



# Seaford Neighbourhood Plan

## Consultation statement



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# 1 INTRODUCTION

This Consultation Statement has been prepared with the aim of fulfilling the legal obligations of the Neighbourhood Planning Regulations 2012, This Consultation Statement includes the following:

- a) details of the persons or bodies consulted and how they were consulted
- b) summary of the main issues and concerns raised during the consultation process and
- c) how the issues and concerns have been considered to inform the Submission Plan

The consultation statement also includes Appendices which give the comments by the public, land owners and statutory consultees:

The Town Council and Seaford Neighbourhood Plan Steering Group (SG) have undertaken a series of consultation activities with residents, statutory bodies and interested parties to enable an extensive engagement and involvement in the preparation of the Neighbourhood Plan.

This consultation statement sets out details of all the events and activities carried out in the parish and with key bodies identified as stakeholders. All activities were carried out to ensure full inclusivity in the decision-making throughout the development of the plan.

A successful Seaford Neighbourhood Development Plan (SNDP) is entirely dependent on the involvement of sufficient, representative, community-minded individuals, associations and groups to drive the project forward to completion. Appropriate community engagement is therefore key to the success of the SNDP.

Our intention is to ensure that every person within Seaford has a fair opportunity to contribute to the delivery of a successful SNDP.

The Steering Group's (SG) communication objectives are to engage with the right people, at the right time, about the right things and to provide appropriate and timely support to our volunteers to enable the project to move forward in accordance with agreed milestones, through to the ultimate delivery of the SNDP with a successful public referendum.

## 2 BACKGROUND AND PLAN PREPARATION PROCESS

Seaford Town Parish began the process of undertaking a Neighbourhood Plan in April 2015 and submitted an application to Lewes District Council (LDC) to be designated. This designation was approved on 13<sup>th</sup> January 2016. A copy of the designation can be found in Appendix A

Different processes were undertaken to ensure effective and efficient engagement with all stakeholders to better inform the outcome of the SNDP. These include but not limited to;

- Establishing Focus Groups to guide the Steering Group with their evidence gathering to inform the Plan and to identify the main themes to plan the consultation strategy.
- Building a profile of the parish in a Scoping Study
- Holding workshops.
- Undertaking Community engagement activities, such as, surveys, workshops, and Public Consultation Events
- Preparing a Pre- submission plan setting out a vision for the future, with objectives and policies
- Undertaking the statutory minimum six week consultation (Regulation 14 consultation) on two occasions
- Ongoing update on plan progress, initially on the Seaford Neighbourhood Plan web site and from August 2018 on the Town Council website. The NP web site was severely hacked in late July 2018 and it has not proved possible to get it back on line.

### 2.1 The three main stages up to submission comprised the following:

- **Scoping Report and Focus Group Evidence Reports** – these report summarised the scope of the Seaford Neighbourhood Development Plan (SNDP) and key factual data about the parish of Seaford. They are supported by detailed Focus Group Working Papers.
- **Pre-Submission Plan** (this comprised the draft vision, objectives, policies, proposals and sites allocated for development) which was submitted for the statutory six week consultation period. In fact it proved necessary to have two Regulation 14 consultations.
- **Submission Plan** – this took into account the representations received on the **Pre- submission plans** and where appropriate, amendments were made.

### 3 STEERING GROUP (SG)

The Seaford Neighbourhood Development Plan (SNDP) Steering Group (SG) is made up of residents and town councillors of the Seaford parish. The first full steering group meeting was held on Saturday 14<sup>th</sup> May 2016 to formally adopt its terms of reference and also elect its officers. This Group then took over from the Interim Steering Group that was established by the Seaford Town Council. The SG met generally on a monthly basis, if there was sufficient business, at the council chamber in the Town Council's offices. The meetings were opened to members of the public but on some occasions when confidential site specific issues were being discussed the public were excluded for that part of the meeting.

In the light of the results of the First Regulation 14 Public Consultation in November/December 2017, a Steering Group Working Group met on 22<sup>nd</sup> January to decide what further work was necessary. A Working Party was set up to consider the possible designation of Grand Avenue fields as a Local Green Space. A specialist consultant was employed to review the Sustainability Appraisal and SEA) When this work had been completed a reconstituted SG met on 21<sup>st</sup> August to review progress and decide whether a second Regulation 14 Consultation would be necessary. Two further meetings of the SG were held to consider reference to Seaford Town Full Council to seek agreement to a Second Public Consultation (Regulation 14).

#### 3.1 SG membership (April 2016 – March 2018)

<b>Chair</b>	<b>Julia Davies</b>	(May – Nov 2016) - Seaford Resident –
<b>Chair</b>	<b>Ted Hart</b>	(November 2016 – resigned 1 <sup>st</sup> December 2016) Seaford Resident –
<b>Chair</b>	<b>Keith Blackburn</b>	(1st December 2016 –to date) Seaford Resident, member of Local Economy and Facilities Focus Group(E&F FG) and Environment and Countryside (E&C) FG
<b>Deputy Chair</b>	<b>Mark Brown</b>	– Seaford Town Councillor, member of Economy & Facilities FG

#### Members

<b>Di Bushell</b>	Seaford Resident, and Housing FG Deputy Chair
<b>Charlie Grimble</b>	Seaford Resident and member of Housing FG
<b>John Alcock</b>	Seaford Resident and member of Housing FG
<b>Alan Latham</b>	Seaford Town Councillor and member of Housing FG
<b>Fiona House</b>	Seaford Resident, member of Local Economy and Facilities Focus Group and administrative support
<b>Sylvia Dunn</b>	Seaford Resident and member of E&CFG
<b>George Taylor</b>	Seaford Resident and member of E and C FG
<b>Richard Honeyman</b>	Seaford Town Councillor
<b>Lindsay Freeman</b>	Seaford Town Councillor
<b>Linda Wallraven</b>	Seaford Town Councillor and member of E&C FG
<b>Sarah McStravick</b>	Seaford Resident and member of Transport FG
<b>Fiona House/ Jane Keel</b>	Minute taker

**Steering Group Restructured March 2018 to date**

**Chair**            **Keith Blackburn** Seaford Resident  
**James Corrigan,**    **Town Clerk**  
**Linda Wallraven**    **Seaford Town Council**  
**Richard Honeyman** **Seaford Town Council**



## 4 ENGAGEMENT ACTIVITIES

**Seaford Town  
Neighbourhood Plan  
LAUNCH**

Come let us decide the future of our Town

**Volunteers needed**  
Sign up to join the  
Steering and Focus  
Groups

Our Local Shops and Businesses  
Our Green and Open spaces  
Our Housing (Type and Design)  
Our Facilities and Services  
Our Travel and Leisure  
Our Education, Health etc...

**Wednesday 20<sup>th</sup> April — 6pm – 9pm**  
Baptist Church Hall;  
Belgrave Rd, Seaford  
**Don't miss the presentation at 7.30pm**

**Refreshments provided**  
**“Your Town, Your Future”**



## 4.1 Launch

The steering group launched the SNDP on the 20th of April 2016 at the Baptist Church. This event attracted over 70 residents who were given the opportunity to contribute to a Strengths, Weaknesses, Opportunities, Threats (SWOT) analysis activity and to comment on areas the SNDP should focus on.

Volunteer forms were made available for residents to volunteer to join the Steering and Focus Groups. 44 volunteer forms were completed which led to the formation of the various Focus groups.





## 4.2 Focus Groups

In order to obtain local and detailed information on residents' issues and concerns to inform the SNDP, Focus Groups examined a number of primary and secondary sources of information to inform the outcomes of the SNDP. Workshops were held to bring together all Focus Groups members to share updates, emerging issues and proposed solutions. Each Focus Group has produced a report on its findings and suggested recommendations for the Neighbourhood Plan to take forward. The four Focus Groups group were:

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

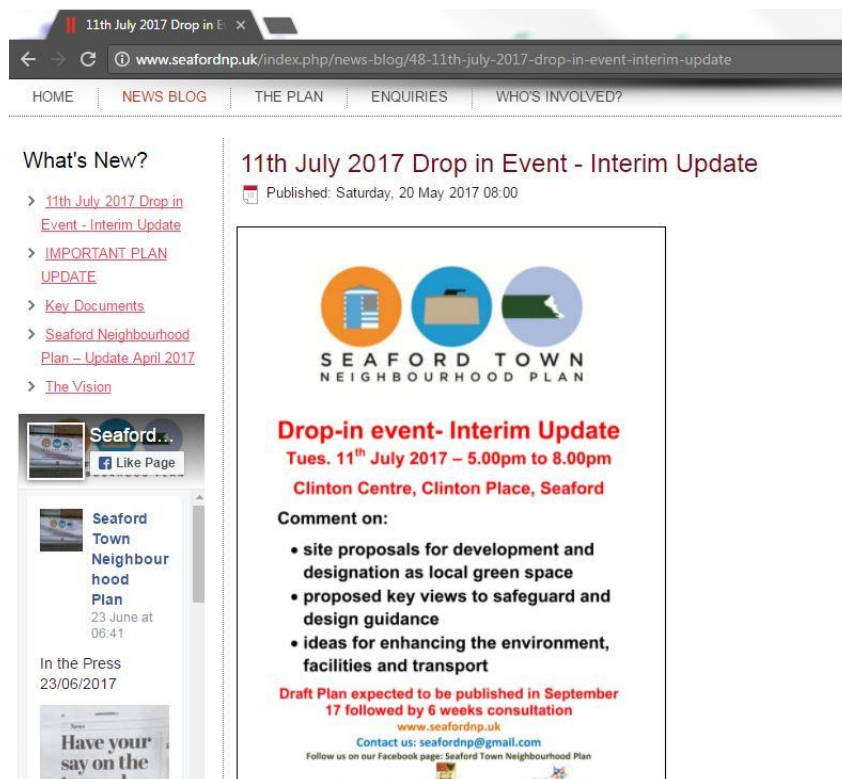
Full versions of the focus groups reports are available on the Seaford Town Council website <https://www.seafordtowncouncil.gov.uk/Seaford-NDP-Supporting-Documents.aspx>



### 4.3 Events

To help prepare the draft SNDP (also known as the “Pre-Submission Neighbourhood Development Plan”) the Steering Group held a series of events and kept the community informed by press releases, articles in the local press, web site and Facebook A summary of the events held is outlined in the table below:

Date	Event
20 April 2016	Public meeting
20 June 2016	
4 August 2016	Focus Group Workshops
5 October 2016	Focus Group Workshops
19 October 2016	Young People’s Workshop
11 November 2016	Seaford Head School Year 8 Assembly
30 November 2016	Informal Consultation Event
5 January 2017	Housing Focus Group Volunteer Workshop
30 January 2017	Youth Workshop
4 March 2017	Residents’ meeting
28 March 2017	Residents’ meeting
23 May 2017	Town Forum
11 July 2017	Drop-in Event (Sites Consultation)
November	Meeting First Reg 14 Consultation: Seaford
9 <sup>th</sup> December	Meeting First Reg 14 Consultation: Bishopstone



## 4.4 Surveys

### **Initial Household Survey and Housing Needs Survey – June 2016**

The survey was distributed by hand to 10,794 households across Seaford. A total of 1,100 responses were returned within the required period, representing an overall response rate of 10.2%. The purpose of the Housing Needs study was to objectively assess the current scale and nature of the need for affordable housing in Seaford.

### **Young People's Survey – November 2016**

This survey was aimed at young people between the ages of 16-35 as well as parents of children attending primary schools in Seaford. The purpose of the survey was to understand whether young people intended to carry on living in Seaford and, if so, what type and tenure of accommodation they would be seeking. The survey was available online on the SNDP website and hard copies were distributed at the 30 November consultation event and at primary schools. 97 responses were received.

### **Other surveys carried out:**

- Environment & Countryside Questionnaire – November 2016
- Local Economy & Facilities Survey – November 2016
- Travel & Transport Survey – November 2016
- Tourist Information Office Questionnaire
- Tourist Accommodation Survey

## 4.5 Visioning Workshop

A visioning workshop was held with members of the Steering Group, Focus Groups and their consultants on 4<sup>th</sup> August 2017. The purpose of the workshop was to gain an understanding of Seaford. To ascertain its planning context and constraints, development pressures, spatial structure and its character and assets. The outcome of this workshop led to a draft vision and gave initial guidance on the objectives for the SNDP.



#### 4.6 Focus Group Workshops

- June 2016 – First workshop of Focus groups to identify key issues
- August 2016 - Workshops to identify objectives to support the SNDP vision statement.
- October 2016 - Workshops to progress evidence reports for 30 November consultation event.







#### **4.7 Young People's Workshops and presentations**

These comprised two workshops (in October 2016 and January 2017) and a presentation to Year 6 Students at Seaford Head School (November 2016) The Focus of these engagements was to seek the views of young people on their long term Housing needs and the sort of facilities for youth they wished to see in the Town. These views were fed into the work of the Local Economy and Facilities Focus Group

## 5. Choice of Development Sites

### 5.1 Call for Sites

As part of the Neighbourhood Plan process, the Town Council undertook a 'Call for Sites' inviting landowners and/or their agents to put forward potential development sites to be considered through the Neighbourhood Plan process. The closing date was on Friday 29 July but was extended until 30 November 2016.

The call for sites was advertised on the Town Council website, the Neighbourhood Plan website and Lewes District Council website. Notices were placed in vantage areas across the town including all five notice boards. Respondents to the Neighbourhood Plan and Housing Needs surveys also identified a number of sites and these were followed up by the housing and development focus group to determine ownership and availability.

The Housing and Development Focus Group also examined the Lewes District SHELAA and considered all sites brought forward to LDC for development purposes. About 300 sites in total have been examined. A detailed site assessment report (Housing and Development Focus Group Working Paper – October 2017) shows how these sites were filtered down and assessed.

### 5.2 Informal Public Consultation Event – 30<sup>th</sup> November 2016

Around 400 people attended this event where residents were given an overview of the SNDP and the Focus Groups shared their draft evidence reports. Requests were also made for more volunteers to join the project





### 5.3. Volunteer Worksop – January Volunteers' Workshop 2017

Following the volunteer recruitment drive at the 30 November consultation, 17 people attended the volunteer workshop and various housing related work streams were created to help take the project forward.

### 5.4. Residents Meeting – March 2017

Two resident meetings in people's homes were held in March 2017 to give an update on the SNDP and respond to questions. 18 residents attended the first meeting held on the 4<sup>th</sup> of March with 20 attending the second meeting which was held on the 28<sup>th</sup> of March.



### 5.5. Town Forum – May 2017

The Steering Group took the opportunity of having a stand at the May Town Forum held at The View, Seaford Head Golf Club. Around 80 people attended. Members of the Steering Group were there to provide updates on the SNDP. They also handed out information on Focus Group proposals and recommendations as well as flyers to promote the Drop-in Event in July.



## **5.6 Drop-in Event – July 2017**

Informal presentation of proposals including all sites assessed and their outcomes for housing, Local Green Spaces to be considered for the draft Plan. Residents were consulted on what the evidence has shown, where development should take place, which Local Green Spaces should be designated, which key views should be preserved as well as the Plan's objectives, including design objectives. Following this event, the Steering Group amended and developed proposals with their consultants in the light of feedback received.

At that stage, the Steering Group were unable to meet the Target of 185 new homes so a proposal was put forward for housing development on part of one of the fields in Grand Avenue. This site is in the National Park and parts of it can be seen from Bishopstone village.

Shortly afterwards additional sites were put forward by land owners and it became possible to meet the 185 target without development on a Grand Avenue field. This episode led to the creation of the "Grand Avenue Pressure Group" who have been tenacious in seeking to have the site designated as a Local Green space and in scrutinising the precise wording surrounding the policy protecting Bishopstone Conservation Area.

## **5.7 Engaging with local businesses**

Two presentations have been given to the Seaford Chamber of Commerce Breakfast meeting: one very brief summary in the early fact finding stage of the Plan's development and a second comprehensive presentation on 11<sup>th</sup> January 2018 when emerging findings were covered. In addition, a prominent member of the Chamber was a member of the Economy and Facilities Focus Group.

## **5.8 Engaging with Local Authorities (LDC and SDNPA)**

In the early stages of Plan development, several one to one informal briefing meetings were held by the Chairman of the Steering Group with the LDC Neighbourhood Planning Officer. In addition, two round the table meetings have been held between the SG Chairman, a leading member of the SNDP Housing Focus Group, and our Consultant and at a later stage with similar attendees to discuss various issues, including the results of the AECOM viability Study of the Dane Valley Project.

One meeting has been held with the South Downs National Park Authority Planners and the SG Chairman, along with the Deputy Chairman of the Housing Focus Group in order to understand their policies and context.

There has been much informal email correspondence and telephone calls with both Authorities.

## **5.9 Ongoing engagement with residents**

A central element in the development of the SNDP has been to ensure that the local community has been informed and had opportunities to contribute to the process. This has been achieved, primarily through regular updates on the Neighbourhood Plan website, as well as on facebook, in press releases, newsletters, posters and flyers. In addition the local radio station (Seahaven FM) has been used. Members of the public also took the opportunity to attend Steering Group meetings and to ask questions.

## 6 REGULATION 14 CONSULTATIONS

### 6.1 First Regulation 14 Consultation (3<sup>rd</sup> November to 20<sup>th</sup> December 2017)

The Plan and associated documentation was publicised through various means to encourage maximum participation and inclusion. The pre-submission plan was available on the Neighbourhood Plan **website** with a link for those who would like to respond online. There was a word version of a questionnaire that could be filled in online and emailed as an attachment. There was also a PDF version that could be downloaded and filled it by hand.

**(a) Availability of documents.** Hard copies were available at the following locations:

- Seaford Library
- Tourist Information Office

**(b) Public consultation** events on the draft Plan were held at the Clinton Centre, Clinton Place, Seaford on Tuesday 28<sup>th</sup> November (4-8pm) and Saturday 9<sup>th</sup> December (2-5pm) 2017 and at Bishopstone Village Hall on 13<sup>th</sup> December (2-5pm) 2017.

**(c) Summary of responses received.** Members of the public were invited to complete a questionnaire which required each Policy and Community Aspiration to be scored: 1 (definitely Agree) to 5 (definitely disagree). 193 questionnaires were completed and analysed. Some scores were left blank and some were scored 3 (neither agreeing or disagreeing). Taking all policies together, 96% of respondents who expressed a view supported the policies and 95% agreed with the Community Aspirations- see Appendix B (Part A) for details.

In addition to scoring, the questionnaire invited respondents to comment on each Policy /Aspiration. 385 comments were made – see Table in Appendix B (Part B) which analyses the comments made on each Policy/Aspiration. 9% of comments showed disapproval and 91% approved the policies/aspirations. However, further analysis of those approving showed that 30% of them were happy with the proposals as drafted but 70% wanted changes to the proposals. The largest number of comments made (108) was on Local Green Spaces; the second largest (75) was on the Bishopstone Conservation Area, and the third largest (25) was on Areas of Established Character. Further analysis of these comments shows that many of them were from the “Grand Avenue Pressure Group” that has been formed by people with houses: in Clementine Avenue (that is, adjacent to three fields in Grand Avenue), Hill Rise (which is close to the Grand Avenue fields) or in Bishopstone village (parts of the Grand Avenue fields can be seen from some parts of the village).

Appendix B (Part C) summarises the comments made on each Policy and responds to the comments. The most frequent comment was that the three Grand Avenue fields should be designated as a Local Green space. Subsequently, a Working Party was set up to consider whether Grand Avenue fields met the National Planning Policy Framework (NPPF) criteria. The second most frequent comment requested that the Plan should use exactly the same words as in the narrative leading up to the

Bishopstone Conservation Area policy in the 2003 saved Local Plan (which was perceived as giving stronger protection against development). This revised wording has been included in the Submission Plan.

Technical comments were received on the SA/SEA from statutory consultees and from the professional adviser to the owners of the Florence House garden site (which drew attention to the fact that a recent Judicial Review had ruled that a garden site in an edge of town location should be classified as Brown field not Green field). This change was fed into a new assessment of the site against the Sustainability Objectives.

All comments were reviewed, including those made by local authorities and other statutory bodies. Appendix C is a schedule of all statutory consultees' comments and the changes made to the Pre-submission Plan. Technical comments made regarding the Sustainability Appraisal/ Strategic Environmental Assessment were reviewed and addressed by a specialist consultant.

## **6.2 Second Regulation 14 (2018) Consultation (from 1<sup>st</sup> November 2018 to 13<sup>th</sup> December 2018**

### **(a) Changes to the Pre-submission Plan and the Sustainability Appraisal.**

The Town Council proceeded to a Second Regulation 14 Consultation because of the changes necessary to the Plan following the analysis of the comments received in the First Regulation 14 Consultation. The revised Plan included the following changes:

- The addition of Florence House to the list of sites proposed for housing development (Policy SEA 15) due largely to a recent judicial review which resulted in the classification of the site being altered from Green Field to Brown Field
- With the announcement of the Downs Leisure Centre/medical development, the Steering Group took the opportunity to assess the site and include it in the Plan (under Policy SEA 15) with the 8 homes planned for it.
- Further information was collected by a Working Party examining the Grand Avenue site. In the light of the review, the Steering Group decided that Grand Avenue should be put forward for designation as a Local Green Space. This gives a total of 12 Local Green Spaces identified in the Revised Report of the Environment and Countryside Focus Group.
- The contribution of new homes in the Dane Valley project was revised down to show the positive response of all but two of the land owners to the project.
- Eleven sites for a total of 218 homes (against a target of 185 homes) were identified in the Plan whereas the previous version identified sites for 229 homes.
- Other changes to the Plan included: the clarification of the policy on recreational space; strengthening the case for improved health services; the inclusion of a policy on local business space; and strengthening the wording on affordable housing and Community Land Trusts.

A much revised SA/SEA was produced by a specialist consultant. The key change is in the detailed methodology used to assess the Plan's objectives, vision, policies and sites. For example, in assessing sites against the Sustainability Objectives, the new methodology uses the distance of a site from services, such as schools, shops, public

transport, etc. For example, a site near public transport would be rated higher with regard to the Transport Sustainability Objective than a site further away from public transport.

**(b)Availability of the documents.**

Copies of the plan were available to download from the Neighbourhood Plan website and for reading at the following locations:

- Seaford Library
- Tourist Information Centre
- St Andrew's Church, Bishopstone
- The View at Seaford Head
- Seaford Head Golf Club

Residents and other interested stakeholders had the opportunity to submit their comments either:

- Online through **Survey Monkey**, or,
- By completing a **Consultation Response Form** and returning by email, or
- Obtaining and submitting a hard copy from, and returning to, the Town Council offices





**Buckle Car Park notice boards**



**Chamber of Commerce NP presentation**



### **(c) Summary of responses received on the Plan**

73 responses were received throughout the consultation period. Of these responses:

- 8 were received from the key statutory bodies
- 6 were received from landowners and or their agents
- 58 were received from groups and residents including 43 responses from residents on Grand Avenue.

The 8 Statutory Consultees that made Representations were:

- Lewes District Council
- South Downs National Park Authority
- Environment Agency
- East Sussex County Council
- Historic England
- Natural England
- Highways England
- Southern Water

A schedule of the representations received from the Statutory Consultees and the Steering Group's changes to the Plan is provided in Appendix E.

No comments were made by the public on 8 of the policies in the Plan.

Appendix D analyses the comments made by members of the public and site owners. The largest number 46 (63% of all comments) commented on SEA 8 (Local Green Spaces), 42 of these were seeking to change the analysis of the extent to which Grand Avenue Fields meet the LGS criteria. The Steering Group concluded in February 2019 that the wording in the Plan and the Local Green Spaces Report should not be changed, and approved the proposals going forward to Seaford Town Council's Extraordinary Meeting of the Full Council held on 28 February 2019 where the revised Neighbourhood Plan was adopted by majority vote.

The second largest group of comments (12 comments) was on SEA 15 (site allocations) which sought textual clarifications or queried the viability of individual sites.

Appendix F covers in full the comments received (on Grand Avenue, the Surrey Road part of Old Brick Field LGS, and the site on Land North of South Barn) and gives the Steering Group's responses.

#### **(d).Comments received on the Sustainability Appraisal/SEA.**

LDC made a number of helpful redrafting suggestions for the SA/SEA. In addition, one owner questioned the omission of affordable housing in the SAE15 sites, and one statutory consultee suggested amendments to Table 17 (Sustainability Framework Objectives)

## **6. CONCLUSION**

Extensive consultation activities with residents and statutory bodies have been carried out since the Town Council decided to embark on developing a Neighbourhood Plan for the Seaford parish. Seaford residents have had many opportunities to become informed and engaged about the Neighbourhood Plan as well as opportunities to provide information, express their views and concerns and make suggestions for improvements.

This Consultation Statement captures but is not limited to the consultation and engagement activities undertaken. It is therefore considered to comply fully with Part 5, Section 15 of the Neighbourhood Planning (General) Regulations, 2012.

**Table 1: Main Documents Produced for the Seaford NP**

<b>Document</b>	<b>Description</b>
SNP Pre-Submission Plan	The two draft plans which were put out for consultation to residents, organisations and statutory consultees
SNP SA/SEA	
SNP Submission Plan: Consultation Statement	Statement of how consultation was carried out to meet statutory requirements
SNP Submission Plan: Consultation Statement Annexes A and B	Tables showing the representations received on the Pre-Submission Plan and the responses made to them
SNP Submission Plan: Basic Conditions Statement	Statement of how the Plan meets the statutory basic conditions
SNP Focus Group Reports	Profile of the parish with summaries and evidence of focus groups and survey findings
SNP Design Guidelines	
SNP Local Green Spaces Report	
SNP Site Assessment Report	

**Table 2: List of persons and organisations consulted on the Pre- Submission Plan**

<b>Residents</b>	Neighbouring Parish Councils
All households in Seaford Parish	Local Clubs and Organisations
<b>Statutory Bodies (Regional and National)</b>	
Natural England	<b>Local Authorities</b>
Historic England	Lewes District Council
Environment Agency	South Downs National Park Authority
	East Sussex County Council

**Table 3: List of stakeholders approached by the SNDP Focus Groups**

Access in Seaford and Newhaven Committee	Newhaven Enterprise Centre
	Old School Surgery
Accommodation providers	Providers of recycling facilities
Allotment Society	Providers of utilities
Barn Theatre	RSPB
Brighton & Hove Buses	Seaford and Newhaven Access Committee
Chamber of Commerce	Seaford Community Partnership
Community Transport Lewes Area	Seaford Golf Club
Compass Buses	Seaford Head Golf Club
Cross-Seaford Travel Working Group	Seaford Health Centre
Cuckmere Buses	Seaford Museum
Dentists	Seaford Residents Voice (SRV)

Downs Leisure Centre	Seaford Seniors
East Blatchington Pond Conservation Society	Seaford Town Council
East Sussex County Council	Seaford Youth Partnership
East Sussex Fire And Rescue Service	South Downs National Park Authority
Flood Action Group	South Downs Society
	Southern Railway
Friends of the Old Brickfield	Southern Water
	State education providers
Friends of Tide Mills	Sussex Community Rail Partnership
Horticultural & Gardening Society	Sussex Police and Crime Commissioner
Land owners and their agents	Sussex Wildlife Trust
Lewes District Council	The Seaford Museum and Heritage Society
Little Theatre	Tourist Information Centre
National Trust	
Natural History Society	
Newhaven & Seaford Sailing Club	

## Appendix 1: SNDP Area Designation



**Lewes District Council**

**Lewes District Council and South Downs National Park Authority**

**Town & Country Planning Act 1990**

**Neighbourhood Planning Regulations (General) Regulations 2012**

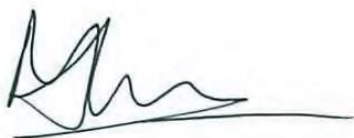
### **Designation of Seaford Parish as a Neighbourhood Area**

Lewes District Council received from Seaford Town Council, under Regulation 5 of the above Regulations, an application to designate the whole parish as a Neighbourhood Area for preparing a Neighbourhood Plan.

A copy of the application, including a map of the area was made available on Lewes District Council's website [http://www.lewes.gov.uk/Files/plan\\_Seaford\\_Town\\_Council\\_Neighbourhood\\_Area\\_Application.pdf](http://www.lewes.gov.uk/Files/plan_Seaford_Town_Council_Neighbourhood_Area_Application.pdf) and the Council's offices at Southover House, Lewes during working hours.

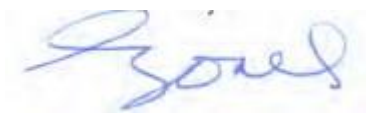
Comments were invited on whether Seaford Parish is an appropriate

Neighbourhood Area between 27<sup>th</sup> November 2015 and 8<sup>th</sup> January 2016. After considering the representations and under Regulation 7 of the above Regulations, we have designated Seaford Parish as a Neighbourhood Area to allow Seaford Town Council to prepare a Neighbourhood Development Plan. The area is mapped overleaf.



Nazeya Hussain

Director of Business Strategy and  
Development



Tom Jones

Lead Member for Planning

13 January 2016





### First (2017) Regulation 14 Consultation: Analysis of the questionnaires on policies and aspirations

#### Scoring on the questionnaires

1. The questionnaires asked respondents to score each Policy and Community Aspiration:

- 1=definitely agree,
- 2=mostly agree,
- 3=neither agree or disagree,
- 4=mostly disagree,
- 5=definitely disagree.

2. In addition, comments were sought on the form (see below for an analysis of these comments)

3. The 193 questionnaires completed by the public were analysed in detail (available on request separately) In summary:

- a) Scores were left blank for 25% of Policies and 30% of Community Aspirations; and
- b) 10% of Policies and 8% of Community Aspirations respondents marked their questionnaire as '3 = neither agree or disagree'.

4. In order to take account of a and b above, we have totalled Scores 1 (definitely agree) and 2 (mostly agree) and expressed as a percentage of the sum of all those who expressed a view (that is, 1+2+4+5).

5. Taking all policies together, 96% of respondents agreed with the Policies and 95% agreed with the Community Aspirations.

6. The level of support (that is, scored 1 or 2) for Policies ranged from 99% (SEA3, Conservation Areas) to 91% (SEA 8, Local Green Spaces). This is probably due to the large number of requests for Grand Avenue to be designated LGS. The top three with the strongest support were Conservation Areas (SEA 3), Design (SEA2) and Seafront (SEA6)

7. The support for Community Aspirations ranged from 97% (five of the aspirations) to 94% (CA 3 Verges and Trees), indicating a high level of support from the public.

#### **(B) Analysis of the comments made by the public on the questionnaires**

8. The table below analyses the comments received on the questionnaires and sets out the number of comments on each Policy and Community Aspiration (385 comments). It shows that 9% of these comments showed disapproval of a proposal, and hence 91% were in favour of the proposals. 30% of these who were in favour of Policies were happy with the proposals as worded but 70% wanted an amendment to a Policy. The disapprovals focussed upon one policy (SEA5, Areas of Established Character, comments use almost identical wording and nearly all were from residents of Bishopstone or residents

of houses close to Grand Avenue.) Most of the other responses focussed upon 2 main proposals which are linked: SEA 4 Bishopstone Conservation Area and SEA8, asking for Grand Avenue to be a Local Green Spaces,

<b>Policy No</b>	<b>Total replies</b>	<b>%age of replies</b>	<b>Approve</b>	<b>Amend</b>	<b>Irrelevant</b>	<b>Disapprove</b>
CA01	17	4.4%	5	11	0	1
CA02	0	0.0%	0	0	0	0
CA03	8	2.1%	4	2	1	1
CA04	2	1.0%	0	2	0	0
CA05	6	1.6%	6	0	0	0
CA06	9	2.3%	9	0	0	0
CA07	6	1.6%	5	0	1	0
CA08	4	1.0%	4	0	0	0
CA09	1	0.3%	0	0	1	0
SEA01	14	3.6%	6	5	2	1
SEA02	8	2.1%	1	6	1	0
SEA03	3	0.8%	0	2	1	0
SEA04	75	19.5%	0	75	0	0
SEA05	25	6.5%	1	2	1	21
SEA06	20	5.2%	8	10	0	2
SEA07	9	2.3%	5	4	0	0
SEA08	108	28.1%	7	97	2	2
SEA09	5	1.3%	4	0	0	1
SEA10	14	3.6%	13	0	0	1
SEA11	3	0.8%	1	2	0	0
SEA12	10	2.6%	6	3	1	0
SEA13	1	0.3%	1	0	0	0
SEA14	6	1.6%	4	1	0	1
SEA15	13	3.4%	4	6	2	1
SEA16	13	3.4%	5	6	0	2
SEA17	3	0.8%	1	0	2	0
SEA18	2	0.5%	1	1	0	0
Total			101	235	15	34
Total	385					385

## **C. Summary of subjects covered by the public's comments and proposed responses**

**SEA 1 (Landscape, Seascape and Townscape Character of Seaford)** Two commented that the platform where Cliff Cottage/Splash Point Hotel stood should be enhanced as a viewing platform with a fully accessible pathway to it from the promenade. Consideration should be given as to how to make the beach more accessible to the less mobile. These are best considered by Seaford Town Council and therefore these comments will be sent to the appropriate team in STC. Otherwise suggestions are already within policy proposals elsewhere in the Plan.

**SEA 2 (Design)**- Telecommunication masts should be regulated by planning (already the case), and car parking controls should safeguard crossing points e.g. Belgrave Road (addressed by recent installation of a pedestrian crossing)

**SEA 3 (Conservation Areas)** No suggestions that can be implemented.

**SEA 4 (Bishopstone Conservation Area)** This policy proposal received the second highest response, all on the same subject, many being in a prepared format, proposing that the original wording in to 2003 Local Plan be used, safeguarding the view back to the boundary of Kings Hedge. This was accepted and the Plan was amended.

**SEA 5 (Areas of Established Character)** This policy proposal received the greatest number of disapprovals, many expressed in a pre-prepared format. The views expressed can be summarised as seeking to apply the Area of Established Character to the whole of Seaford. Other views suggested extending the areas, e.g., the streets south of Belgrave Road, the area around Southdown Road. It is suggested that any extension to the AECs in Seaford has to be justified by evidence, and the NP Steering group does not have the time, money or resources to undertake any extensions over those that have been established through past research by LDC Planners. This public response therefore cannot be accepted into the NP at this time. It is possible however, to commence the debate in order to review the town to see if evidence can be amassed to justify new AECs during the life of the first NP.

**SEA 6 (Development on the Seaford)** There are a number of specific proposals in the comments made by the public, and these need to be considered under Community Aspiration 1 (and will be referred to the appropriate team in STC). They can be encompassed and considered within the broad policy guidelines of the proposed policy, which therefore does not need amending.

**SEA 7 (Recreational Facilities)** The responses were supportive and made suggestions such as a new swimming pool and reviewing tennis facilities with the possibility of expanding them. This can be accommodated within the proposed policy without requiring amendment.

**SEA 8 (Local Green Spaces)** This policy received the most numerous supportive responses, although 95% of them required the SG to consider amending the policy. 80 wanted Grand Avenue added in, 5 wanted North Way/adj 130 Firle Road added in, 1 wanted Micklefields AOS added, 1 wanted Splash Point added, 1 wanted Martello Fields added, 1 wanted Land adj 47 Surrey Road removed and 1 wanted Chyngton Way/Land N of South

Hill Barn removed. The response of adding in further sites will require further consultation and so should only be done if the sites fulfil the assessment criteria. The Grand Avenue comments sought to have the three fields in Grand Avenue that back on to properties in Clementine Avenue to be designated as a Local Green Space. A small Working Party was set up to collect evidence using the NPPF Local Green Space criteria to establish whether the fields met the strict criteria required to be met in order for a site designated as a Local green Space.

**SEA 9 (Allotments)** There are no new suggestions to consider for this proposed policy.

**SEA 10 (Health Facilities)** This policy received strong backing, with the only dissenting voice disagreeing with the NP proposal to use a possible site for housing rather than the much-needed health service. No change is proposed to this proposed policy.

**SEA 11 (New Business Space)** It is suggested that the word 'encouraged' should be used instead of 'permitted'. This appears to be an acceptable amendment.

**SEA 12 (Visitor Accommodation)** This proposal was fully supported by respondents and so no change is proposed.

**SEA 13 (Footpath to Church Lane)** No relevant proposals were made to this proposed policy and so no change is proposed.

**SEA 14 (Transport Projects)** The response was small but supportive of the proposed policy, with one person disagreeing with both proposals. No change is proposed.

**SEA 15 (Site Allocations)** The response was largely positive with 1, disputing the viability of the Dane Valley Project. The voices proposing amendments expressed concern that the health infrastructure will not cope with the increased population, (covered by Community Aspiration 5) and questioning Jermyn Ford and Seven Sisters pub proposals.

**SEA 16 (Dane Valley)** Of the 2 comments disagreeing with this proposed policy, one argues that Seaford's target for new housing is too high, hence the Dane Valley Project is not needed, and the other proposes a linear park on the land. Neither therefore recognises the reality of the NP's purpose and so are not followed up. Of the remaining supportive comments, most make comment on aspects of the development process (vehicular access, disruption during the development process). The desire for truly affordable homes as part of this scheme is supported. No change is proposed to this proposed policy.

**SEA 17 (Seaford Planning Boundary)** - No realistic comments were made on this, so no amendment is proposed.

**SEA 18 (Windfall Development)** As there was only 1 comment, and it was supportive, no amendment is proposed.

**Community Aspirations** - Generally, this part of the Neighbourhood Plan attracted fewer comments, and of those made, most were supportive. No proposed amendments are suggested, but some points made are worth noting and taking forward in discussions with relevant bodies.

**Voting intentions.** An analysis was made of the responses to the last question on the questionnaire, that is: 'Would you vote for this plan at a referendum?' This shows that:

- 56% said Yes,
- 6% said No, and
- 38% are unsure.

The vast majority of 'unsures' were from the Grand Avenue Pressure Group, that is, residents of Clementine Avenue, Princess Drive. Hill Rise or Bishopstone

#### **D. Responses to the Public's comments**

In summary, the above analysis resulted in amendments to the Plan as follows:

- No Specific action – 13 policies
- Plan amended to reflect this paper 4 policies
- Further work needed at the time of analysis and now addressed (Grand Avenue LGS) 1 policy

#### **E Sustainability Appraisal (SA/SEA)**

A number of comments were received from Statutory Consultees and a specialist Consultant has been employed to address the comments made. He re-structured the original SA, added new material and devised a new methodology for assessment of the extent to which the Sustainability Objectives would be achieved in relation to the Plan's objectives, vision, policies and sites.