undertaken by AECOM consultants on the deliverability of the Dane Valley comprehensive redevelopment scheme. Further details on this will be provided within the Submission SA and SNP.

- 5.50. The sites were appraised by the Town Council's independent consultants Action in Rural Sussex assisted by members of the SNP steering group using the information gathered above and assessed against the sustainability objectives. The objectives were amended following comments and feedback on the Scoping Report and the sites re-assessed to make sure there were no changes³⁶. In addition, the steering group held a drop-in consultation session on 11th July 2017 where feedback from the general public was taken into account when considering the sites to take forward within the SNP. Details of this can be found on the Neighbourhood Plan website³⁷. The assessment table containing the sites as considered against the sustainability objectives is attached as **Appendix 5.3**.

³⁶ There have been 2 very small changes to the wording of objective 1 and 4 – these are considered to be de minimis.

³⁷ <http://www.seafordnp.uk/index.php/the-plan/steering-group-minutes/55-update-on-draft-neighbourhood-plan-housing-proposals>

6. Assessment of the Seaford Neighbourhood Plan

Assess SNP Vision

- 6.1. The SNP vision statement would only have positive impacts on sustainability as it complies directly or indirectly with the following Sustainability Framework Objectives:
1. Housing;
 2. Sustainable Transport;
 3. Community Infrastructure;
 4. Green Infrastructure;
 5. Heritage Assets;
 6. Countryside, Landscape and Key Views;
 7. Flooding; and
 10. Local Business and Tourism.
- 6.2. The vision does not specifically refer to biodiversity or sustainable design (objectives 8 and 9) but would not have a negative impact on these.

Assess SNP Objectives

- 6.3. The SNP objectives have been assessed for compatibility with the Sustainability Framework objectives in **Table 17**:

Table 18 Comparing SNP with the Sustainability Framework objectives

Neighbourhood Plan Objectives											
		1	2	3	4	5	6	7	8	9	10
Sustainability Objectives	1	√						√	√	√	
	2	√	√		√			√	√		√
	3	√			√		√				√
	4		√		√	√	√				√
	5		√			√				√	
	6		√			√	√			√	
	7										
	8					√	√				
	9									√	
	10		√	√							

Key:

√	Compatible
	Potential for incompatibility if implemented without regard for other sustainability objectives
x	Incompatible
	No link/negligible link

- 6.4. There is a risk that if a SNP policy was implemented without regard for all sustainability framework objective there could be incompatibility. For example, providing new housing and allocating space and land for this within the SNP could be considered to result in some loss of existing and new land for employment use and green space. However, this would only occur if the SNP policies were implemented in isolation and not together. The designation of an area suitable for development and it being in a strategic green space or better suited for economic use should not occur without suitable compensation.
- 6.5. Similarly, development that turns permeable ground into hard standing runs a risk of increasing flooding. But it does not need to. Firstly, sustainable drainage systems (SuDS) can be used to reduce runoff and secondly water retention/storage on site to allow surface water discharge over a longer time at a rate that does not increase flood risk is an option.
- 6.6. The SNP Steering Group recognises that compromise may have to occur as development will be required in areas that neighbour the SDNP. Here development needs to be sympathetic to its setting and utilise measures to minimise effects on and conserve the landscape setting of the SDNP.
- 6.7. Development of or near heritage assets can be done providing the reason for the designation is preserved. Similarly, biodiversity need habitat connectivity and provided this is preserved impacts on populations of flora or fauna can be reduced and even enhanced through providing better connectivity e.g. hedgerow repair and maintenance.

Assess SNP policies

- 6.8. A wide range of policy areas have been included within the draft Neighbourhood Plan. It will be these areas that will be appraised in the SA to evaluate whether they have a positive or negative impact on the future of the Parish, using the Sustainability Framework to undertake the evaluation.

- 6.9. In the absence of the draft SNP (the no plan alternative), it is considered there will be fewer opportunities to address the issues and challenges facing Seaford. Without the SNP, opportunities for the following issues may be compromised:
- greater involvement of local people in local/community planning;
 - be able to protect and retain community facilities;
 - opportunities to allocate sites that are supported by the local community;
 - opportunities to improve the town centre;
 - opportunities to protect, improve and/or enhance green spaces and open spaces;
 - opportunities to seek good design and layout within new developments;
 - opportunities to regenerate and redevelop sites that are in decline or in need of improvement; and
 - opportunities to address the issues of contamination, flood risk, access and other matters as a comprehensive scheme for the Dane Valley site.
- 6.10. All policies have been appraised in order to assess their impact on the ten Sustainability Framework Objectives. This exercise ensures that the policies within the Neighbourhood Plan are the most sustainable, given all the reasonable alternatives. The appraisal process has been undertaken using the methodology outlined in **Chapter 4**. A summary of the appraisal is given in each case.
- 6.11. Whilst it is predicted that many of the policies will have an overall positive or neutral/unknown impact on sustainability issues, it is inevitable that some of the options appraised will present conflicting sustainability drivers. For example, a policy promoting development will increase demand for resources and increase energy use which could be seen to conflict with part of the SNP SA framework Objective 9 to “reduce the Parish’s impact on climate change”. Where conflicting impacts are predicted to arise, mitigation measures have been suggested or explanation/suggestion on how to resolve the conflict.
- 6.12. Tables Aa - Ar as attached in **Appendix 6.1** set out all of the policies as originally drafted in the SNP and a number of reasonable alternatives (options) for each. The text for each policy may be different within the latest version of the SNP as the results of the SA have been taken on board plus any further changes made by the Steering Group. This is because the SA forms part of the iterative process of developing the SNP. The draft policies that have been amended are set out in **Appendix 6.2**. This shows only those policies that were revised in light of the SA assessment. These have been reassessed as in **Appendix 6.3**. The Steering Group have considered the suggested amendments to the original policies and concluded that the amended policies should all be accepted. The policies in the SNP itself have now been amended to reflect the Steering Group’s decision.

Comparing LDC Core Strategy Sustainability Appraisal with LDC Core Strategy and SNP Sustainability Objectives

- 6.13. The LDC Core Strategy identified sustainability challenges facing the District and set its own sustainability framework objectives based on these. **Table 18** is a comparison of the key sustainability issues identified in the Core Strategy SA, the sustainability objectives for the local plan and the SNP sustainability objectives.

Table 19 Comparing sustainability issues and priorities within Lewes District and Seaford areas

Sustainability issues identified in the Core Strategy	Core Strategy SA Objective	SNP SA Objectives
There is pressure to supply additional housing within Lewes District, particularly in the affordable housing sector, whilst there is also a need to provide housing suitable for smaller households.	1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	1. To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future.
There is a need to protect and enhance the District's important landscapes, areas of biodiversity and other protected areas.	8. To conserve and enhance the District's biodiversity. 9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park.	4. To maintain and enhance green infrastructure within the parish. 8. To protect and enhance the biodiversity of the SNP area.
The recent designation of the South Downs National Park, of which 55.6% of Lewes District is a part, is likely to increase the attractiveness of the area as a place to visit. A key issue will be ensuring that the economic benefits to be gained from this are realised without being of detriment to the National Park or surrounding area.	9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park. 17. To encourage the growth of a buoyant and sustainable tourism sector.	6. To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park
It is important to ensure that the District's Historic Buildings and features are conserved and enhanced.	9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park.	5. To protect or enhance the heritage assets and historic environment of the Parish
The amount of domestic waste that goes to landfill is comparatively high, although this is likely to decrease as	10. To reduce waste generation and disposal and achieve the	9. To encourage high quality design and layout in all new development and promote

Sustainability issues identified in the Core Strategy	Core Strategy SA Objective	SNP SA Objectives
the Energy from Waste Incinerator in Newhaven has been built. Despite this, there is a need to further promote prudent use of resources, including water, energy and waste materials by increasing the amount of recycling of waste and, where possible, the re-use of waste materials in new developments and in renovation.	sustainable management of waste. 12. To reduce the emissions of greenhouse gases, to reduce energy consumption and increase the proportion of energy generated from renewable sources.	systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.
There is pressure to locate new development on previously developed land, thus avoiding the unnecessary loss of greenfield land and valuable agricultural land.	7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and minimising the loss of valuable greenfield land.	1. To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future
Flooding presents a clear risk to many parts of the district, including significant areas of many of the larger settlements of the district. Along the coast there are also areas that are at a significant risk from coastal erosion.	14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. 15. To ensure that the District is prepared for the impacts of coastal erosion and tidal flooding.	7. To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere
There is a need to improve the water quality of the rivers in the District, which is currently far below the national average.	11. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management.	
There are clear disparities between the most deprived areas and more prosperous parts of the District. Accessibility to important services and facilities is also a significant issue in parts of the District, particularly in some rural areas.	2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the district.	2. To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car. 3. To maintain and enhance community infrastructure within the Parish.

Sustainability issues identified in the Core Strategy	Core Strategy SA Objective	SNP SA Objectives
The ageing population of Lewes District, which is already high, is likely to increase further, resulting in an additional strain on health and social care, particularly residential nursing care and intensive home care.	5. To improve the health of the District's population	
Industry and business are still suffering in parts of Lewes District, partly because of the recent recession, causing damage to local economies. This is particularly evident in areas along the coastal strip.	16. To promote and sustain economic growth in successful areas, and to revive the economies of the most deprived areas. 17. To encourage the growth of a buoyant and sustainable tourism sector.	10. Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish
Car ownership in the District is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26. Parking is a problematic issue across the District's towns. This is particularly the case in Lewes town.		
	3. To increase travel choice and accessibility to all services and facilities.	2. To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.
	4. To create and sustain vibrant, safe and distinctive communities.	
	6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services.	

Sustainability issues identified in the Core Strategy	Core Strategy SA Objective	SNP SA Objectives
There is pressure to supply additional housing within Lewes District, particularly in the affordable housing sector, whilst there is also a need to provide housing suitable for smaller households.	13. To improve the District's air quality	

6.14. Sustainability objectives are set to highlight the highest priority issues for an area and are not an exhaustive list of every issue. As outlined in **Table 18** there are many similar sustainability priorities between Lewes District and SNP but also some differences. This would be expected as the SNP would focus on the issues particular to its location rather than needing to provide sustainability objectives to cover all rural and urban areas in Lewes District. The differences can be summarised as:

- Within the Core Strategy water quality of rivers is an issue across the District but in Seaford where bathing water quality is consistently good a specific sustainability objective has not been considered necessary.
- Significant elderly population resulting in an additional strain on health and social care, particularly residential nursing care and intensive home care is highlighted in the Core Strategy but not in the SNP sustainability objectives. The SNP can guide where development is likely to be acceptable to the community but will have minimal influence over the strain on health and social care.
- Congestion during peak hours especially on the A259, A27 and the A26 and lack of parking in Lewes is highlighted in the Core Strategy and although not a specific issue for Seaford will affect its residents that commute along these routes and to Lewes. The subsequent impacts on air quality is an issue for Lewes District as it has an Air Quality Management Area designation in the town centre but not such a priority for Seaford. As these issues cannot be directly influenced by the SNP it seems appropriate that a sustainability objective is not specifically required. Although it is recognised that by promoting development near public transport commuting to Lewes and Newhaven by car may be reduced.
- Although not highlighted in the Core Strategy, a Core Strategy sustainability objective specifically to create and sustain vibrant, safe and distinctive communities is set. This has not been seen as a high enough priority within the SNP area.
- Similarly, a sustainability objective has been set in the Core Strategy to increase levels of educational attainment and to improve access to educational services to boost employment opportunities within the district but not for Seaford. The split of

employment types is similar across Seaford as in the district but there are ~2% less professional occupations and ~2% more in the caring, leisure and other service occupations in Seaford. The SNP is unlikely to be able to influence access to education or educational attainment as such a sustainability objective specifically for this topic seems unnecessary.

Overall contribution of the Plan towards sustainable development

- 6.15. The SEA regulation also requires the SA to consider the overall contribution of the SNP towards sustainable development.

Table 20 Overall contribution of the Neighbourhood Plan towards sustainable development

SA Objective	Effects of the Neighbourhood Plan
<p>1. Housing To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future.</p>	<p>The Neighbourhood Plan has carefully selected seven housing sites, which ensure Seaford continues to thrive as a vibrant community that can provide a mixed housing stock that meets the needs of existing and future residents. The positive effects of the Plan are likely to continue over time as the housing policies are delivered especially those on brownfield sites within the urban area.</p>
<p>2. Sustainable Transport (including walking/cycling) To ensure that the SNP area benefits from a robust, accessible and sustainable transport system for its residents, visitors and businesses, that: (i) encourages and facilitates sustainable economic development and access to services whilst (ii) reducing the need to travel by car.</p>	<p>The Neighbourhood Plan seeks to improve the overall sustainability of the area by enabling new development in order to support and improve existing infrastructure. The plan also seeks to improve existing green infrastructure nodes and to encourage people to walk and cycle to nearby services and facilities. The positive effects of the Plan are likely to be in the medium to longer term.</p>
<p>3. Community infrastructure To maintain and enhance community infrastructure within the Parish</p>	<p>The Neighbourhood Plan seeks to protect, support and enhance local community infrastructure in the Plan area. The Plan recognises the need to achieve a balanced community, supporting young people and elderly residents alike through housing, green infrastructure and community facilities. Positive effects are likely to increase with application of the Plan's policies and have a long-lasting effect.</p>
<p>4. Green Infrastructure To maintain and enhance green infrastructure within the parish.</p>	<p>The Neighbourhood Plan encourages the protection and enhancement of existing green infrastructure nodes and open spaces within the area. The positive effects of the Plan are likely to have medium to long term benefits for the area and for residents.</p>
<p>5. Heritage Assets To protect or enhance the heritage assets and historic environment of the Parish.</p>	<p>The Neighbourhood Plan will have positive effects on the historic environment by steering development away from key heritage assets so there is no detrimental impact and/or developing much needed local housing in a sympathetic way which respects the local distinctiveness and heritage assets of the area.</p>

<p>6. Countryside, Landscape and Key Views To conserve and enhance the countryside of the Parish and surrounding area, including the setting of the National Park.</p>	<p>Protecting and enhancing the local landscape and countryside has the potential to have an indirect positive effect on the South Downs National Park and other areas of countryside. The Plan directs development to the urban area. The positive effects of the Plan in relation to this policy area are likely to increase over the medium and longer term.</p>
<p>7. Flooding To steer new development away from areas at high risk of flooding or where it may cause or increase flooding either on site or elsewhere.</p>	<p>The Neighbourhood Plan seeks to steer new development away from areas of risk of flooding. This will have a positive impact on the residents and businesses within the parish in the short to medium term.</p>
<p>8. Biodiversity To protect and enhance the biodiversity of the SNP area.</p>	<p>Protecting areas known to be biodiversity rich has the potential to have an indirect positive effect on the SNP area. The positive effects of the Plan in relation to this policy are likely to increase over the medium and longer term.</p>
<p>9. Sustainable Design To encourage high quality design and layout in all new development and promote systems efficiency and local renewable energy production and to reduce the Parish's impact on climate change.</p>	<p>The Neighbourhood Plan encourages the wider protection of the environment and sustainable development, which would include the use of sustainable construction methods and renewable energy. The positive effects of the Plan in relation to this are likely to increase over the medium and longer term.</p>
<p>10. Local businesses and tourism Enhance and maintain the local economy by: (i) supporting employment and businesses in the SNP area and (ii) encourage tourism throughout the Parish.</p>	<p>The Neighbourhood Plan seeks to support the improvement of local services and tourism facilities within the Plan area as well as supporting local businesses. It also seeks to promote good designed places in order to support a more balanced local community and to protect areas of value. These combined will have a positive impact on local employment and tourism. The positive effects in relation to this are likely to increase over the medium and longer term.</p>

Monitoring

6.16. Under the SEA Directive, there is a statutory requirement to monitor the environmental impacts of the implementation of the plan. The purpose of monitoring is to measure the environmental effects of a plan, as well as to measure success against the plan's objectives. The SNP sets out the intention to monitor the plan, including the attainment of the sustainability objectives, in partnership with LDC on an annual basis. **Table 16** identified a number of monitoring indicators and from this list it is suggested given the SA findings that a number are of particular importance and are:

- Number of new homes completed each year;
- Percentage of brownfield land developed as compared to greenfield;
- Number of green spaces allocated within the SNP area;

- Number of new developments incorporating Sustainable Drainage Systems (SuDS); and
- Net amount of employment floorspace maintained and/or created in the SNP area.

Summary

- 6.17. In summary the SNP vision statement would only have positive impacts on sustainability as it complies directly or indirectly with 8 of the 10 objectives and has no impact on the other two. Provided that SNP objectives are implemented with regard for all sustainability framework objectives and not in isolation then there should be no adverse effects.
- 6.18. In the absence of the draft SNP, it is considered there will be fewer opportunities to address the local issues and challenges facing Seaford.
- 6.19. The impact of the SNP policies on the Sustainability Framework Objectives has been considered to ensure that the policies within the Neighbourhood Plan are the most sustainable, given all the reasonable alternatives. Whilst it is predicted that many of the policies will have an overall positive or neutral/unknown impact on sustainability issues, it is inevitable that some of the options appraised will present conflicting sustainability drivers.
- 6.20. As expected the SNP's sustainability priorities focus on the issues particular to Seaford and so differ from Lewes District priorities that needs to provide sustainability objectives to cover all rural and urban areas within the District. For example, water quality of rivers is an issue across the District but in Seaford the focus is on bathing water quality (due to its importance to the tourist trade). Some differences are due to the inability of the SNP to influence the issue. For example, SNP can highlight where development is more likely to be acceptable to the community but will have minimal influence over the strain on health and social care, congestion on roads outside the SNP area or increase the levels of educational attainment, that are all a priority issues within the District.

7. What are the next steps?

- 7.1. When the SNP meets the requirements in the legislation, Lewes District Council must publicise the SNP for a minimum of 6 weeks, inviting representations, notifying any consultation body referred to in the consultation statement and send the draft SNP to independent examination.

APPENDIX 3.1

Age structure of the population across the SNP area as recorded in the 2011 census

Age Structure	Parish/NP Area (2011)	
	Number	%
Aged 0 to 4	995	4.22
Aged 5 to 7	588	2.49
Aged 8 to 9	399	1.69
Aged 10 to 14	1,145	4.86
Aged 15	243	1.03
Aged 16 to 17	519	2.20
Aged 18 to 19	455	1.93
Aged 20 to 24	1,056	4.48
Aged 25 to 29	980	4.16
Aged 30 to 44	3,370	14.30
Aged 45 to 59	4,690	19.90
Aged 60 to 64	1,977	8.39
Aged 65 to 74	3,271	13.88
Aged 75 to 84	2,568	10.89
Aged 85 to 89	843	3.58
Aged 90 & over	472	2.00
TOTAL	23,571	100.0

APPENDIX 3.2

List of nature conservation designations

Statutory site designations

Site of Special Scientific Interest (SSSI) - Seaford to Beachy Head
National Park - South Downs
Local Nature Reserve (LNR) - Seaford Head
County Park - Seven Sisters

Non-statutory site designations

Local Wildlife Site (LWS)
CW29 - Blackstone Down
L06 - Bishopstone Downs
L17 - Denton Hill Downs
L52 - Seaford Green site, Marine Parade
L60 - Tide Mills
L72 - Blatchington Reservoir
L78 - Seaford Head
Local Geological Site (LGS)
TV59/10 - Coastal section: Seaford Head
TV59/10a - Coastal section: Hope Gap Steps-Cuckmere Haven

Section 41 / Priority Habitats & other

Chalk stream
Reedbed
Intertidal mudflat
Coastal vegetated shingle
Maritime cliff & slope
Saline lagoon
Intertidal chalk
Coastal saltmarsh
Lowland calcareous grassland
Coastal & floodplain grazing marsh
Deciduous woodland
Tree Register of British Isles
Ancient Tree Hunt

Notable Road Verge

A259 Buckle By-pass
Bishopstone Road
Edinburgh Road, Seaford

Appendix 3.3

List of Section 41 / Priority Habitats

Coastal

Coastal Vegetated Shingle Priority Habitat – three areas:

- areas (1.59 Hectares & 11.7 Hectares) located to the south of Tide Mills in the south west corner of the Parish;
- one area (0.44 Hectares) located to the east of the 'Cable House' in the south west corner of the Parish.
- Maritime Cliffs and Slopes Priority Habitat – 12 areas located in the south-east corner of the Parish between Seaford Head and Cuckmere Haven.

Coastal Saltmarsh Priority Habitat – four areas:

- one area (0.75 Hectares) located alongside to the River Cuckmere in the north east of the Parish adjacent to the 'High and Over';
- one area (0.07 Hectares) located just north of the Cuckmere Inn public house;
- one area (0.64 Hectares) located just south of the Cuckmere Inn public house adjacent to the Exceat Saltings;
- one area (2.1 Hectares) located directly east of 'Walls Brow' adjacent to the River Cuckmere.

Mudflats Priority Habitat – one area (0.68 Hectares) located directly east of 'Walls Brow' adjacent to the River Cuckmere.

Grassland

Coastal Floodplain & Grazing Marsh Priority Habitat – five main areas [zones]

- one area between the Parish's eastern boundary and Walls Brow extending north from the Cable House to the Exceat Saltings;
- one area between the Parish's eastern boundary and Litlington White Horse extending north from the Cable House to the Exceat Saltings;
- one area at Brock Hole Bottom;
- one area [several small zones] located around Ringmer Road in the south of the Parish;
- one area covering the land area to the west of Bishopstone Railway Station and to the south of Newhaven Road.

Good Quality Semi-Improved Grassland Habitat (non-priority) – four main areas:

- one area in the western part of the Parish adjacent to Rookery Hill;
- one area to the south of the A259 adjacent to Surrey Road;

- one area in the south east of the Parish covering the area between the Coastguard Cottages, South Hill, the eastern boundary of the Parish and Wall's Brow.
- one area located directly south of Litlington White Horse.

Lowland Calcareous Grassland – three main areas:

- area in the western part of the Parish adjacent to Rookery Hill;
- one area to the east of the Alfriston Road in the north of the Parish (covering Litlington White Horse);
- one zone (made up of multiple small areas) in the south-east corner of the Parish between Seaford Head and Seaford Head Nature Reserve.

Woodland

Deciduous Woodland Priority Habitat – Multiple small areas. Clusters are concentrated around: Rookery Hill and Bishopstone Place in the west of the Parish; at Bullock's Barn, Seaford Golf Course and Normansal Park Avenue in the north of the Parish; near the cemetery off Alfriston Road and at White Horse in the north east of the Parish, between Surrey Road and the railway line in the south west of the Parish and across portions of the land area of Seaford Head Golf Club, Seaford Head and Seaford Head Nature Reserve.

Appendix 3.4

List of Statutory

Heritage Assets

Grade I listed buildings and structures including:

CHURCH OF ST ANDREW, BISHOPSTONE, Seaford
THE PARISH CHURCH OF ST LEONARD, CHURCH STREET, Seaford

Grade II listed buildings and structures including:

18, SOUTH STREET, Seaford
4, CROUCH LANE, Seaford
FITZGERALD HOUSE, 1-14, CROFT LANE, Seaford
CAUSEWAY HOUSE, 37, STEYNE ROAD, Seaford
SEAFORD RAILWAY STATION, SEAFORD, Seaford
THE GABLES, BLATCHINGTON HILL, Seaford
THE STABLES (BELONGING TO 'THE GABLES'), BLATCHINGTON HILL, Seaford
MONKS ORCHARD, BLATCHINGTON HILL, Seaford
CHURCHYARD WALL, CHURCH STREET, Seaford
ALMA HOUSE, 4, CHURCH STREET, PHOENIX CORNER HOUSE, CHURCH STREET, Seaford, PREVIOUSLY SEAFORD COLLEGE OF EDUCATION, COLLEGE ROAD, Seaford
STONE HOUSE (IMMEDIATELY BEHIND SEAFORD HOUSE), CROUCH LANE, Seaford
SUTTON PLACE, EASTBOURNE ROAD, Seaford
THE STAR HOUSE, HOMEFIELD ROAD, EAST BLATCHINGTON, Seaford
ALBION HOUSE, 2, HIGH STREET, Seaford
5-9, HIGH STREET, Seaford
THE OLD HOUSE, 15 AND 17, HIGH STREET, Seaford
BARN OPPOSITE DORCAS COTTAGE, SAXON LANE, Seaford
5 AND 5A, STEYNE ROAD, 7 AND 9, STEYNE ROAD, Seaford
1-4, STEYNE ROAD, 1-4, MARINE TERRACE, Seaford
151 AND 152, CHYNGTON LANE, Seaford
OUTBUILDING IMMEDIATELY EAST OF DOVECOTE AT CHYNGTON HOUSE, CHYNGTON LANE, Seaford
OUTBUILDING SOUTH OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford
CHYNGTON COTTAGES, 155 AND 156, CHYNGTON LANE, Seaford
FIELD COTTAGE, BELGRAVE ROAD, EAST BLATCHINGTON, Seaford
WALL OF CHURCHYARD AND ENCLOSURE TO THE EAST, BISHOPSTONE, Seaford
ARCHWAY LEADING INTO CROUCH GARDEN, EAST STREET, Seaford
MARTELLO TOWER, THE ESPLANADE, Seaford
GARDEN WALL AT NO 2, HIGH STREET, Seaford
GARDEN WALL TO THE NORTH AND SOUTH OF PEAR TREE COTTAGE, SAXON LANE, Seaford
GARDEN WALL AT SAXON LODGE, SAXON LANE, Seaford
43 AND 45, STEYNE ROAD, Seaford
CHYNGTON HOUSE, CHYNGTON LANE, Seaford
OUTBUILDING IMMEDIATELY WEST TO DOVECOTE AT CHYNGTON HOUSE, CHYNGTON LANE, Seaford
THE OLD TOWN HALL, SOUTH STREET, Seaford

44, 46, 48 AND 50, HIGH STREET, Seaford
BISHOPSTONE RAILWAY STATION, STATION ROAD, BISHOPSTONE, Seaford
TWIN COTTAGE, 3, BLATCHINGTON ROAD, TWIN HOUSE, 5, BLATCHINGTON ROAD, Seaford
COWSHEDS EAST OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford
GARDEN WALL IN FRONT OF NOS 1 TO 4 (CONSECUTIVE), STEYNE ROAD MARINE TERRACE, Seaford
THE REGENCY LOUNGE, 20, HIGH STREET, Seaford
SMUGGLERS COTTAGE, PELHAM ROAD, WEST HOUSE, PELHAM ROAD, 15, PELHAM ROAD, Seaford,
GARDEN WALL AT FIELD COTTAGE, BELGRAVE ROAD, EAST BLATCHINGTON, Seaford, ALMSHOUSES (NOW 2 DWELLINGS), BISHOPSTONE, Seaford
THE MANOR HOUSE, BISHOPSTONE, Seaford
BARN OPPOSITE CHURCH AND TO THE SOUTH OF MARKSDOWN, BISHOPSTONE, Seaford,
CHURCHYARD WALL, BLATCHINGTON HILL, Seaford,
DREW COTTAGE, 28, BLATCHINGTON HILL; RECTORY COTTAGE, 26, BLATCHINGTON HILL, Seaford,
12-16, HIGH STREET, Seaford
PEAR TREE COTTAGE, SAXON LANE, Seaford
SAXON LODGE, SAXON LANE, Seaford
51, STEYNE ROAD; 1, ST MARTINS, Seaford,
DOVECOTE SOUTH EAST OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford,
BARN NORTH EAST OF CHYNGTON HOUSE, CHYNGTON LANE, Seaford,
NEW BARN, BISHOPSTONE, Seaford,
STEYNE HOUSE, 35, STEYNE ROAD, Seaford,
ABERDEEN HOUSE, 41, STEYNE ROAD, Seaford,
HONEYSUCKLE COTTAGE, 1, SOUTH STREET; SAXON COTTAGE, 3, SOUTH STREET, Seaford,

Grade II* Listed:

THE PARISH CHURCH OF ST PETER, BLATCHINGTON HILL, Seaford,

Appendix 3.5

List of Items of Historical Significance to the Parish

ITEMS OF HISTORICAL SIGNIFICANCE TO THE PARISH.

The Seven Sisters Pub, Alfriston Road.

A good example of mid-war pub architecture. This was built in the 1930s to be on a roundabout for the proposed Seaford ring-road.

Direction Finder Table, High and Over, Alfriston Road.

Installed by the Jeffrey's Trust to commemorate Road Campaigner, William Rees Jeffreys 1872-1954.

Trig Point, High and Over, Alfriston Road.

Installed by the Ordnance Survey to assist with map-making.

West Indian Commemoration Plaque in the Cemetery, Alfriston Road.

Installed in 2015 to commemorate the West Indian soldiers who were based in the town during 1915.

Mortuary Chapel, Seaford Cemetery, Alfriston Road.

Dating for 1898, the small flint chapel was designed to hold funerals. Unfortunately, the bell from the top has gone missing.

Original Cast Iron Road Sign, Avondale Road.

Outside Avondale Hotel.

Old Lamp-post near War Memorial, Avondale Road.

This is an original gas-lamp later converted to electricity.

The East Blatchington Railway, Belgrave Road.

Modern light railway track in garden of house in Belgrave Road (Private Property)

Plaque to commemorate Blatchington School in Belgrave Road.

Commemorating the school that stood here from 1951 to 1985 and placed on the building which was once the school chapel.

Metal Fence at the Rookery, Bishopstone Road.

Long fence alongside track to the east of Rookery Hill. Erected in the 1880s.

Buckle Plaque on Bishopstone Manor House, Bishopstone Road.

Buckle marked "1688 - T.P"

Walled Garden, Bishopstone Village.

Former Kitchen Garden wall to Bishopstone Place.

Lych Gate at St Andrew's Church, Bishopstone Village.

To the south east of the church. A large Lych gate with benches. Erected 1907.

Certain Graves in St Andrew's Churchyard, Bishopstone Village.

Donald Norman (Goldfish Club)

Grave of Dr Janet Forber

Catt Box Tombs

Venus Grave

Buckle Plaque on Bishopstone Hall, Bishopstone Village.

Pelham Buckle Badge above the door to the former school, now the Village Hall.

Bishopstone Place Cellars, Bishopstone Village.

All that is left from the 18th century Pelham Mansion. (Private property but entrance visible from Bishopstone Graveyard).

Carved Bench Mark on St Peter's Church, Belgrave Road, East Blatchington.

Carved on the South West corner of the tower.

Quern Stone in St Peter's Church Yard, Belgrave Road.

Set in front of the south porch of the church (possible replica?)

Certain Graves in St Peter's Churchyard, Belgrave Road.

Grave with Sabre and Flintlock Pistol

Tyler-Smith Grave

Military grave with skull

Grave of Robert Lambe

Lych Gate to St Peter's Church, Blatchington Hill, East Blatchington.

Built in 1892 to commemorate the former vicar, Robert Dennis.

Carved Initials on wall on Blatchington Hill.

Carved initials GW (probably for George Wood and the date 1677).

Former Bakehouse on Blatchington Hill.

A Victorian community bakehouse now converted into a garage.

Original Cast Iron Road Sign, Blatchington Road.

On side of former bait-shop

Old Lamp Post in Bramber Lane.

This is an original gas-lamp later converted to electricity.

Gas Lamp outside Cameron's Chemist in Broad Street.

The Seaford Gasworks was established in Blatchington Road in 1860 (10 years after Newhaven got gas and over 50 years after the first gas street-lights appeared in London.) This an early example erected outside Camerons the Chemist which had been establish nine years before. Although no long working the glass lampshade is still in-tact but appears to be in danger of falling off. The base has places for dogs to get water.

Seaford Women's Institute Gate, Brooklyn Road.

With words "Seaford WI 2012".

Memorial Plaques, Brooklyn Road.

Commemorating former WI members including some who died in Air-Raids during WW2.

Griffin Plaques on houses in Carlton Road.

Winged Lion figure on Ann Boleyn Cottage and a nearby house.

The Clinton Centre, Clinton Place.

Former Congregational Church with strange Victorian spire.

Carved Bench Mark on letter box in Carlton Road.

Circa 1937. The benchmark is in the base of the George VI letter box.

Bomb Shelter in Church Street.

Brick and concrete WW2 Bomb Shelter built for the children of the nearby school.

Church Lych Gate, Church Street.

The Lych Gate was erected in 1894 but probably replaced an earlier one. It defines the entrance of the graveyard but is also used for notices.

Carved Bench Mark on Church, Church Street (just visible).

Bench Marks were used by surveyors preparing the Ordnance Survey Maps. This probably dates to the early 1800s and is badly worn.

Metal Bench Mark in Church Street.

This benchmark dates from a later date to the one of the church. It is metal and set into the entrance of the former school.

Decorated Windows, Crown Pub, Church Street.

These five windows appear to be about 90 years old and maybe older. They are etched with floral designs and a King's Crown (post 1901).

Certain graves in St Leonard's Churchyard, Church Street.

Buckmaster Tuck (Last Bailiff of Seaford)

Joseph Funnell (metal Grave Marker)

Henry Bull (Obelisk)

Admiral Walker (Box Tomb)

Resurrection Gravestone.

King's Well off Chyngton Road.

There were once wells all over the town but they tended to be brackish so this well, used to supply the farmland around was particularly important. Next to the well is a feeding trough for sheep. Probably early 19th Century.

Original Cast Iron Road Sign, Clinton Lane.

On side of former Drill Hall

Decorative Plaques in Clinton Place.

Who installed these circular plaques and who they represent is unknown.

Memorials inside the Clinton Centre, Clinton Place.

Several memorials (some to Crook Family) from when the building was a church.

Cemetery Lodge, Cradle Hill Road.

This flint lodge still houses the staff who help care for the cemetery. It was built in 1896.

Old Lamp at Fitzgerald Almshouses, Croft Lane.

This is an original gas-lamp later converted to electricity and attached to the entrance to the almshouses.

Original Cast Iron Road Sign, Croft Lane.

On side of Hurdis House.

Sarsen Stone on the Crouch.

The oldest thing in Seaford!

Cartwheel Template in Crouch Lane.

This circular template was used during the Victorian era for making cartwheels and is in the yard of the former Berry Brothers Blacksmiths. Circa 1890.

Funnell Plaque in Crouch Lane.

Plaque is dated 1891 and shows the initials of William Funnell, an anvil and two horseshoes.

Seaford Ladies College Plaque, Eastbourne Road.

The plaque with carved letters SLC on the site of what is now Cuckmere House School.

Scalloped Portico, Eastbourne Road.

Possibly 1920s above front door.

Decorated Coal Hole on Esplanade.

Circular multi pennant designs by Clark & Hunt Ltd, Shoreditch. (Operating between 1826 and 1948).

Kings Mead War Memorial, Carlton Road.

A little-visited War Memorial in the grounds of a small garden. This was unveiled in 2004 and lists the names of the old boys of Kings Mead School killed in the second World War.

Stone Roses in Church Street.

There were once at least a dozen of these sandstone Tudor Roses on the wall. The story is they are Yorkshire roses included into the wall by a Yorkshire builder in the late 1800s. There are now just two left.

Practice War Trenches off Chyngton Road.

Still very visible. Probably dating from the 1920s.

Pillar Box, Claremont Road.

The box dates from Edward VII (1901-1910). It once had a stamp machine attached to the side of it.

Commemorative Stone at the Fitzgerald Almshouse, Croft Lane.

Commemorative stone sadly now half covered by tar forecourt.

Weather Vane in Crouch Lane.

Made by Berry Brothers and dates 1957.

Gates to former Blacksmith in Crouch Lane.

Large double gates with the Initials B.B. (Berry Brothers).

Arched Wall in Crouch Gardens, East Street.

These are the back garden gates of a row of terraced houses in East Street. Probably dates from mid-19th Century. Now an interesting feature of the Crouch Gardens.

Peace Statue in Peace Gardens, East Street.

Erected in 2011 and unveiled by actress Sheila Hancock. It is the work of local artist Christian Funnell.

'Gordon' Busts in East Street.

These four busts above the front-doors of houses on Guardswell Terrace date from the 1880s and are believed to depict General Gordon.

SUDC Plaque in East Street.

The Plaque commemorates the opening of Council Houses built to replace those destroyed in air-raids. It has the letters S.U.D.C. (Seaford Urban District Council) 1950

Bonningstedt Plaque in Crouch Gardens, East Street.

The plaque commemorates the gift of trees to replace those destroyed in the Great Storm of 1987.

QEII Coronation Gate in East Street.

Gate installed in Tudor Gateway in East Street to commemorate the Coronation of HM the Queen.

Tudor Gateway in East Street.

A sandstone arch removed from the Old Town Hall in 1921.

Royal Monogram on Telephone Exchange, East Street.

Very rare Royal Monogram Plaque of Edward VIII and the date 1936 on the side of the Seaford Telephone Exchange.

Black and White road markings Dane Road / Esplanade.

This paintwork probably dates from WW2 to assist motorists during the times of blackouts.

Decorated Eaves on the former Beach Hotel, Esplanade.

Dating from the late 1890s these eaves are unnecessary but decorative.

Rotary Memorial Plaque on Esplanade.

Installed in 2014 this commemorative direction finder and plaque was installed on one top of the old steps that once led down onto the beach. A memorial to Martello Rotary President, Claire Ivory.

Commemorative Plaques, Blatchington Golf Club, Firle Road.

A number of plaques commemorating past members.

Windmill Mound in the garden of Firle Cottage, Firle Road.

Site of the 18th century Black Mill. A quern stone from the mill is used for the front-door step and there are the ruins of mill buildings in the back garden. (Private property).

War Memorial Plaque, Inside Bowden House School, Firle Road.

Brass Plaque commemorating former pupils killed during the Great War.

Modern house in Grosvenor Road.

Designed house at 9, Grosvenor Road, built in 2014.

Red Telephone Box, Hastings Avenue.

A K6 telephone designed by Sir Giles Gilbert Scott in 1936. In poor condition.

Firebacks in High Street.

Two original Wealden iron firebacks on the Old House, one dated 1625 and the second dated 1766.

Commemorative Initials, Upper High Street.

Brick-carved plaque with initial J.R.U. and dated 1894. The initials are for John and Robert Underwood who owned shops here and opposite.

Front of Lucky House, Upper High Street.

Highly decorated front of the former Robins Brewery with mock columns, decorated windows and scrolled central pediment.

Door-step of Lucky House, Upper High Street.

The word ROBINS spelt out in mosaic tiles.

Front of shop in Lower High Street

The front of the shop is carved with the initials L.C.M. Co. Ltd. Possibly the London Cooperative Movement?

Old Sign on side of Robin's Brewery, Upper High Street.

The old paintwork advertising spelling out ROBINS BREWERY can just be seen on the side of the building in High Street.

Mathematical Tiles in Lower High Street.

On the side of the Regency Restaurant (probably part of listed building registration). The originals would have dated from the late 18th Century but these are later.

Oven Door, Boot Inn, Lower High Street.

Dating from when the premises was a bakers.

Coal Hole in Upper High Street.

Coal hole near the Front Room restaurant. Eight circles interlinked with a square and four diamonds. Probably dates from early 20th Century.

War Memorial, Kings Mead Lane.

To commemorate the ex-pupils killed in WW2.

Oil Pipe-Line Control Point, Marine Parade.

There was a plan during WW2 to flood the bay with oil and set fire to it to deter a German landing. The control point still contains the valves which would have been connected to two large oil tanks in Bishopstone village.

World War Two Tank Trap, Buckle Car-Park, Marine Parade.

Recovered during recent road works. Used to delay enemy tanks.

Buckle Plaque, Marine Parade.

The plaque commemorates the Battle of the Buckle in 1545. It is probably about 30 years old.

Decorated Balconies in Pelham Road.

Galleried front of Bay House.

Water Pumping Station, Poverty Bottom.

Built 1901

World War Two Tank Traps, Richmond Road.

Used to delay enemy tanks, now used as a wall.

Cartwheel template in Richmond Terrace.

This circular template was used during the Victorian era for making cartwheels and is in the yard of St James House. In 2016, it was removed. The contractors said it would be replaced but this does not seem to be the case.

Doorway at 3, Salisbury Road.

Decorated dog-tooth design.

Sir Frank Short Plaque in Salisbury Road.

The brown plaque has letters picked out in white "Sir Frank Short RA PRE. Lived Here 1922-1939" Sir Frank Short (1857 - 1945) was an artist, engraver and printmaker. He was a member of the Royal Academy and President of the Royal Society of Painter-Printmakers.

Carved Insect on House in Salisbury Road.

A brick carved insect (a bee or butterfly) above the front door of 'The Harbour' detached house.

Vereeniging in Saxon Lane.

Built in 1902 and named after the place where the Boer War Peace Treaty was signed that year. The house has a plaque with the initials CC and the date 1902.

Cast Iron Road Sign, Saxon Lane.

Situated at the High Street end.

Moon School Memorial Plaque, St Peter's Road.

Commemorated the foundation of Blatchington School for the Blind.

Cannon set in wall Saxon Lane / Steyne Road.

The cannon has been place for over 150 years and possibly earlier. It is believed to have been a signal gun which was once on the roof of Hurdis House in Broad Street.

Flint Buckle Badge in Silver Lane.

The buckle is the symbol of the Pelham Family and this was probably made by one of their workers to show the extent of the land held by Bishopstone Place. Possibly dates from the late 1700s.

Flint Diamond Badge in Silver Lane.

Probably constructed at the same time as the buckle, above. The symbolism has been lost.

Metal template in Silver Lane, Bishopstone.

Set into garden of house in Silver Lane.

Decorated doorstep in Stafford Road.

Flowers and swags and the date 1901 on the doorstep of the former Constitutional Club.

Edward VIII Post-box, Steyne Road.

The post-box is over 100 years old and was in front of the former Post Office here.

Memorial Fountain and Sundial, Jubilee Garden, Steyne Road.

Previously sited in front of the Wellington Hotel and the Salts.

Crenelated Wall, Steyne Road.

Installed in the garden of Saxon Lodge by Lewis Crook circa 1880.

Anniversary Plaque at Seaford Station, Station Approach.

To commemorate 150 years of the opening of the Seaford Branch Line in 1864. Installed on 7th June 2014.

Memorial Plaque, Cheneys Rest Home, Sutton Avenue.

To commemorate the opening of the 'Cheney's Home for Elderly People' by Mrs Winston Churchill on 20th June 1952. Brown metal plaque with further text.

Blatchington Pond, Sutton Drove.

This ancient pond is possibly a thousand years old. It used to feed the Lily ponds in Blatchington Road and the old Dann stream.

Ammonites on Wall in Sutton Drove.

Fake Fossils decorate wall.

St Thomas More Church, Sutton Road.

Built in 1935 and formally opened for worship on 12th March 1936.

Original Cast Iron Road Sign, Sutton Road.

On side of Harry Nats Cafe

Fireman Mace Plaque in Sutton Road.

Placed by the East Sussex Fire Brigade, Seaford Museum and Fireman Mace's family to commemorate the death of the fireman in 1939. Erected in 2010.

Mill Building in Sutton Road.

Dating from the late 1700s or Early 1800s, this low flat building is all that is left of Thomas Ade's Sutton Windmill.

Sculpture Bench outside Library, Sutton Park Road.

The Bench was installed in 2016.

Cuthbert Bromley Plaque at War Memorial, Sutton Park Road.

Paving slab incised with the Victoria Cross and the words "Major Cuthbert Bromley, Lancashire Fusiliers, 25th April 1915." Unveiled 2015.

Horse Bath, Tide Mills.

Remains of the slope used to bathe horses, once part of Dale's Stables.

Old Station Platform, Tide Mills.

Bishopstone Beach Halt. In use from 1854 to 1943.

Marconi Radio Aerial Fittings, Tide Mills.

Used to secure the massive aerial, once part of the Marconi Radio Relay Station 1906

Remains of Mill Buildings and sluices, Tide Mills.

The Tide Mill in use from 1776 until the 1880s.

Remains of Station Masters House, Mill Drove, Tide Mills.

Circa 1864 on the site of an earlier building. Excavated by Sussex Archaeology Society.

Red Telephone Box, Vale Road / Lexden Road.

A K6 telephone designed by Sir Giles Gilbert Scott in 1936. In poor condition.

Memorial Plaques, Seaford Baptist Church, Westdown Road.

Commemorating former members of the Baptist Church.

Plasterwork on house in Wilmington Road.

This beautiful plasterwork probably dates from the 1920s

Tank Roads on Seaford Head.

These roads on Seaford head allowed easy access to military vehicles to the Observation Post and to give a good range across the coast.

World War Two Tank Traps, South Hill Barn, Seaford Head.

Close to the barn. Once used to delay enemy tanks.

Retaining Brick Wall for Cliff Cottage, Seaford Head.

Used to surround the property later known as Splash Point Hotel.

Bullock Barn, East Blatchington.

Now a feature of Blatchington Golf Course.

Houses Designed by Alwyn Underdown.

Various around Seaford, usually identified by a bottle-top pressed into the eaves.

Houses Designed by Alfred Blandford Hutchings.

Various around Seaford, usually identified by a corner-tower.

Version 2 18th March 2017 Kevin Gordon

Appendix 5.1

Responses to consultation on Scoping Report

Responses to consultation on Scoping Report

Organisation	Comment	Response/changes to Scoping Report
Lewes District Council 23 rd May 2017	We note that the report is titled Seaford Neighbourhood Plan - Scoping report for Sustainability Appraisal and that the overall process is referred to as the Sustainability Appraisal. We would advise to add '(Incorporating a Strategic Environmental Assessment)'. This is to signpost that the work prepared complies with the requirements set out in the Neighbourhood Planning Regulations.	Thank you – this has been amended
	The implications behind the preparation of a SA and a SEA are very different and we would advise you to make this clearer in your report. The SA (incorporating a SEA) should be carried out in conformity with the SEA Directive transposed into UK law as the Environmental Assessment of Plan or Programmes Regulations 2004. We would strongly advise you to signpost in the SA (incorporating the SEA) how it meets the requirements set out in the relevant regulations.	Thank you for your comments. The issue of the difference between a SA and SEA is raised in paragraph 1.6 of the scoping report. This has now been expanded upon.
	Appendix B provides a long list of plans and policies that influence the preparation of the SA (incorporating the SEA) and the Seaford Neighbourhood Plan. It would have been useful to draw out of these documents the elements that specifically refer to or affect the designated neighbourhood area. This would also help the Seaford Neighbourhood Plan Steering Group to clearly identify the existing policies in the area, to prevent any repetition and to pinpoint potential policy gaps or areas that could benefit from stronger policies.	The steering group are already considering the existing policies that cover Seaford with the view to identifying gaps and/or areas that are adequately covered by existing policies. In terms of the scoping report, a summary of the key plans has been included within the text of the report but this has been expanded upon – again within the report. However, this has not been undertaken for the entire list included within the Appendix.
	We note the reference to the Lewes District Local Plan Part 2. For information, we are aiming to consult on Part 2 in autumn 2017. As the designated neighbourhood area straddles, more than one local planning authority, we would advise you to include a similar update on the South Downs Local Plan.	Thank you. This has now been added to the report
	The Environmental Assessment of Plans and Programmes Regulations 2004 suggests that a SEA must describe the baseline environment in your neighbourhood in terms of nature conservation, landscape, heritage, air and climate, water, soil, human population, human health, 'material assets' (this includes transport, waste and infrastructure). When also carrying a SA, you need to widen this to also include issues such as employment and jobs, education and skills, different groups of people in the neighbourhood (young and old people, people without access to cars, Gypsies and Travellers...). Not all of these SA topics will be relevant, but if you decide to not cover one of these topics you should explain why.	Thank you. This information has been provided in a Table in section 5 (from para 5.3 onwards).

	<p>The way the data is presented in the report is not on the whole easy to read and analyse. The use of charts is welcomed; however, ensure to use an appropriate setup to allow a quick and efficient understanding of the situation. We would also advise you to choose one format (table, chart, map...) per indicator to display the information to avoid repetition and confusion. When comparing the data to wider areas than the designated neighbourhood area (district, county, region, country), percentages are often the most relevant figure to provide in order to simply identify trends. Each set of data should be accompanied by supporting text explaining what it shows to help build up a portrait of Seaford Town.</p>	<p>Thank you. Some text has now been provided within section 5 across several of the categories. The section has also changed layout. It is noted that a variety of formats is used to present the baseline information within LDC's scoping reports.</p>
	<p>Regarding the housing section, additional information on affordable housing would be helpful such as a snapshot of the housing register or a breakdown of renting and selling costs for the area. Regarding the environmental data, and location-specific data in general, the provision of a map gathering all the information would be very useful to support the report.</p>	<p>Thank you. We have provided some further information on affordable housing. Maps will be included within the draft SA.</p>
	<p>The sustainability issues are not that clearly presented in the report. This section contains a lot of information but does seem to bring clarity to the report. We would expect a succinct list of the sustainability issues for the Neighbourhood area identified through the work done in the previous section. The outcome of the various consultation exercises could be introduced under each topic of the previous section. This would help identify the priority for residents in the neighbourhood area or where there is a difference between perception and reality.</p>	<p>Thank you. We will be able to bring forward a summary of the key responses from the consultation exercise within the final SA. However – we have provided a summary of the key issues.</p>
	<p>We would advise a review and the rewording of the following objectives:</p> <ul style="list-style-type: none"> - Housing - Sustainable transport – does not seem to support walking and cycling - Community infrastructure - Flood risk – there is no mention of developments which would increase flooding - Biodiversity – if maintain, 'areas of value to local residents' would need to be clearly defined. 'locally, nationally and internationally designated areas' would be the preferred wording as these areas are already clearly defined. We would encourage the use of general sustainability principles to ensure that all elements are duly considered. It may be useful to have questions to consider for each sustainability objective. This will allow for additional focus to be given to certain elements within the objectives (e.g. healthcare provision under community infrastructure). 	<p>Thank you for your comments. Information regarding cycling and walking will be included within objective 2. Amendments will be made to objective 7 to refer to increased flooding. References to locally, nationally and internationally designated areas for biodiversity have been included within the questions to objective 8.</p> <p>It is not clear what general sustainability principles mean however, it is considered that all elements of importance to the local community have been included within the objectives. The suggestion to include questions has also been taken on board and included within the SO table.</p>
	<p>Suggested wording for the Housing objective:</p>	<p>Thank you for your comments on the Housing objective however, it is considered that the alternative suggested is</p>

	<p>To deliver high quality new open market and affordable homes for everyone. Suggested questions to consider: Does the approach add to the housing stock? Does the approach help meet affordable housing needs? Does the approach meet the needs of all members of the community in particular younger and older people? Will the approach contribute to reducing the number of households on the housing register?</p>	<p>limited and does not take into sustainable issues such as promoting brownfield land in the first instance. It is agreed that the objective could be clearer and is therefore amended to read - <i>To deliver, in the first instance on brownfield sites, high quality new open market and affordable homes that meet the needs of the whole community both now and in the future.</i> As above, questions have been included and indicators have been reviewed and revised where appropriate.</p>
	<p>The following topics could be added or merged with existing objectives under a wider label to strengthen your sustainability framework: - Archaeology - Climate change - Land efficiency A separate tourism objective could be considered as tourism was identified as a priority for Seaford.</p>	<p>Thank you for your comments. Land efficiency is already dealt with under the Housing objective as outlined in the Scoping Report. It is considered that objective 9 adequately deals with tourism as well as employment. Matters relating to archaeology have been included within the questions to objective 5. A new objective has been included relating to design and climate change.</p>
	<p>The indicators will be particularly helpful to monitor the performance of the neighbourhood plan against the sustainability objectives. Therefore, they should be designed to demonstrate the impacts on the objectives. You need to ensure that the data is accessible and will be available in the future. These indicators should align with baseline indicators where relevant.</p>	<p>Thank you and noted. Some changes have been made to several of the indicators.</p>
	<p>Suggested presentation of the sustainability framework – the letter sets out a table showing how the information could be presented.</p>	<p>Thank you. Overall the layout of the scoping report has been changed and hopefully this addresses some of your recommendations.</p>
<p>Historic England 25th May 2017</p>	<p>Having briefly reviewed the report I am pleased to confirm that we have no substantive concerns to raise. We note that at present the baseline data for the historic environment includes the designated heritage assets (scheduled monuments, listed buildings, conservation areas, etc.) as well as the list of potential non-designated heritage assets prepared by members of the steering group. The latter is a feature that we will be keen to support as a tool for decision making and which may be subject to development during the plan-making process. Nevertheless, we will also be keen to ensure that the evidence of non-designated archaeological sites and structures recorded on the East Sussex Historic Environment Record are also considered if and when they could be affected by any possible site allocations or other plan proposals. We strongly recommend the steering group consult this resource at the earliest opportunity to identify any issues that might affect heritage assets.</p>	<p>Thank you for your comments. These have been passed on to the steering group so that you are provided with site allocation information as early as possible in the process.</p>

	We also support the preparation of a character assessment to support the plan and see this as evidence of good practice. It may be helpful to consider whether the objective in the sustainability framework relating to heritage assets should be broadened to 'historic environment' and indicator relating to sustaining positive features of local character identified through the character statement or conservation area appraisals included.	Thank you for your comments. These have been taken on board and amendments to objective 5 included.
	We are pleased to see the positive emphasis on making better use of the historic environment set out in the vision for the plan and will be interested to see how this translates into policies as the plan develops.	Thank you and noted.
East Sussex County Council – Landscape Architect	Paragraph 5.4.3 suggests that the Grand Avenue ridge forms a defensible boundary to development. This statement could be misinterpreted to lead to an assumption that all of the area in the SDNP between the built-up edge and Grand Avenue could be suitable for development. As was discussed in the meeting with LDC any decisions with regard to development in this part of the SDNP should be subject to landscape and visual assessment to decide whether in fact any of the area could be considered suitable. I would recommend that this is reworded or removed.	Thank you. This wording has been removed as requested.
	Landscape section -we would like to reiterate the comments from the SDNP with regard to the additional documents which need to be referenced. In addition to these the National Character Assessment (Natural England website) and the East Sussex County Landscape Assessment (ESCC website) which has a section on towns including Seaford (2010).	Thank you. These have been inserted (although the East Sussex Landscape Assessment is already on the list)
	Table under paragraph 7.3 -Section numbered 6 - Indicators: Text reads 'Number of landscaping schemes put forward as part of new development' Recommended rewording: Number of landscape masterplans delivered which will provide multifunctional green infrastructure.	Thank you. Amendments have been made to the indicator
	SWOT analysis refers to Listed parks and gardens. The correct term is Registered Parks and Gardens. This is important as it is a different designation by Historic England.	Thank you. This has been amended
	Under Opportunities a suggested addition: To enhance the public realm (streetscape and civic spaces) with high quality hard and soft landscape materials including surfacing, street furniture and trees.	Thank you. This has been amended.
East Sussex County Council - Ecologist	Biodiversity Paragraphs 5.29 – 5.41: The reference implies that all the information for this section has been drawn from MAGIC. As MAGIC does not hold the most accurate or up-to-date biodiversity information for the County, it is recommended that the Sussex Biodiversity Record Centre (SxBRC) should be contacted as the best evidence base for biodiversity.	Thank you. A report from SxBRC has been provided to the Steering Group. However, the report and maps cannot be copied or shared and therefore the amended scoping report contains only limited information from this source.

	<p>Reference should be made to Habitats and Species of Principal Importance (as defined under section 41 of the Natural Environment and Rural Communities Act 2006 as well as to Priority BAP habitats and species. Maps of important habitats should be provided; the SxBRC should be able to provide these.</p> <p>No reference is made to Local Wildlife Sites (aka Sites of Nature Conservation Importance) or Local Geological Sites (aka Regionally Important Geological and Geomorphological Sites). Again, this information is available from the SxBRC. No reference is made to the Marine Conservation Zone, important species, the Seven Sisters Voluntary Marine Conservation Area, Wildlife Verges or to green infrastructure.</p>	<p>See above</p>
	<p>Sustainability objectives and indicators:</p> <p>4. Green infrastructure (GI) should not just be measured by the availability of recreational space and local green spaces. GI also comprises hedgerows, woodlands, LWS, ponds and other waterbodies etc. The GI of the Parish overall should be multi-functional if possible, but it may be necessary for access and recreation to be limited in some areas to benefit other functions, e.g. biodiversity.</p>	<p>These issues have been included within the questions and indicators.</p>
	<p>8. Biodiversity. Locally designated sites should be added as well as non-designated sites if they support Habitats or Species of Principal Importance. In addition to the number of enhancement schemes incorporated into development, indicators should include the percentage of Local Wildlife Sites in positive conservation management, the proportion of SSSIs in favourable conservation status etc.</p>	<p>Thank you for your comments. Locally designated sites have been included within the questions. Whilst it is agreed that the suggested indicators are important, it is considered these are too specific for the neighbourhood plan.</p>
	<p>Key Policy Documents and Strategies:</p> <p>We recommend adding the following to the list in Appendix B</p> <ul style="list-style-type: none"> -Natural Environment and Rural Communities Act 2006 -Sussex BAP (Biodiversity Action Plan) -Wildlife and Countryside Act 1981, as amended -Countryside and Rights of Way Act 2000, as amended -The Conservation of Habitats and Species Regulations 2010, as amended -Selsey Bill to Beachy Head Shoreline Management Plan -East Sussex Green Infrastructure Study 2014 <p>http://sussexlnp.org.uk/projects.php</p> <ul style="list-style-type: none"> -Sussex Local Nature Partnership Local Plan Guidance <p>http://sussexlnp.org.uk/documents/SxLNP_Local_Plan_Guidance_2014.pdf</p>	<p>Thank you. The documents that have or will have an influence on the SNP have been added.</p>

East Sussex County Council - Archaeologists	The SEA Scoping Report needs to include reference to the full range of heritage assets within the plan area, above and below ground including those with archaeological and historical interest. It would be useful if there was reference to the NPPF definition of heritage assets (so it is not just buildings and not just those that are presently designated).	Thank you. Reference to the NPPF has been included.
	Appendix D includes a list of 'heritage' but there didn't appear to be any grid references or locations map so this would benefit from some more work to make it more comprehensive and useful.	The steering Group will request assistance with mapping from ESCC and LDC
	The Historic Environment Record (HER) should be the source of the data that is referred to. We understand that the Steering Group will make contact with Greg Chuter (County Archaeologist, ESCC) once a shortlist of the housing site allocations has been drawn up. Greg will then be able to advise on the options that are available in terms of providing data from the HER and/or carrying out an archaeological assessment.	Thank you. The steering group is aware that further site-specific work is required.
	The Seaford Historic Character Assessment (2005) can be downloaded from here: https://www.westsussex.gov.uk/media/1745/seaford_eus_report_maps.pdf	Thank you and noted
Environment Agency Email 27th June 2017	<p>Thank you for consulting us on your Neighbourhood Plan. The Environment Agency is a statutory consultee in the planning process providing advice to Local Authorities and developers on pre-application enquiries, planning applications, appeals and strategic plans.</p> <p>We recommend an objective is included to protect and enhance the environment. Indicators should relate to the environmental constraints in your local area. This may include flood risk, water quality, biodiversity.</p> <p>We also recommend your SA takes account of relevant policies, plans and strategies including your local Strategic Flood Risk Assessment, flood risk strategies (https://www.gov.uk/government/collections/flood-risk-management-current-schemes-and-strategies), and the South East River Basin Management Plan (https://www.gov.uk/government/publications/south-east-river-basin-management-plan)</p>	Thank you. The sustainability objectives have been updated.
Natural England letter by email 23rd May 2017	<p>Scoping Report Objectives</p> <p>Green Infrastructure We advise that Green Infrastructure is not limited to recreational fields and green spaces. It includes gardens, footpaths, sustainable urban drainage systems, habitat networks, allotments, green roves and cemeteries for example as well as watercourses and road and rail verges. The indicators for Green Infrastructure should therefore be amended to reflect the multifunctional nature of Green Infrastructure. The</p>	Thank you and noted. The list of green infrastructures has been expanded within the questions and indicators. A question relating to GI links into the National Park have been added. Existing indicators have been amended to ensure there is a wide range of GI opportunities.

	<p>plan should seek all opportunities to enhance this resource. Opportunities to increase and enhance G.I links into the South Downs National Park should also be secured.</p>	
	<p>Landscape The need to protect the character and setting of the National Park should be emphasised as this will be a key issue for Seaford Neighbourhood Plan. Development proposals in close proximity to the National Park can deleteriously impact on tranquillity for example by increases in lighting and noise as well as visual impacts, these are Special Qualities of the National Park which need to be considered. Any sites in the setting of the National Park will need to be demonstrate their contribution for biodiversity, green infrastructure, recreational value, access to the National Park protection of water resources for example.</p>	<p>Thank you. Reference to the setting of the National Park has been included within one of the questions.</p>
	<p>Biodiversity We advise that this objective requires clarification and strengthening. The objective citing internally designated areas should be amended to read internationally protected sites. Furthermore, biodiversity objectives should not be restricted to statutory sites but also include local wildlife sites, priority habitats and species and habitat networks. Neighbourhood Plans have great potential to improve wildlife at a local scale with multiple benefits for people and wildlife. The indicators could be strengthened by including enhancing networks of natural habitats for example as reflected in the NPPF:</p> <p><i>117. To minimise impacts on biodiversity and geodiversity, planning policies should plan for biodiversity at a landscape-scale across local authority boundaries; identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation; promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan;</i></p> <p>We advise that the indicators should include the condition of nationally protected and local wildlife sites, for example Tide Mills SNCI and other wildlife habitats within the Neighbourhood Plan area.</p>	<p>Thank you. These issues have been included within the questions.</p>

	<p>Flood Risk We note that this section concentrates only on issues of flooding. We advise that water use and the protection of the chalk aquifer is a key issue for Seaford to consider. This area is in an area of water stress and the protection of the aquifer resource is of key importance. Sustainable use of water should therefore be highlighted.</p>	<p>Matters relating to sustainable use of water have been included within the questions connected to objective 9.</p>
	<p>Ecosystems Services We advise that an objective to enhance Ecosystems Services should be included. This has a wealth of benefits to people and wildlife and is missing from the document further advise that the parish contains Seaford to Beachy Head Site of Special Scientific Interest (SSSI) and development proposals should avoid any impacts to this statutorily protected site. The location of allocated sites for development is currently unclear and as such we advise that impacts with respect to biodiversity and statutorily protected sites cannot yet be negated.</p>	<p>Thank you and noted. However, it is considered that a stand lone objective on ecosystems is not necessary even though it is acknowledged as being an important topic. It is felt that enhancing ecosystems is beyond the realms of a neighbourhood plan but certain elements of this are found within individual objectives. In addition, the need for this has not come clearly through the sustainability issues section of the scoping report. It is also dealt with on a district wide basis through the SEA/SA to the Joint Core Strategy.</p>
<p>South Downs National Park Authority 9th May 2017</p>	<p>Relevant policies, plans and programmes - the following are missing from the review of relevant policies, plans etc and should be included. Links are provided where possible:</p> <ul style="list-style-type: none"> • South Downs Local Plan: Preferred Options (Sept 2015) • South Downs Local Plan Sustainability Appraisal Report to accompany the Local Plan Preferred Options • South Downs National Park Partnership Management Plan 2014-2019 • SDNPA State of the South Downs National Park (2012) • South Downs Integrated Landscape Character Assessment 2011 • South Downs Viewshed Analysis 2015 • EC Habitats Directive and the Conservation of Habitats and Species Regulations 2010 • Environment Act 1995 • The English National Parks and the Broads Circular (2010) 	<p>Thank you. These have been included</p>
	<p>Baseline data The section on Landscape should also reference the South Downs Integrated Landscape Character Assessment (2011). Seaford is within the Ouse to Eastbourne Open Downs Character Area and contains some small areas of Cuckmere Valley and Floodplain.</p> <p>‘Breathtaking views and diverse, inspirational landscapes’ are one of the seven Special Qualities of the SDNP. We have undertaken research in order to protect and conserve these views and others like them through our Viewshed Study. This takes 120 of the most widely known views and</p>	<p>Thank you. This has been added to the landscape section.</p>

	landmarks in the National Park and maps them using computer modelling to a 35 kilometre distance. These plots of views are called Zone of Theoretical Visibility (ZTVs). These are used to help assess and understand the impact of visible change in the views. There are a number of prominent viewpoints near to Seaford which could be sensitive to visible change from development. These include White Horse, Seaford Head and Seven Sisters Country Park. There are likely to be other views in and around Seaford which will be sensitive to change from development. These should be taken into account in the Sustainability Appraisal.	
	Sustainability Framework The objective on heritage assets should also include archaeology.	This has been added.
	South Downs National Park has International Dark Night Skies Reserve Status. It would be good to see the protection of dark night skies within the landscape objective of the sustainability framework	Whilst this is an important subject area, it is considered that the landscape objective covers a number of issues already and that Dark Night Skies has not been highlighted as one of the key sustainable issues identified by the local authority. However – this is a matter that will be referenced within the policies and supporting text in the neighbourhood plan.
	Surprisingly, the Sustainability Framework doesn't identify addressing Climate Change as a sustainability objective. Climate change is expected to have fundamental impacts on the National Park. It can lead to changes in landscape features, habitats and crops, as well as contribute to soil erosion and flooding.	Climate change is of course an important topic and whilst the Sustainability Appraisal for the Joint Core Strategy addressed this issue on a district wide basis, it is acknowledged that the neighbourhood plan SA should also refer to this. A new objective has been included relation design and climate change together.

Appendix 5.2

Results of SWOT Analysis

Environment and Countryside	
<p>Strengths:</p> <ul style="list-style-type: none"> • Nestled between a stunning coastline and the South Downs National Park (SDNP); • Nationally and internationally recognised iconic sites including Cuckmere Haven and Seaford Head; • Strong history with a number of scientific and archaeological sites of interest; • Unspoilt seafront with excellent vistas and accessibility; • Strong built heritage and conservation areas; • Gateway to the SDNP; • Number of national cycle routes run through the town. 	<p>Weaknesses:</p> <ul style="list-style-type: none"> • No Registered Parks and Gardens; • Seafront has lacked investment – e.g. seating, lighting and toilets; • Recreational space for the size of the population is low; • Lack of “green assets” such as trees in the post-war developments of the town. • Town vulnerable to urban encroachment with detrimental effect on the environment, wildlife and the town as whole – especially where development negatively “impacts” the SDNP. • Vulnerability of some archaeological remains.
<p>Opportunities:</p> <ul style="list-style-type: none"> • To ensure green spaces and the seafront are enhanced and preserved to support the environment, biodiversity, tranquillity and/ or recreation for the citizens of the town. • To promote sustainable tourism given the environment and countryside are key assets; • To promote sustainable development which supports our strong environment and countryside assets • To enhance the public realm (streetscape and civic spaces) with high quality hard and soft landscape materials including surfacing, street furniture and trees. 	<p>Threats:</p> <ul style="list-style-type: none"> • Risk of flooding, adequate drainage; • Loss of footpaths owing to erosion – e.g. Splash Point footpath. • Erosion impacts on rare plants – e.g. moon carrot at Hope Gap. • Risk of invasive plants (e.g. Russian vine, cotoneaster); • Urban sprawl without careful planning considerations. • Seafront is both a leisure/ tourism asset and a flood defence system. • Unique flint walls at risk of decay. • Suitable access for those with limited mobility and/ or are registered disability.

Local Economy and Facilities	
<p>Strengths:</p> <ul style="list-style-type: none"> • A stunning coastline and the South Downs National Park (SDNP); • Unspoilt seafront with excellent vistas and accessibility; • Good sports facilities; • Seaside gateway to the SDNP; • Number of national cycle routes run through the Town; • A vibrant town centre with a good mix of shops, restaurants, pubs, banks and facilities; • Excellent film location. 	<p>Weaknesses:</p> <ul style="list-style-type: none"> • A potential lack of school provision; • NHS services full to capacity and under continued increasing pressure; • Lack of facilities for young people; • Potential under-provision of tourist accommodation; • Lack of affordable and accessible community “space” • No start up business incubator centre; • Disconnect between seafront (main visitor attraction) and town centre, including lack of signage.
<p>Opportunities:</p> <ul style="list-style-type: none"> • To enhance tourism in the town; • To improve youth and community facilities • To promote sustainable development which supports our strong environment and countryside assets. 	<p>Threats:</p> <ul style="list-style-type: none"> • Increased population growth without the necessary infrastructure; • Seafront does not receive the necessary maintenance it requires. • Health and education services become insufficient and unsafe (particularly health).

Transport and Travel	
<p>Strengths:</p> <ul style="list-style-type: none"> • Geographical position between Brighton and Eastbourne, on A259, and gateway to South Downs National Park (SDNP) and heritage coast. • Excellent Bus service on main Brighton – Eastbourne artery with accessible buses serving town, SDNP and heritage coast, and in-town services. • Share-with-care Promenade & free seafront parking linked to campsite and safe bathing. • Town centre with free on-street parking (limited time) and pay & display car parks for shops and business • Rail service with two stations. 	<p>Weaknesses:</p> <ul style="list-style-type: none"> • Many poorly maintained tverns • Many poor pavement surfaces requiring maintenance • Limited parking at schools and train stations. • Number of “rat runs” by trucks. • A number of areas where traffic speed and poor pedestrian crossing facilities – e.g. at Claremont Road. • Few cycle routes or cycle parking • No real North – South public transport / cycle and pedestrian provision to e.g. Alfriston/ Lewes • Lack of seafront public transport service from town or across seafront (Splash Point to Tidemills) • Traffic pinch-points/congestion – for example, Newhaven, Alfriston and Exceat
<p>Opportunities:</p> <ul style="list-style-type: none"> • Publicity, electronic service-information, and timetable co-ordination for buses and trains. • Increasing cycle journeys (incl. electric) with provision of parking, crossings, safe cycle-paths and signposting. • To increase the connectivity within the town (e.g. North-South travel and Seafront to main town) and to destinations outside the Town. • To enhance capacity and not limit future potential capacity. • To improve pavements and tverns (surfaces, vegetation, lighting, signage, dropped kerbs) to create a better pedestrian offering, especially for those with limited mobility. 	<p>Threats:</p> <ul style="list-style-type: none"> • New developments creating population growth that do not take adequate assessment of travel and transport requirements and therefore necessary action. • Flooding to railway line at Newhaven and to A259 at Exceat. • Withdrawal of train service to Newhaven and Lewes. • Withdrawal of Newhaven Ferry Service.

Housing and Development	
<p>Strengths:</p> <ul style="list-style-type: none"> • Active housing market • Small amount of dereliction • High proportion of existing housing is accessible to public transport • South Downs National Park (SDNP) provides some protection of green field sites given the SDNP's objectives are set out in Parliamentary legislation • Attractive for commuters to Brighton, Eastbourne, Lewes • House prices lower than county and regional average 	<p>Weaknesses:</p> <ul style="list-style-type: none"> • Inadequate number of 1 & 2 bedroom dwellings and bungalows • Need for more affordable open market and rented accommodation • Adequacy of current housing stock (some too large) • Lack of Infrastructure (e.g. doctors and schools), particularly local amenity in the South-East corner of the town and uncertainty over future train services. • Geographic constraints mean limited space available for building
<p>Opportunities:</p> <ul style="list-style-type: none"> • To maximise opportunities for identifying potential brownfield sites for redevelopment over the next 14 years • To maximise residential accommodation in the town centre by re-using or converting vacant upper floors above shops and offices • To ensure opportunities to sub-divide larger dwellings into smaller units are identified • To create design specifications that complement and enhance the town's built and natural environment 	<p>Threats:</p> <ul style="list-style-type: none"> • Decreasing amount of amenity open space, which any further development may impact • Demand from pensioners who retire to Seaford from outside the area • Ageing population structure • Loss of young people who cannot afford to stay or work in the town • Risk of flooding, both from sea and surface water • Some archaeologically sensitive areas • Potential impact of any development on the SDNP's statutory objectives

APPENDIX 5.3

Sites assessment against Sustainability Framework Objectives

The following colours and criteria are used to assess each site:

SO	Sustainability Measure	REJECT (X)	Constraint (- -)	Negative (-)	Neutral (#)	Positive (+)
SO1	Brownfield site	n/a	n/a	no	n/a	yes
SO2	Proximity to railway and bus services or employment	n/a	>2km	800m -2km	500m to 800m	<500m
SO2	Proximity to primary school	n/a	>2km	800m -2km	500m to 800m	<500m
SO3	Proximity to community infrastructure e.g. PO, GP and shops	on site	>2km	800m -2km	500m to 800m	<500m
SO4	Proximity to natural green space	on site	>1km	800m to 1km	250m to 800m	<250m
SO5	Proximity to heritage asset	National designation on site	local asset on site	adjacent to asset	site visible from heritage asset	Not near heritage asset
SO6	Proximity to SDNP	on site	outside Planning Boundary	on/adjacent to Planning Boundary	within Planning Boundary	n/a
SO7	Proximity to area of flooding	n/a	flood zone 3- high risk	flood zone 2 - medium risk	flood zone 1 - low risk	very low risk
SO8	Proximity to nationally designated nature conservation site	on site	<0.4km	<1km	>1km	n/a
SO8	Proximity to locally designated nature conservation site	n/a	on site	<0.1km	>0.1km	n/a
SO10	Existing business on site	n/a	yes	n/a	No and not within 500m	<500m

NOTES

It is considered that 90 units a hectare is applied to all urban sites. Those that are within suburban/low density areas but within the Planning boundary (BUAB) - could be greenfield sites - will be assessed at 45 units per hectare and greenfield sites outside of the BUAB are assessed at 25 units a hectare.

 Sites that are shaded blue are taken forward into the Seaford neighbourhood plan.

The assessments highlight constraints to development or where the site could comply with sustainability framework objectives (SO) easily.

ASSESSED SITES

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
Dane Valley Project³⁸										
SITE SC1 48 Brooklyn Road	+	+	#	+	#	--	#	-	#	--
	<p>Site Description: fall under the Dane Valley Regeneration site – buildings in commercial use</p> <p>Issues: The building was the site of Seaford’s first cinema. <800m from Seaford Primary School. There is a low to medium risk of flooding from surface water and no risk of flooding from rivers and sea. The site is occupied by commercial businesses and any loss of these would have a negative impact on SO10.</p> <p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office., near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield: 2</p> <p>Recommendation: brownfield site in a sustainable location within the town centre, however due to the size of the site, it is unlikely to achieve a relevant number of housing units that will contribute to the supply of market and affordable housing. Not selected for inclusion in the SNP as a standalone site.</p>									
SITE SC2 48A –Brooklyn Road	+	+	#	+	#	-	#	-	#	--
	<p>Site Description: sites that fall under the Dane Valley Regeneration site – buildings in commercial use</p> <p>Issues: There is a grass bank at the back of the Site that would need an ecological survey to check if any ecological mitigation is required. <800m from Seaford Primary School. There is a low to medium risk of flooding from surface water/ groundwater and no risk of flooding from rivers and sea. The site is in on the edge of an archaeological notification area. The site is occupied by commercial businesses and any loss of these would have a negative impact on SO10.</p>									

³⁸ Information on the flood risk for each Dane Valley site has been taken from this website which provides detail on surface water flooding - <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?eastng=549168&northing=98718&address=100060076117>

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office., near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield:14</p> <p>Recommendation: brownfield site in a sustainable location within the town centre. The site could accommodate both housing and employment uses. Selected for inclusion within the SNP</p>									
SITE SC3 Units 1-4 Industrial estate 48 Brooklyn Road	+	+	#	+	#	-	#	--	#	--
	<p>Site Description: sites that fall under the Dane Valley Regeneration site – buildings in commercial use</p> <p>Issues: There is a small area of unit 4 that would need an ecological survey to check if any ecological mitigation is required. <800m from Seaford Primary School. There is a high risk of flooding from surface water/groundwater and no risk of flooding from rivers and sea. The site is in on the edge of an archaeological notification area. The site is occupied by commercial businesses and any loss of these would have a negative impact on SO10.</p> <p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office. Near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield:</p> <p>Recommendation: brownfield site in a sustainable location within the town centre. The site could accommodate both housing and employment uses. The site is selected for inclusion in the SNP.</p>									
SITE SC4 1-5 Blatchington Road Industrial Units	+	+	#	+	#	--	#	--	#	--
	<p>Site Description: sites that fall under the Dane Valley Regeneration site – buildings in commercial use</p> <p>Issues: There are trees along the eastern boundary which will need to consider what root protection measures are appropriate and an ecological survey to check if any ecological mitigation is required. The site is in an archaeological notification area . <800m from Seaford Primary School. There is a low risk of flooding across the main part of the site, high risk on the perimeters and no risk of flooding from rivers and sea. It has a significant negative impact on SO10 as the site is an existing industrial estate.</p> <p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office. Near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield: 14</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Recommendation: brownfield site in a sustainable location within the town centre but appears to be occupied by a number of existing businesses with limited space and opportunity for development on its own. Despite the loss of employment and other constraints as part of development of the wider area the site is selected for inclusion in the SNP.</p>									
SITE SC5 Gasworks site, Seaford	+	+	#	+	#	--	#	--	#	--
	<p>Site Description: sites that fall under the Dane Valley Regeneration site – buildings in commercial use</p> <p>Issues: There are trees and shrubs over the whole site and so an ecological survey will be required to check if any ecological mitigation is required. The site is in an archaeological notification area. <800m from Seaford Primary School. There is a high risk of flooding across the site and no risk of flooding from rivers and sea.</p> <p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office. Near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield: 31</p> <p>Recommendation: brownfield site in a sustainable location within the town. Despite the site having archaeological and flooding constraints it is identified within the Lewes DC SHELAA and a saved policy within the Lewes District Local Plan for housing. The site is selected for inclusion in the SNP.</p>									
SITE SC6 land adj to Water Pumping Station, 37 Brooklyn Road	+	+	#	+	#	-	#	--	#	+
	<p>Site Description: fall under the Dane Valley Regeneration site – area to east of pump station unused.</p> <p>Issues: There is a high risk of flooding from surface water and of no risk of flooding from rivers and sea. <800m from Seaford Primary School. The site is on the edge of an archaeological notification area.</p> <p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office. Near blatchington pond and ~400m from the crouch natural green space. Site vacant.</p> <p>Yield: 3</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	Recommendation: vacant brownfield site in a sustainable location within the town centre, however due to the size of the site it is unlikely to achieve a relevant number of housing units that will contribute to the supply of market and affordable housing. Not selected for inclusion in the SNP as a standalone site.									
SITE SC7 Yard at 66 A & B Chichester Road	+	+	#	+	#	#	#	--	#	--
	<p>Site Description: site falls under the Dane Valley Regeneration site and has existing access on to Chichester Road between numbers 64 and 66</p> <p>Issues: there is potential for land contamination issues and associated remediation costs. <800m from Seaford Primary School. The southern half of this site is a high risk of flooding from surface water and the whole site is of no risk of flooding from rivers and sea. Vegetation, trees and shrubs within the site so ecological survey required to identify if mitigation is required. Demolition company and storage land use.</p> <p>Contribute to SO: brownfield, <500m from train station, <500m from library and shops (~640m from GP and PO), near blatchington pond and ~400m from the crouch natural green space and site vacant.</p> <p>Yield: 30</p> <p>Recommendation: vacant brownfield site in a sustainable location within the town centre and site is within the LDC SHELAA for 10 units. Selected for inclusion in the SNP.</p>									
SITE SC8 Old Dairy, 51-53 Blatchington Road,	+	+	#	+	#	-	#	-	#	--
	<p>Site Description: site falls under the Dane Valley Regeneration site, currently used as car storage depot with associated buildings and is within the LDC SHELAA for 9 units.</p> <p>Issues: Adjacent to Archaeological Notification Area. <800m from Seaford Primary School. The site is a low to medium risk of flooding from surface water and the whole site is of no risk of flooding from rivers and sea. In commercial use.</p> <p>Contribute to SO: brownfield located within planning boundary, <500m from train station. <500m from library, shops, PO and GP, near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield: 10</p> <p>Recommendation: brownfield site in a sustainable location within the town centre and there is an expired planning approval for residential on the site. Despite the employment use existing on the site the site is included in the SNP.</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE SC9 The Trek 2000 Club, Blatchington Road	+	+	#	+	#	--	#	-	#	--
	<p>Site Description: sites that fall under the Dane Valley Regeneration site – buildings in commercial use as night club</p> <p>Issues: medieval pottery and other materials were actually found on the site in 1929 and adjacent to Archaeological Notification Area. <800m from Seaford Primary School. The site is a low to medium risk of flooding from surface water and the whole site is of no risk of flooding from rivers and sea.</p> <p>Contribute to SO: brownfield, <500m from train station, <500m from library, shops, GP and PO, near blatchington pond and ~400m from The Crouch natural green space.</p> <p>Yield: 12</p> <p>Recommendation: brownfield site in a sustainable location within the town. Despite the site having archaeological and flooding constraints it is identified within the Lewes DC SHELAA and a saved policy within the Lewes District Local Plan for housing. Site is selected for inclusion within the SNP.</p>									
SITE SC12 46 Brooklyn Road	+	+	#	+	#	-	#	--	#	--
	<p>Site Description: fall under the Dane Valley Regeneration site – buildings in commercial use</p> <p>Issues: <800m from Seaford Primary School. There is a medium to high risk of flooding from surface water and no risk of flooding from rivers and sea. The site is on the edge of an archaeological notification area. The site is occupied by commercial businesses and any loss of these would have a negative impact on SO10.</p> <p>Contribute to SO: brownfield, <500m from train station, shops, library, Post Office. Near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield: 2</p> <p>Recommendation: brownfield site in a sustainable location within the town centre, however in commercial use and due to the size of the site, it is unlikely to achieve a relevant number of housing units that will contribute to the supply of market and affordable housing. Not selected for inclusion in the SNP as a standalone site.</p>									
DANE VALLEY sites assessed as a comprehensive masterplan	+	+	#	+	#	--	#	--	#	--

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Site Description: This assessment brings together all the sites that make up the Dane Valley Regeneration scheme. It considers the option of the site being comprehensively developed for a mix of uses to include housing and employment. It creates a critical mass of land suitable for housing rather than looking at several small plots. It will enable affordable housing to come forward as part of the development due to critical mass.</p> <p>Issues: <800m from Seaford Primary School. There are areas of low to high risk of flooding from surface water and no risk of flooding from rivers and sea. The site is occupied by commercial businesses and includes areas in and adjacent to archaeological notification areas. Ecological surveys will be required to identify if any mitigation measures are required.</p> <p>Contribute to SO: brownfield, <500m from library, near blatchington pond and ~400m from the crouch natural green space.</p> <p>Yield: 131</p> <p>Recommendation: given the greater increase in new residents and employees of business units this may provide more support for transport options including new cycles lanes and bus stops. This option could improve local green infrastructure through the overall masterplan especially in a dense urban area and allow housing and commercial use to be developed together easier. An overall redevelopment will provide the opportunity to undertake archaeological investigations and/or preserve heritage buildings across the whole sit rather than only for the areas developed. It will also lead to some improvement in surface flooding problems as these measures will form part of an overall planning approval and whilst there will be some loss of employment, there may be opportunities to include new space. Although this masterplan site includes all the constraints of the smaller site by having the whole site as one masterplan it should be easier to mitigation for these constraints. The site is selected for inclusion in the SNP.</p>									
Potential Large Sites										
SITE SC13 Brooklyn Hyundai, Claremont Road	+	+	#	+	#	-	#	--	#	--
	<p>Site Description: This site is an existing car showroom and car garage and is located within the town centre</p> <p>Issues: <800m from Seaford Primary School, ~600m from the crouch natural green space, in existing commercial use. There is a medium to high risk of flooding from surface water in the southern half of the site and no risk of flooding from rivers and sea. The train station is a Listed Building and development may affect its setting.</p> <p>Contribute to SO: within 200m of the train station, brownfield site, <500m from post office, GP and library, very near salts recreational field.</p> <p>Yield: 13</p> <p>Recommendation: brownfield site in a sustainable location within the town centre. Due to the existing business located on the site and the fact that this has been recently refurbished – any redevelopment for housing would result in the loss of an employment generating use. Car showrooms fall</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	within sui generis use and not within one of the planning business use classes and therefore amending land use class to residential may be easier. The site is selected for inclusion in the SNP.									
SITE SC16 Holmes Lodge, 72 Claremont Road	+	+	#	+	+	#	#	#	#	--
	<p>Site Description: The site is an existing B&B business and is a converted residential unit between a pub and the British Legion at the end of a row of flats. It obtained outline planning permission (LW/07/0834) for 12 flats which has now expired.</p> <p>Issues: <800m from Seaford Primary School, ~500m from The Old Brickfields green space, in existing commercial use. There is a low risk of flooding from surface water and no risk of flooding from rivers and sea. Loss of a tourism facility for the town. Site visible from heritage asset.</p> <p>Contribute to SO: brownfield site within 500m of the train station, <500m from post office, GP and library, very near salts recreational field. Within walking distance of bus stop, train station and town centre services and facilities.</p> <p>Yield: 12 (due to planning permission)</p> <p>Recommendation: Due to the expired planning permission, sustainable town centre location site is included in the SNP.</p>									
SITE SC21 Station Approach/ Dane Road	+	+	#	+	#	-	#	+	#	--
	<p>Site Description: Currently in use as retail unit in town centre location (Core Strategy Core Policy 6) and within the LDC SHELAA.</p> <p>Issues: Adjacent to grade 2 listed building and in close proximity to Seaford Town Centre conservation area and Archaeological Notification Area. <800m from Seaford Primary School, ~300m from The Crouch green space. Site in existing commercial use. The train station is a Listed Building and development may affect its setting.</p> <p>Contribute to SO: It is brownfield site in town centre location (Core Strategy Core Policy 6). Highly sustainable site adjacent to town centre services, train station and within walking distance of bus stop and community infrastructure. Area of no flood risk.</p> <p>Yield: 12 (due to planning permission)</p> <p>Recommendation: The site has an expired planning approval (LW/04/1665) but is suitable for development and is therefore including in the SNP.</p>									
SITE SC26 Jermyn Ford Garage, 10 Claremont Road	+	+	#	+	#	-	#	#	#	--
	Site Description: This site is an existing car showroom and car garage									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Issues: ~475m from Seaford Primary School, ~400m from The Crouch green space. Site is in existing commercial use. There is a low risk of flooding from surface water and no risk of flooding from rivers and sea. Site in close proximity to Seaford Town Centre conservation area and Archaeological Notification Area. The train station is a Listed Building and development may affect its setting.</p> <p>Contribute to SO: Highly sustainable site adjacent to town centre services, train station and within walking distance of bus stop and community infrastructure.</p> <p>Yield: 10</p> <p>Recommendation: brownfield site in a sustainable location within the town centre. Due to the existing business located on the site– any redevelopment for housing would result in the loss of an employment generating use. Car showrooms fall within sui generis use and not within one of the planning business use classes and therefore amending land use class to residential may be easier. Site is included in SNP.</p>									
SITE SN5 10 Homefield Place, Seaford	+	+	+	+	-	-	#	#	#	+
	<p>Site Description: This site owned by ESCC is within the urban area and is in use as temporary accommodation. ESCC considers the site suitable, available and deliverable early within the plan.</p> <p>Issues: <500m from Seaford Primary School, near tennis club, <500m form bus stop, ~800m from Downs Leisure centre and 800m from Normansal Park/Chalvington Fields and The Ridings green spaces. The site is in area of low risk of surface water flooding and no risk of river or sea flooding. On the edge of archaeological notification area.</p> <p>Contribute to SO: It is located 800m from railway station. As the current use is redundant, it is considered there is no loss to the local community facilities on offer to the Seaford population.</p> <p>Yield: 19</p> <p>Recommendation: vacant brownfield site in a sustainable location within the town centre that can support a sufficient number of residential units therefore included in SNP.</p>									
SITE SN7 Land east of Barn Close	-	+	#	-	#	+	X	+	-	#
	<p>Site Description: This site is a greenfield however it is located within the SDNPA SHLAA as being acceptable.</p> <p>Issues: Loss of green open space albeit that there is no public access.<800m to primary school, over 1km to shops and Post Office and over 2km to GP surgery. Located within the national park. Site classified as of medium landscape sensitively in SDNPA SHLAA. A greenspace with an established bridleway along one boundary and the site is a habitat for Corn Bunting, Grey Partridge, Lapwing and Turtle Dove. Site is just <2km from train station.</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>The site is ~825m from Seaford and Beachy Head SSSI. Loss of agricultural land. Chalvington Fields & Normansal Park Avenue AOS are within 800m.</p> <p>Contribute to SO: Close to employment places and bus stop. No risk of flooding.</p> <p>Yield:</p> <p>Recommendation: Site greenfield and within SDNP and although employment nearby the Site is just <2km from the train station. There are sufficient other sites for this site to not need to be included. Not selected for the SNP.</p>									
SITE SS13 Seven Sisters pub, Alfriston Road	+	+	+	+	+	#	#	+	#	--
	<p>Site Description: This site is an existing pub within the urban area. The lease expires in 2022</p> <p>Issues: The site is a local community facility and in retail use including serving the tourist trade. The site is 1.25km from the railway station.</p> <p>Contribute to SO: This is located in close/walking distance of a number of key facilities including bus stop, Downs Leisure Centre, Alfriston shops, recreation fields and allotments. Site is <500m from Cradle Hill Primary School. No risk of flooding.</p> <p>Yield: 9</p> <p>Recommendation: Site is to become available and despite being an existing business it meets most of the sustainability objectives and so is included in the SNP.</p>									
	Potential Sites that met LGS Criteria									
SITE SC11 Blatchington Pond	-	+	#	#	X	-	--	--	#	#
	<p>Site Description: Greenfield site</p> <p>Issues: Greenfield site. ESCC Archaeological records state a 1624 map shows a pond existing in this location. Lexden Road shops are 680m away. A high risk of surface flooding across the majority of the site. Impact on biodiversity due to the presence of the pond.</p> <p>Contribute to SO: Close to bus stop</p> <p>Yield:</p> <p>Recommendation: loss of green infrastructure so not selected as site in SNP</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE SC24 Foster Close AOS	-	+	+	+	X	-	#	-	#	+
<p>Site Description: Greenfield site</p> <p>Issues: Site is greenfield status and has constraints of PROW and woodland. Natural England identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail and impact on trees. Very southern edge at a low risk of surface flooding..</p> <p>Contribute to SO: Close to bus stop, Seaford Primary School and Downs Tennis Club. Tesco's is 410m away. Demolition company at site SN7 less than 100m away.</p> <p>Yield:</p> <p>Recommendation: loss of green infrastructure so not selected as site in SNP.</p>										
SITE SE2 Land north of South Hill Barn	-	--	-	-	X	--	--	--	--	#
<p>Site Description: Open Space & Grazing</p> <p>Issues: Slightly over 0.5 miles to the bus stop and may impact on pedestrian / cycle use of PROW. The site is opposite and in sight of Chyngton Lane Conservation Area, close to Medieval settlement of Poynings Town and site of World War I South Camp. Impact on landscape setting of SDNP. Understood to be a number of in-filled pits in the surrounding area with a 1970s registered landfill site 225m south. Land south of Chyngton Way is at risk of groundwater flooding and the site is also upstream of an area that is of significant risk of surface water flooding. Adjacent to SSSI and NE identified possibility of Corn Bunting, Grey Partridge and Lapwing. Potentially detrimental impact on tourism and access to the iconic Seven Sisters view from South Hill Barn. 1.4km from school. The site is within the heritage coast designation.</p> <p>Contribute to SO:</p> <p>Yield:</p> <p>Recommendation: Loss of green infrastructure and risk to heritage asset mean the site was not selected for the SNP.</p>										
SITE SN2 The Ridings	-	+	+	#	X	+	#	#	#	#
<p>Site Description: Greenfield site</p> <p>Issues: loss of green infrastructure. Lexden Road shops are 480m away. NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail. Long distance from train station. Some areas of low risk of surface water flooding.</p>										

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Contribute to SO: Close to bus stop and cradle Hill primary school. No heritage assets in view.</p> <p>Yield:</p> <p>Recommendation: Loss of green infrastructure mean the site was not selected for the SNP.</p>									
SITE SN3 Normansal Park Avenue	-	+	+	#	X	#	#	#	#	#
	<p>Site Description: Greenfield site</p> <p>Issues: loss of green infrastructure. Adjacent to SDNP boundary and woodland priority habitat on part of site. NE identified potential for Corn Bunting, Lapwing and Turtle Dove. Long distance from train station. >800m to GP and Post office but Lexden Road shops are 480m away. Some areas of low risk of surface water flooding adjacent to the site on Normansal Park Avenue and in the gardens of the houses to the south. No heritage assets in view.</p> <p>Contribute to SO: Close to bus stop and <500m to Cradle Hill primary school.</p> <p>Yield:</p> <p>Recommendation: Loss of green infrastructure mean the site was not selected for the SNP.</p>									
SITE SS15 The Crouch	-	+	-	+	X	--	#	#	#	+
	<p>Site Description: Greenfield site</p> <p>Issues: loss of green infrastructure. NE identified potential for Corn Bunting, Lapwing and Turtle Dove. Some areas of low risk of surface water flooding. Adjacent to archaeology notification areas. Grade II listed Archway leading into Crouch Gardens on site.</p> <p>Contribute to SO: Close to bus stop and <500m from train station. <500m from shops. <500m from employment.</p> <p>Yield:</p> <p>Recommendation: Loss of green infrastructure mean the site was not selected for the SNP.</p>									
SITE SW11 Princes Drive Land	-	+	-	+	X	+	-	--	#	+
	<p>Site Description: Greenfield site</p>									

SITES	Sustainability Objectives									
	SO1. Brown-field	SO2. proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Issues: loss of green infrastructure. >1km from the train station. NE identified potential for Corn Bunting, Lapwing and Turtle Dove. Some areas of high risk of surface water flooding in road adjacent to site. School <1km from site.</p> <p>Contribute to SO: Close to bus stop. Coop minimarket 360m away. No heritage is visible from site.</p> <p>Yield:</p> <p>Recommendation: Loss of green infrastructure mean the site was not selected for the SNP.</p>									
SITE SW12 Surrey Road	-	#	-	+	X	-	#	--	-	+
	<p>Site Description: Greenfield site</p> <p>Issues: >1km to Bishopstone Train Station and bus stop 800m away. Loss of visual amenity greenspace albeit with no public access. Adjacent to Archaeological Notification Area, & Coastguard Cottages nearby. Provides a visual, undeveloped break or buffer between two areas of residential development. Adjacent to SNCI and potential species of Corn Bunting and Yellow Wagtail. Some areas of high risk of surface water flooding around the pond. Risk of flooding and over topping risk to development in the lower section. Seaford Primary School over 1km from the site. Adjacent to Archaeology notification area.</p> <p>Contribute to SO: <500m from employment. Shops 430m away.</p> <p>Yield:</p> <p>Recommendation: Loss of green infrastructure means the site was not selected for the SNP.</p>									

Grand Avenue sites										
	SO1. Brownfield	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE SW5 Grand Avenue Field Number 4825	-	+	--	--	+	#	X	+	#	#
	Site Description: Greenfield arable field with public access limited to footpath on north-eastern boundary									

Grand Avenue sites										
	SO1. Brownfield	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Issues: Site is greenfield status, <800m from Bishopstone Train Station. 2.2km from GP surgery and post office and 2.4km from primary school. Site in SDNP and is visible from 2-3 viewpoints in the National Park. NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail.</p> <p>Contribute to SO: <500m from bus stop, no flood risk</p> <p>Yield: 5.25 hectares</p> <p>Recommendation: The site was rejected due to High Landscape Sensitivity owing to its visual sensitivity in a vulnerable location on the edge of the settlement and the contribution that its undeveloped state makes to the overall character. Development on the site would have a potential adverse impact on the character and appearance of the landscape. There is insufficient evidence of availability. Site not selected for inclusion in the SNP.</p>									
SITE SW6 Grand Avenue field number 7148	-	+	--	--	+	#	X	+	#	#
	<p>Site Description: Arable farm land</p> <p>Issues: loss of grade 3 agricultural land, Sensitive landscape area classified as having no capacity to accommodate development although some areas of site are hidden from sensitive views due to the topography. Bishopstone train station >1km away. GP surgery and Post Office >2km away. Primary school >2km away. Site in the SDNP.</p> <p>Contribute to SO: Bus stop within 360m. Close to natural green space. Very low flood risk.</p> <p>Yield: 4.21 hectares</p> <p>Recommendation: This site is a greenfield site and impacts on SDNP and loss of green infrastructure meant the site was not selected for the SNP</p>									
SITE SW7 Grand Avenue field number 9264	-	+	--	--	+	#	X	+	#	#
	<p>Site Description: Arable farm land</p> <p>Issues: loss of grade 3 agricultural land, Sensitive landscape area classified as having no capacity to accommodate development. Site in the SDNP and visible from 2-3 viewpoints in the SDNP. Residential development may break the Bishopstone skyline. King's Hedge to the south-east forms a strong defensible boundary to the Planning. Bishopstone train station >1km away. GP surgery and Post Office >2km away. Primary school >2km away. NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail</p>									

Grand Avenue sites										
	SO1. Brownfield	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Contribute to SO: Bus stop within 360m. Close to natural green space. Very low flood risk. Yield: 5.04 hectares Recommendation: This site is a greenfield site and impacts on SDNP and loss of green infrastructure meant the site was not selected for the SNP</p>									
Grand Avenue housing and protection scheme	-	+	--	--	+	#	X	+	#	#
	<p>Site Description: Arable farm land Issues: loss of grade 3 agricultural land, Sensitive landscape area classified as having no capacity to accommodate development. Site in the SDNP and visible from 2-3 viewpoints in the SDNP. Residential development may break the Bishopstone skyline. King's Hedge to the south-east forms a strong defensible boundary to the Planning Boundary. Bishopstone train station >1km away. GP surgery and Post Office >2km away. Primary school >2km away. NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail Contribute to SO: Bus stop within 360m. Close to natural green space. Very low flood risk. Yield: 75 Recommendation: This assessment brings together the three sites that make up the what is called the 'Grand Avenue housing and protection scheme'. It considers whether there is a sustainable solution to bringing forward a greenfield site for housing within the SDNP as part of a wider project. This would form a mix of housing and provide open space and protection of other areas from development. Further work on landscape and biodiversity would need to be undertaken. This option would consider that only the southern end of Site SW5 is considered for development and only just over half of this (3 hectares) as an initial proposal. Through building on the lower areas, this would prevent any negative impact on the landscape value of the SNP however, an overall scheme could include new/improved landscape boundary treatment. Utilise all three sites means there is critical mass of land suitable for housing and will enable affordable housing to come forward. The greater increase in new residents could provide more support for proposals including new cycles lanes and bus stops. The most visible parts of the overall site would need to be protected from development. Areas of biodiversity could be protected and/or enhanced as part of the overall scheme and further work may be required. A significant amount of further technical work would be required in order to address some of the impacts site. However as discussed within the SNP SA there is sufficient land proposed for the required level of housing within the SNP area and so this site is not selected for inclusion in the SNP.</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE SC12 46 Brooklyn Road	Covered by Dane Valley Project									
SITE SC15 Firle Close amenity open space	-	+	#	+	X	-	#	+	#	+
	<p>Site Description: Greenfield Island in centre of residential close</p> <p>Issues: Loss of visual amenity greenspace. 1.45km from GP surgery and post office and site adjacent to conservation area. <800m from Seaford Train Station, 640m from primary school.</p> <p>Contribute to SO <500m from bus stop. Princess Drive Co-op minimarket 350m away. Very low risk of flooding. Blatchington House Care Home, employment 350m away.</p> <p>Yield:</p> <p>Recommendation: Site is greenfield status and development would result in loss of publicly accessible green infrastructure. Site not selected for inclusion in the SNP.</p>									
SITE SC17 Kemps Garage, Steyne Road	+	+	-	+	#	--	#	#	#	--
	<p>Site Description: Brownfield area</p> <p>Issues: In archaeological notification area, borders conservation area. Low pressure gas pipeline buffer zone. Landfill site 250m away. Hydrocarbon contamination likely. 1.44km from primary school. 'Flood risk from surface water shows a high risk of flooding of up to 900mm on the periphery of the site. Loss of business space.</p> <p>Contribute to SO: Brownfield, <500m from Seaford Train Station and <500m from GP surgery and Post Office.</p> <p>Yield: owner not keen to develop site</p> <p>Recommendation: Site not selected as not available and heritage and flood issues and loss of business.</p>									
SITE SC18 Land adjacent to sunken gardens	-	+	-	+	X	#	#	--	#	+
	Site Description: Greenfield space between Esplanade and Green Lane									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Issues: Greenfield site so loss of publicly accessible green infrastructure. 1.44km from primary school. The bottom of Green Lane at high risk of flooding from surface water up to a level of below 300mm.</p> <p>Contribute to SO: Close to bus stop and town centre/community infrastructure. <500m from train station. Low risk of flooding on most of the site.</p> <p>Recommendation: Site not selected as on green space and areas of high risk of flooding</p>									
SITE SC20 Martello Fields west	-	+	-	#	X	#	#	#	#	#
	<p>Site Description: Greenfield open space bordering Esplanade and College Road</p> <p>Issues: Loss of visual amenity greenspace. <2km from primary school.</p> <p>Contribute to SO: <1km from Seaford Train Station. Close to bus stop. 640m from GP surgery and post office. EA map has this area as low risk of flooding. <500m from shops.</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of publicly accessible green infrastructure.</p>									
SITE SC23 The Salts	-	+	-	+	X	#	#	--	#	+
	<p>Site Description: greenfield site off Marine Parade bordering Richmond Road and Park Road.</p> <p>Issues: Loss of community facilities loss of publicly accessible green infrastructure. EA maps show this as a high risk of flooding on the ESE side of the grounds and half the site across a SW/NE diagonal across half the grounds has lesser risk of flooding. There is a similar risk from surface water over all but the western part of the site. 1.6km from primary school. >500m from bus stop</p> <p>Contribute to SO: <500m from train station. <500m from GP surgery, Post Office and shops.</p> <p>Yield:</p> <p>Recommendation: not selected due to due to loss of publicly accessible green infrastructure</p>									
SITE SC25 Royal British Legion 70 Claremont Road	+	+	-	X	-	#	#	+	#	--

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Site Description: Royal British Legion building - The site is held in trust by the charity. The Seaford club signed a 10 year internal, repairing only lease in 2015. It is operating as a business and, as long as it is profitable, he would expect the lease to continue and be renewed. If at any stage the lease was to be surrendered and the site was to become vacant, the owner would look to maximise the benefit to the charity by converting the site into mixed community and/or residential use. He is not putting the site forward, however, it is suitable for a site specific policy.</p> <p>Issues: Due to size of site – it is unlikely to contribute towards affordable housing. Loss of community facility</p> <p>Contribute to SO: Close to bus stop. Not in flood area.</p> <p>Yield:</p> <p>Recommendation: not selected due to Site being too small and not available just now and loss of community facility.</p>									
SITE SN1 Land north east of Firle Road	-	+	+	-	--	#	X	+	-	+
	<p>Site Description: greenfield between Seaford Golf Club house and Abundant Grace nursing home - The Golf Club wishes to see this developed if constraints can be overcome.</p> <p>Issues: Greenfield due to loss of green infrastructure, albeit not publicly accessible. >2km from railway station. Site in SDNP and would have a potential adverse impact on the character and appearance of the landscape. Access to the site is very tight, currently only possible from within the golf club. Firle Road is too narrow to allow turning off into the site unless there is significant loss of mature hedging and a line of trees. NE identified potential for Corn Bunting, turtle dove and Yellow Wagtail so possible negative impact on biodiversity. 800m from community infrastructure</p> <p>Contribute to SO: Close to bus stop. <500m from primary school.</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of green infrastructure and within SDNP</p>									
SITE SN4 Chalvington Field	-	+	+	-	X	+	X	+	-	#
	<p>Site Description: A greenfield site partly within the National Park, currently in use as open space and recreation ground.</p> <p>Issues: The site has not been put forward by the owner. Greenfield. Within SDNP boundary. Woodland on part of site and NE identified potential for Corn Bunting, turtle dove and Yellow Wagtail. TPO group runs along western boundary. 600m from primary school. >2km from train station. 960m from community infrastructure.</p> <p>Contribute to SO: Close to bus stops. Cradle Hill Primary School is 448m away.</p> <p>Yield:</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	Recommendation: not selected due to loss of green space and within SDNP. SDNP has confirmed the site is not available.									
SITE SN6 Alfriston Road	-	+	#	#	X	#	X	+	-	#
	<p>Site Description: Amenity open space with small recycling station. The site is in 2 parts, the wood and the open land within the SDNPA.</p> <p>Issues: greenfield. Loss of community facility. Primary school 640m away and 960m from community facility. >2km from train station. Within SDNP boundary, highly visible to the surrounding downland and poor relationship with the settlement pattern. Within SSSI Impact Risk Zone. Woodland on part of site and NE identified potential for Corn Bunting, Turtle Dove and Lapwing</p> <p>Contribute to SO: Close to bus stops. No flood risk.</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of publicly accessible green infrastructure and within SDNP.</p>									
SITE SS1 6th Hole Seaford Head Golf Course	-	+	-	-	X	X	X	--	-	--
	<p>Site Description: greenfield status part of the golf course</p> <p>Issues: Greenfield. 1.6km from train station. >1km from community infrastructure. >1.5km from primary school. Roman Burial Ground in dense thicket to SE of 6th hole. Within SDNP boundary and Heritage Coast with substantial value, high sensitivity and low capacity. EA maps this land as a high risk of flooding as it is the valley bottom. NE identified potential for Corn Bunting and Grey Partridge and within SSSI impact zone.</p> <p>Contribute to SO: Close to bus stops</p> <p>Yield:</p> <p>Recommendation: not selected due to due to loss of publicly accessible green infrastructure, impact on heritage and within SDNP and Heritage coast.</p>									
SITE SS2 Allotment site, Sutton Drove	-	+	-	X	X	+	#	#	#	+
	<p>Site Description: Allotments off Sutton Drove bordering Vale Road,</p> <p>Issues: Greenfield. Covered by a statutory allocation for allotments. It is fully occupied with a waiting list; therefore, unlikely Secretary of State would give permission to sell for housing. >1km from train station. >1km from primary school. >1km from community infrastructure. Loss of community</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	infrastructure (separate to its visual value as non-publicly accessible green infrastructure). Low flood risk NE identified potential for Corn Bunting, Turtle Dove and Grey Partridge Contribute to SO: Close to bus stops. The Downs Leisure Centre employment is less than 500m away Yield: Recommendation: not selected due to due to loss of green infrastructure and allotments.									
SITE SS3 Corner of Southdown Road/ Chyngton Road	-	+	-	-	X	-	X	--	#	+
	Site Description: land situated at junction of Southdown Road and Chyngton Road Issues: Greenfield. >1km from train station. >1.5km from primary school. 960m from community infrastructure. Site in SDNP and heritage coast and landscape has substantial value, high sensitivity and negligible/low capacity for development. The EA map of surface water flooding has a high risk as this is the lowest point in the valley. Roman Burial Ground is adjacent. Contribute to SO: Potential for significant number of dwellings. Close to bus stops. Florence House employment adjacent. Yield: Recommendation: not selected due to loss of publicly accessible green infrastructure and within SDNP.									
SITE SS4 Downs Leisure Centre	+	+	-	+	+	+	#	+	#	+
	Site Description: Leisure centre and recreational open space Issues: Availability uncertain but has potential for significant number of dwellings however it would result in some loss of greenspace, albeit with no public access. loss of employment opportunities through redevelopment of the site. >1km from primary school. >1km from train station. >1km from community infrastructure. Contribute to SO: Brownfield. Close to bus stops. Alfriston Road shops are 180m away. Proposal includes convenience store, enlarged GP and health facilities improved quality of recreation space through a higher capacity G4 floodlit pitch Yield: 8									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Recommendation: LDC has carried out its own assessment of the suitability of the site, and in view of the level of investment proposed, and the support of major stakeholders (ESHT and a national operator for the proposed convenience store, the view is that the proposals are entirely suitable, although subject to review and amendment as the scheme evolves through further consultation.</p> <p>Clearly this proposal, sponsored by LDC is supported by the elected members.</p>									
SITE SS5 East Street car park	+	+	-	+	+	--	#	+	#	--
	<p>Site Description: car park on Junction of East Street and Sutton Road</p> <p>Issues: Availability uncertain but has potential for a small contribution. 960m from primary school. Loss of community facility of car park. which would have an impact on town centre. Within an Archaeological Notification Area. Site borders Town Centre Conservation Area</p> <p>Contribute to SO: Brownfield. Close to bus stops and near train station. Near community infrastructure. <250m from green space.</p> <p>Yield:</p> <p>Recommendation: not selected due to the impact on heritage, impact on town centre and the site has not been put forward by the owner.</p>									
SITE SS6 Florence House, Southdown Road	+	#	#	-	+	--	--	#	-	#
	<p>Site Description: land within curtilage of a retreat and conference centre, wedding venue and B&B</p> <p>Issues: Ancey Catholic Primary School >500m away. SDNP borders site and Heritage Coast designation crosses eastern boundary. Within Archaeological Notification Area. Railway station is 1.38 km away. Would require ecological surveys to identify if any protected species were present. GP surgery and Post Office >1km away. ~400m from SSSI. Will impact on views looking east over Seaford towards Brighton from near South Hill Barn (point Q in Statement on Seaford's Local Landscape Character views. Expected to have an effect on landscape of high sensitivity and substantial value (see Landscape Capacity Study by Lewes District Council and South Downs National Park Authority September 2012)</p> <p>Contribute to SO: Development would not affect the business or community infrastructure and should be able to support affordable housing. Due to the proposed land being within the curtilage of Florence House it is a brownfield site. Within flood zone 1 (low risk). Adjacent to green space and recreation area. Bus stop is <700m away.</p> <p>Yield: >1000sqm of residential floor space (7 units?)</p> <p>Recommendation: Site is within the SHELAA as being developable. It does border the SDNP although golf course surrounds site. Would have impacts on views to and from the SDNP. Despite the issues site is included within the SNP</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE SS7 Land adj. to Florence House, Southdown Rd.	-	#	#	-	X	-	--	#	-	#
<p>Site Description: Greenfield land adjacent to Florence House, Southdown Road</p> <p>Issues: Greenfield. >500m from bus stop. GP surgery and Post Office >1km away. ~400m from SSSI. Loss of green infrastructure (not publicly accessible). Within Heritage Coast so potential impact on heritage assets. Site adjacent to SDNP and heritage coast and landscape has substantial value, high sensitivity and negligible/low capacity for development. NE identified potential for Corn Bunting and Grey Partridge and within SSSI impact zone so potential impact on biodiversity</p> <p>Contribute to SO:</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of green infrastructure (even though not publicly accessible).</p>										
SITE SS8 Land at the Boundary/ College Road	-	+	-	+	X	-	#	--	--	+
<p>Site Description: Open, green space. Flood alleviation zone</p> <p>Issues: greenfield. >1km from primary school. The EA maps show flood risk from surface water as low, medium and high risk of flooding, and a medium risk of flooding from rivers and sea. This land is flood alleviation land, designed to absorb flood water in part of town that suffers from flooding. loss of publicly accessible green infrastructure. The site is a Priority Habitat – Coastal and Floodplain Grazing Marsh - with identified potential for Corn Bunting</p> <p>Contribute to SO: Close to bus stops. Close to community infrastructure.</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of flood alleviation and publicly accessible green infrastructure.</p>										
SITE SS10 Martello Fields east	-	#	--	#	X	#	#	#	-	#
Site Description: Open green space and recreation.										

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Issues: greenfield. 960m from community infrastructure. >2km from primary school. >500m from bus stop and >1km from train station. Loss of publicly accessible green infrastructure. The Environment Agency's 'Flood risk from rivers or from the sea' map has the NW part of the site as low risk of flooding. NE has identified potential for Corn Bunting</p> <p>Contribute to SO:</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of publicly accessible green infrastructure.</p>									
SITE SS11 Martello Fields middle	-	+	-	#	X	#	#	#	-	#
	<p>Site Description: Open green space and recreation</p> <p>Issues: greenfield. 800m from community infrastructure. >1km from primary school. and >1km from train station. Loss of publicly accessible green infrastructure. The Environment Agency's 'Flood risk from rivers or from the sea' map has the NW part of the site as low risk of flooding. NE has identified potential for Corn Bunting</p> <p>Contribute to SO: <500m from bus stop</p> <p>Yield:</p> <p>Recommendation: not selected due to due to loss of publicly accessible green infrastructure</p>									
SITE SS12 Seaford Head Golf Course	-	#	#	-	X	--	X	+	-	--
	<p>Site Description: existing golf course</p> <p>Issues: greenfield. 800m from bus stop and >1.5km from train station. Ancey Primary school is 730m away. >1.5km from community infrastructure. Loss of publicly accessible green infrastructure. Within Heritage Coast so potential impact on heritage assets. Within SDNP boundary and Heritage Coast with substantial value, high sensitivity and low capacity (none at Seaford Head). NE identified potential for Corn Bunting, Lapwing and Grey Partridge and within SSSI impact zone. Also records of Green-winged Orchid (<i>Anacamptis morio</i>) and Waxcap Fungi. impact on tourism if the golf course was developed for housing</p> <p>Contribute to SO: very low risk of flooding</p> <p>Yield:</p> <p>Recommendation: not selected due to in SDNP, loss of golf course and green infrastructure</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE SS14 Sutton Road car park (Sutton Croft Lane)	+	+	-	+	#	--	#	--	#	--
	<p>Site Description: small car park site.</p> <p>Issues: Due to size of site – it is unlikely to contribute towards affordable housing. Loss of community facility of car park which will have an impact on town centre. In an Archaeological Notification Area. >1km from primary school. High risk of surface water flooding.</p> <p>Contribute to SO: Close to bus stop, community infrastructure and train station.</p> <p>Yield:</p> <p>Recommendation: not selected due to size and loss of car park in town centre.</p>									
SITE SW2 Buckle car park	+	+	-	-	#	#	#	--	#	--
	<p>Site Description: car park by Marine Parade.</p> <p>Issues: Due to the size of the site and its ability to only bring forward under 10 units. Proposal by LDC for housing withdrawn due to title difficulties in February 2016. 800m from Bishopstone train station. >1.5km from community infrastructure. >1.5km from primary school. Edge of high risk flood zone. Loss of community facility of car park especially as only one at this end of the town and close to station also used by visitors to the town and beach</p> <p>Contribute to SO: Close to bus stops.</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of car park, distance from community infrastructure and site not put forward by owner.</p>									
SITE SW3 Buckle lorry park	+	+	-	-	#	#	#	--	#	--
	<p>Site Description: lorry park on Marine Parade</p> <p>Issues: Due to the size of the site and its ability to only bring forward under 10 units. Proposal by LDC for housing withdrawn due to title difficulties in February 2016. Site allocated as part of Town Council's seafront development plan for motorhome carpark a tourism/visitor facility for the town. 800m from Bishopstone train station. >1.5km from community infrastructure. >1.5km from primary school. Edge of high risk flood zone.</p> <p>Contribute to SO: Close to bus stops</p> <p>Yield:</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	Recommendation: not selected due to loss of car park, distance from community infrastructure and site not put forward by owner.									
SITE SW4 Clementine Ave, Katherine Way/Princess Dr AOS	-	+	-	+	X	#	#	#	#	+
	<p>Site Description: Open green space and recreation, children's play area. Issues: greenfield site. >2km from GP surgery and Post office. >1km from primary school. Loss of publicly accessible green infrastructure. NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail. Contribute to SO: Close to bus stops and shops. Low risk of flooding. Co-op minimarket is adjacent and also employment. Yield: Recommendation: not selected due to loss of publicly accessible green infrastructure. The site has not been put forward by the owner.</p>									
SITE SW8 Land north of Crown Hill	-	#	-	#	+	+	--	+	-	--
	<p>Site Description: Agricultural, used intermittently as turf nursery for golf club. Issues: greenfield site. 1.4km from Bishopstone train station. Bus stop 650m away. >2km from GP surgery and Post Office and 800m from shops. >1.5km from primary school. Some uncertainty on availability due to ransom strip. Impact on green infrastructure albeit an arable field with no public access. Adjacent to SDNP and significant impact on landscape as the site is visible from 2-3 viewpoints in the National Park. NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail. Proposed access is via private land Contribute to SO: Very Low risk of flooding Yield: Recommendation: not selected due to proximity to SDNP.</p>									
SITE SW9 Land off Firle Road	-	#	-	#	X	+	--	+	--	+
	<p>Site Description: Greenfield, Adjacent to site of old waterworks Issues: Greenfield site. Bus stop 650m away. >2km from GP surgery and Post Office and 800m from shops. 1.44km primary school. Significant loss of green infrastructure which acts as amenity land to adjacent development. Site border SDNP and the site is visible from 2-3 viewpoints in the</p>									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	National Park. Significant loss of protected trees and NE identified potential for Corn Bunting, Turtle Dove and Yellow Wagtail. Covered by Group TPO. Contribute to SO: Very Low risk of flooding. Employment within 500m Yield: Recommendation: not selected due to loss of green space.									
SITE SW14 Newlands, Bishopstone	-	+	--	-	X	+	-	--	--	#
	Site Description: Land between the A259, Marine Parade and the railway line in Bishopstone Issues: Greenfield site which lies outside the South Downs National Park but adjacent to it. >1km from community infrastructure. >2km from primary school. Negative impact on green infrastructure albeit an arable field with no public access. Outside SDNP but valley either side of A259 landscape assessment concludes high value, high sensitivity and no development potential. The site has medium risk of flooding from rivers or the sea and a high risk of flooding from surface water and is Flood Zone 3. Site of Nature Conservation Importance and NE has identified potential for Corn Bunting, Grey Partridge, Lapwing, Turtle Dove and Yellow Wagtail. Contribute to SO: Close to bus stops and train station Yield: Recommendation: not selected due to loss of green space and trees and distance from primary school.									
SITE NP1 High & Over car park,	+	+	--	--	+	+	X		-	--
	Site Description: car park Issues: >1km from primary school. Loss of trees. The site is located within the SDNP and in an area of high visibility. By developing on it, the site would not seek to conserve or enhance the landscape character. It is in the national park and close to areas of biodiversity value and a heavily wooded area. In SSSI Impact Risk Zone It is also a carpark used by walkers and visitors to the national park and by developing it would have a negative impact on tourism. Contribute to SO: The site is an existing car park covered in tarmac and therefore considered to be brownfield. The site is near a bus stop Yield: Recommendation: not selected due to being in SDNP and distance to primary school and community infrastructure.									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
SITE NP2 Parcel of land on Newhaven Road near the junction of Bishopstone Road	-	+	--	-	X	#	X	#	-	#
	<p>Site Description: Scrubland</p> <p>Issues: greenfield site. >1km from community infrastructure. >3km from primary school. Negative impact on green infrastructure albeit difficult to access, rough ground with little use. Within SDNP and valley either side of A259 landscape assessment concludes high value, high sensitivity and no development potential. NE has identified potential for Corn Bunting, Grey Partridge, Lapwing, Turtle Dove and Yellow Wagtail. Low risk of flooding</p> <p>Contribute to SO: Close to bus stops and train station</p> <p>Yield:</p> <p>Recommendation: not selected due to loss of green open space and within SDNP.</p>									
SITE NP3 Land north of Rookery Hill.	-	+	--	-	X	#	X	+	-	#
	<p>Site Description: farmland</p> <p>Issues: greenfield site. 1.44km from community infrastructure. 2km from primary school. Negative impact on green infrastructure albeit farmland with no public access. Within SDNP and landscape assessment of Rookery Hill concludes high value, high sensitivity and no development potential. Site is visible from St Andrew's church, Bishopstone (Grade I Listing). The site is visible from 6-10 viewpoints in the National Park. Parts of the site are Priority Habitat – Lowland Calcareous Grassland; Good Quality Semi-Improved Grassland (Non Priority); Deciduous Woodland; and Broadleaved National Forest. NE has identified potential for Corn Bunting, Grey Partridge, Lapwing, Turtle Dove and Yellow Wagtail.</p> <p>Contribute to SO: Close to bus stops. Very low risk of flooding</p> <p>Yield:</p> <p>Recommendation: not selected due to being in SDNP and distance to primary school.</p>									
SITE NP4 76 Rookery Way, Bishopstone	+	#	--	-	x	#	X	+	-	#
	Site Description: Single house and garden									

Other Sites										
	SO1. Brown-field	SO2. Proximity to public transport or employment	SO2 Proximity to primary schools	SO3 Proximity to community infrastructure	SO4 Proximity to natural green space	SO5 Proximity to heritage assets	SO6 Proximity to SDNP	SO7 Proximity to areas of flooding	SO8 Proximity to designated nature conservation	SO10 Existing business on site
	<p>Issues: >500m from bus stop and >1km from train station. >3km from primary school. >1.7km from community infrastructure. Within SDNP and landscape assessment of Rookery Hill concludes high value, high sensitivity and no development potential. NE has identified potential for Corn Bunting, Grey Partridge, Lapwing, Turtle Dove and Yellow Wagtail. Site is visible from St Andrew's church, Bishopstone (Grade I Listing).</p> <p>Contribute to SO: brownfield as in curtilage of property. Very low risk of flooding</p> <p>Yield:</p> <p>Recommendation: not selected due to site being in SDNP and distance from primary school and community infrastructure.</p>									

NOTES

It is considered that 90 units a hectare is applied to all urban sites. Those that are within suburban/low density areas but within the built-up area / Planning Boundary (could be greenfield sites), will be assessed at 45 units per hectare and greenfield sites outside of the BUAB are assessed at 25 units a hectare.

Sites that are shaded blue are taken forward into the neighbourhood plan.

APPENDIX 6.1

Assessment of Core Strategy Policies Against Sustainability Framework Objectives

The following colours and symbols are used to assess each policy:

++	Greater positive impact on the sustainability objective
+	Possible positive or slight positive impact on the sustainability objective
#	No impact or neutral impact on the sustainability objective
-	Possible negative or slight negative impact on the sustainability objective
--	Greater negative impact on the sustainability objective

Please note this assessment was done on the original wording in the policies which have now been revised following consultation on iterations of the SNP. However, the changes would not affect the assessment results.

Table Aa Policy SEA1 - Landscape, Seascape and Townscape Character of Seaford

<i>Policy SEA1a as drafted in the Seaford Neighbourhood Plan</i>										
<i>New development within the Seaford Neighbourhood Plan Area will conserve and enhance the landscape, seascape and townscape character of Seaford. In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances:</i>										
<i>a) the landscape setting of Seaford, including meeting the purposes of the South Downs National Park and protecting the character of the Heritage Coast;</i>										
<i>b) the key views as identified in the Seaford Landscape and Key Views Report;</i>										
<i>c) tranquillity and dark night skies;</i>										
<i>d) the natural, locally distinctive and heritage landscape qualities and characteristics of Seaford including trees and hedgerows, particularly in areas which are currently deficient in such natural assets;</i>										
<i>e) features of biodiversity, geological and heritage interest, including appropriate management of those features; and</i>										
<i>f) the River Cuckmere, its margins and associated wetlands, preventing development which would adversely affect its quiet and natural character or have a direct or indirect effect on its wildlife and geological features.</i>										
Policy SEA1 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking /cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	+	++	++	-	+	-	++
B	-	-	-	+	+	++	-	+	-	-
<p>Option A – To have a policy that sets out when development will be permitted and the key landscape, seascape and townscape that need to be conserved and enhanced (policy as drafted).</p> <p>Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>Appraisal: Both options would ensure that development respected the landscape, seascape and townscape of Seaford design. However, Option A seeks to ensure development is sympathetic and conserves/enhances the local area of the parish which will have a positive impact on sustainability objectives 4, 5, 6, 8 and 10. It will provide greater detail on the characteristics of the SNP area and represent the wishes of the local community, reflecting on the information provided in the evidence background papers. Option B would not provide the required local context or state the local character and although it will have a slight positive impact on objectives 4, 5 and 8 and a greater positive impact on 6, the extent of this is less than Option A because of the more general nature of national and District wide policies compared to the local focus of neighbourhood plan policies.</p> <p>Preferred Policy Option: A</p>										

Table Ab Policy SEA2 - Design

<i>Policy SEA2 as originally drafted in the Seaford Neighbourhood Plan</i>										
<i>Subject to other relevant development plan policies, development will be permitted provided that its design, form and detail is of a high quality to reflect and distinguish the attractive and unique landscape, seascape and townscape character of Seaford. Development must comply with the twelve design principles set out below in paragraph 6.8 above. A Design Guide exploring these principles in more detail will be produced as a Supplementary Planning Document.</i>										
Policy SEA2 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	+	-	+	+	++	-	-	?	-
B	-	++	-	+	++	++	-	-	?	+
C	-	-	-	-	+	+	-	-	++	-

Option A – To have a policy that sets out when development will be permitted in terms of design principles (policy as drafted).
 Option B – To have a policy that also includes the 12 design principles and/or further detail on sustainable design.
 Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

All options would seek to ensure that design is given consideration. However, options A and B seek to ensure development is sympathetic and in keeping with the local area. However, the policy as written in the draft SNP (option A) has limited information on the design standards expected in new development nor does it refer to local characteristics or anything specific about Seaford. It means that Option A has been scored as having a greater positive impact on 6 and a lesser positive impact on 2,4,5.

Option B has been scored as having a greater positive impact on 2, 5 and 6. By including the 12 design principles, this means that sustainable transport, heritage and landscape are specifically highlighted in the policy. Both options A and B have a slight negative impact on SO9. By taking one of these as the preferred options would result in no reference being made within the policy to sustainable design.

Option C would not provide local context or local character and although it will have a positive impact on objectives 5, 6 and 9. However, the extent of this is less than options A and B because of the more general nature of national and District wide policies compared to the local focus of neighbourhood plan policies.

Preferred Policy Option: B. It is recommended that the policy is expanded to include further details on design standards – such as the design principles and sustainable design references.

Table Ac Policy SEA3 – Conservation Areas

<i>Policy SEA3 as originally drafted in the Seaford Neighbourhood Plan</i>										
<p><i>Subject to other relevant development plan policies, development within or in the setting of Conservation Areas will be permitted provided that it:</i> <i>(a) conserves or enhances the special architectural or historic character or appearance of the area and reinstates historic elements wherever possible;</i> <i>(b) does not require the demolition or partial demolition of any unlisted buildings which make a positive contribution to the character or appearance of the area;</i> <i>(c) uses materials which are traditional to the area or are otherwise sympathetic to the character of the particular building or site;</i> <i>(d) respects the design of the existing buildings of the area;</i> <i>(e) respects any important traditional groupings of buildings which contribute to the character of the area; and</i> <i>(f) protects open spaces, trees and significant public views.</i></p>										
Policy SEA3 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	++	++	++	-	-	-	+
B	-	-	-	+	++	+	-	-	-	+
<p>Option A: To have a policy that provides guidance on when development within Conservation Areas is acceptable (policy as drafted). Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>Both options have similar outcomes when assessed against the objectives. Option A scores has having a greater positive impact on 4,5 and 6 and a lesser positive impact on 10. Option B has a greater positive impact on 5 and a lesser positive impact on 4, 6 and 10. Although it is felt the policy could be more Seaford specific in the detail, option A refers to open space and public views which are important to the town and is considered acceptable.</p> <p>Preferred Policy Option: A</p>										

Table Ad Policy SEA4 Bishopstone Conservation Area

Policy SEA4 as originally drafted in the Seaford Neighbourhood Plan										
<i>Subject to other relevant development plan policies, development will be permitted provided that it does not detract from the isolated character of Bishopstone village and its downland setting in the Bishopstone valley as shown on the Policies Map. No further development will be allowed to intrude into the valley or the ridgelines around the valley.</i>										
Policy SEA3 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	-	++	++	-	-	-	+
B	-	-	-	-	?	?	-	-	-	+
C	-	-	-	-	++	-	-	-	-	+
<p>Option A - To have a policy that provides guidance on when development within the Bishopstone Conservation Areas is acceptable (policy as drafted). Option B – To have a policy that allows some development within the valley or ridgelines provided it does not detract from the character and setting of the village. Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>All options have similar outcomes when assessed against the objectives. Option A scores has having a greater positive impact on 5 and 6 and a lesser positive impact on 10. Option B has a slight negative impact on 5 and 6. This is because even though this policy option states that any negative impact on the character and setting of the village will not be supported, it is highly likely that some form of impact would result from implementing the policy especially on the isolated character of the area. Option C can provide some protection from inappropriate development, although it is not specific enough to address the concerns of the local community. All three options have a slight positive impact on 10.</p> <p>Preferred Policy Option: A</p>										

Table Ae Policy SEA5 Areas of Established Character

Policy SEA5 as originally drafted in the Seaford Neighbourhood Plan										
<i>In considering proposals for development within Areas of Established Character, as designated on the Proposals Map, special attention will be paid to the need to retain the existing character of the area in terms of spaciousness, building heights, building size and site coverage, building lines, boundary treatments, trees and landscaping.</i>										
Policy SEA5 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	-	++	++	-	-	-	-
B	-	-	-	-	++	++	-	-	-	-
C	-	-	-	-	-	-	-	-	-	-

Option A - To have a policy that provides guidance on development proposals within Areas of Established Character (policy as drafted).
 Option B – To have a policy that is as written but includes a list of the Areas of Established Character within Seaford
 Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

Options A and B have similar outcomes when assessed against the objectives. They both have a greater positive impact on 5 and 6. Option c has a neutral impact on 5 and 6. However, the wording of the policy as written is the same as Local Plan 2003 saved policy H12. In order to make it clear within the actual policy of how this policy relates specifically to Seaford, it is recommended that the locations are included. National and strategic development plan policies do not include a reference to Areas of Established Character although local policy does.

Preferred Policy Option: B. It is recommended that the names of the Areas of Established Character are included within the policy in order for it to have a more local relevance and therefore different to the saved Local Plan policy.

Table Af Policy SEA6 Development on the Seafront

Policy SEA6 as originally drafted in the Seaford Neighbourhood Plan										
<p><i>Subject to other relevant development plan policies, sensitive development around Seaford Seafront will be permitted provided that:</i></p> <p><i>a) It does not detract from the natural, open, un-commercialised environment of the Seafront;</i></p> <p><i>b) It does not impact on the spatial or visual openness or attractiveness of the Seafront and its vistas;</i></p> <p><i>c) It enhances and preserves the biodiversity and amenity use of the Seafront; and</i></p> <p><i>d) Opportunities are taken to enhance the public realm of the Seafront as part of the development.</i></p>										
Policy SEA6 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	++	+	+	-	++	-	++
B	-	-	-	-	-	++	-	++	-	?
C	-	-	-	-	-	-	-	-	-	-
<p>Option A - To have a policy that provides guidance on acceptable development proposals around Seaford Seafront (policy as drafted).</p> <p>Option B – To have a policy that does not permit any development around the seafront.</p> <p>Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>Option A scores highly against 4, 8 and 10 and has a slight positive impact on 5 and 6. This is because the policy is positive in encouraging appropriate development that will enhance green infrastructure, biodiversity and help the local tourism businesses. Option B may result in the protection of key views and biodiversity because it does not allow for any development however, it is not a proactive policy. National and strategic development plan policies do not include a reference to Seaford seafront although local policy does.</p> <p>Preferred Policy Option: A however it is recommended that reference is made to supporting walking and cycling along Seaford seafront. This would allow the policy to have a positive impact on SO2.</p>										

Table Ag Policy SEA7 Recreational Facilities

Policy SEA7 as originally drafted in the Seaford Neighbourhood Plan										
<i>Subject to other relevant development plan policies, development will be permitted provided that it does not result in a loss of recreational facilities, particularly outdoor sports facilities. Where contributions from new development towards recreational space are required by other development plan policies, or collected via the Community Infrastructure Levy, priority will be given to the provision of formal outdoor sports facilities to reflect the current deficit in Seaford.</i>										
Policy SEA7 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	++	+	-	-	-	-	-	-
B	-	-	+	-	-	-	-	-	-	-
<p>Option A - To have a policy that provides guidance on acceptable development and the loss of recreational facilities (policy as drafted). Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>Option A scores as having a significant positive impact on objective 3– community infrastructure. Option B scores as having a slight positive impact on the same SO because national and Lewes planning policies will contain policies about ensuring there is adequate leisure and recreational space within the District. In order to reinforce option A as the most appropriate for the parish and SNP area, it is recommended that the policy refers to the areas to be protected and retained.</p> <p>Preferred Policy Option: A however it is recommended that reference could be made to a number of the existing recreational areas so that the policy has a more local relevance.</p>										

Table Ah Policy SEA8 Local Green Spaces

Policy SEA8 as originally drafted in the Seaford Neighbourhood Plan										
<i>The Neighbourhood Plan designates the following locations as Local Green Spaces, as shown on the Proposals Map: 1</i>										
<i>Proposals for any development on these Local Green Spaces will only be permitted in very special circumstances, for example, it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.</i>										
Policy SEA8 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	++	++	-	+	-	++	-	-
B	-	-	?	?	-	-	-	?	-	-
<p>Option A – To have a policy that sets out the sites to be allocated as Local Green Spaces (policy as drafted).</p> <p>Option B – To not have a policy and rely on the National Planning Policy Framework regarding advice on Local Green Spaces and request that Lewes District Council assesses and includes sites for Seaford parish in the Local Plan Part 2.</p> <p>Option A is the culmination of extensive background research undertaken by the steering group. This is located within the Local Green Spaces Report 2016. This policy has been assessed as having a greater positive impact on a number of objectives. The spaces have been assessed as being appropriate to include in the policy as judged against the criteria in the NPPF. Option B has been assessed as having a slight negative impact on objectives 3, 4 and 8. Whilst there could be an opportunity to include allocations for Local Green Spaces within the emerging Lewes Local Plan part 2, this is not guaranteed and it is unlikely a District wide document would include such allocations for each parish. Therefore – without specific allocations within NPs, there are no opportunities to protect these areas as green spaces of value to the local community.</p> <p>Preferred Policy Option: A</p>										

Table Ai Policy SEA9 Allotments

Policy SEA9 as originally drafted in the Seaford Neighbourhood Plan										
<p><i>Proposals resulting in the loss of allotments will only be permitted if it is demonstrated that:</i></p> <p>a) <i>Alternative allotment provision is made on a site of equivalent visual and horticultural value; or</i></p> <p>b) <i>there is no need or demand for the allotments and that this is unlikely to change in the foreseeable future.</i></p>										
Policy SEA9 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	++	++	-	-	-	++	-	-
B	-	-	-	-	-	-	-	-	-	-
<p>Option A – To have a policy regarding the loss of allotments within the parish (policy as drafted). Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>Option A has a greater positive impact on 3, 4 and 8. It is unlikely that policies within the Development Plan and national policy will relate to the importance of allotments to the local community and it is important that protecting allotments for local people is a policy within the SNP.</p> <p>Preferred Policy Option: A</p>										

Table Aj Policy SEA10 Health Facilities

Policy SEA10 as originally drafted in the Seaford Neighbourhood Plan										
<i>Proposals for new or expanded health facilities will be permitted subject to other relevant development plan policies.</i>										
Policy SEA10 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	++	-	-	-	-	-	-	-
B	-	-	-	-	-	-	-	-	-	-

Option A – To have a policy regarding Health Facilities (policy as drafted).
 Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.

Option A has a greater positive impact on 3. It is unlikely that policies within the Development Plan and national policy will relate to the importance of health facilities within Seaford.

Preferred Policy Option: A

Table Ak Policy SEA11 New Business Space

Policy SEA11 as originally drafted in the Seaford Neighbourhood Plan										
<i>Proposals for new business space to provide flexible start-up and grow-on accommodation for new and expanding businesses will be permitted subject to other relevant development plan policies.</i>										
Policy SEA11 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	-	-	-	-	-	-	++
B	-	-	-	-	-	-	-	-	-	++
<p>Option A – To have a policy regarding new business space (policy as drafted). Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>Both policies score the same against 10 – positive impact. It is recommended that in order to provide a more local element to the policy that it includes references to existing employment and business space.</p> <p>Preferred Policy Option: A however it is recommended this policy includes a reference is made to a new/proposed local facility such as an enterprise unit which will ensure the policy is more locally specific.</p>										

Table A1 Policy SEA12 Visitor Accommodation in Seaford

Policy SEA12 as originally drafted in the Seaford Neighbourhood Plan										
<i>Subject to the provisions of the Joint Core Strategy Core Policy 5 and other relevant development plan policies, proposals for increased visitor accommodation will be permitted within the development boundary of Seaford.</i>										
<i>The limited existing visitor accommodation will be safeguarded unless an alternative use is demonstrated to provide more social, economic and/or environmental benefits to the area.</i>										
Policy SEA12 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	-	-	-	-	-	-	-	-	++
B	-	-	-	-	-	-	-	-	-	++
C	-	-	-	-	-	-	-	-	-	+
<p>Option A – To have a policy regarding visitor accommodation (policy as drafted). Option B – To have a policy that sets out specific locations for new visitor accommodation and/or lists existing premises that should be retained. Option C – To not have a policy and rely on the National Planning Policy Framework and strategic policies within the adopted Development Plan.</p> <p>All options have a positive impact on SO10 but option A refers to Seaford and the need to retain visitor accommodation in a more general and over-arching way. Whilst Option B highlights specific areas/locations this could be too restrictive. The policy as written supports new accommodation within the Planning boundary which is acceptable.</p> <p>Preferred Policy Option: A</p>										

Table Am Policy SEA13 Footpath to Church Lane

Policy SEA13 as originally drafted in the Seaford Neighbourhood Plan										
<p><i>A pedestrian way (minimum two metres width) linking Broad Street (between Nos 17 and 25 Broad Street) to Church Lane will be protected from development. Developers will be required to incorporate such a link (or the relevant parts of such a link) in any proposals for redevelopment of any of the land or premises in the area of the route shown on the Policies Map. The local authorities will seek to secure the dedication of this route as a public right of way.</i></p>										
Policy SEA13 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	++	-	-	-	-	-	-	-	-
B	-	?	-	-	-	-	-	-	-	-
C	-	??	-	-	-	-	-	-	-	-
<p>Option A – To have a policy that seeks to protect the route of a pedestrian way to Church Lane (policy as drafted) Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies of the adopted Development Plan Document of the District. Option C – To not protect the route of the pedestrian way.</p> <p>Option A has a greater positive impact on SO2 as it enables the pedestrian way to be protected from development. Whilst this policy is also contained within the saved policies of the 2003 Local Plan, it is not covered by national planning policies or strategic policies in the Joint Core Strategy. It therefore has a slight negative impact on SO2. Option C has a greater negative impact on SO2.</p> <p>Preferred Policy Option: A</p>										

Table An Policy SEA14 Safeguarding Future Transport Projects

Policy SEA14 as originally drafted in the Seaford Neighbourhood Plan										
<p><i>Development within the Seaford Neighbourhood Plan Area will not be permitted if it would inhibit the future implementation of the following potential transport projects: Re-dualling of the train lines through the parish; or Widening or re-siting the Exceat Bridge on the A259.</i></p> <p><i>The areas to be safeguarded from such development are delineated on the Policies Map.</i></p>										
Policy SEA14 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	-	+	-	-	?	?	-	?	-	++
B	-	?	-	-	?	?	-	?	-	?
C	-	++	-	-	?	?	-	?	-	++

Option A – To have a policy that seeks to safeguard future transport projects (policy as drafted)
 Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies of the adopted Development Plan Document of the District.
 Option C – To only protect transport projects if they are for sustainable transport links (bus, trains, cycling, walking).

Option A and C score as having a slight negative impact on 5,6 and 8 as there may be visual impacts on heritage assets, views and landscape and biodiversity from the transport projects. However, it is considered that these matters will be considered as part of the overall planning applications and will be given due consideration. Option C will have a greater positive impact on 2 as it solely safeguards locations related to sustainable transport projects. However, it is likely that by widening Exceat bridge, this would become suitable for sustainable modes of transport. Options A and C will also have a greater positive impact on 10 as better transport links will help business and tourism. Option B would rely on national policies and these are not specific or local in detail. This would have a slight negative impact on 2 and 10.

Preferred Policy Option: A but with reference to/emphasising the need to improve sustainable transport links and options. Matters relating to SO5, 6 and 8 would be addressed at planning application stage.

Table Ao Policy SEA15 Site Allocations

Policy SEA15 as originally drafted in the Seaford Neighbourhood Plan										
<p><i>The following sites as defined on the Policies Map are allocated for development subject to the provisions of SEA14 and SEA15 below and other relevant development policies such as those on design and parking standards:</i></p> <p><i>i. Dane Valley Project Area – 131 dwellings and employment space</i></p> <p><i>ii. Jermyn Ford, 10 Claremont Road – 20 dwellings</i></p> <p><i>iii. 10 Homefield Place – 19 dwellings</i></p> <p><i>iv. Brooklyn Hyundi, Claremont Road – 13 dwellings</i></p> <p><i>v. Holmes Lodge, 72 Claremont Road – 12 dwellings</i></p> <p><i>vi. Station Approach/Dane Road – 12 dwellings above existing retail space</i></p> <p><i>vii. Seven Sisters pub, Alfriston Road – 9 dwellings</i></p>										
Policy SEA15 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
	++	?	-	-	?	-	?	-	+	?
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed and those identified within the policy are considered the most sustainable against the sustainability objectives. However, the policy as written has been assessed against the objectives. The policy scores well against SO1. However, whilst it makes reference to other policies within the SNP and other development policies, there is no reference to sustainable transport (only parking), impact on heritage assets, flooding or loss of existing businesses. There is a separate policy for Dane Valley. It is recommended that this policy is widened to refer to these key issues set out within the sustainability objectives.</p>										

Table Ap Policy SEA16 Dane Valley Project

Policy SEA16 as originally drafted in the Seaford Neighbourhood Plan										
<p><i>Development of the Dane Valley Project sites shall be carried out in accordance with a comprehensive masterplan to ensure that the following requirements are met:</i></p> <p><i>a. The delivery of about 131 dwellings;</i></p> <p><i>b. The delivery of replacement employment space for that lost on the site;</i></p> <p><i>c. The provision of open space to provide amenities for the new residents and to protect areas of biodiversity and archaeological interest;</i></p> <p><i>d. Enhanced transport provision to encourage new and existing residents to access the town centre and railway station by foot, cycle and bus.</i></p>										
Policy SEA16 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
	++	++	-	++	++	-	?	-	?	++
<p>There is no assessment of alternative options against this policy as the preferred housing sites have already been assessed and those identified within the policy are considered the most sustainable against the sustainability objectives. However, the policy as written has been assessed against the objectives. The policy scores as having a greater positive impact on a number of objectives such as 1, 2, 4, 5 and 10. However, reference should be made to matters relating to flooding and encouraging sustainable design within the policy.</p>										

Table Aq Policy SEA17 Seaford Planning Boundary

Policy SEA17 as originally drafted in the Seaford Neighbourhood Plan										
<i>Proposals for development within the Planning Boundaries for Seaford parish as shown on the Proposals Map will be permitted subject to other relevant development plan policies. Planning permission will not be granted for development outside the Planning Boundaries, other than in those circumstances specifically referred to in other development plan policies.</i>										
Policy SEA17 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	++	+	-	-	-	++	-	-	-	-
B	++	?	-	-	-	?	-	?	-	-
C	++	?	-	-	-	??	-	?	-	?

Option A – To have a policy that seeks to support development within the planning boundaries (policy as drafted)
 Option B – To not have a policy and rely on the National Planning Policy Framework and strategic policies of the adopted Development Plan Document of the District.
 Option C – To seek to change the existing planning boundary and/or allow some development outside of the existing planning boundaries.

Options A has a number of positive impacts on the objectives. Through supporting development within the planning boundary, this enables sustainable housing schemes to come forward. It also has a positive impact on protecting the countryside beyond the boundary (SO6) and to enable people to use urban sustainable transport systems easily but developing within the town centres. Matters controlling development within the existing boundaries are not covered by the strategic policies within the Joint Core Strategy and it is therefore considered that policy SEA17 is required. Option B therefore scores as having a negative impact on 2, 6 and 8. Option C would have a greater negative impact on SO6 as it would allow development within the countryside. It would also have a slight negative impact on 2, 8 and 10 as further development into the National Park could have a detrimental impact on tourism.

Preferred Policy Option: A

Table Ar Policy SEA18 Windfall Developments

Policy SEA18 as originally drafted in the Seaford Neighbourhood Plan										
<i>The redevelopment of brownfield sites within the Planning Boundaries of Seaford will be permitted subject to other relevant development plan policies. The conversion of upper storey space to housing and/or building of residential units above non-residential premises such as shops and other businesses is particularly encouraged.</i>										
Policy SEA18 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
A	++	?	-	-	?	??	?	?	+	?
B	++	++	-	-	?	++	?	-	+	?
C	++	?	-	-	?	??	?	?	+	?
D	??	-	-	-	-	++	-	-	-	-
E	++	++	-	-	-	-	-	-	-	-

Option A – To have a policy that supports windfall development in all locations (within and outside planning boundaries).
 Option B – To have a policy that supports windfall development within planning boundaries (policy as written).
 Option C – To have a policy that supports windfall development in all locations but with preference to those within or adjacent/abutting the planning boundary.
 Option D – To have a policy that does not support any new windfall housing development.
 Option E – To not have a policy and rely on the National Planning Policy Framework and strategic policies of the adopted Development Plan Document of the District to enable windfall sites to come forward.

Options A and C refer to having some windfall development outside of the development boundary. These have a potential negative impact on SO 2, 5, 6, 7, 8 and 10 with a greater negative impact on 6 because of the issues with developing housing within the countryside. Option D will have a greater negative impact on SO1 and would be contrary to government advice that sustainable development should be supported and approved. Whilst national and local strategic policies do support windfall development provided it is considered sustainable development and in accordance with development plan policies, it is recommended that option B is preferred but the policy as written should be expanded to address some local and Seaford specific requirements for developers to take into account.

Preferred Policy Option: B however, it may be useful to include a reference to achieving the sustainability objectives so that matters relating to sustainable design, sustainable transport, biodiversity, heritage etc are all included.

Table As Policy SEA19 Utility Infrastructure

Policy SEA19 as originally drafted in the Seaford Neighbourhood Plan										
<i>New and improved infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other relevant development plan policies.</i>										
Policy SEA18 Options	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
	+	-	++	-	-	-	-	-	-	-
<p>There is no assessment of alternative options against this policy as the policy has no negative effects on the sustainability objectives that could be improved. However, the policy as written has been assessed against the objectives.</p>										

APPENDIX 6.2 AMENDED NEIGHBOURHOOD PLAN POLICIES

AMENDED NEIGHBOURHOOD PLAN POLICIES

These policies have been amended from that originally drafted following the assessment of each policy within the SA.

SEA1a Development within or affecting the South Downs National Park

New development within or affecting the South Downs National Park will conserve and enhance the landscape, seascape and townscape character of Seaford. In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances:

- a) the landscape setting of Seaford, including meeting the purposes of the South Downs National Park and protecting the character of the Heritage Coast;
- b) the key views as identified in the Statement on Seaford's Local Landscape Character and Views and shown on Maps within that report;
- c) tranquillity and dark night skies;
- d) the natural, locally distinctive and heritage landscape qualities and characteristics of Seaford including trees and hedgerows, particularly in areas which are currently deficient in such natural assets;
- e) features of biodiversity, geological and heritage interest, including appropriate management of those features; and
- f) the River Cuckmere, its margins and associated wetlands, preventing development which would adversely affect its quiet and natural character or have a direct or indirect effect on its wildlife and geological features, but allowing for change that accommodates natural coastal erosion, responds to climate change and facilitates naturally functioning river systems.

Policy SEA2 Design

Subject to other relevant development plan policies, development which contributes towards local character and distinctiveness

through high quality design will be permitted where the following criteria are met:

- (1) The design has regard to the distinctive and attractive characteristics of Seaford and its setting and the key views identified in the Statement on Seaford's Local Landscape Character and Views and the new Design Guide for Seaford;
- (2) The site is located and designed to facilitate connectivity between the site and local services by cyclists and pedestrians, having regard to the ESCC Local Cycling and Walking Infrastructure Plan for the area. This will take into account the need to provide routeways with sufficient informal surveillance and lighting so that people feel safe using them;
- (3) The site provides good access to public transport to help reduce car dependency and support public transport use, including where appropriate, provision of better connections between bus and rail, and improved passenger information;;

(4) The design incorporates a high-quality layout, building design and durable and sustainable materials of an appropriate texture, colour, pattern and appearance that will contribute positively to the landscape and townscape character and local distinctiveness of Seaford;;

(5) The design incorporates public and private spaces which are clearly defined and designed to be attractive, well-managed and safe. There should be suitable private outdoor amenity space for new dwellings so passers-by respect the boundaries and residents feel their personal space is protected, and adequate, appropriately-designed external storage space for bins and recycling facilities as well as bicycles.

(6) The design is informed by a landscape assessment that has regard to the existing topography and landscape features of the site and the townscape, landscape and seascape of the surrounding area.

(7) The design is informed by an Ecological Impact Assessment (EclA), in line with BS42020:2013 and CIEEM guidelines, and any impacts on ecological assets will be appropriately mitigated/compensated, providing a net gain in biodiversity. Existing individual trees or tree groups that contribute positively to the area will be retained and opportunities taken to provide or improve green and blue infrastructure and habitat connections and linkages to green spaces and/or the countryside;;

(8) The design is informed by a heritage assessment using the Historic Environment Record as well as archaeological work which are research-driven to answer specific questions relevant to the history and archaeology of Seaford and the plan area;.

(9) Car parking or other servicing areas will meet ESCC standards and be appropriate to the context and sensitively located and designed so as not to dominate the public realm. Adequate electric vehicle charging points will be provided to future-proof the development.

(10) The development will provide a connection to the nearest point of adequate capacity in the sewerage network, as advised by the service provider.

A Design Guide exploring these principles in more detail has been produced as a Supplementary Planning Document.

SEA3 Conservation Areas

Subject to other relevant development plan policies, development within or in the setting of Conservation Areas will be permitted provided that it:

(a) conserves or enhances the special architectural or historic character or appearance of the Conservation Area and its setting and reinstates historic elements wherever possible;

(b) does not require the demolition or partial demolition of any unlisted buildings which make a positive contribution to the character or appearance of the Conservation Area;

(c) uses materials which are traditional to the Conservation Area or are otherwise sympathetic to the character of the particular building or site;

(d) respects the design of the existing buildings of the Conservation Area;

(e) respects any important traditional groupings of buildings which contribute to the character of the Conservation Area; and

(f) protects open spaces, trees and significant public views as identified in the Conservation Area Appraisals.

Retention in the town centre of commercial use on the ground floor will be supported and above this level, conversion to domestic use will also be supported.

Policy SEA4 Bishopstone Conservation Area

Subject to other relevant development plan policies, and specifically Policy SEA3 Conservation Areas, development will be permitted provided that it does not detract from the isolated character of Bishopstone village and its downland setting in the Bishopstone valley as shown on the Proposals Map at Appendix Ai. No further development will be allowed to intrude into the valley or the ridgelines around the valley

Policy SEA5 Areas of Established Character

In considering proposals for development within Areas of Established Character, as designated on the Proposals Map (Appendix Ai), the existing character of the area in terms of spaciousness, building heights, building size and site coverage, building lines, boundary treatments, trees and landscaping shall be retained. The Areas of Established Character in Seaford are:

Firle Road area including Firle Close, Firle Grange and Firle Drive

St Peter's Road

Glebe Drive

Belgrave Road, Westdown Road and Beacon Road

Corsica Hall

Chyngton Road and Cuckmere Road

Chyngton Way area including South Way and Lullington Close

Blatchington Road/Richmond Terrace and Broad Street, north of the A259

Policy SEA6 Development on the Seafrost

Subject to other relevant development plan policies, sensitive development around Seaford Seafrost will be permitted provided that:

a) It does not detract from the natural, open, un-commercialised environment of the Seafrost;

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;

c) It should be low density and low rise so it does not impact significantly on the spatial or visual openness or attractiveness of the Seafrost and its vistas and protects the setting of and views to and from the South Downs National Park, the Heritage Coast, the shoreline and the Seaford Head Gateways. Measures should be incorporated to protect the buffer zone between the built up area and open downland; and reflect the open character of the surrounding downland;

d) It enhances and conserves the biodiversity and amenity use of the Seafront, for example, the Kittiwake colony at Splash Point and the shingle vegetation at Tidemills, and

e) Opportunities are taken to enhance the public realm of the Seafront and improve walking and cycling facilities as part of the development.

SEA7 Recreational Facilities

Subject to other relevant development plan policies, development will be permitted provided that it does not result in a loss of recreational facilities, particularly the outdoor sports facilities at the following locations:

- School Playing Fields
- Downs Leisure Centre's and grounds
- The Salts Recreation Ground
- Blatchington Bowls Club
- Seaford Tennis Club
- Walmer Road Recreation Ground
- The Crouch

SEA8 Local Green Spaces

The Neighbourhood Plan designates the following locations as Local Green Spaces as shown on the Map in **Appendix B** attached:

1. Bishopstone Village Green
2. Blatchington Pond
3. Foster Close Open Space
4. Land North of South Hill Barn/ Chyngton Way field
5. Normansal Park/Chalvington Fields not in the National Park
6. Princess Drive Green and old Grand Avenue bridleway
7. The Crouch
8. The Old Brickfields and site adjacent to 47 Surrey Road
9. The Ridings, Lexden Road
10. Tidemills
11. Land North of Alfriston Road (4 plots)
12. Land at Grand Avenue (3 fields)

Proposals for any development on these Local Green Spaces will only be permitted in very special circumstances, for example where it is essential to meet specific necessary utility infrastructure needs and no alternative feasible site is available.

SEA11 New Business Space

Land at Cradle Hill Industrial Estate is allocated for industrial development, subject to other development plan policies and the following criteria:

- a) the site of the proposed extension shall be excavated to the generally prevailing levels of the existing estate prior to the commencement of the development
- b) the height of the development shall be no higher than the existing buildings
- c) the scheme shall provide for any off-site highway works proportional to the additional traffic created by the development (or a contribution to such works) if measures of this kind are demonstrated to be a pre-requisite of development
- d) the eastern boundary of the Cradle Hill Estate extension shall be clearly demarcated with a substantial landscaped buffer of varying width, but no less than 4 metres, to be provided at the time of the layout of the estate roads.

Existing business space at Cradle Hill and other established employment sites will be safeguarded unless the viability criteria set out in the Joint Core Strategy Core Policy 4 are met and an alternative use is demonstrated to provide more social, economic and/or environmental benefits to the area.

Proposals for new business space to provide flexible start-up and grow-on accommodation for new and expanding businesses will be encouraged subject to other relevant development plan policies. This could include a new Enterprise Centre and live/work units as well as extensions to existing employment areas such as Cradle Hill.

SEA12 Visitor Accommodation in Seaford

Subject to the provisions of the Joint Core Strategy Core Policy 5 and other relevant development plan policies, proposals for increased visitor accommodation will be permitted within the development boundary or just outside the boundary, if sympathetic to the surroundings. Properties with easy access to the seafront would be particularly suitable for this use.

The limited existing visitor accommodation will be safeguarded by requiring any change of use to be supported by evidence of:

- (a) A lack of viability for the continued provision of visitor accommodation, or
- (b) A greater social, economic and /or environmental benefit to the area from the proposed new development'

SEA13 Footpath to Church Lane

A pedestrian way meeting recognised standards (minimum two metres width) linking Broad Street (between Nos 17 and 25 Broad Street) to Church Lane will be protected from development. Developers will be required to incorporate such a link (or the relevant parts of such a link) in any proposals for redevelopment of any of the land or premises in the area of the route shown on the Proposals Map). The local authorities will seek to secure the dedication of this route as a public right of way.

SEA14 Safeguarding Future Transport Projects

Development within the Seaford Neighbourhood Plan Area will not be permitted if it would inhibit the future implementation of the following potential transport projects:

- Re-dualling of the train lines through the parish; or
- Widening or re-siting the Exceat Bridge on the A259.

The areas to be safeguarded from such development are delineated on the Policies Map. (Appendix Ai). The implementation of these projects should maximise opportunities for more sustainable forms of travel such as walking, cycling and access to public transport.

SEA15 Site Allocations

The following sites as defined on the Proposals Map - total dwellings 218) are allocated for development subject to other relevant development plan policies and meeting the Sustainability Objectives in Appendix E:

- i. Dane Valley Project Area –104 dwellings in the initial, deliverable phase, (net addition of 74) and employment space
- ii. Jermyn Ford, 10 Claremont Road – 20 dwellings
- iii. 10 Homefield Place – 19 dwellings
- iv. Brooklyn Hyundai, Claremont Road – 13 dwellings
- v. Holmes Lodge, 72 Claremont Road – 12 dwellings
- vi. Station Approach/Dane Road – 12 dwellings above existing retail space
- vii. Seven Sisters pub, Alfriston Road – 9 dwellings
- viii. *Old House Depository, Claremont Road – 35 dwellings
- ix. *Elm Court, Blatchington Road – 9 dwellings
- x. Homes above new retail unit on the Downs site – 8 dwellings
- xi. Land at Florence House – 7 dwellings

A total of 218 dwellings against a target of 185 dwellings.

SEA16 Dane Valley Project

Development of the Dane Valley Project sites shall be carried out in accordance with a comprehensive masterplan to ensure that the following requirements are met:

- a. The delivery of 131 dwellings;
- b. The delivery of replacement employment space for that lost on the site;
- c. High quality development that incorporates best practice in sustainable design;
- d. Measures to manage the potential for flooding on the site and prevent increased risk of flooding as a result of the development;
- e. Measures to investigate the extent of contaminated land and remove any contaminated material from the site;

f. The masterplan will be informed by an Ecological Constraints and Opportunities Plan and there will be provision of open space to provide amenities for the new residents and to protect areas of biodiversity and archaeological interest;

g. Enhanced transport provision to encourage users of the development to access the town centre and railway station by foot, cycle and bus". The key walking and cycling links will be identified as part of the master planning process; and

h. The layout is planned to ensure future access to the existing sewerage infrastructure for maintenance and upsizing purposes, and to ensure a gap of 15 metres between development and Brooklyn Road pumping station.

SEA17 Seaford Planning Boundary

Proposals for development within the Planning Boundaries for Seaford parish as shown on the Proposals Map (Appendix Ai) will be permitted subject to other relevant development plan policies. Planning permission will not be granted for development outside the Planning Boundaries, other than in those circumstances specifically referred to in other development plan policies or it is for essential utility infrastructure where no suitable alternative sites are available

SEA18 Windfall Development

The redevelopment of brownfield sites within the Planning Boundaries of Seaford will be permitted subject to other relevant development plan policies and having regard to the Sustainability Objectives in Appendix E. The conversion of upper storey space to housing and/or building of residential units above non-residential premises such as shops and other businesses is particularly encouraged.

SEA19 Utility Infrastructure

New and improved utility infrastructure will be encouraged and supported in order to meet the identified needs of the community subject to other relevant development plan policies.

APPENDIX 6.3

Assessment of all policies as amended

The following colours and symbols are used to assess each policy:

++	Greater positive impact on the sustainability objective
+	Possible positive or slight positive impact on the sustainability objective
#	No impact or neutral impact on the sustainability objective
-	Possible negative or slight negative impact on the sustainability objective
--	Greater negative impact on the sustainability objective

POLICY NUMBERS	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside, Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
Policy SEA1	-	-	-	+	++	++	-	+	-	++
Policy SEA2	-	++	-	+	++	++	-	-	++	+
Policy SEA3	-	-	-	++	++	++	-	-	-	+
Policy SEA4	-	-	-	-	++	++	-	-	-	+
Policy SEA5	-	-	-	-	++	++	-	-	-	-
Policy SEA6	-	++	-	++	+	+	-	++	-	++
Policy SEA7	-	-	++	+	-	-	-	-	-	-
Policy SEA8	-	-	++	++	-	+	-	++	-	-
Policy SEA9	-	-	++	++	-	-	-	++	-	-
Policy SEA10	-	-	++	-	-	-	-	-	-	-
Policy SEA11	-	-	-	-	-	-	-	-	-	++
Policy SEA12	-	-	-	-	-	-	-	-	-	++
Policy SEA13	-	++	-	-	-	-	-	-	-	-
Policy SEA14	-	++	-	-	?	?	-	?	-	++

POLICY NUMBERS	Objective 1 Housing	Objective 2 Sustainable Transport (including walking/cycling)	Objective 3 Community Infrastructure	Objective 4 Green Infrastructure	Objective 5 Heritage Assets	Objective 6 Countryside , Landscape and Key Views	Objective 7 Flooding	Objective 8 Biodiversity	Objective 9 Sustainable Design	Objective 10 Local businesses and tourism
Policy SEA15	++	+	-	-	+	-	+	-	+	+
Policy SEA16	++	++	-	++	++	-	++	-	++	++
Policy SEA17	++	+	-	-	-	++	-	-	-	-
Policy SEA18	++	++	-	-	++	++	++	-	+	++
Policy SEA19	+	-	++	-	-	-	-	-	-	-