

## SDNPA response to the Second 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	We appreciate the changes to the Neighbourhood Development Plan that have been made as a result of our comments to the previous Pre-Submission consultation, including the Vision Statement, the Neighbourhood Plan objectives, Policies SEA1, SEA4, SEA6, SEA16 and Community Aspiration 3.	We appreciate the changes made to the Neighbourhood Development Plan (NDP) as a result of our comments to the previous Pre-Submission consultation.  We suggest below where supporting text or policies should be amended for clarity and/or to protect the special qualities of the South Downs National Park (SDNP).
Overarching Comment	It is noted and welcomed that the NDP does not allocate any sites for development in the National Park.	
Para 2.11	The South Downs National Park Local Plan examination is currently underway with the hearings finishing on Wednesday 12 December 2018. The Inspector's report on the Local Plan is expected early in 2019. As per previous comments, the Reg 16 version of the NDP will need to refer to the most up to date stage of the South Downs Local Plan.	Amend text to the current stage of the South Downs Local Plan in the Reg 16 version of the NDP.
Policy SEA2 - Design	We welcome the new design policy and related Design Guide for Seaford. We recommend that a criterion is added to the policy for development that is likely to have an impact on the National Park, for example because of views to and from the site. This criterion should support a landscape led approach to design	Welcome the new policy and recommend an extra criterion to have a landscape led approach to design for sites likely to have an impact on the National Park. We would be happy to discuss the

	on these developments. We would be happy to discuss the wording of this criterion further with Seaford Town Council.	wording of this criterion further with Seaford Town Council.
Policy SEA6 – Development on the Seafront	<p>We welcome the changes made through the new part c) in the policy following our previous comments on protecting the setting of and views to and from the South Downs National Park, Heritage Coast, the shoreline and the Seaford Head Gateways.</p> <p>We reiterate our previous comment that for clarity the Seafront Area to which this policy applies is identified on the Proposals Map.</p>	<p>We welcome the changes to the policy through the new part c).</p> <p>Recommend that for clarity the Seafront Area to which the policy applies is identified on the Proposals Map.</p>
Policy SEA11 – New Business Space	<p>This policy is now carrying forward an allocation from the Lewes Local Plan 2003, policy SF8. The allocation is in the area of the site nearest to and sharing a boundary with the National Park. To clarify it is recommended that the Inset Map on page 42 clearly shows this area where the new policy applies, as distinct from the rest of Cradle Hill Industrial Estate.</p> <p>We recommend that the policy and therefore the design of any future development takes a landscape led approach that seeks to conserve and enhance the setting of the National Park and mitigates against visual impact on the landscape. It is recommended that the South Downs Integrated Landscape Character Assessment (SDILCA) is referenced in the supporting text to inform the design of any future development, specifically Landscape Type A: Open Downland, A1: Ouse to Eastbourne Open Downs  <a href="http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf">http://www.southdowns.gov.uk/wp-content/uploads/2015/03/ILCA-Appendix-A-Open-Downland.pdf</a></p> <p>We are concerned that the detailed criteria in the policy were created before the formation of the National Park and may not achieve a landscape led approach to the design. We would be happy to discuss the preferred landscape led approach further with Seaford Town Council in developing this policy.</p>	<p>Recommend that the Inset map on page 42 shows the area covered by the allocation and therefore where the new policy applies as distinct from the rest of Cradle Hill Industrial Estate.</p> <p>Recommend a landscape led approach to the policy as described in the comments opposite. We would be happy to discuss the landscape led approach on this site further with Seaford Town Council.</p>

Community Aspiration 1	Reiterate our previous comment that 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 4	In reference to our earlier comments we appreciate that the Steering Group have contacted the Environment Agency asking for SDNPA to be consulted on future flood defence strategies. We would welcome this inclusion in the consultation process and recommend this is reflected in the wording of the Community Aspiration. Suggested sentence to be added <u>“When appropriate the South Downs National Park Authority (SDNPA) should be consulted on any future flood defence strategy given the impact this can have on the natural appearance of the Heritage Coast.”</u>	Recommend the inclusion of the SDNPA in any consultations on flood defence strategies.  Suggest adding to the Community Aspiration the sentence in the comments opposite.