

## SDNPA response to the Seaford Submission (Regulation 16) Neighbourhood Development Plan

All text to be added is underlined, all deleted text is ~~struck through~~.

Reference	Comment	SDNPA Recommendation to Examiner
General comments	<p>Seaford Town Council, and all those closely involved with the Neighbourhood Plan, are congratulated for their hard work in reaching this stage of the process. It is clear a considerable amount of effort has been involved.</p> <p>SDNPA appreciates the efforts that have been made to take into account comments made at the earlier Pre-Submission consultations. All the comments at the second Pre-Submission consultation have been included in the Submission version. The one exception was for policy SEA 11 New Business Space at Cradle Hill. The wording in the Submission policy was agreed at a meeting between representatives of the SDNPA, Lewes District Council, the steering group and their consultant following the second Pre-Submission consultation.</p> <p>As a general comment, references in the Sustainability Appraisal (SA) and the Habitats Regulation Assessment (HRA) to the South Downs Local Plan need to be updated to reflect the fact the Plan has been adopted.</p> <p>It bears repeating that it is noted and welcomed that the Neighbourhood Plan does not allocate any sites for development in the National Park.</p>	<p>SDNPA congratulates Seaford Town Council on the hard work and effort to reach this stage of the Neighbourhood Plan process.</p> <p>Involvement in the previous stages of the process and the efforts made to take into account the comments of the SDNPA is appreciated.</p> <p>The majority of recommendations below for amendments to the text reflect the fact that the South Downs Local Plan has now been adopted. This should also include amending the SA and HRA to reflect this fact.</p>
Page 1, paragraph 1	<p>Include reference that the Neighbourhood Plan must also be in general conformity with the adopted South Downs Local Plan (2014-2033).</p> <p>Correct plan period for Lewes Local Part 1: Joint Core Strategy 2010-2013<u>30</u> (LPP1).</p>	<p>Update paragraph to include general conformity with the South Downs Local Plan (2014-2033).</p> <p>As left correction to plan period for Lewes Local Plan Part 1: Joint Core Strategy.</p>
Page 16, paragraph 2.7	<p>Update the second bullet point to read:  “<del>The emerging</del> <u>South Downs National Park Local Plan</u>”.</p>	<p>Amend text as per left, to reflect change in status of the South Downs Local Plan.</p>

Page 17, paragraph 2.11	Replace existing paragraph 2.11 with the following: <u>“The South Downs Local Plan was adopted in July 2019 and takes a landscape led approach to development. The Plan seeks to capture the principles of ecosystem services. This approach ensures the services nature provides us (such as woodfuel, clean water, health and well-being) from nature’s own ‘capital’ (timber, water, and fresh air) are factored into decision making and allocations. Key policies include SD2 Ecosystem Services, SD5 (Landscape led) Design and SD9 Biodiversity &amp; Geodiversity. The latter seeks biodiversity net gain in development proposals. From a Seaford perspective and the Heritage Coast in particular, Policy SD18 The Open Coast is also relevant.”</u>	To amend paragraph 2.11 as per the text on the left, to introduce, and reflect the change in status of, the South Downs Local Plan.
Page 29, paragraph 6.8	Update second sentence as follows: “ <del>The National Park has a Strategic Policy (SD8) in its Preferred Options</del> Local Plan to <del>preserve</del> <u>conserve</u> and enhance...”	Amend paragraph 6.8 as per the text on the left, to update status of the South Downs Local Plan and reflect the wording in policy SD8.
Page 31, SEA1 f)	Amend as follows, so that the wording on the adverse effects of development reads more clearly: “(from first paragraph second sentence) In particular, subject to other relevant development plan policies, development will be permitted provided that it conserves and enhances: f) the River Cuckmere, its margins and associated wetlands, <del>preventing development which would and does not</del> adversely affect its quiet natural character...”	Amend SEA1 f) as per the text on the left for the policy to read more clearly.
Page 61, paragraph 6.58	Amend second sentence as follows: “ <del>In the National Park this is covered by policy SD28: Affordable Homes of the will be updated by the emerging</del> South Downs National Park Local Plan.”	Amend paragraph 6.58 as per the text on the left, to reflect the updated status of the South Downs Local Plan.
Page 72, SEA17 Florence House	This policy on Florence House was not included in the Pre-Submission version of the Neighbourhood Plan. This is the first opportunity to comment on the policy. In principle the policy is supported.	To note the comments on the left.