

SDNPA response to the Seaford Pre-Submission Neighbourhood Development Plan

The comments set out below are South Downs National Park Officers views only under Delegated Powers.

All references to emerging South Downs Local Plan policies relate to the Pre-Submission version unless specified. All text to be added is underlined, all deleted text is ~~struck through~~.

Ref	Comment	SDNPA Recommendation to Seaford Town Council
General Comments	A significant part of the South Downs National Park (SDNP) lies within the Neighbourhood Plan area. We welcome the statements of the importance of the National Park to the town in the Neighbourhood Plan.	Welcome and support the general approach proposed in this Neighbourhood Plan but suggest below where supporting text or policies should be amended for clarity and/or to protect the special qualities of the SDNP.
Para 2.11	The current version of the South Downs Local Plan is the Pre-submission version which has just recently been subject to public consultation. The SDNPA will be submitting the Submission version to the Secretary of State at the end of March 2018. The Reg 16 version of the Neighbourhood Plan will need to refer to the most up to date stage of the South Downs Local Plan.	Amend text to refer to the current stage of the South Downs Local Plan.
5.0 Vision Statement objectives	We are supportive of the vision for Seaford which highlights Seaford as gateway to SDNP, the important green spaces, spectacular views and the aspirations for improved transport infrastructure to make Seaford more accessible. We suggest that the vision also includes mention of the conservation and enhancement of the character of the Heritage Coast to benefit future generations given its unique and iconic status and national importance.	Amend vision to include mention of the Heritage Coast.
Seaford Neighbourhood Plan's objectives	We are supportive of the objectives. However, excellent work has been carried out in producing 'Seaford's Local Landscape Character and Views – August 2017' Background Document. Given that the Neighbourhood Plan proposes a landscape led approach, we recommend that objective 5 includes reference to also protecting landscape character and there is an additional objective relating to protecting the important views identified in the Background Document.	Include reference in Objective 5 to preserve and enhance landscape character and include an additional objective relating to the protection of important views.

Policy SEA1 Landscape, Seascape and Townscape Character of Seaford	<p>We consider this to be an excellent overarching policy and welcome specific mention of the protection of the special qualities of Tranquillity and Dark Night Skies in the South Downs National Park. We also welcome specific mention in criteria e) of the management of features of biodiversity, geological and heritage interest as, for example, there are further improvements that could be made to improve the management of Seaford Head Hillfort in terms of scrub/rabbits/surface damage.</p> <p>In relation to criteria f), it is important that as a result of coastal erosion and climate change that natural forces are allowed to take place within the river course. The current wording could be interpreted as 'preventing natural change'. We therefore recommend the inclusion of additional wording allowing for change that comprises natural coastal erosion, responds to climate change and facilitates naturally functioning river systems.</p>	Amend criteria f) to include the wording <u>to allow for change that comprises natural coastal erosion, responds to climate change and facilitates naturally functioning river systems.</u>
Policy SEA 2 – Design and Para 6.11 Principle 2 - Connections	<p>We suggest that an additional principle should be included in this policy relating to promoting sustainable design and mitigating impacts of climate change.</p> <p>We recommend that Principle 2 – Connections also refers to providing or improving green infrastructure connections or linkages within new developments to green spaces or the countryside. Green Infrastructure is a multi-functional network of natural and semi natural features which is capable of delivering a wide range of environmental and quality of life benefits for local communities, as well as providing resilience to climate change.</p>	<p>Recommend inclusion of a principle relating to sustainable design and mitigating climate change.</p> <p>Include in Principle 2 – Connections, mention of the provision of Green Infrastructure connections or linkages.</p>
Policy SEA4 - Bishopstone Conservation Area	While we appreciate that this policy starts with 'Subject to other relevant development plan policies', we recommend that specific mention is also made of Policy SEA3 in this policy, so that it is clear that the general conservation area policy criteria also relate to Bishopstone Conservation Area and it is not only about protecting its isolated character and downland setting, which we agree are very important.	For clarity and avoidance of doubt we recommend inclusion of the following wording 'Subject to other relevant development plan policies <u>and specifically Policy SEA3 Conservation Areas</u>
Seaford Seafront and Policy SEA6	We recognise the importance of the seafront as an asset to the town and the SDNP. It is also crucial that any new developments here do not impact on the	We recommend that this policy includes additional wording or new criteria to say "Any new development should protect the setting of

<p>Development on the Seafront.</p>	<p>setting of the South Downs, Tide Mills and the Heritage Coast and views to and from these areas.</p> <p>With regard to the above, we refer the Town Council and Steering Group to the important views identified in the Seaford's Local Landscape Character and Views – August 2017' Background Document and in particular Views M: Seaford Bay looking West, V: Seaford Bay looking East and X: Seaford Beach looking West which are views from the South Downs looking across the seafront.</p> <p>Section 4 of the above document identifies a number of Issues and Threats from the pressure of development for new visitor facilities and the importance of mitigating these impacts. The document highlights the following issues and actions;</p> <ul style="list-style-type: none"> • Erosion, demand for access, parking problems, facilities and conflicts of interest arising from diverse recreational use of the SDNP and Heritage Coast. Care should be taken before proposing any significant increase in visitor numbers or new visitor infrastructure to ensure the landscape and views will not be undermined; • The quality of the views to and from the Downs and Heritage Coast in Seaford; • Maintaining the largely undeveloped character of the shoreline, the SDNP and the Heritage Coast; • Any development should take account of the setting of the SDNP, the Heritage Coast, the shoreline and the Seaford Head Gateways. Measures should be incorporated to protect the buffer zone between the built up area and open downland; reflect the open character of the surrounding downland; be low density and low rise; conserve and enhance views and biodiversity; • Building design should be of a high quality, and the design, scale and mass of the units should reflect the material, finishes and elements of Seaford's historic character. <p>We therefore recommend that this policy includes specific reference to "Any new development should protect the setting of and views to and from the</p>	<p>and views to and from the SDNP, the Heritage Coast, the shoreline and the Seaford Head Gateways. Measures should be incorporated to protect the buffer zone between the built up area and open downland; reflect the open character of the surrounding downland; and therefore be low density and low rise;"</p>
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	<p>SDNP, the Heritage Coast, the shoreline and the Seaford Head Gateways. Measures should be incorporated to protect the buffer zone between the built up area and open downland; reflect the open character of the surrounding downland and therefore be low density and low rise;”</p> <p>For clarity, we also recommend that the Seafront Area to which this policy applies is identified on the Proposals Map.</p>	
Supporting text - Local Green Space Designation - Policy SEA8 – Local Green Spaces	<p>We are supportive of this policy and pleased that the proposed allocations includes two sites – Tide Mills and Bishopstone Village Green that are proposed to be designated as Local Green Spaces in the South Downs Local Plan. The Tide Mills is of value as an outdoor area for recreation, heritage interest as well as being a Site of Nature Conservation Importance and thereby a valuable habitat for wildlife. The site provides an important coastal beach area The SDNPA is improving interpretation on the site in a joint project with Sussex Past.</p> <p>It is generally the position of the SDNPA that Local Green Spaces designations are not included in the Local Plan where neighbourhood development plans are being prepared. It is more straightforward for all Local Green Space designations to be set out in the same document. Therefore we will be removing these two proposed designations from the next version of the Local Plan as they have been appropriately designated within the Seaford Neighbourhood Plan.</p>	To avoid duplication, we will remove the proposed Local Green Space designations in the South Downs Local Plan at Tide Mills and Bishopstone Village Green as they are now designated under this Neighbourhood Plan.
Policy SEA15 – Site Allocations; Policy SEA17 Seaford Planning Boundary and Policy SEA18 - Windfall development	<p>We welcome that the Neighbourhood Plan housing requirement can be met through the allocation of housing sites within the development boundary of Seaford, given that the SDNP boundary runs tightly up to the built up area of the town. This approach will help to ensure that the landscape, seascape and special qualities of the South Downs National Park and Heritage Coast are protected.</p> <p>We are also supportive of the redevelopment of brownfield sites above greenfield sites, as the open spaces within Seaford Town settlement boundary contribute to its character and are highly valued by the community.</p>	Support the approach proposed in relation to these policies.

Policy SEA16 Dane Valley Project	We are pleased that the need for enhanced transport provision is highlighted in this policy. This could be strengthened by identifying the key walking and cycling links that will be needed as part of this development to make sure they get captured in subsequent master planning.	Recommend the inclusion in this policy of the identification of key walking and cycling links as part of the master planning process.
Community Aspiration 1	We welcome and wholly support Seaford TC and the SDNP working closely together to deliver better signage to the National Park from the town. We would also welcome a co-ordinated and joint approach to signage and any fencing on Seaford Head and cliffs and the Heritage Coast overall.	Recommend inclusion in Aspiration 1 mention of co-ordinated and joint approach to signage on the Heritage Coast within Seaford Parish.
Community Aspiration 3	We support Community Aspiration 3 to enhance grass verges, designate new wildlife verges and for ESCC to trial reduced verge cutting to promote biodiversity.	Welcome and support the approach proposed.
Community Aspiration 4	<p>We would welcome the inclusion of the SDNPA to be consulted on any future flood defence strategies given the impact this can have on the natural appearance of the Heritage Coast.</p> <p>Seaford's Local Landscape Character and Views – August 2017' document highlights that inappropriate sea and coastal erosion defences can harm the landscape character and appearance of the seafront and coastline. The overall management objective should be to conserve the exposed, wild character of the shoreline and protect it from built development and insensitive engineering works. Any coastal defences should be designed with this management objective.</p>	<p>Recommend the inclusion of the SDNPA in any consultations on Flood defence strategies.</p> <p>The provision of any future flood or coastal defences should be considered in relation to the management objective to conserve the exposed, wild character of the shoreline and protect it from built development and insensitive engineering works.</p>
Appendix D – List of Proposed Transport Improvements	<p>We recommend that this appendix is expanded to include the following:</p> <p>Under Cycling – add the provision of cycling parking both at key destinations such as the seafront and town centre as well as associated with development. Cycle Parking should be located closer to facilities than car parking provision. This will encourage greater uptake of cycling. <i>Note: we are supporting an application for free cycle stands at Newhaven and Seaford Sailing Club. It is outside the NP boundary so we are not the planning authority here and the club is making enquiries as to whether planning permission is required.</i></p>	Expand Appendix D to include mention of specific projects or initiatives contained in adjacent comments.

	<p>We support the reference to the need for crossing points on A259. We suggest that new and improved crossing points for cyclists and pedestrians are needed in other locations within the Neighbourhood Plan area. This would be worth highlighting in the main body of the report which should also identify key crossing points if this information is available. The A259 is a significant barrier for walkers and cyclists accessing the National Park e.g. visitors staying in holiday accommodation. More generally, the road is a barrier suppressing uptake of walking and cycling and the plan may wish to emphasise this in the Travel and Transport section, 6.44 onwards.</p> <p>Regarding the bullet point below (appendix D) -</p> <p>Enforce the separation of motor vehicle and cycle use, where separate provision is already made (A259 Seaford to Newhaven).</p> <p>We recommend an aspiration for separation of motor vehicles and Non-Motorised User's along the whole of the A259 as this would make a considerable impact in safety and perceptions of safety which would encourage greater uptake.</p> <p><i>Note: ESCC has commissioned a Local Cycling and Walking Infrastructure Plan (LCWIP) for the Newhaven, Peacehaven and Seaford area. The issues mentioned above should be picked up in this document which is currently at a draft stage. If the Neighbourhood Plan team at Seaford is engaged in this process they should make sure the points they raise here and more are captured in the plan.</i></p> <p>There appears to be no mention in the document of NCN2 - https://www.sustrans.org.uk/ncn/map/route/route-2 – this is part of the National Cycle Network (a route from St Austell to Dover) and a key route which passes through Seaford, linking Brighton and Eastbourne. This should be referenced under travel and transport and also under tourism, particularly as reference is made to the Newhaven – Dieppe ferry links and also the role of Seaford as a gateway to the National Park.</p> <p>Under Accessibility for Pedestrians, we suggest the overarching aim of this section should be increased permeability for walkers and cyclists and people with disabilities to be delivered through the various bullet points.</p> <p>Rights of Way</p> <p>There is no mention of rights of way or walking routes (other than urban pedestrian paths). This is surprising considering the importance of tourism to Seaford and the reference to being a gateway to the SDNP. The Vanguard Way</p>	
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	<p>long distance path runs the length of the seafront, up and down Seaford Head, crosses the Cuckmere at Exceat Bridge and into the Seven Sisters CP. It links here with the South Downs Way. Also worth mentioning is the England Coast Path (ECP) – a new trail being developed by Natural England – proposals for the route through East Sussex and the SDNP will be released for public consultation early next year.</p>	
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