

Seaford Neighbourhood Plan Environment and Countryside Working Group Revised Evidence report on Local Green Spaces – October 2017



Seaford Neighbourhood Plan Eleven Local Green Spaces

Contents

	Page
1. Background to this Working Document.	3
2. Introduction	3
3. The National Planning Policy Framework & Local Green Spaces	3
4. Our approach & methodology	4
5. Sites proposed for LGS Designation	6
6. The Outcome of this report	7
Annex A – Map showing 11 Local Green Spaces	8
Annex B -Proposed 11 Local Green Spaces	9
Annex C: Overview of sites not taken forward for Local Green Space Designation	58
Annex D: Preliminary Ecological Report –Kate Ryland	62

Background to this Working Document.

This Working Document is the culmination of the work of this Focus Group – bringing together in this revised version, all the key background information from our previously published Working Paper (April 2017) which also included, as Part A, a copy of our Evidence Report (November 30th 2016).

1. Introduction

As we outlined in our Focus Group's Evidence Report (**ER**), the Town of Seaford is privileged to be located in one of the most beautiful locations in the UK, nestled between the English Channel and surrounded by the South Downs National Park (**SDNP**). But with this privilege comes responsibility: we need to ensure that the natural beauty, iconic locations, wildlife, biodiversity and our heritage assets are enhanced and preserved for both current and future generations. Part of our work was to undertake a Local Green Space Assessment (**LGSA**) and this report sets out the work we have done and that we will continue to consult on. This report therefore sets out

1. A brief overview of the Local Green Space (**LGS**) 'criteria' as set out in the Government's National Planning Policy Framework (**NPPF**) ¹;
2. Our methodology to assess sites;
3. Our initial detailed assessment of the 11 sites which, based on the evidence analysed, are extremely important to the Town and its community, and we believe meet the strict LGS criteria;
4. A brief overview of the other sites that we looked at which we concluded did not meet the LGS criteria and/or were already subject to adequate National and/or District-wide policy.

2. The National Planning Policy Framework (NPPF) and Local Green Spaces

The work of our Focus Group when undertaking the LGSA has been fully guided, as is required, by the NPPF. Paragraphs 76-78 in that Framework set out precisely what both a LGS is, and the criteria that it must meet. It states²

76. *Local communities through local and neighbourhood plans should be able to identify for special protection green area of particular importance to them. By designating land as Local Green Space local*

¹ http://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

² Paragraphs 76-78 of the National Planning Policy Framework.

communities will be able to rule out new development other than in very special circumstances.

Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.

77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- Where the green space is in reasonably close proximity to the community it serves;
- Where the green area is demonstrably special to a local community and holds a particular significance for example, because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife, and
- Where the green area concerned is local in character and is not an extensive tract of land.

78. Local policy for managing development within a Local Green Space should be consistent with policy for Green Belts.

3. Our approach & methodology

Progress up to April 2017.

Given the criteria set out in the NPPF, our Focus Group undertook the following work to propose the selection of 8 sites that we believed, based on the evidence, met the LGS criteria set out in the NPPF. It is important to highlight that our Focus Group recognised:

- a. That any site we proposed for LGS designation had to be fully evidenced based;
- b. Any site had to meet the strong criteria set out in the NPPF in detail – i.e. it could not “sort of” or “maybe” meet the criteria to be considered; and
- c. That our role is to look at where we think the Seaford Neighbourhood Plan (**SNP**) can make recommendations which add to the policy framework.

Given this, we undertook the following analysis:

- Used all available data to create an initial list of 66 potential sites from a slightly longer list. The longer list included a small number of duplications and/ or errors.

- We did an initial assessment of all 66. Of these 22 seemed to have green space potential.
- We then did a more detailed assessment of these 22 sites, including site visits, because we thought they might meet the LGS criteria set out in the NPPF set by Central Government.
- Of these 22, we originally identified 8 sites which we believed met the LGS criteria.

An assessment of the other sites not taken forward is set out in **Annex C**. 8 sites (numbered 2-9 in Section 4 below) were originally identified for LGS designation and were consulted on in November 2016. The same 8 sites were included in the Drop-in Session for the public in July 2017.

Progress since April 2017.

- Following comments made by some members of the public at the July 2017 Drop-in session and subsequently, via the SNP website, the Neighbourhood Plan Steering Group (**NPSG**) decided that a Review of LGS should be undertaken by an independent group. As part of this Review, a local ecological consultant helped the review group to assess the wildlife value of the 8 sites in the very short time available. This report appears as **Annex D** to this document. This Review, together with discussions with the SDNPA, led to boundary amendments of 2 of the sites, and the addition of 3 further sites, bringing the total number of proposed sites to 11. Further ecological assessment is needed on several sites so that the evidence presented is as robust as possible and presented in a consistent way.
- The 11 proposed sites in the draft SNP were approved by Seaford Town Council (**STC**) on 19 October 2017. **As a consequence, this LGS report complements and updates the report of the Environment and Countryside Focus group dated April 2017 in respect of LGS.**

We are keen to emphasise that where a site has not met the LGS assessment, it is **not** that we assume it can be used for development, nor does it ear-mark land for development. What it means is that, given the work we have undertaken we have concluded:

- d. The site does not meet the strict criteria set out in the NPPF and there is not sufficient evidence to support a LGS designation; and/ or
- e. A site is already subject to national or District policy. A good example is the provision of recreation, sports and play where Lewes DC

already has a strong policy basis in place. We cover these issues fully in our Evidence Report.

During this process, it was noted that a number of the sites in the initial 66 link together, or could potentially link together, in networks, or wildlife corridors, of green spaces, footpaths and twittens. We therefore propose that STC should consider commissioning a Green Infrastructure and Biodiversity review of the Town and / or facilitate some or all of this work by community engagement. The identification of wildlife corridors and habitats could help to inform future decision making and provide protection for important corridors.

As we stated in our ER, the original findings of our work up to April 2017 were used, and informed, the work of other Focus Groups to ensure the SNP looked at a range of local needs and issues.

4. Sites proposed for LGS Designation

The following 11 sites are those that this Focus Group proposes for designation as a LGS:

Ref	Name	Size in hectares (approx.)	Location
1	Bishopstone Village Green	0.547 Ha	<i>See Annex A for map identifying each location. The same reference number is used there to identify the proposed site.</i>
2	Blatchington Pond	0.423Ha	
3	Foster Close Footpath & Open Space	0.434 Ha	
4	Land N. of South Hill Barn, Chyngton Way Field	2.75 Ha	
5	Normansal Park/ Chalvington Fields not in the National Park	1.693 Ha	
6	Princess Drive Green & old Grand Avenue bridleway	1.53 Ha	
7	The Crouch	2.780 Ha	
8	The Old Brickfields/site adj. to 47 Surrey Road	3.377 Ha	
9	The Ridings (Lexden Road)	0.291 Ha	
10	Tidemills	18.741 Ha	
11	Land N. of Alfriston Road (4 plots)	4.19 Ha	

5. The Outcome of this report.

The Draft SNP (including the proposals in this paper), was approved by Councillors at the STC meeting on 19th November. The following text in the Seaford Neighbourhood Plan (pre-submission version) stated :

“Para 6.34 The work undertaken on reviewing potential sites for designation as Local Green Spaces is set out in full in the Seaford Neighbourhood Plan Local Green Spaces Report. This reviewed a total of 66 sites against the criteria in the NPPF and recommends the allocation of 11 of these. Detailed information about each of these allocations is contained in Appendix B to this Neighbourhood Plan.”

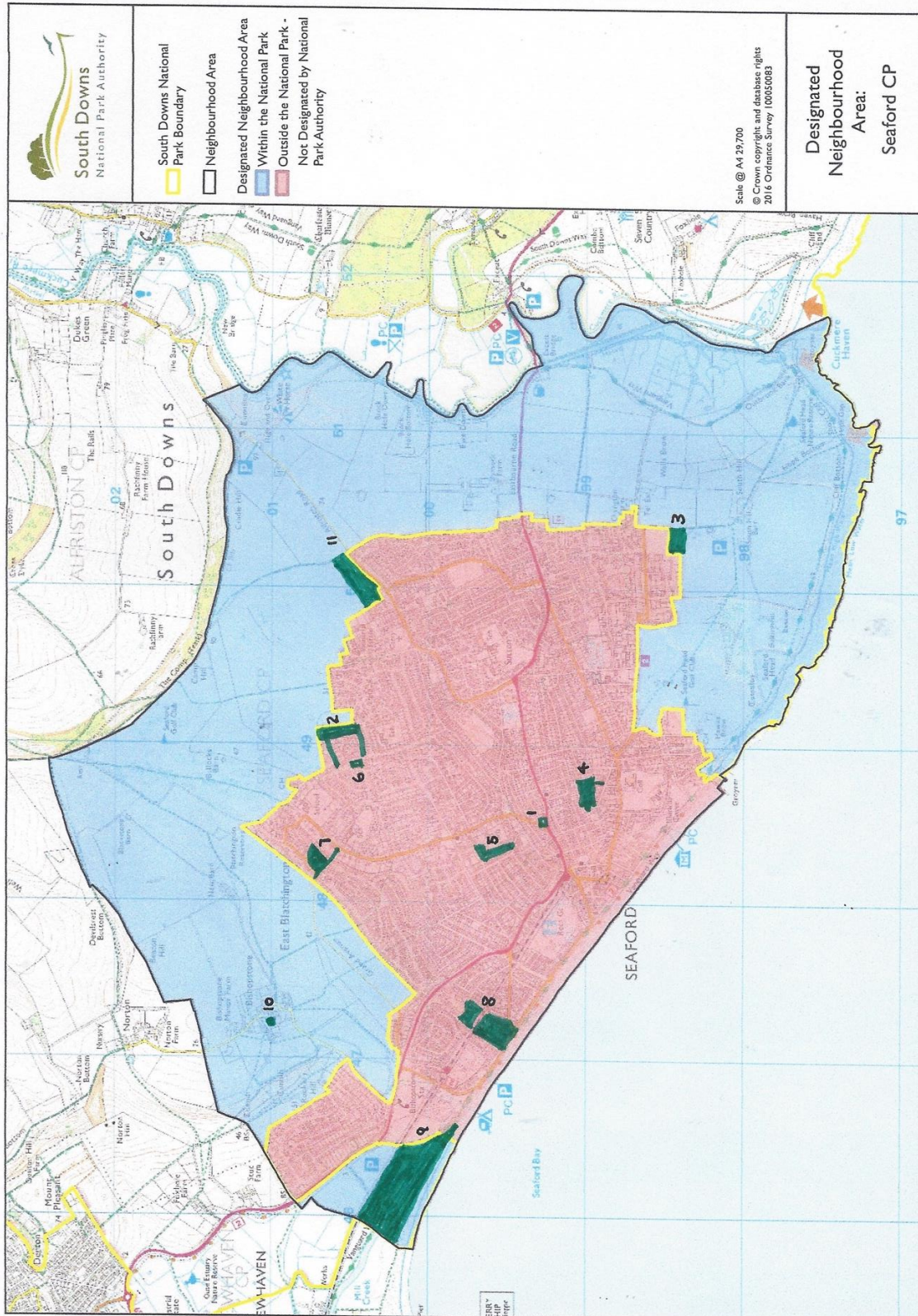
SEA 8 Local Green Spaces

The Neighbourhood Plan designates the following locations as Local Green Spaces as shown on the Proposals Map.

1. Blatchington Pond
2. Normansal Park/Chalvington Fields not in the National Park
3. Chyngton Way Field
4. The Crouch
5. Foster Close Open Space
6. The Ridings (Lexden Road)
7. Princess Drive Village Green and old Grand Avenue Bridleway
8. The Old Brickfields and site adj to Surrey Road
9. Tidemills
10. Bishopstone Village Green
11. Alfriston Road (4 sites)

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 site is available”

Annex A – The 11 Local Green Spaces (numbered as in Section 5 of his report and in Annex B below)



Annex B -Proposed 11 Local Green Spaces

1 Bishopstone Village Green

Registered (1 August 1972) Village Green, Bishopstone BN25 2UE OS reference TQ474011

Site Area: 0.547 Ha

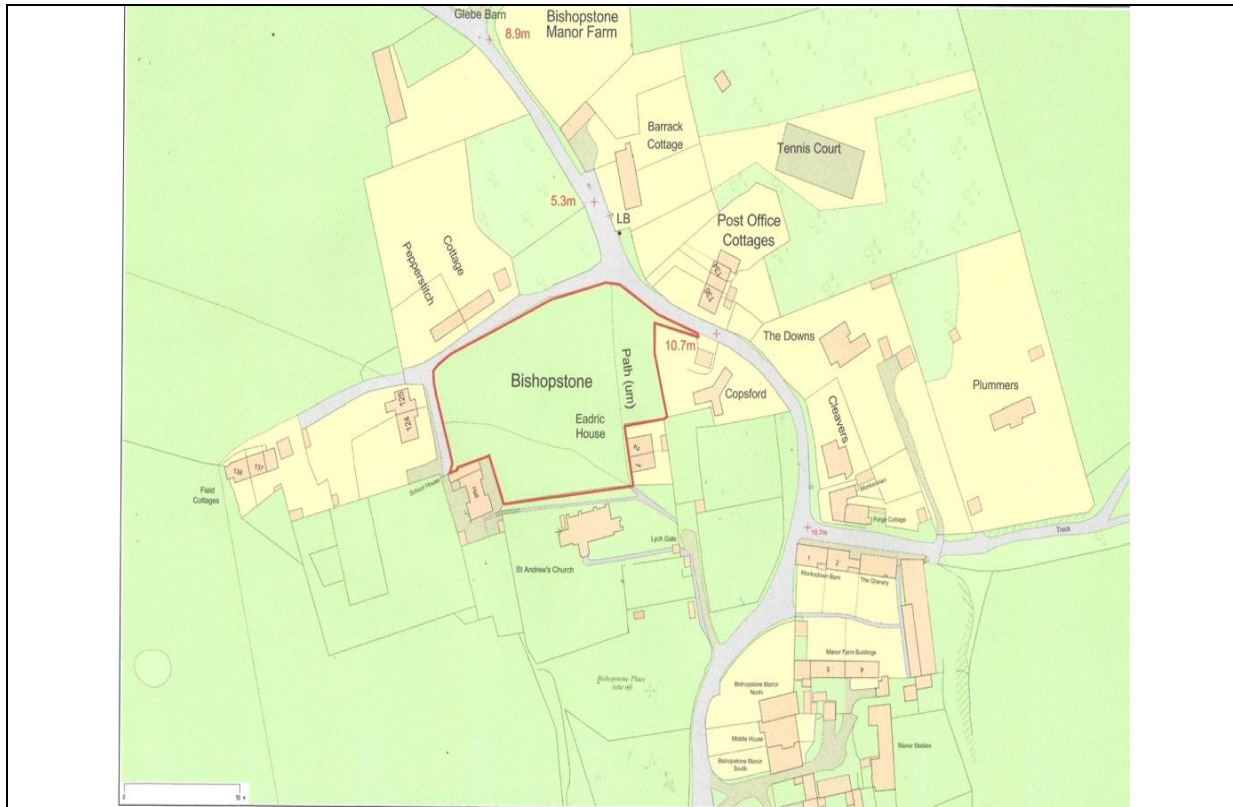
Overview

Bishopstone Village Green is situated in the Bishopstone Conservation Area 1976, within the SDNP. The site was not submitted as part of the SNP consultation event in November 2016 or July 2017 but was included following discussions with the SDNPA, within whose borders it lies, and following consultation with Bishopstone village residents.

Existing policies:

- The site is a registered Village Green (Confirmed in Land Registry 1972) https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/218584/village-green-1993.pdf
- The land is owned by a charitable trust (the Willett Charitable Trust Bishopstone), created on 8 February 2008 to hold the freehold title to the land. It is therefore in private ownership, with the charitable objective "To administer and maintain an open space to be known as Bishopstone village green for the benefit of the inhabitants of the area of benefit and to be used forever as an area for informal recreation play or other leisure-time occupations, a meeting place for community events and for any other lawful purpose consistent with these trusts and for the general benefit of the community."





The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	high	high	high	high	medium	√

77i: The site is in reasonably close proximity to the community it serves

- The site is in the centre of Bishopstone village. (Population > 120 in 2011)
- The site is 0.9 miles from the Seaford suburb of Bishopstone and 2.4 miles from the centre of Seaford. Bishopstone railway station is 0.9 miles away but across a busy main road. The Brighton & Hove bus stop for No 12/12A bus is 0.7 miles.

Criterion is met.

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

Overview:

- The site was not submitted as part of the SNP consultation event in November 2016 so no feedback is available. One mention of the site was made in the SNP Survey response.
- We believe that the evidence listed below demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The site is part of the small ridge on which the church, the old manor house (demolished) the former village school and two almshouses sit. Because of the building materials used, including extensive flint boundary walls, slate and tile roofs, rendered cottage walls, this green has a picturesque appearance, accentuated by the green only being rough cut, not mown and manicured.
- Although the site in isolation is not of outstanding beauty, its setting within the village and surrounding landscape means it is of exceptional importance to the unspoilt nature of this historic village.
- The site is adjacent to the Grade 1 listed Saxon Church of St Andrews
- Bishopstone was designated a Conservation Area in 1976 (ref Bishopstone CA Appraisal 2003 http://www.lewes.gov.uk/Files/plan_caa_bishopstone.pdf. The Conservation Appraisal says about this site: 'This open space is therefore important from an historic point of view and also adds to the informal, spacious character of the village.'
- Tourist routes - 6 footpaths lead into and out of the village, 2 of which cross the Green.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The 1777 estate map shows the site as a field in active agricultural use as part of Bishopstone Farm, on the Earl of Chichester's land.
- There is significant evidence of a late (8th Century AD) Anglo-Saxon settlement on this site. (Research report 163, a 270-page report '**The Later Anglo-Saxon settlement at Bishopstone**' edited by Dr Gabor Thomas, of the Dept. of Archaeology, of University of Reading).
- The Green is directly accessible from the adjacent churchyard which enriches the wider context of the Green, as does the Victorian Almshouse and former School, built in 1849, now serving as the Village Hall.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The site is used regularly for community events, not just by the village community, but by the wider community. e.g. The annual Festival of Colour and the annual May Fair.
- The site is crossed by 2 registered footpaths, as shown on the Parish Online map, and forms part of a wider network of footpaths, referred to above, used by those enjoying the SDNP.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- Bishopstone village is a quiet, tranquil community, accessible only by a single land road in and out of the village or by footpaths.

- The Trust that owns the Village Green also owns and maintains the adjacent roads. It sits on higher ground with the main village road to Norton being screened from the Green as it is on a lower level. This enhances the sense of tranquillity by deadening the noise of infrequent passing traffic.
- Because of the above, there is a real quietness allowing the sounds of Nature to be heard.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Findings from Preliminary Ecological Report (See Annex D).

Central grid reference TQ 472010. Open access. Within SDNP.

Bishopstone Village Green candidate LGS lies in the centre of the village on the north side of the churchyard. It comprises a small area of level, open grassland and a steep north-facing slope with scattered trees and patches of scrub. The open grassland appears to be maintained by periodic mowing but is not manicured.

The upper, level part of the area has a sward that is locally quite rich in plants typical of neutral grassland such as red fescue, red clover and common knapweed. The edges of the green and the steep slope support a mixture of tussocky grasses and tall herbs including cow parsley and nettles. These areas are likely to have been subject to localised soil enrichment or disturbance, for example near a bonfire site and under the trees. The scattered mature trees on the main slope and around the site edges include elm and sycamore. Some of the older trees have features likely to be of value to bats and nesting birds such as tree holes, crevices and bark flaps. The mature elms may support white-letter hairstreak butterflies.

The southern edge of the site adjoins the flint wall of the churchyard, which is an interesting feature and may support lower plants of interest as some uncommon lichens have been recorded in the churchyard itself (SxBRC report). The site is clearly used for informal recreation and has entirely open access with far-reaching views across the SDNP. The boundary between the Village Green and surrounding domestic gardens is indistinct in places.

Relevant Sussex Biodiversity Centre (SxBRC) records

Most of the SxBRC records are from the vicinity of the Village Green not from the site itself. The records include several species that could potentially make use of the habitats present on the candidate LGS, for example common toad, smooth newt, great crested newt and grass snake have been recorded nearby and could forage in the grassland and wooded habitats.

Eggs of the brown hairstreak butterfly were found on blackthorn scrub nearby in 2007. There are several records of bats from a winter roost in a wine cellar in the vicinity. Daubenton's, Natterer's and Pipistrelle bats have all been recorded nearby.

Potential value to wildlife

Bishopstone Village Green candidate LGS includes an area of semi-natural grassland that may be used by pollinators such as bees and

hoverflies along with other invertebrates and has **moderately good potential to support a range of wildlife, including protected species**. The management of the grassland, especially how often it is mown, will have a large impact on its value to wildlife. Tussocky areas of taller sward on the site edges and on the slope are potentially valuable to small mammals and invertebrates.

The mature trees are potentially valuable features for tree-nesting birds, roosting bats, invertebrates and lower plants. The combination of trees and tussocky grassland could provide useful foraging habitat for bats. The site may also support foraging amphibians and reptiles.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met Site Area: 0.547 Ha

2 Blatchington Pond

Junction of Avondale Road and Sutton Road O.S Grid Ref. TV486995

Site area 0.423Ha.

Overview

Blatchington Pond comprises a duck pond, grass, trees and flowers and is well-maintained by volunteers the East Blatchington Pond Conservation Society (EBPCS) which holds it on a lease from STC. The site area also includes the wide verges to the North and West of the pond, which are maintained by EBPCS and planted with spring bulbs.

Existing policies:

The site was sold to Seaford UDC in July 1914 with restrictive covenants to confine the use of the land “for ornamental gardens and pleasure grounds for the resort and recreation of the public”. SUDC covenanted to only use the land “for an open space plantation or for the erection of sheltered or other seats for the public use”.





The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as ‘high’, ‘medium’ or ‘low’

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	high	high	high	medium	high	√

77i: The site is in reasonably close proximity to the community it serves

- The site is in the centre of Seaford
- The site is 5 minutes' walk from the town centre
- The site is on the 12A bus route (Seaford to Eastbourne)

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey Response 23 respondents (11th highest place out of total sites mentioned) to the survey mentioned Blatchington Pond in terms of green spaces the residents wanted to preserve.
- The site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 out of the 126 of respondents (91%) agreed that the 8 sites should be local green spaces.
- The site includes the only public pond in the town
- The site is managed by the community group, the EBPCS with currently 318 members.
- We believe that the above evidence, together with the evidence listed below, demonstrate that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The site is not only attractive in its own right, but its setting, within a built-up residential area, close to busy roads and near the town centre adds to its value as a green 'oasis'.
- The site is well maintained by the EBPCS volunteers who hold regular work sessions.
- The pond is backed by a bank of mature trees, including elms, which shields it from the housing to the south of the site.
- Volunteers have planted spring bulbs on the borders of the site.
- The site is within the East Blatchington Conservation Area

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The pond is the last one of the many along the medieval cattle drove from Alciston to the then Cinque Port, Seaford. It therefore links back to Seaford's medieval public heritage.
- The Pond as it currently exists is the result of community regeneration efforts starting in 1980.
- During the intervening time, the site deteriorated and was adversely affected by various building developments beyond its boundaries.
- The site marked the southern boundary of the parish of East Blatchington.
- The pond is also said to have its own ghost.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The site is maintained by the EBPCS. The regular workgroups of volunteers enable people to engage with wildlife, nature and to spend time outside.
- The site is well used by residents of all ages, including families with children, teenagers hanging out after school and older people who can sit on the benches and watch the ducks.
- Feeding the ducks is a popular activity for residents of all ages.
- The copse of trees along one side of the Pond affords a walk along a tree-lined, tarmacked path.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- The pond is sited in a chalk valley between steep river cliffs. The northern slope is developed, but the southern slope is tree-covered, which gives it some protection from the noise of traffic.
- The site is on a bus route and at a busy traffic route and junction, but there are moments of quiet during the day, when the benches are used by local residents.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Findings from Preliminary Ecological Report (See Annex D).

Blatchington Pond

Open access.

Blatchington Pond is a moderately large, urban pond with some marginal vegetation that is surrounded by a mixture of mown grassland, trees and shrubs with both surfaced and informal paths around the site. A mixture of native and non-native plant species is present on the site.

Relevant Sussex Biodiversity Centre (SxBRC) records

Section 41 habitat (open water), dotted bee-fly 2016, pipistrelle (nearby) 2015, common toad 2014, white-letter hairstreak (a butterfly) 2014, garden tiger (a moth) 2014, Jersey tiger (a moth) 2014, galingale 2005, smooth newt 1993, common frog 1993, slow worm 1990.

Potential value to wildlife

The site has a mixture of habitats with good structural diversity and is **potentially of high value** to a range of wildlife, particularly breeding amphibians, invertebrates, foraging bats and wetland birds.

There is anecdotal evidence of fish in the pond, including goldfish (LGS draft report), which will reduce its value to some native amphibian species but a recent record of common toad is important as this declining species, listed on S41 of the NERC Act is able to breed in ponds where fish are present.

The 2014 record of white-letter hairstreak suggests that this butterfly is breeding in the mature elm trees in the vicinity of the pond. This S41 butterfly species has a restricted county distribution due to its dependence on mature elm trees.

Other notable invertebrates recorded recently (moths and dotted bee-fly) are not likely to be restricted to the site but may make use of the habitats present.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met

Site area 0.423Ha.

3 Foster Close Open Space

Right of way linking Wilkinson Way with Chichester Road. O.S. Grid Ref. TV482996
Site area: 0.434 Ha

Overview

This is one of the smallest sites and is a small parcel of mature deciduous woodland adjacent to Seaford Primary School.

Existing policies

The site was deliberately not built on when planning permission was given for new housing and school in 1988. The information in the Neighbourhood Plan Housing Site Assessment says *“The housing and school development was covered by 2 Outline approvals in 1987 (LW/87/1777 & 1778) and confirmed by reserved matters dealt with in case LW/89/0745 in 1989. This reserved the right of way and the amenity open space “to remain as such in perpetuity for the benefit of the occupiers”.*





Date Created: 26-2-2017 | Map Centre (Easting/Northing): 548342 / 99629 | Scale: 1:1591 | © Crown copyright and database right. All rights reserved (100038055) 2017

The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as ‘high’, ‘medium’ or ‘low’

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	medium	medium	high	high	medium	√

77i: The site is in reasonably close proximity to the community it serves

- The site is within a built-up area of Seaford and adjacent to Seaford Primary School
- The site is 1.1 miles from Seaford Railway Station. The Brighton & Hove bus stop for No 12/12A bus is 0.7 miles.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- The site was not specifically mentioned in the SNP survey response.
- The site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 out of the 126 of respondents (91%) agreed that the 8 sites should be local green spaces.
- We believe that the evidence above and given below demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The site is well-loved by children at Seaford Primary School and is referred to by them as 'the forest'. The site is visible within the school grounds and so enhances the experience of the children when playing outdoors.
- The site was created out of the Blatchington Manor School grounds in 1988, retaining the natural western boundary, and providing a footpath linking Chichester Road with Wilkinson Way. It includes significant land adjacent to it, preserving the natural vegetation that was part of the Manor grounds.
- The site includes a woodland canopy, shrub and ground flora and the footpath, in some places, is fairly enclosed with little intrusion of views of local properties and therefore feels very rural, despite being in an urban area.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The site was part of a larger site, the whole of which formed part of Blatchington Court School. Prior to that, the larger site contained the manor house for the Blatchington estate, which goes back to 1161 AD when Robert Peverel owned the manor house, which is described in local historian Rodney Castleden's book 'On Blatchington Hill' (2011).
- The boundary between Kedale Road rear gardens and Fosters Close Open Space therefore dates to this time (1161 AD).
- It is understood that the site marks the border of a Romano-British cemetery (and is hence the subject of an archaeological "watching brief"), reference MES 19365 p 44, ESCC Monument Full Report 23 Feb 2017.
- Local residents report having found Saxon pottery and a Neolithic flint on the site.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The site is adjacent to Seaford Primary School, and provides a safe cut-through, encouraging children to walk to school. When leaving the school, children have a choice between walking through the site or along a pathway through housing. The majority, if the weather allows, will always choose the wooded path through 'the forest'.
- The site is in the centre of Seaford, and the only open access green space within walking distance for many residents and children, many of whom do not have their own gardens. It is an area for 'letting off steam.'
- It is an excellent location for children's outdoor play in a woodland setting (there is evidence of den-building) and is therefore of high recreational value given its setting near a primary school and the scarcity of safe, wild places for children to play in Seaford.
- The site is used daily by dog walkers.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- The woodland walk is effectively hidden from the adjacent pedestrian path and surrounding buildings and feels quite wild by comparison. It is away from the road, and sheltered by trees, and bird song can be heard.
- The mature trees add considerably to the sense of tranquillity, and form a wind-break in this high-lying part of the town.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Findings from Preliminary Ecological Report (See Annex D).

Open access.

This more-or-less linear site contains a surfaced path that runs between two roads with a strip of secondary woodland of varied width adjacent to it. The woodland canopy is predominantly a mixture of sycamore, elm and ash, including several sizeable mature trees, with some elder and hawthorn in the shrub layer. The ground flora includes much ivy, cow parsley and stinking iris.

Relevant Sussex Biodiversity Centre (SxBRC) records

White-letter hairstreak nearby/in site 2010-2016, breeding stock dove 2014.

Potential value to wildlife

Foster Close Open Space **is likely to be of moderate value to wildlife.**

The site contains several mature elm trees that could potentially support white-letter hairstreak and which are an important feature of Seaford. These trees all contribute to the coastal East Sussex stronghold for this uncommon butterfly. Some of the mature trees present have features likely to be of value to roosting bats, including ivy-clad trunks, bark flaps and crevices. Tree nesting birds may well use this area of habitat and small mammals are also likely to be present. The site is small and sandwiched between areas of housing but may represent a useful wildlife corridor through the urban area.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met.

Size of site is **0.383 Ha.**

4 Land North of South Hill Barn/ Chyngton Way field

Eastern end of Chyngton Way, adjacent to National Park and Heritage Coast
O.S. Grid Ref. TV503985
Site area 2.75 Ha.

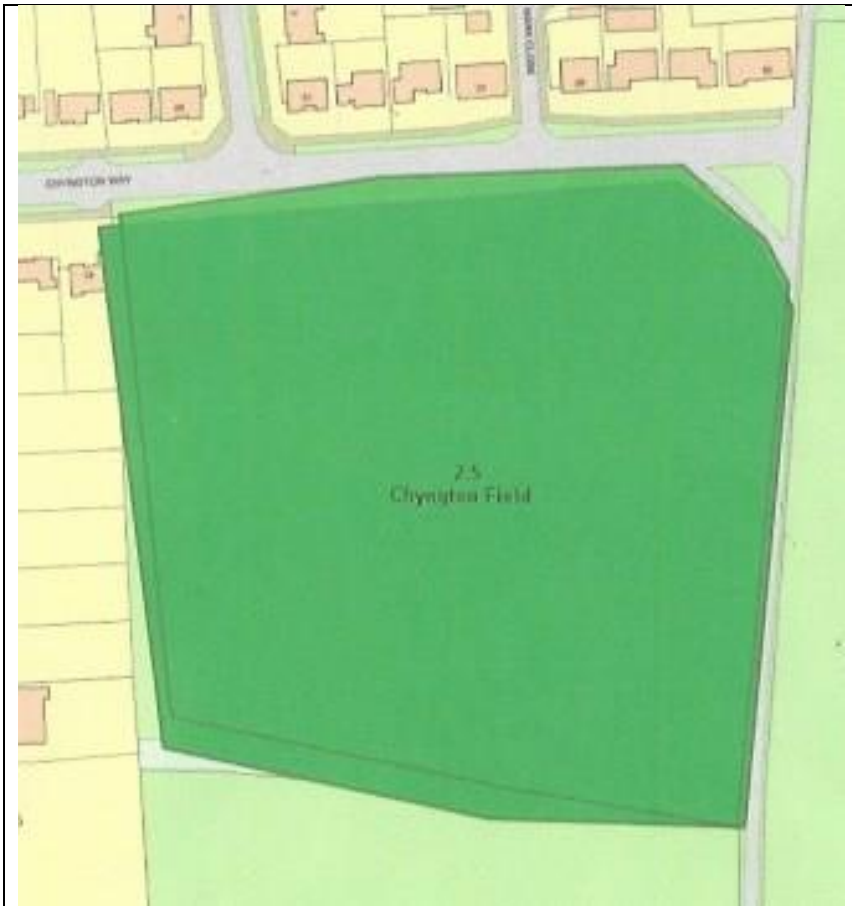
Overview

This privately-owned site is at the end of Chyngton Way (south side) and abuts both the South Downs National Park and National Trust owned land and is immediately adjacent to the built-up area of Seaford.

Existing policies

Because of its position between 2 boundaries there are a number of policies that impact upon it from the SDNPA and LDC relating to constraints or potential for development. (Refer to Neighbourhood Plan Housing and Development Site Assessment papers for details).





The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'.

Criteria measure							
77i:	77ii:						77i ii:
	overview	a)	b)	c)	d)	e)	
√	√	high	medium	low	high	medium	√

77i: The site is in reasonably close proximity to the community it serves

- The site is on the edge of the town and adjoins housing.
- The site is 1.4 miles from Seaford town centre. Seaford Railway Station is 1.6 miles and the Brighton & Hove bus stop for 12/12A is 0.5 miles.
- The site borders well-used routes to the SDNP including to local visitor attractions, South Hill Barn and Coastguard Cottages and to Cuckmere Haven There are no rights of way on this site and it is not publicly accessible.

Criterion is met.

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey Response, the site was mentioned 33 times (ranking 6th) in terms of green spaces residents wished to preserve.
- The site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 out of the 126 of respondents (91%) agreed that the 8 sites should be local green spaces.
- We believe that the above evidence, together with the evidence listed below, demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- In isolation, the site is not of outstanding beauty. It is valued by the local community because of its setting within the landscape and the part it forms of the views from local beauty spots within the SDNP, from the town to the SNDP, and as gateway to the SDNP.
- Evidence from planning and regulatory bodies:

National Trust, Letter dated 1st September 2016 (copy with this site assessment):
"The site lies adjacent to the South Downs National Park (SDNP) and is highly visible in views from the National Park from the east and south..... The National Trust recognises that this site does not lie within the National Park itself, but it lies immediately adjacent to it and any developments to this land will have a direct impact on the landscape character and visual qualities of the National Park"

Lewes District Council Public Realm Framework – Page 48 Para 4.2.14

(http://www.lewes.gov.uk/Files/plan_Public_Realm_Report_Final_Report_July13_-_Blandford_Assocs.pdf)

"For the entries to the South Downs National Park they are particularly important to celebrate the beauty of the setting and to enhance and promote the influence this has on the character of the District."

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The site was part of the extensive World War I South Camp, (see attached map), housing over 15,000 troops at a time. An English Heritage Report by Robert Skinner from 2011 states in conclusion that "The surviving archaeological remains of South Camp are a special heritage asset of local and national importance". (See Appendix 3 for map showing the site in relation to the camp.)
- A 2005 survey identified only 4 out of 128 WW1 camps in England with surviving remains and Seaford is listed as destroyed. Robert Skinner's report shows this not to be the case.
- The sites were occupied by the Canadians during WWI they hence also have international and Commonwealth interest. There are commemorative plaques and 2 pews in St Leonard's church as memorials to this historic role played by Seaford in WW1. There is reference to this on the Seaford Heritage Trail website.

<http://www.seafordheritagetrails.co.uk/index.php>

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The site is not publicly accessible so has no recreational value in itself.
- The site runs alongside a well-used route for walkers, cyclists, joggers and dog walkers into the SDNP, including to South Hill Barn and the Coastguard Cottages and to Cuckmere Haven. The built-up area is left behind sooner and therefore residents and visitors are encouraged to enjoy and engage with the countryside. For example, the site borders route 21 of the National Cycle Route: Eastbourne to East Grinstead and the tourist route 'The Slater Trail'.
- As stated above, the concrete roadway beside the site is the principal pedestrian and vehicular access to South Hill Barn. Already a popular local destination, STC is considering ways of enhancing this building and so increasing the visitor attraction of this route to the SDNP and its iconic views.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- The site is at the end of a cul-de sac, set away from main and through routes and is on the borders of the town, and is therefore quiet and tranquil. Its use as grazing land for horses adds to the peaceful, rural setting.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Findings from Preliminary Ecological Report (See Annex D).

No public access. Site was viewed from the roadside to the north.

This is a large field on a north-facing slope in the south-eastern corner of Seaford. It has a tussocky, grass-dominated sward with prominent patches of coarse herbaceous and ruderal plants including thistles and docks. Several horses were present in the field on the day of the site visit.

There is a wide outgrown hedge/band of mixed native scrub along the southern edge of the field.

This site adjoins and is contiguous with open arable farmland and pasture within the SDNP, some of which is owned by the National Trust. There is uninterrupted habitat connectivity with the wider countryside.

Relevant Sussex Biodiversity Centre (SxBRC) records

There are many bird records for "Chyngton Farm" which are mostly at tetrad level and so can't be ascribed specifically to this field. These records include grey partridge, kestrel, osprey, tawny owl 1989, breeding cuckoo 1989, breeding turtle dove 2004, tree sparrow and corn bunting from 1990s. It is probable that many of these records relate to the areas of farmland to the east and south which include arable areas and pasture managed under agri-environment agreements.

No other records for the site itself.

Potential value to wildlife

The habitats present in this field are **likely to be of moderate value** to a range of fauna and may provide, for example, nesting opportunities for birds and foraging/shelter for reptiles in the scrub, along with useful habitat for invertebrates in the tussocky field edges and scrub. The patches of tall, coarse sward may be rich in small mammals such as field vole, which could attract their predators such

as foxes or birds of prey to the field.

This site is surrounded by diverse land of potentially high value to a range of wildlife, much of which is managed to benefit biodiversity. In the absence of site-specific survey information, it is not really possible to define the intrinsic value of the field.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met.

Site area 2.75 Ha.

Letter from National Trust in response to Planning Application LW/16/0460



National Trust

Mr Steve Howe
Planning and Building Control
Lewes District Council
Southover House
Southover Road
LEWES
BN7 1AB

anna.budge@nationaltrust.org.uk
Direct Line: 01962 794128
Mobile No: 07917 277227
My Ref: AB/S.Down/Chyngton

01 September 2016

Dear Mr Howe

**Outline Planning application for Residential Development at Chyngton Way, Seaford
(Ref: LW/16/0460)**

The National Trust would like to thank Lewes District Council for giving us the opportunity to comment on the outline planning application which has been submitted for up to 55 residential units on land at Chyngton Way, Seaford. The site lies adjacent to National Trust owned land at Chyngton Farm. The farm forms part of a much wider landholding of the Trust which encompasses much of the western side of the Cuckmere Valley south of Alfriston.

The Trust has reviewed the information that has been submitted in support of the planning application and wishes to object to the proposed development.

The site lies adjacent to the South Downs National Park (SDNP) and is highly visible in views from the National Park from the east and south. Seaford Head provides important views across both the downland landscape and the Cuckmere Valley to the north and east and wonderful views along the iconic chalk cliffs of Seven Sisters. The Trust considers that the introduction of built form in the proposed location will have a significant adverse visual impact on this part of the South Downs National Park. The National Planning Policy Framework (NPPF) states: "Great weight should be given to conserving landscape and scenic beauty in National Parks... which have the highest status of protection in relation to landscape and scenic beauty" (para 115). The National Trust recognises that this site does not lie within the SDNP itself, but it lies immediately adjacent to it and any development on this land will have a direct impact on the landscape character and visual qualities of the National Park. The Trust considers that such a proposal does not comply with the NPPF as development in this location will not conserve the landscape and scenic beauty of the SDNP at Seaford. The South Downs Integrated Landscape Character Assessment (2011) identifies the SDNP adjacent to the site as Open Downland and specifically highlights that

National Trust
Micheldever Consultancy Hub
4 Warren Farm Barrs
Andover Road
Micheldever Station
Winchester
Hampshire SO21 3FL
Tel: 01962 794141
www.nationaltrust.org.uk

President: HRH The Prince of Wales
Chairman London and South East Region: David Coleman
Regional Director for London and South East: Nicola Briggs
Registered office:
Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Registered charity number 205846

this landscape character is particularly sensitive to development in adjacent urban areas, such as Seaford, and that this could have a detrimental visual impact on the SDNP. In addition to the detrimental visual impact that development on the site would have, the Trust considers that the introduction of a significant landscape belt around the southern and eastern sides of the site would have a detrimental landscape impact on the open downland character, as this is not characteristic of this landscape type and would introduce an alien and damaging feature into the area. The Lewes District Local Plan Part 1 (May 2016) contains a Core Policy relating to the natural environment and landscape character and this specifically makes reference to development within the setting of the SDNP. Core Policy 10 states: "...Within and in the setting of the South Downs National Park, development will be resisted if it fails to conserve and appropriately enhance its rural, urban and historic landscape qualities, and its natural and scenic beauty, as informed by the South Downs Integrated Landscape Character Assessment." The Trust considers that this proposal will adversely impact the setting of the SDNP, contrary to CP10, as it clearly fails to conserve the landscape quality and will visually detract from its scenic beauty.

The Trust is also concerned at the impact that the proposal would have on the Sussex Heritage Coast, which it adjoins on the eastern boundary. The NPPF clearly states at para 114 that Local Planning Authorities should maintain the character of the undeveloped coast and protect and enhance its distinctive landscape. The introduction of this development will bring development right up to the edge of the Heritage Coast and, as indicated above, will detract from the visual and landscape qualities of the area which will be detrimental to the Heritage Coast's distinctive views and character.

The Trust considers that the proposal will have an adverse impact on the Chyngton Lane Conservation Area and its setting. The Conservation Area is centred on Chyngton House and its grounds, which is medieval in origin. The Conservation Area has a rural feel with irregular development, unmade roads and a number of mature trees reflecting its historic development as a rural hamlet. Whilst it is now bounded on its northern and western sides by Seaford it retains this rural feel and the views across the surrounding downland to the east and south help to reinforce this distinctive character. The Trust considers that the introduction of the proposal development would have an adverse impact on the character of the Conservation Area as it would interrupt and diminish these views to the south and would significantly alter the setting of the Conservation Area from Seaford Head. The Trust considers that whilst this does not result in substantial harm, as defined by the NPPF, it will result in some harm to the significance of the Conservation Area and that this is not outweighed by any public benefits that the housing would bring. The Trust therefore considers that the proposal is contrary to para 134 of the NPPF.

The site lies outside the built up area boundary for Seaford and consequently the residential development proposed has to be considered against Policy RES6 of the Lewes District Local Plan 2003. This clearly states that outside development boundaries permission will be refused for new residential development unless it complies with Policy RES10 or there is a functional need for a new residential dwelling in a countryside location. Neither of these exceptions applies to this proposal. In addition, Lewes District Council has recently adopted a new Local Plan Part 1 where the Objectively Assessed Need (OAN) for the District was Cont'd

2

considered and agreed. The District also has a five year housing land supply with the Local Plan Part 2 to consider additional residential allocations to meet the agreed OAN to 2030. The Trust therefore considers that this proposal should be determined in accordance with the approved Development Plans which would resist such a proposal and that there are no material considerations sufficient to outweigh such a determination and that such a decision would be in full compliance with the requirements of the NPPF.

Finally, the Trust is concerned about the impact that such a proposal can have on the International Dark Sky Reserve. Whilst it is acknowledged that the site lies adjacent to the urban edge of Seaford the proposal will extend the built up area of the town towards Seaford Head and will result in additional lighting impact on this part of the reserve. The Trust considers that advice should be sought from the National Park as to the magnitude of the impact of such a proposal.

The National Trust hopes that you can consider these points in your determination of the application. Should you require any further information or clarification please do not hesitate to contact me.

Yours sincerely

Mrs Anna Budge MRTPI
Planning Adviser

The site in the context of the 1914-18 South Camp.



5 Normansal Park/Chalvington Fields not in the National Park

Land located on South & East of Normansal Park Avenue bordering Chalvington Park Field O.S. Grid Ref. TQ490006
Site area 1.693 Ha.

Overview

The site consists of a mix of woodland and grassed areas. It is adjacent to Normansal Park Avenue and Chalvington Fields proper which is in the National Park. It is therefore sometimes referred as Chalvington Fields. It takes its name from its history as part of the playing fields of Normansal School, which in various ownerships, occupied the site since 1904. The Playing fields were sold off for housing development in 1993, and the planning permissions for the 2-phase development set aside this open space as part of the amenity open space required by Lewes DC Planners. The land was transferred to LDC on 9 July 1995 and subsequently to STC





The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	medium	low	high	high	medium	√

77i: The site is in reasonably close proximity to the community it serves

- The site is located on the edge of Seaford and borders a residential area.
- The site is 0.3 miles from Cradle Hill Primary School.
- It is 0.2 miles from the 119 Bus Route and 0.5 miles from the Brighton and Hove 12A bus route. It is 1.3 miles from Seaford Railway Station.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey response, the site was mentioned 21 times in terms of green spaces residents wished to preserve (15th in terms of ranking of sites mentioned.) However, Chalvington Fields was mentioned 30 times (8th highest ranking) and it is clear from the comments that residents are, in many cases referring to Normansal Park or to both sites.

- The site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 (91%) out of the 126 of respondents agreed that the 8 sites should be local green spaces.
- We believe that the above evidence, together with the evidence listed below, demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The site is not of outstanding beauty in itself, but is valued by the community for its setting between the housing estates and the SDNP, giving a more rural feel to an otherwise built-up area.
- The site has distant views of the Downs through opening onto Chalvington Fields and there are many mature trees and a hedgerow.
- The SDNP Viewshed Analysis states the site is visible from 2-3 viewpoints in the National Park. (<https://www.southdowns.gov.uk/planning/national-park-local-plan/evidence-and-supporting-documents/viewshed-analysis/>)

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- Up to 1904, this parcel of land was part of the holding of South Down Farm. From 1904-1995, the land was part of the playing fields of Lexden House School (1904-1928), Normansal School (1928- 1981) and a Christian community called Abundant Grace (1981-2011).
- The woodland fringes on the eastern and southern boundaries therefore demarcate the edge of the school playing fields and are at least 80 years old and therefore well-established.
- The site has no particular historical significance, but the information is relevant in terms of the biodiversity value of the site.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The SNP survey response indicated comments relating to the site having a strong recreational use.
- It is regularly used by dog-walkers and children. It has been used for get-togethers and the occasional picnic, games of rounders, and for birthday celebrations.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- Given its location on the borders of the town, the site is tranquil. It is possible to view and appreciate the South Downs from the site.
- Mature trees on the eastern and northern woodland fringe add to the sense of tranquillity.
- Because this site is beside a cul-de-sac, with a footpath leading directly onto the SDNP, and is adjacent to a woodland that screens it from the Chalvington Fields amenity Open Space, it is a tranquil area, part of a more extensive area totalling 3.6Ha with sounds of both wildlife as

described below, and children's play filtered through the woodland that separates the 2 areas.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Findings from Preliminary Ecological Report (See Annex D).

Normansal Park Avenue

Open access.

This site supports short mown amenity grassland and an area of secondary woodland with some scrubby edge habitats. It directly adjoins and is contiguous with an area of open space within the National Park which provides uninterrupted habitat connectivity with the wider countryside.

Relevant Sussex Biodiversity Centre (SxBRC) records

Rose chafer (a beetle) 2012, Nathusius's pipistrelle (cat caught nearby) 2011

Potential value to wildlife

The woodland and the edge habitats between the grassland and woodland are structurally diverse habitat **likely to be of moderate value** to a range of fauna. Nesting birds, small mammals, foraging/roosting bats, invertebrates and widespread reptiles could all potentially make use of the semi-natural vegetation on this site though the amenity grassland is likely to be of much less value to wildlife.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met.

Site area 1.693 Ha

6 Princess Drive green and old Grand Avenue bridleway

Land on north west side of Princess Drive, and Bridleway of old Grand Avenue
O.S Grid Ref. TQ482007
Site area: 1.53 Ha.

Overview

The proposed site consists of 2 adjoining areas, the Princess Drive green, a more formal area of mown grass and trees, and the old Grand Avenue bridleway, which is more rural in character and includes hedgerows and trees. The Old Grand Avenue bridleway element of this site was not included with the Princess Drive green when it formed one of the 8 proposed LGS consulted on in November 2016 and July 2017, but has been included following further research.

Existing policies

The open space part of this parcel was created by a s106 agreement dated 22 December 1988 between Lewes DC and Development, reserving the land "for open space to be enjoyed by residents and others". Adjoining housing was developed at a higher density because of the wish of LDC to create this open space for the local community.

The change in status of this section of Grand Avenue from public highway to bridleway occurred in 1988 by decision of LDC Planning.





The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	medium	low	medium	medium	medium	√

77i: The site is in reasonably close proximity to the community it serves

- The site is towards the edge of the town in a built-up area.
- It is 0.9 miles from Seaford Station and Brighton & Hove 12/12A bus route. It is 0.2 miles from the 120 Bus Route.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- Analysis of the comments of the SNP Survey reveals 16 references to the Princess Drive Green (this is not reflected in the summary findings, perhaps because of confusion of how the sites are referred to by local people). This would rank the site joint 16th in terms of green spaces residents wished to preserve.
- The Princess Drive Green part of site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 (91%) out of the 126 of respondents agreed that the 8 sites should be local green spaces.

- Princess Drive Green is known locally as 'Princess Drive Village Green'. This name has no standing in law, but demonstrates the affection for the site amongst the local community.
- We believe that the above evidence, together with the evidence listed below, demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- Princess Drive Green is not of exceptional beauty in itself, but is valued by the local community as a green space in a built-up area. The green adjoins the old Grand Avenue Bridleway, which has a much more rural feel.
- The Bridleway of old Grand Avenue contains a rich diversity of flora, which has grown beyond the limit of the old grass verge, through the palisade fence and onto the green open space itself and across the old road surface also. Across Princess Drive, the richness of flora is greater, because the land widens as it approaches Firle Road, as can be seen on the map. It thus links the green space of the St John's school campus on Firle Road, the verges of Firle Road itself, through to the SDNP at Kings Hedge. The height of the bushes and trees is such that it screens most of the bridleway from the 8 houses that adjoin its route, forming a gateway through to the Bishopstone valley part of the SDNP.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The old Grand Avenue bridleway was created in 1937 as part of Grand Avenue, which stretched from Hill Rise to Firle Road.
- Grand Avenue remained until 1988 when it became redundant as a new extension of Grand Avenue was created to serve the new housing to the north-east of Valley Dip that was to be built between 1990-1996. The old tarmac road was left to nature, with a bridleway replacing it in 1988. The vegetation either side of this road therefore is a continuation of the habitat that runs the length of Grand Avenue and is therefore well established.
- The site has no particular historical significant, but the information is relevant in terms of the biodiversity value of the site.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The site is well used by local residents, including families with young children, older people and dog walkers.
- The secluded footpath along the side of the green, fringed by trees, bushes and wild plants, is accessible.
- The recreational value of the bridleway as a route from Firle Road to the Bishopstone valley is already stated above.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- Given its location in a residential area towards the edge of the town, the site is naturally quiet and tranquil.
- Because the green slopes down from Kings Hedge to Princess Drive, it is not suitable for formal games, but fulfils the planners' objective of creating a green 'lung' in the midst of this cul de sac development of over 250 homes built within the Valley Dip estate. The Seaford location map shows how important this open space is within the suburban fabric, giving breathing space for the local residents.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Please note that the Preliminary Ecological Report refers only to the Princess Drive Green section of the site. (See Annex D). Pending a report on the old Grand Avenue area, which is expected to show much higher biodiversity, due to the rich diversity of flora within the bridleway and its role as a wildlife corridor to and from the National Park.

Princess Drive Green:

Open access.

This site comprises an area of close mown amenity grassland on a southeast-facing slope with scattered trees surrounded by housing. There is an outgrown hedgerow/band of native scrub species along the southern edge adjoining a public right of way.

Relevant Sussex Biodiversity Centre (SxBRC) records

None

Potential value to wildlife

Short, frequently mown grassland of this type tends to be of very **limited value to wildlife** and the current biodiversity interest of this site is likely to be centred around the old hedgerow/scrub in the south. This could provide useful habitat to wildlife such as birds, small mammals, reptiles and invertebrates.

A few widespread native wildflower species were noted in the grassland sward and a more relaxed mowing regime which allowed some areas to grow longer could enhance the value of this area to wildlife.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met

Site area: 1.53 Ha.

7 The Crouch

Crouch Gardens off East Street, bordering Bramber Lane and Heathfield Road
O.S Grid Ref. TV486990
Site area: 2.780 Ha

Overview

The Crouch, in the centre of the Town, is the name used by the local community since the space was created, to cover this important green space and recreation space with various regular sporting activities (football, bowls). The Peace Garden and the parkland adjacent to Coldstream House is in the Seaford Town Centre Conservation Area (1967). The doorway built into the boundary wall of this parkland has Grade II listed status.





The evidence is given below, and summarised in the matrix. Evidence in categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	High	High	High	High	high	√

77i: The site is in reasonably close proximity to the community it serves

- The site is in the centre of Seaford.
- It is 0.2 miles from the No 40 and 119 Bus Routes; it is 0.4 miles from Seaford Railway Station and 0.4 miles from the Brighton & Hove 12/12A Bus Route.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey response, the site was mentioned 117 times in terms of green spaces residents wished to preserve (3rd highest ranking)
- The site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 out of the 126 of respondents agreed that the 8 sites should be local green spaces.

- We believe that the above evidence, together with the evidence listed below, demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The site is highly valued by residents, with the park combining historical elements, formal planting, mature trees and shrubs and is an extensive green area in the town centre
- The associated "Peace Garden" was designed in collaboration with Seaford Quakers as a quiet place of peace, beauty and contemplation
- The site enhances the character of Seaford's historic centre and benefits local tourism.
- The site is partly within the Seaford Town Centre Conservation Area

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The site was originally the site of a medieval market.
- From the early 1800s Crouch House stood in one corner of the site, until it was demolished in 1967.
- The park was requisitioned for allotments in both world wars and as a designated gas decontamination centre in WW2.
- The archway leading into the gardens is Grade II listed.
- A football club based here since 1900s and bowling club founded in 1935
- The site is featured on Seaford Town Council's Heritage Trail.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

The site is used extensively for recreational use by all ages including:

- Children's playpark;
- Green area for 'kickaround' / formal & informal children's games and play area;
- Bowling green;
- Football club (junior and senior teams);
- Dog walkers;
- Outdoor theatre, music and other live events;
- Community allotment and garden which includes a classroom and
- Mercread Youth Centre.
- The site provides a safe and healthy cut-through for children and other pedestrians going to and from town centre from the east side of town.
- The Community Allotment provides way for residents to interact with plants and nature.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- The site is a valuable green oasis in centre of Seaford – the relatively large area of the site means it is far enough from passing traffic to be quiet and peaceful.
- The Peace Gardens designed as place for tranquillity and reflection.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Findings from Preliminary Ecological Report (See Annex D)

Open access.

The Crouch Gardens in the centre of town has mown lawns as well as a variety of features such as mature trees, mixed shrubs, nectar- and pollen-rich perennial plants and old flint and brick walls, all of which can be attractive to the type of wildlife that occurs in urban areas.

Relevant Sussex Biodiversity Centre (SxBRC) records

Wall (butterfly) 2014 a S41 species, hedgehog (nearby) 2012 a nationally declining S41 species.

Potential value to wildlife

The Crouch is a varied site with **good wildlife potential particularly in view of its urban location**. The gardens appear to be managed in a way that is sympathetic to wildlife and the flowery plantings are likely to attract a range of invertebrates to the site. Trees and shrubs provide moderately good bird nesting habitat and there is the potential for bat foraging and roosting on the site. The recent record of hedgehog in the vicinity is important because this native mammal is in serious national decline and depends on quite large areas of suitable habitat, often in gardens. The Crouch could provide a significant proportion of the habitat necessary for hedgehogs to persist within Seaford town centre.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met

Site area: 2.780 Ha

8 a) The Old Brickfields and b) site adj. to 47 Surrey Road

a) Between Buckle Drive and Kimberley Road with Marine Parade to the South OS Grid Ref. TV471995 Site area: 2.177 Ha.

b) Land north of railway track adj. To 47 Surrey Road, Seaford O.S. Grid Ref.TV472997 Site Area: 1.2 Ha.

Overview

The Old Brickfields and site adjacent to Surrey Road originally formed one site, now separated by the railway line. Wildlife is able to move between the sites via a culvert. The Old Brickfields is publicly accessible whereas the site adjacent to Surrey Road is privately owned and not accessible by the public. The Old Brickfields site was not included in the 8 proposed LGS consulted on in November 2016 and July 2017, but has now been included following advice that although it is maintained as a nature reserve by The Friends of the Old Brickfields, it does not currently have full statutory protection. The site adjacent to Surrey Road was included in the proposed LGS, but the 2 sites have been combined following consultancy advice which demonstrated evidence that the 2 sites form a coherent whole in terms of their wildlife value.

The Old Brickfields



Site adj. to 47 Surrey Road



The Old Brickfields



Site adj. to 47 Surrey Road



The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77ii i:
	overview	a)	b)	c)	d)	e)	
√	√	high	medium	medium	high	high	√

77i: The site is in reasonably close proximity to the community it serves

- The site is on the southern border of Seaford, beside the coast.
- The site is 0.4 miles from Bishopstone Station; 0.7 miles from Seaford Station and 0.7 miles from the Brighton & Hove Buses 12/12A bus stop.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- The Old Brickfield and site adjacent to 47 Surrey Road (or variants on the name) was mentioned 10 times in the SNP Survey Response, (ranking 18th) in terms of green spaces residents wanted to preserve.
- Part of the site (see overview above) was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 (91%) out of the 126 of respondents agreed that the 8 sites should be local green spaces.
- The Old Brickfields is maintained by a community group, 'Friends of the Old Brickfields'. In addition to helping to care for the site, they hold regular community events.
- We believe that the above evidence, together with the evidence listed below, demonstrate that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The Old Brickfield site is designated as a nature reserve by Lewes District Council. Their website states that: 'This former brickyard is located on the Seaford sea front in a dip in the landscape and occupies a former tidal inlet. All evidence of the site's brick-making past has long gone. Today a mixture of coastal and terrestrial habitats surround the site on two sides, with housing, Marine Parade and the sea to the south and the Seaford Railway line to the north. Although small, it contains a number of rare national habitats and species including vegetated shingle and remnant salt marsh. The dominant habitat is improved grassland which provides home to good slow worm and Lizard populations, small mammals and a variety of insects. These in turn support birds including Kestrels.
- Although the above text refers only to the southern part of the site, the northern part (site adjacent to 47 Surrey Road) was originally part of the site and therefore the description of the habitat is similar.
- In 2006, the Inspector turned down an application for housing on the basis that development would 'erode the unspoilt natural qualities of the site'. This decision was upheld in 2010.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The combined site is the lower part of Valley Dip, a dry chalk valley protected since Norman times by a shingle beach, that was regularly breached by strong and often violent storms.
- The site therefore was salt marsh, as the earliest map of 1777 shows the valley draining round the Buckle into the East Mill Pond of Tidemills via a sluice at The Buckle Inn, that regulated incoming seawater from the millpond.
- The railway embankment, built between 1862-4, cut the valley in 2, requiring a culvert to go under the embankment to drain the higher valley from Hawth Pond upwards. This series of circumstances has created a unique ecological environment for Seaford.
- It became known as the Old Brickfield, when Thomas Funnell, a local builder, at the beginning of the 20th century, opened a brickworks on the site tapping into a local seam of clay on the slopes of Hawth Hill, but its exposure to storm damage meant that it did not last long as a business.
- The Old Brickfields site is listed on the Seaford Heritage Trail

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The Reserve is managed with the intention of attracting visitors, especially families, for wildlife-related activities. It is bisected by a number of footpaths. It is also used by dog-walkers.
- The Friends of the Old Brickfield is an active body which works in partnership with the Ranger employed by Lewes DC, to manage the site, undertake educational activities and record wildlife sightings. Moth-trapping, butterfly surveys and pond-dipping activities are undertaken occasionally.
- The site adjacent to 47 Surrey Road is not publicly accessible.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- Although the site is surrounded on 3 sides by housing, and bisected by the railway line, its vicinity to the coast, the topography (in a dip) and the natural vegetation means it is sheltered from traffic noise.
- The fact that the site adjacent to 47 Surrey Road is not publicly accessible means that wildlife is undisturbed.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Preliminary ecological report (See Annex D)

Central grid reference TV471995

The Old Brickfield: Open access and designated a Local Wildlife Site (LWS L52 "Seaford Green site, Marine Parade").

Hawth Pond: No public access to this northern section and warning signs of deep water. Site was viewed from the roadside to the north.

The Hawth Pond half of this candidate LGS appears to be part the former clay pit and brickworks. It comprises a deep, steep-sided pit with the railway line on an embankment forming its southern edge. A large pond with well vegetated margins occupies the bottom of the pit. The pit sides are covered with dense, mixed scrub of mostly native species and the area appears to be unmanaged.

The Old Brickfield, on the south side of the railway embankment, is a popular and well-used area for informal recreation with many paths criss-crossing the site. This part of the site was designated a Site of Nature Conservation Importance (now known as Local Wildlife Sites) in 1992 for its mixture of maritime grassland, brackish inundation vegetation, scrub and dry grassland on the northern edge. These habitats are still present on the site and there is now a small pond in the northern area, created by the Friends of the Old Brickfield group. The pond is an excellent addition to the site and has a good range of wetland plants in and around it.

The Old Brickfield grassland still has plants of coastal habitats present, especially on the embankment on the southern side, along with extensive stands of tall, coarse grassland dominated by sea couch, false oat-grass and other tussocky species. The dense stands of scrub on the railway embankment and scattered across the other margins are valuable for breeding and passage birds whilst the invertebrate fauna of the site is also diverse. Of particular ecological interest at the Old Brickfield is the stonewort *Chara* sp. that was observed in the pond during the site visit and the large quantity of rock samphire within the maritime grassland on the southern bank.

Both parts of this candidate LGS, which are now bisected by the railway line, were presumably once part of the same site and are likely to share much of their fauna and flora. There are drainage culverts under the railway embankment which will allow some species of fauna to move between the two areas.

Relevant Sussex Biodiversity Centre (SxBRC) records

Section 41 habitat (open water), common toad 2002, common frog 2003, widgeon 1997.

There are many biological records particularly uncommon beetles, moths and other invertebrates from the Old Brickfield LWS. Because the Hawth Pond area is largely inaccessible for survey biological records are sparse.

Potential value to wildlife

The Old Brickfield/Hawth Pond site is a quite sizeable area of varied and structurally diverse habitat with of high value to wildlife and very good potential to support a range of fauna including legally protected species. It is likely to be used by fauna such as breeding amphibians, reptiles, breeding birds, wetland invertebrates, foraging bats, small mammals and their predators. The large Hawth Pond and the small pond in the Old Brickfield support a variety of wetland plants.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met

3.32 Hectares

9 The Ridings, Lexden Road

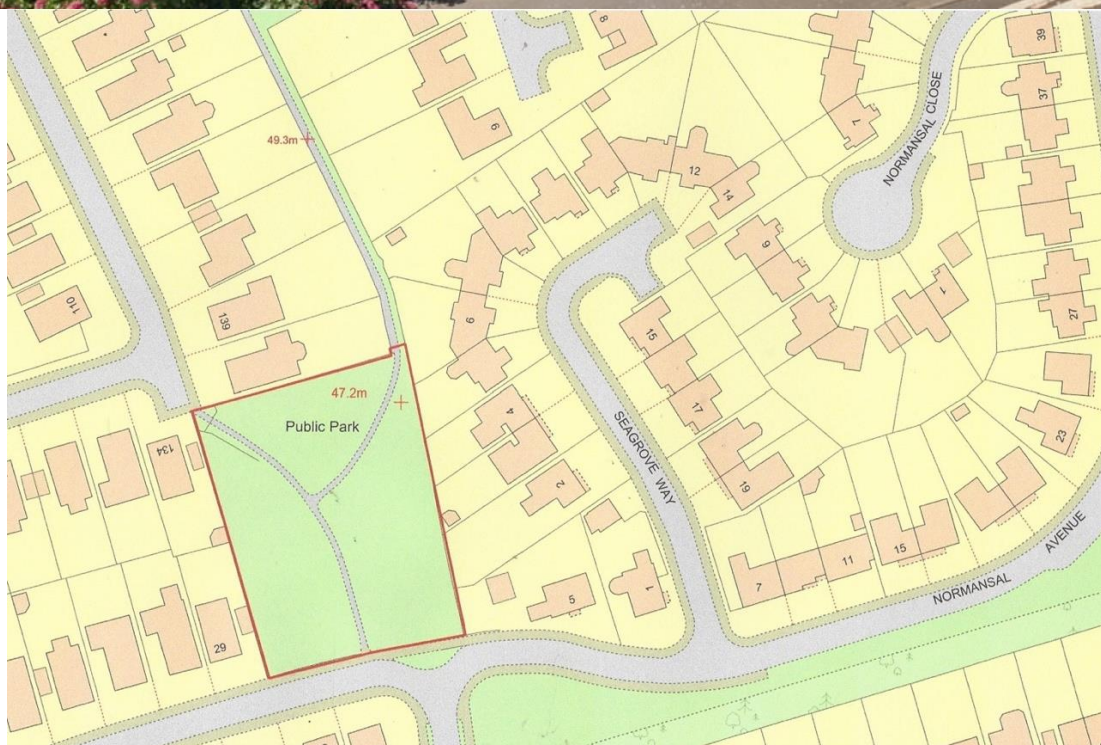
Northern end of Lexden Road at junction with The Ridings and Normansal Park Avenue

O.S Grid Ref. TQ489004

Site Area: 0.291 Ha.

Overview

This space was retained as amenity open space as part of the North Way development. It is effectively an old right of way, as it is a pedestrianised part of Lexden Road/Firle Road, which followed the parish boundary between East Blatchington and Seaford giving access to Lexden School/Normansal School from the town since 1904. It was created around the public footpath, in 1994, when the adjoining North Way estate was completed.



The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii :
	overview	a)	b)	c)	d)	e)	
√	√	medium	low	medium	medium	low	√

77i: The site is in reasonably close proximity to the community it serves

- The site is within the built-up area of the town and 0.1 mile from Cradle Hill Primary School
- It is 0.1 mile from the 119 bus route, 1.2 miles from Seaford Station and 0.4 miles from the Brighton and Hove Buses 12A route.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey Response 21 respondents to the survey mentioned The Ridings in terms of green spaces the residents wanted to preserve. (13th highest place out of total sites mentioned).
- The site was submitted as one of eight sites as part of the SNP consultation event in November 2016. 115 out of the 126 of respondents (91%) agreed that the 8 sites should be local green spaces.
- A survey was carried out by STC in early 2016 which asked whether residents were in favour of the sale of this site for development. 952 people responded, 481 said yes, **471** said no. On the basis of this result, STC decided not to go ahead with the sale of the land and referred it to the SNP process.
- We believe that the above evidence, together with the evidence listed below, demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The surrounding area, particularly the approach to The Ridings, consists largely of housing estates and bungalows with a scarcity of greenery and tree cover. The Ridings is therefore a valued open, green space with trees and shrubs. Its position at the top of a long, straight road means it is visible from a distance.
- The site is an open grassed area with a planting in an 'island' plot alongside the path, and along its western boundary. In the north-east corner the hedge boundary becomes more dense, as it approaches the footpath that goes east to the SDNP.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- We are not aware of any historic significance to this site.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- Local residents testify that the space is valued as a peaceful area between blocks of housing. The bench is used by the elderly taking a rest, by teenagers hanging out and by other passers-by. It is also used by families, school children en route between school and home twice a day, as well as dog-walkers and as a cut through route to the SDNP.
- The space is used by local elderly people who use it to sit and relax or exercise their dogs.
- The site is a green space in a high density residential area, close to Cradle Hill Primary School with potential for external learning through curriculum opportunities.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- The site is surrounded on 3 sides by housing and backed onto by gardens, so is a quiet space, where birds can be heard.
- The mature trees and shrubs help to shield the space from traffic noise.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Preliminary ecological report (see Annex D)

Open access.

This is a small site which comprises short mown amenity grassland with scattered ornamental trees and shrubs. The flower beds contain some herbaceous species that are a source of nectar and pollen.

Relevant Sussex Biodiversity Centre (SxBRC) records

Hedgehog nearby in 2015

Potential value to wildlife

The Ridings is **likely to be of only modest value to wildlife** in its own right though there is some potential for nesting birds in the shrubs and the flowering plants may provide sources of food for invertebrates. The record of hedgehog in the vicinity is important and The Ridings could be part of the wider territory used by a population of this declining mammal.

There is certainly scope to enhance the value of this area for wildlife

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met.

Site Area: 0.291 Ha.

10 Tidemills

Tidemills village, east pond and foreshore and fields. OS Ref. TQ460004
Site Area 18.741 Ha.

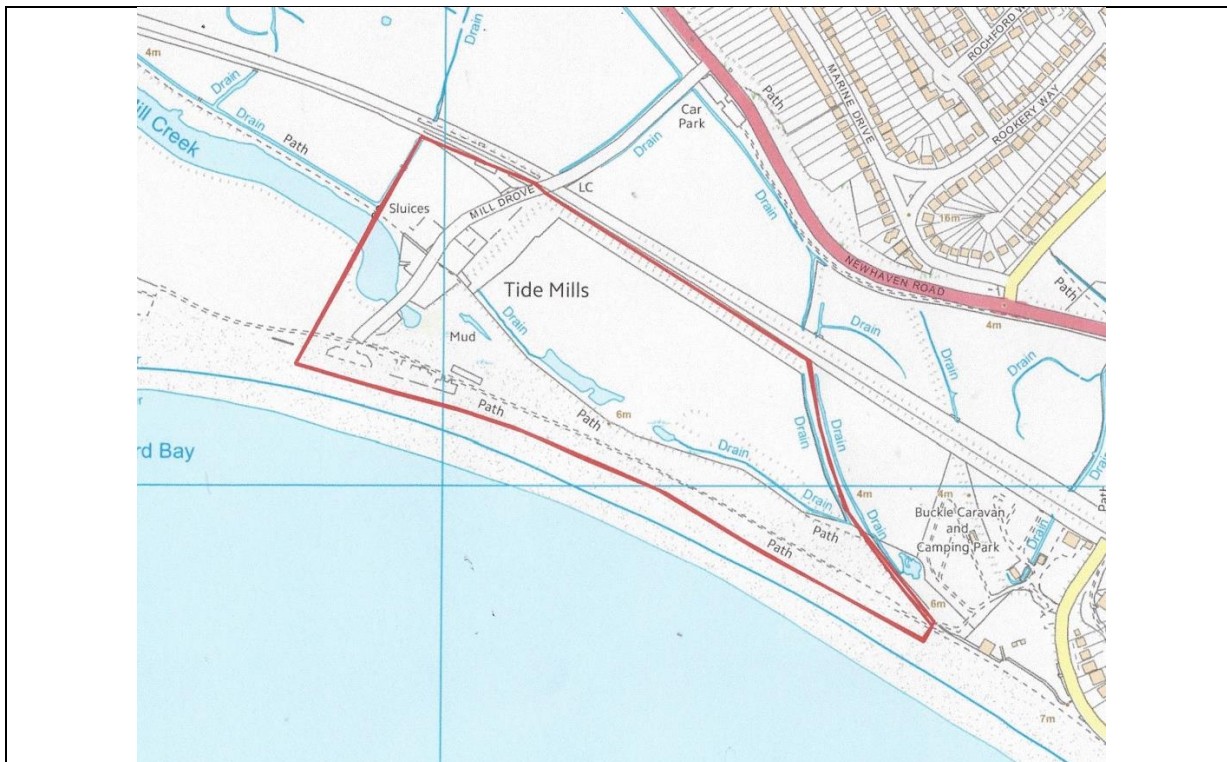
Overview

Tidemills is now an area of vegetated shingle beach, wetlands and creeks, and remains and ruins from the different eras of its history. The site was not submitted as part of the Neighbourhood Plan consultation event in November 2016 or July 2017 but was included following discussions with the SDNP, within whose borders it lies. The SDNPA is proposing to designate part of this site as a Local Green Space, so this proposal complements that from a local perspective.

Existing policies:

The site is on the boundary of Seaford Town Council, abutting Newhaven TC's territory. There have been proposals since 2003 to develop the adjacent land on the Newhaven side for port facilities, industrial uses and residential. (Not in the proposed LGS area). Creating this site as a Local Green Space will enhance its role in complementing those proposals for the benefit of both existing and new residents.





The evidence is given below, and summarised in the matrix. Evidence in categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	High	High	High	High	high	√

77i: The site is in reasonably close proximity to the community it serves

- The site is 1.5 miles from the centre of Seaford and Seaford Railway Station. It is not accessible by car, but via a beachside footpath, or by a short walk (0.3 miles or 0.15 miles) from either of 2 car parks across the railway line. It is 0.3 miles from the Brighton & Hove Buses 12/12A route.
- The site is on a well-used recreational path along the seafront.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey Response 29 respondents (ranking 9th) to the survey mentioned Tidemills in terms of green spaces the residents wanted to preserve.
- The site is cared for by an active community group, the Friends of Tidemills, created in 2005, who involve the wider community in its upkeep. (<http://tidemills.webs.com>)

- We believe that the above evidence, together with the evidence listed below, demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The site is not only ruggedly beautiful in its own right, but also when put in the context of its coastal location almost on the shingle beach.
- Tidemills is regarded by the local community as a beauty spot and features in tourist information literature such as in the SDNPA leaflet 'Car-free days out from Lewes'
- Tidemills, with its stark landscape of vegetative shingle, has significant value in terms of being accessible, undeveloped coastal landscape.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The site includes archaeological remains, much of which is still standing, such as flint walls and major features such as the mill race bridge, and the bunds that enclosed the West and East Mill Ponds.
- The Tidemills was created in 1761, and enlarged throughout the following 100 years, and is the subject of an archaeological dig that has been going for a decade, to capture the full extent of this unique activity for this part of the south coastal area. The site also includes remains of a 1920's convalescent home for children.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- The site is well used by walkers, dog-walkers and families who come both to enjoy the beach and visit the Tidemill ruins.
- The site is maintained by the 'Friends of Tidemills', who have regular tidying sessions to which the wider community is invited. The Friends of Tidemills are also involved in clearing invasive vegetation and recording plants and animals on the site, enabling people to engage with wildlife and the outdoors.
- Tidemills is featured on Seaford's 'Exercise Path'
- The site is bounded on the north by the Vanguard Way/Sussex Ouse Valley Way. This important district footpath links with The South Downs Way in the Cuckmere Valley, and also in the Ouse Valley at Southease station. It is used regularly by students on national hiking schemes such as the Duke of Edinburgh Award scheme.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- Given its coastal setting, and the fact that it can only be reached by foot or bicycle, the site is extremely peaceful and tranquil.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Please note that the report refers to a smaller section of the site proposed as an LGS. The ecologist has noted that: 'There is also likely to be more data biodiversity for the revised, larger Tide Mills site than for the single field described.' (See Annex D). Further assessment of this site is pending.

Central grid reference TQ 460003. Open access. Within SDNP. Within the Tide Mills Local Wildlife Site (LWS L60).

The Tide Mills candidate LGS is an area of rough grassland that lies between a public footpath, the railway embankment and the Mill Creek embankment with the National Park boundary on its western edge. This is a fragment of unmanaged coastal grazing marsh that would once have been grazed by livestock.

The coarse, tussocky sward is dominated by grasses including cock's-foot, common couch, false oat-grass and creeping bent with locally dense stands of creeping thistle and some bramble becoming established within the field.

Bramble scrub and fragments of old flint walls are present on the northern, eastern and southern boundaries. Wide, shallow brackish ditches mark the western end of the site. These contain stands of sea club-rush and were largely dry at the time of the site visit but are likely to fill at high tide when Mill Creek is full.

Relevant Sussex Biodiversity Centre records

Section 41 habitat (coastal and floodplain grazing marsh). Most records relate to the wider area not specifically to this field but a wide range of invertebrates, particularly bees and beetles, occur within this part of the Tide Mills LWS. Common toad, smooth newt and great crested newt have all been recorded either in or very near to the candidate LGS field along with slow-worm and common lizard.

Potential value to wildlife

The Tide Mills candidate LGS is an area of Section 41 habitat (coastal and floodplain grazing marsh) and has **good potential to support a range of wildlife, including legally protected species**. This field forms part of an extensive and important area of coastal habitats.

The tussocky grassland is likely to be rich in small mammals, such as field vole, which are an important prey item for birds such as barn owl as well as mammalian predators. It may also provide good habitat for a range of invertebrates and represent good foraging habitat for amphibians and reptiles.

This site is not particularly botanically diverse but is likely to have high value to some of the typical fauna of the wider wetland area. The Tide Mill LWS coastal wetland habitat is of importance for its flocks of wintering wetland birds, legally protected species are known to be present, including populations of great crested newt, and widespread reptiles.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met.

Site Area 18.741 Ha.

Note: Although the largest site proposed, it is smaller than sites agreed in other Neighbourhood Plans. We believe that it is essential to include the entire area proposed to make the site coherent in terms of value to wildlife and historical significance, as well as in terms of its setting in the wider landscape.

As noted in the Plumpton Local Green Spaces and Infrastructure report (<http://www.plumptonpc.co.uk/>):

“While the criteria state that it should not be an ‘extensive tract of land’, there is no definition of this and the only discussion so far relates to much

larger sites. Natural England's guidance suggests that more than 20ha would be considered an extensive tract of land, but Natural England does suggest that larger sites are more acceptable (and often necessary) in 13 wider countryside areas (as here)."

11 Land North of Alfriston Road (4 plots)

Land off Alfriston Road O.S Grid Ref. TQ501106

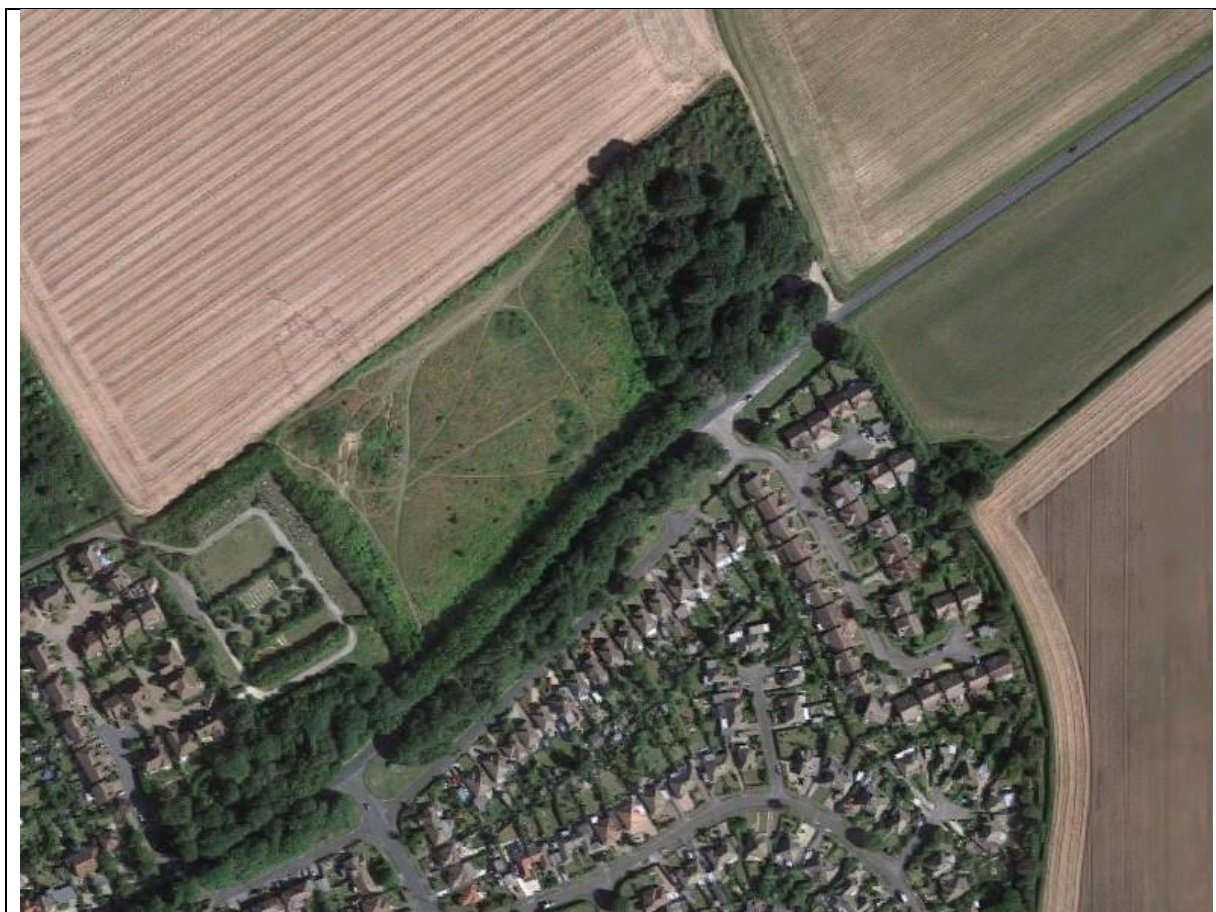
Site area 5.159 Ha. gross, cemetery extension is 0.969 Ha. The net area of the proposed LGS therefore is 4.19 Ha.

Overview

The proposed site consists of 4 parcels of land which, however, form a coherent area. The site borders the town and is partly within the SDNP. The site was not included in the 8 proposed LGS consulted on in November 2016 and July 2017, but has been included, after further recent research by the Neighbourhood Plan team and following the preliminary ecological report (Appendix 1). A small compound in the south-eastern corner of Site C, between the road and the bridleway, is used by Lewes DC recycling services. Part of the site is referred to locally as 'The Last Wood'.

Existing policies:

The site boundary including the cemetery extension, and the recycling unit on Site C is covered by Lewes DC Retained Policy SF12 (for recreational use)





The evidence is given below, and summarised in the matrix. Evidence is categories 77ii a) – e) is further assessed as 'high', 'medium' or 'low'

Criteria measure							
77i:	77ii:						77iii:
	overview	a)	b)	c)	d)	e)	
√	√	medium	low	high	high	high	√

77i: The site is in reasonably close proximity to the community it serves

- The site is on the border of the town and borders residential estates and housing
- It is 1.3 miles from Seaford Railway station and is on the 119 bus route.

Criterion is met

77ii: where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife

- In the SNP Survey Response 10 respondents to the survey mentioned the Alfriston Road sites in terms of green spaces the residents wanted to preserve. The site was not submitted as part of the SNP consultation event in November 2016 so no feedback is available.
- We believe that the evidence listed below demonstrates that the site is special to the local community.

77ii a): The site is demonstrably special to a local community and holds a particular local significance in terms of BEAUTY

- The combined 4 sites enhance the border of the town, particularly on the approach from the Alfriston Road.

- The combined 4 sites contain a mix of field, made-up ground, and woodland, with mature trees, giving a rural and wild feel to the boundary between town and countryside.
- The valley-like topography of Site A creates a 'secret' landscape, hidden from its surroundings.

77ii b): The site is demonstrably special to a local community and holds a particular local significance in terms of HISTORIC SIGNIFICANCE

- The site has no particular historic significance, but its history, particularly of Site A, which was an old chalk quarry, gives it value in terms of biodiversity.

77ii c): The site is demonstrably special to a local community and holds a particular local significance in terms of RECREATIONAL VALUE

- All 4 sites are publicly accessible.
- Sites A-D form part of a larger parcel allocated under policy SF12 for outdoor sports facilities. We do not believe this precludes it also being designated as a LGS. Indeed, the implementation of this policy will enhance the site's recreational value considerably, and is reflected in the score of 'high' in the matrix above.
- All 4 sites are well-used for informal recreation, such as dog walking and rambling, and as a wild place for children to play.

77ii d): The site is demonstrably special to a local community and holds a particular local significance in terms of TRANQUILITY

- Given the site's position on the borders of the town, and adjacent to the SDNP, it is naturally tranquil and quiet.
- The mature trees screen noise from passing traffic.
- The topography of site A, which is valley-like, screens the site from traffic noise.

77ii e): The site is demonstrably special to a local community and holds a particular local significance in terms of RICHNESS OF WILDLIFE

Preliminary ecological report (See Annex D)

Alfriston Road Site

Central grid reference TQ 501004. Open access. Part within SDNP.

The Alfriston Road proposed LGS is an elongated area of secondary woodland and scrub that lies on the north side of the Alfriston Road, at the north-eastern edge of Seaford.

The northern section of woodland is roughly rectangular and lies on a southeast-facing slope. It may have developed on the site of an old garden since there are brick remains and partial flint walls around the wooded area. It contains a mixture of sycamore, ash and elm (including some very large mature elms) with frequent elder in the shrub layer over a mixture of ivy, Alexanders, winter heliotrope and stands of nettle. Towards its northern edge there are some large old sycamore pollards with the characteristic features of veteran trees, which can be of value to a range of fauna including roosting bats. A standing dead tree in the area has

evidence of woodpecker nests. In the northern tip of this block is very dense scrub of blackthorn, elder and abundant buddleja. Small paths run through the woodland and there is a large, active badger sett in the upper slopes. Some litter is present and there is evidence of previous campfires.

Alongside the Alfriston Road is a wooded strip approximately 8-10m wide comprising even-aged sycamore and ash over a sparse shrub layer and a ground flora dominated by ivy. This habitat corridor links the northern section of the site with the southern block of woodland and forms a boundary to the area of open space that adjoins the cemetery extension (see below).

The smaller, southern section of woodland is more inaccessible than the northern block and lies on a steep-sided gully with exposed chalk banks. The linear hollow may have been created by small-scale chalk extraction in the past. The canopy is largely sycamore with some ash and elm and there is a tangled, mixed shrub layer with frequent bramble. The bottom of the dip is quite damp and there are signs of surface water run-off into this area. There is also evidence of badger activity in this part of the site.

The woodland and scrub of this proposed LGS adjoin (and are effectively part of) a more extensive mosaic of open grassland, tall herb and scrub habitat that is well-used for informal recreation. It should be noted that the high wildlife value of this area as a whole results from the presence of all these different habitats in close proximity.

Relevant Sussex Biodiversity Centre records

The only records in the SxBRC report relate to the open area adjacent to the wooded area. They are for invertebrates associated with the grassland habitat and include dingy skipper (2015) and a beetle *Cryptocephalus aureolus* (2015). There are other records for this site, collected by the author, which include European hedgehog (2015), wall butterfly (2017), pyramidal orchid (2017) and marbled white butterfly (2017).

Potential value to wildlife

The secondary woodland and scrub is unlikely to be of high botanical diversity but is of most ecological value for its fauna it supports and has **good potential to support a range of wildlife, including legally protected species.**

European hedgehog, a nationally declining Section 41 species, has been recorded from the site. One legally protected species (badger) is certainly present and others may be present, including bats and breeding birds.

Mature elms that may support white-letter hairstreak are present on the site. The mature elm trees in Seaford that are currently free of Dutch elm disease are important at a county level and also contribute to the coastal East Sussex stronghold for this uncommon butterfly species.

The Alfriston Road candidate LGS site partly adjoins the extension to Seaford cemetery and in part is contiguous with open arable farmland within the National Park, some of which is owned by the National Trust. There is uninterrupted habitat connectivity through this site from the town to the wider countryside.

77iii: where the green area concerned is local in character and is not an extensive tract of land

Criterion is met.

Site area 5.159 Ha

Annex C: Overview of sites not taken forward for Local Green Space Designation

Overview: This annex provides an overview of the 55 sites that we analysed that do not form part of the 11 sites that we wish to take forward for consultation for LGS designation. This Annex should be read in conjunction with the main section of this report as well as the Focus Group's Evidence Report.

1. Provision of Sport, Recreation and Play and Existing Recreational Open Space

As we set out in our ER, the Focus Group reviewed a number of school playing fields and public play areas as we see these as integral to the Town. However, we are also aware that the role of the Neighbourhood Plan is to add to the policy framework, not to duplicate it. We are aware that Lewes District Council has retained policies RE1 and SF12 and replaced RE2 with Core Policy 7 Infrastructure. This is a very strong policy backdrop and an area where, in our view, no additional policy recommendations are required Proposal number 4 in our ER stated:

As a result of this, the following **18** sites were not taken forward for LGS Designation:

Name of site:
Annecy School Fields
Aquila Park
Beach Garden and Green Lane Garden
Bowden House School Fields
Chyngton School Fields
Cradle Hill School Fields
Cuckmere House School Fields
Downs Leisure Centre
Martello Fields
Peverells Play Area
Princess Drive Children's Play Park
The Salts
Seaford Head Lower School Fields
Seaford Head Upper School Fields
Seaford Primary School Fields
St John's School
St Crispians
Walmer Road Green and Playpark

2. Sites within the South Downs National Park

Our Focus Group was advised that the South Downs National Park Authority (SDNPA) is currently taking forward its own core strategy, including what sites it may want to designate as green space, for development etc. Whilst the SDNPA is currently developing its own approach in the long run, our Focus Group concluded that most sites within the SDNPA's remit should be referred to them for their own consideration, and in line with their own consultation procedures. However, two sites, (Bishopstone Village Green and Tidemills) are of such intrinsic value to the local communities of Seaford and Bishopstone, as well as Newhaven, that as they clearly both meet the LGS criteria, designation will reinforce the opportunity afforded by that status.

As a result of this, the following **10** sites were not taken forward for LGS Designation within the SNP by our Focus Group.

Name of site:
Bishopstone Downs
Bishopstone Road
Part of Chalvington Fields in the National Park
The Comp
Cradle Valley
Cuckmere Valley (from Alfriston to Exceat Bridge)
High and Over
Seaford Golf Course
Seaford Head Nature Reserve
South Hill Barn

3. Sites covered by other District-wide policy

As we set out in our evidence report, we are aware that the role of the Neighbourhood Plan is to add to the policy framework, not to duplicate it. As a result, the following **7** sites were not taken forward for LGS Designation:

Name	Reason
Allotments, Sutton Drove	Policy RE9 covers this site.
Buckle Car Park	Registered as a community asset and not, by definition, a green space.
Florence House	Policy RES6 covers this site and is not, by definition, a green space.
Newlands School Site	This site is already subject to a planning application and as such cannot be considered by this Focus Group.
Old Gas Works site	Policy SF5 covers this site as suitable for development. It is part of the Dane Valley Project.

Steyne Road Drinking Fountain	Taken forward as a heritage asset. Not, by definition, a green space.
The Seafrost	See our evidence report. Additionally, policies SF14, SF15 and SF16 cover this site.

4. Sites within the context of Proposal 7 of our Evidence Report: Grass Verges

As we set out in our evidence report, we have taken this forward as **Community Aspiration 3** within the Draft Seaford neighbourhood Plan with respect to grass verges throughout the Town. Whilst we recognise that at some point in the future some verges may be deemed suitable for development, additional thought to preserving and enhancing verges is important. The following **8** sites are ones which we do not think meet the LGS criteria, but which we want to identify as being potential sites where the verge policy may want to be given due consideration, if adopted as part of the SNP process.

Names of Sites (not exhaustive)
Alfriston Road verge between Hillside Avenue and Alfriston Park
Barn Rise Estate verge
Chalvington Close verge
Coxwell Close verge
Eastdean/ Westdean Rise verge
Buckle By-pass verge
Bishopstone Road verge
Edinburgh Road verge

5. Sites which we think do not sufficiently meet the Local Green Space Criteria, but are vital contributors to Policy RE1

We are keen to emphasise that where a site has not meet the LGS assessment it is **not** that we assume it can be used for development, nor does it ear-mark land for development. Indeed, they are vital contributors to the town's requirement under Policy RE1, because even with them, their contribution falls short of the requirements of that policy, and therefore must be considered as an essential part of the amenity needs of the town. We could not find sufficient evidence and/ or justification for why the following sites would meet the LGS criteria. As we set out at the beginning of this report, the criteria are challenging and robust and are set by the UK Government through the NPPF. The **12** sites identified here are:

Name	Reason
Bodiam Close Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife.

Bowden Rise Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife.
College Road sites	Not seen, by definition, to be a green space.
Etherton Way Island	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife. Part used for parking and, by definition, not a green space.
Firle Close green	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife.
Hardwick House	Not seen, by definition, to be a green space.
Katherine Way Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of historic significance, tranquillity or richness of wildlife.
Micklefield Park/ Green	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of historic significance or richness of wildlife.
North Way Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife.
Sandore Road Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife
Seafeld Close Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of historic significance or richness of wildlife
Vale Close Open Space	Unable to identify sufficient evidence to support the key Government-set NPPF criteria of beauty, historic significance, recreational value, tranquillity or richness of wildlife.

Annex D: Preliminary Ecological Report –Kate Ryland

Preliminary Assessment of the Biodiversity Potential of Candidate LGS Sites for the Seaford Neighbourhood Plan

Kate Ryland

7th October 2017

Background

I am a freelance ecological consultant with more than 25 years of experience in carrying out a wide range of biodiversity surveys and assessments. I am a full member of the Chartered Institute of Ecology and Environmental Management and a Chartered Environmentalist.

This report summarises the biodiversity potential of 11 sites that have been proposed as Local Green Spaces (LGS) in the Seaford Neighbourhood Plan. These consist of the original eight sites put forward as LGS in 2016/17 and an additional three sites which had previously been excluded because they fall wholly or partly within the South Downs National Park (SDNP).

The assessment was carried out on a voluntary basis on behalf of the members of the LGS Focus/Review Group. Only those sites with open public access were entered for assessment. One site without public access was viewed from adjoining roads.

It is strongly recommended that if the Neighbourhood Plan Steering Group decide to accept the proposed LGS sites then each candidate LGS site should be subject to at least a Phase 1 type habitat survey to support a more robust assessment of their value to wildlife.

The need for site surveys is made clear in the LGS Focus Group draft report (version updated on 7th July) which states in section 2 Our Methodology that

“It should be noted that (this) data search by SBC will give a clear indication of what biological recording has taken place. The information provided is a useful tool for making an assessment of the site but should be used in conjunction with site visits *and appropriate surveys* before further judgements on the presence or absence of key species or habitats can be made.” (My italics).

Assessment Method

Very brief visits were made to each site of the 11 sites during August and September 2017. The assessment of the biodiversity potential of each site largely relies on my professional judgement of the habitats present and the wildlife they may support.

Data supplied by the Sussex Biodiversity Centre (SxBRC) in reports dated 31st May 2017 and 16th June 2017 for specific sites and for the entire Seaford Parish was also used. The data contained within the SxBRC reports includes biological records from a 200m buffer around two of the sites but only site-specific records or records of those species in the near vicinity that are likely to use the habitats present on each site are considered here.

Relying solely on biological records supplied by SxBRC or those found on the Magic/Nature on the Web website to assess the actual wildlife value of the sites can be very misleading for the following reasons:

- Many of the records are at tetrad (2km x 2km square) scale or larger so cannot be

ascribed to the relatively small individual sites

- The data includes significant numbers of ornithological records, most at tetrad scale, which are simply observations of birds in flight over an area of land
- There are significant designated areas and sites of high biodiversity value within close proximity of some of the proposed LGS, especially on land within the South Downs National Park. Many of the biological records, particularly of habitat specialists such as chalk grassland, farmland or wetland birds, will be derived from these well known sites not from the nearby open spaces within the town
- The data includes records from 1980 onwards which means that some records may be more than 30 years old

In the absence of current site survey data I have extracted SxBRC records with an accurate grid reference (six figures or more) that correspond with the proposed LGS sites or where the LGS site is reliably named in the data. These records are summarised in the site descriptions below.

Two further sites that could be considered as candidate LGS were mentioned at the LGS review meeting on 7/9/17. These are the Seaford Head Golf Course and the “Beach Garden”. Both these sites are well-used by the local community and are likely to have some ecological interest, though they are very different in size and habitat complexity. The sites are owned by Seaford Town Council and the ecological value of these sites will only be assessed further at the recommendation of the Steering Group.

Part of Seaford Head already has statutory protection as Seaford Head Local Nature Reserve (LNR) and Seaford to Beachy Head SSSI but other parts of the golf course which support valuable habitats such as chalk grassland and scrub could qualify as LGS. It lies wholly within the SDNP.

Summary

- Alfriston Road, Blatchington Pond, Normansal Park Avenue, Old Brickfield/Hawth Pond, Princess Drive and The Crouch form part of the Green Infrastructure of Seaford town.
- Bishopstone Community Green lies within a small, rural village rather than in the town and Tide Mills is entirely away from any development. Both of these sites are of less significance for their habitat connectivity than the more urban sites.
- The Alfriston Road, Blatchington Pond and The Old Brickfield/Hawth Pond currently have the best documented wildlife and are clearly of high nature conservation value.
- There is also likely to be more data biodiversity for the revised, larger Tide Mills site than for the single field described above. Further assessment of this site is needed in view of the enlarged boundary.
- Alfriston Road and Tide Mills are part of more extensive areas of semi-natural habitat so their biodiversity interest is not confined to land within the proposed LGS boundary.
- The Crouch is an important urban site and is particularly important in that context.
- Normansal Park Avenue adjoins the SDNP and supports some areas of semi-natural vegetation that are potentially of value to native fauna. Further survey is essential to clarify the biological interest of this site.
- The Princess Drive is of relatively low value to wildlife at present. This is due in part to the way that most of it is managed as amenity grassland. The bridleway alongside the open space is the most valuable feature of this candidate site.

For information on each of the sites surveyed, please see Annex B

