



Lewes District Council

Working in Partnership



South Downs

National Park Authority

Lewes District Joint Core Strategy

Sustainability Appraisal (Incorporating a Strategic Environmental Assessment)

Post - Adoption Statement

June 2016

Introduction

The Lewes District Joint Core Strategy (JCS) was adopted by Lewes District Council on the 11 May and by the South Downs National Park Authority on 23 June 2016.

In accordance with European¹ and national legislation², development plans must be subject to the Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) processes.

A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from implementing development plans. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.

The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies, such as a Core Strategy. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. For the purposes of the Core Strategy, the SEA process was incorporated into the SA process.

Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004³ (from hereon in referred to as the SEA Regulations) sets out the requirements with regard to the post adoption procedures of the SA/SEA. This statement has been prepared in accordance with this regulation.

In accordance with the SEA Regulations, this statement sets out the following:

- (a) how environmental considerations have been integrated into the Plan;*
- (b) how the environmental report has been taken into account;*
- (c) how opinions expressed in response to public consultation have been taken into account;*
- (d) the reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and*
- (e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan*

¹ A Strategic Environmental Assessment (SEA) is a requirement of the SEA Directive, as well as the Environmental Assessment of Plans and Programmes Regulations 2004

² A Sustainability Appraisal is a requirement of the Planning and Compulsory Purchase Act 2004

³ http://www.legislation.gov.uk/uksi/2004/1633/pdfs/uksi_20041633_en.pdf

(a) How environmental considerations have been integrated into the Joint Core Strategy

The SA and SEA process has been fully integrated into the plan-making process, with its findings being a key influence on the policy decisions made. When work on the JCS began in 2009, it was decided that the SEA process would be incorporated into the Sustainability Appraisal process to fully assess the environmental, economic and social effects that are likely to arise from the options and subsequent policies being developed for the Core Strategy.

Stages of the SA/SEA

In May 2010, a SA Scoping Report was produced alongside the Issues and Emerging Options Topic Papers and subsequently consulted upon alongside the Issues and Options Topic Papers.

Amongst other things, the SA Scoping Report had sections that:

- Collated baseline information (economic, social and environmental), presenting the current picture of Lewes District and identified a number of sustainability issues (see Appendix 1)
- Developed a Sustainability Framework, comprising of a set of sustainability objectives and indicators (see Appendix 2)

The Sustainability Framework was developed to assess the policy options and draft policies developed through the preparation of the JCS. The objectives were specifically identified to address the sustainability issues and so it is clear that from the offset environmental (as well wider social and economic) considerations were integrated into the JCS.

In September 2011, the SA accompanying the Emerging Core Strategy was published for consultation which included a revised Sustainability Framework and appraised the following policy options:

- The policy options identified in the Issues and Options Topic Papers.
- New policy options for housing and employment provision which reflected the latest evidence work and changes to national planning policy such as the Government's intention, at the time, to abolish regional planning (with the revocation of the South East Plan).
- Strategic housing sites, broad locations for growth and employment sites
- Core Policy options for issues such as affordable housing, economic development and the natural environment.

The SA accompanying the Proposed Submission Core Strategy was published for consultation in January 2013 and appraised the following options, as well as where appropriate re-appraising previously appraised options, against the Sustainability Framework helping to identify the preferred options in the Proposed Submission Core Strategy.

- Updated housing and employment provision options based on the latest evidence
- Housing distribution options
- Updated strategic housing sites/broad locations for change options based on new information gathered
- New and refined options for some of the Core Policies

- The preferred approach for the strategic and core policies

The next SA Report was published alongside the Proposed Submission Focussed Amendments Core Strategy in May 2014. This was a track-changed version of the Proposed Submission SA incorporating the following changes:

- New and updated housing provision options were appraised taking into account the latest evidence on housing capacity and reflecting the district's agreed Objectively Assessed Need (OAN)
- New housing target options based on the Policy Constraints Report, and other relevant evidence, were appraised
- New and updated (with the latest SHLAA capacity evidence) housing distribution options were appraised ensuring all settlements allocated a housing target had been considered.
- Updated strategic housing site appraisals based on new information gathered
- Amendments to the appraisals of core policy options [Chapter 10] and the strategic and core policies [Chapter 11] to reflect the latest information and evidence.

The Submission SA was published in September 2014 incorporating the track-changes made to the Proposed Submission SA. The Submission SA sets out the process to date, how the options have been developed, justification for the recommended options and an appraisal of all the strategic and core policies within the Submission Core Strategy. A Schedule of Recommended Modifications was also published setting out further proposed modifications to the SA to reflect modifications made to the Core Strategy following the Focussed Amendments consultation. The modifications in the Schedule were generally minor changes reflecting updated information and minor errors and did not result in changes to the findings of the appraisals. However, they were considered important in achieving consistency between the Core Strategy and SA

Following the Hearing Sessions in January 2015, the Inspector published an Initial Findings Letter which set out his initial conclusions and inviting the Councils to submit main modifications in light of the discussions during the Hearing Sessions and the recommendations set out in the Letter. A number of important modifications were recommended by the Inspector, including an increase to the housing target (to approximately 6,900 net additional units per annum) and the allocation of additional strategic housing sites. Where necessary, these options required SEA appraisal and were done so in the *Addendum to the Sustainability Appraisal*.

The table below outlines how this iterative process has taken place.

Core Strategy Production Stage	Sustainability Appraisal Production Stage	When Completed
Issues and Emerging Options	Scoping Report	May 2010
Emerging Core Strategy	Emerging Core Strategy SA Report	September 2011
Proposed Submission	Proposed Submission SA Report	Autumn 2012

Proposed Submission - Focussed Amendments	Proposed Submission Document Focussed Amendments SA Report	March 2014
Formal Submission	Submission Version SA + Sustainability Appraisal - Schedule of Recommended Modifications	September 2014
Examination Joint Core Strategy – Proposed Main Modifications	Addendum to the Sustainability Appraisal	August 2015
Adoption	Monitoring of the Core Strategy	11 May 2016 (LDC) 23 June 2016 (SDNPA)

(b) How the Environment Report has been taken into account

As demonstrated in part (a), the SA has been an iterative process that has been fully integrated into the plan-making process and has ensured that sustainability has been at the heart of the JCS. At each stage, the findings of the SA, along with all other components of the Council's evidence base, have been considered by officers in developing the JCS.

The SA identified options for consideration and, through the detailed appraisal of options and draft policies, identified environmental and wider sustainability implications and was ultimately a key influence on the policy decisions made in the JCS.

Importantly, the SA has identified and appraised options ('reasonable alternatives') and draft policies against the Sustainability Framework. Details of this process can be found in sections 10 and 11 of the SA and the detailed appraisals can be found in Appendix 3 and 4. As noted in section (a), the iterative nature of the process has allowed the SA to remain flexible through the appraisal of new options and able to respond to the increased pressure to meet objectively assessed housing needs. By identifying environmental and wider sustainability issues, the SA was able to recommend the most sustainable options, propose mitigation measures and refine policy wording.

In September 2014, the Submission Version SA/SEA was published alongside the JCS and submitted to the Planning Inspector appointed to undertake the Examination in Public. Following the Hearing Sessions in January 2015, the Inspector published his Interim Report which stated his opinion that "Lewes District Council and the South Downs National Park Authority have essentially met all the statutory requirements, including those arising from the Duty to Cooperate and those relating to legal compliance".

In his Report on the Examination of the JCS, the Inspector clarified his satisfaction with the Plan as modified, which notably included an increase in the level of housing provision to a

minimum of 6,900 net additional dwellings, making specific reference to the corresponding option that had been appraised through the Submission SA. Furthermore, the Inspector also confirmed that all of legal requirements had been met, including an adequate Sustainability Appraisal, including in respect of the Main Modifications.

(c) How opinions expressed in response to public consultation have been taken into account

The SA has been consulted upon extensively and in line with Regulation 13 of the SEA Regulations. As referred to in section (a), this consultation process has run in parallel with the preparation of the JCS and so has been carried out in accordance with Lewes District Council and South Downs National Park Authority's Statement of Community Involvement.

A wide range of stakeholders, including statutory environmental bodies and members of the public, have been consulted at each stage of the statutory consultation process. The Summary of Representations documents that have been published following each consultation demonstrate how representations have been considered and how they have influenced the JCS. The Consultation Statement, published alongside the Submission JCS in September 2014, provides a summary of the consultation that has taken place on the JCS at the statutory consultation stages.

The Scoping Report was published alongside the Issues and Emerging Options Topic Papers for consultation in May 2010. The Scoping Report set out the Sustainability Framework against which options and policies would subsequently be appraised, ultimately informing the JCS. Comments were received on the Sustainability Framework, including additional and amended objectives, all of which were considered by officers. One such representation recommended a standalone Air Quality objective (whereas previously it was incorporated into the Transport objective) and this comment was taken into account by the planning authorities and Air Quality was subsequently included as a separate objective.

A relatively small number of representations were received which specifically related to the SA at subsequent stages of the JCS. Some of these comments objected to details or the scoring of various appraisals, all of which were given full consideration by officers as well the Inspector through the examination process. Also, in response to consultee feedback, various minor amendments have been made to the SA to correct inaccuracies and update baseline date and appraisal assessments where appropriate.

(d) The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with; and

As touched on in section (b), the SEA Regulations require environmental reports to consider reasonable alternatives taking into account the objectives and geographical scope of the Plan.

Chapter 10 of the Submission SA appraises the policy options that have been considered through the preparation of the JCS, starting with the Issues and Emerging Options Topic Papers. This chapter considers options for key aspects of the JCS such as the provision of

housing and employment land, the distribution of housing across the district's settlements, options for strategic development sites and the Core Policies.

The SA has been an iterative process and new options have been identified and considered in light of the latest evidence (such as housing needs and capacity studies) as well as changing priorities at the regional and national policy level.

In most cases the most sustainable options were taken forward in the JCS. However, it must be mentioned that the ultimate decision to take forward a policy approach or a particular strategic allocation was made with consideration to the Council's entire evidence base as well as viability and deliverability issues which the SA may not fully reflect.

In his Interim Findings Report, the Inspector recommended a level of housing provision (which was subsequently accepted and incorporated into Spatial Policy 2) that was not initially identified as the preferred option in the SA. Whilst recognising the district's high quality natural environment, and notably the South Downs National Park, the Inspector made it clear that a fairer balance between social, economic and environmental considerations in the JCS needed to be struck.

This was recognised in the Addendum to the Submissions SA. Spatial Policy 1, as modified, appraised favourably whilst acknowledging potential adverse environmental and economic impacts. The social benefits associated with a higher housing target (most notably the pressing need for additional affordable housing) therefore outweighed these potential adverse impacts and the appraisal concluded that, on balance, the approach set out in Spatial Policy 2 was the most sustainable option to take forward.

Overall, the SA process found that the spatial and core policies in the JCS appraised positively against the Sustainability Framework, although some uncertainty and potential adverse impacts against economic and environmental objectives were identified as referred to above.

The Councils remain of the belief that, on the whole, the JCS will direct development in a sustainable manner over the plan period. It is expected that mitigation measures introduced into policy wording, in addition to the implementation of other JCS policies, will reduce potential adverse impacts, or potentially negate altogether. Furthermore, the planning application process will allow further consideration of site-specific issues through detailed supporting documents (where necessary) such as Environmental Impact Assessments and the introduction of planning conditions or obligations that will also further offset or compensate for any unavoidable harm.

(e) the measures that are to be taken to monitor the significant environmental effects of the implementation of the Plan

Appendix 5 of the SA Report sets out the Monitoring Framework which will monitor the effects of the Plan against the sustainability objectives (see Appendix 2). The Framework includes a wide range of social, economic and environmental indicators, as well as past trends and future targets. This monitoring process will enable the authorities to determine whether targets are being achieved and will be able to identify any significant environmental

effects, in which case a review of certain JCS policies may be required so that changes can be made to improve a policy's performance.

In addition to the SA monitoring process, the JCS itself includes a Monitoring and Delivery Framework (Appendix 3) which will monitor the implementation of the Core Strategy's policies to ultimately determine whether its strategic objectives are being achieved. In addition to monitoring the performance of individual policies and objectives, the monitoring framework will also identify unexpected outcomes which will allow the authorities to take appropriate action, which may include triggering of a review of relevant policies. This flexibility will allow the JCS to respond to changing circumstances over the course of the plan period.

The monitoring process for the JCS and the SA will be carried out on an at least annual basis through the respective Council/South Downs National Park Authority Monitoring Reports (AMR). It is clear that a flexible and thorough monitoring process is in place to ensure that no significant environmental effects occur as a result of the JCS over the plan period.

Appendix 1 – Sustainability Issues Affecting Lewes District

1. There is pressure to supply additional housing within Lewes District, particularly in the affordable housing sector, whilst there is also a need to provide housing suitable for smaller households.
2. There is a need to protect and enhance the District's important landscapes, areas of biodiversity and other protected areas.
3. The recent designation of the South Downs National Park, of which 55.6% of Lewes District is a part, is likely to increase the attractiveness of the area as a place to visit. A key issue will be ensuring that the economic benefits to be gained from this are realised without being of detriment to the National Park or surrounding area.
4. It is important to ensure that the District's Historic Buildings and features are conserved and enhanced.
5. The amount of domestic waste that goes to landfill is comparatively high, although this is likely to decrease as the Energy from Waste Incinerator in Newhaven has been built. Despite this, there is a need to further promote prudent use of resources, including water, energy and waste materials by increasing the amount of recycling of waste and, where possible, the re-use of waste materials in new developments and in renovation.
6. There is pressure to locate new development on previously developed land, thus avoiding the unnecessary loss of greenfield land and valuable agricultural land.
7. Flooding presents a clear risk to many parts of the district, including significant areas of many of the larger settlements of the district. Along the coast there are also areas that are at a significant risk from coastal erosion.
8. There is a need to improve the water quality of the rivers in the District, which is currently far below the national average.
9. There are clear disparities between the most deprived areas and more prosperous parts of the District. Accessibility to important services and facilities is also a significant issue in parts of the District, particularly in some rural areas.
10. The ageing population of Lewes District, which is already high, is likely to increase further, resulting in an additional strain on health and social care, particularly residential nursing care and intensive home care.
11. Industry and business are suffering in parts of Lewes District, partly because of the recession, causing damage to local economies. This is particularly evident in areas along the coastal strip.
12. Car ownership in the District is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26. Parking is a problematic issue across the District's towns. This is particularly the case in Lewes town.

Appendix 2 – Sustainability Framework

Objectives	Questions to consider	Indicators	SEA Factors
Social			
<p>1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home. (Housing)</p>	<p>Does the approach add to the housing stock?</p> <p>Does the approach help meet affordable housing needs?</p> <p>Does the approach meet the needs of all members of the community?</p> <p>Does the approach lead to more sustainably constructed homes?</p>	<ul style="list-style-type: none"> • Net housing completions per annum • Net affordable housing completions per annum • Lower quarter house prices • House prices to earnings ratio • Households on housing needs register • Number of households considered homeless • Percentage of unfit dwellings • Net additions Gypsy and Traveller pitches 	<p>Population</p>
<p>2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the district. (Deprivation)</p>	<p>Does this approach benefit the most deprived areas of the district?</p> <p>Does the approach support social inclusion?</p>	<ul style="list-style-type: none"> • Rank and change in rank of Lewes District in the Index of Multiple Deprivation • Number and location of Super Output Areas in the District considered to be in the most deprived 30% in the country 	<p>Population</p>
<p>3. To increase travel choice and accessibility to all services and facilities. (Travel)</p>	<p>Does this approach encourage sustainable modes of transport?</p> <p>Will this approach have an impact on out-commuting?</p> <p>Will the approach</p>	<ul style="list-style-type: none"> • Number of large development completions estimated to be within 30 minutes of public transport and walking and cycling journey time of services 	<p>Population</p> <p>Material Assets</p>

	increase congestion?	<ul style="list-style-type: none"> • Mode of travel to work • Levels of out-commuting • Percentage of the district connected to the internet 	
4. To create and sustain vibrant, safe and distinctive communities. (Communities)	<p>Will the approach impact on the happiness of the community?</p> <p>Does the approach impact on community safety?</p> <p>Does the approach create additional community facilities?</p>	<ul style="list-style-type: none"> • Percentage of people satisfied with their local area as a place to live • Change in number of community meeting facilities • Change in the amount of public open space • Crime rate per 1000 of the population 	<p>Population</p> <p>Material Assets</p>
5. To improve the health of the District's population. (Health)	<p>Will the approach benefit the District's health?</p> <p>Does the approach reflect the needs of the elderly and disabled population?</p>	<ul style="list-style-type: none"> • Life expectancy at birth • Percentage of population in bad/very bad health • Percentage of the population over 65 	<p>Human Health</p> <p>Population</p>
6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services. (Education)	<p>Will the approach increase attainment at schools?</p> <p>Will the approach increase the skill levels of the district?</p> <p>Will the approach improve access to educational services?</p>	<ul style="list-style-type: none"> • Students achieving 5 or more A*-C GCSE grades (including Maths and English) • Numbers of adult learners • Percentage of adults without any qualifications • Percentage of adults with degree level (or equivalent) qualification 	<p>Population</p> <p>Material Assets</p>
Environmental			
7. To improve efficiency in land use through the re-	Does the approach bring vacant units	<ul style="list-style-type: none"> • Percentage of new homes built on previously 	Soil

<p>use of previously developed land and existing buildings and minimising the loss of valuable greenfield land. (Land efficiency)</p>	<p>back into use?</p> <p>Does the approach promote the best use of brownfield land?</p> <p>Will the approach protect quality agricultural land?</p>	<p>developed land</p> <ul style="list-style-type: none"> • Number of empty homes • Density of new dwellings • Amount of grade 1, 2 and 3 agricultural land lost to new development⁴ 	<p>Landscape</p> <p>Material Assets</p>
<p>8. To conserve and enhance the District's biodiversity. (Biodiversity)</p>	<p>Will the approach affect internationally and nationally important wildlife and geological sites?</p> <p>Does the approach seek to protect local nature reserves and sites of nature conservations?</p> <p>Does the approach protect areas of ancient woodland?</p>	<ul style="list-style-type: none"> • Condition and size of Sites of Special Scientific Interest and Special Areas of Conservation • Number and extent of SNCIs and LNRs • Area of ancient woodland 	<p>Fauna</p> <p>Flora</p>
<p>9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park. (Environment)</p>	<p>Does the approach have an impact on listed buildings?</p> <p>Does the approach allow access to the countryside?</p> <p>Will the approach impact on the valued landscape?</p> <p>Does the approach relate to the National Park purposes?</p>	<ul style="list-style-type: none"> • Number of listed buildings on the buildings at risk register • Amounts of Rights of Way • Capacity for change as defined by Landscape Character Study 	<p>Landscape</p> <p>Cultural Heritage</p>

⁴ Planning policy seeks to protect the best and most versatile land, this represents grades 1-3a in the agricultural land use classification. Our GIS system does not distinguish between 3a(good) and 3b(moderate) and thus it will be difficult to accurately assess the impact of the Core Strategy using this indicator.

<p>10. To reduce waste generation and disposal, and achieve the sustainable management of waste. (Waste)</p>	<p>Will the approach reduce the generation of waste?</p> <p>Will the approach increase recycling rates?</p>	<ul style="list-style-type: none"> • Domestic waste produced per head of population • Percentage of waste that is recycled or reused 	<p>Material Assets</p>
<p>11. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management. (Water)</p>	<p>Does the approach encourage the reduction in water consumption?</p> <p>Will the approach have a positive impact on water quality?</p>	<ul style="list-style-type: none"> • Biological, ecological and physico-chemical quality of water • Bathing water quality • Water consumption per capita 	<p>Water</p>
<p>12. To reduce the emissions of greenhouse gases, to reduce energy consumption and increase the proportion of energy generated from renewable sources. (Energy)</p>	<p>Will the approach reduce carbon dioxide emissions?</p> <p>Does the approach reduce energy consumption?</p> <p>Will the approach increase the proportion of energy from renewable sources?</p>	<ul style="list-style-type: none"> • Annual consumption of energy per user • Percentage of waste converted to energy • Number of grants for renewable energy installations obtained • Number of planning applications received relating to renewable energy • Carbon dioxide emissions per sector 	<p>Air</p> <p>Climatic Factors</p> <p>Material Assets</p>
<p>13. To improve the District's air quality. (Air quality)</p>	<p>Does the approach increase air pollution?</p> <p>Does the approach have an effect on the AQMA?</p>	<ul style="list-style-type: none"> • Number of Air Quality Management Areas 	<p>Air</p> <p>Human Health</p>
<p>14. To reduce the risk of flooding and the resulting</p>	<p>Will the approach impact on flooding?</p> <p>Does the approach</p>	<ul style="list-style-type: none"> • Number of residential properties at risk of flooding 	<p>Human Health</p> <p>Water</p>

<p>detriment to public wellbeing, the economy and the environment. (Flooding)</p>	<p>reduce the risk of flooding?</p>	<ul style="list-style-type: none"> • Number of new developments with sustainable drainage systems or developments that minimise water consumption • Amount of land in flood risk zones 2 and 3 as a percentage of the district's area • Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial) 	<p>Climatic Factors Material Assets</p>
<p>15. To ensure that the District is prepared for the impacts of coastal erosion and tidal flooding. (Coastal Erosion)</p>	<p>Will the approach have an impact on or be impacted by coastal erosion? Will the approach increase the risk of tidal flooding?</p>	<ul style="list-style-type: none"> • Amount of erosion to coastal areas • Number of planning applications contrary to the advice by the Environment Agency on flood defence grounds (tidal) 	<p>Water Climatic Factors Human Health Material Assets</p>
<p>Economic</p>			
<p>16. To promote and sustain economic growth in successful areas, and to revive the economies of the most deprived areas. (Economy)</p>	<p>Will the approach reduce retail vacancy rates? Will the amount of employment land increase? Will this approach create jobs?</p>	<ul style="list-style-type: none"> • Retail unit vacancy rates in town centres • Net amount of floorspace developed for employment land • Unemployment Rate • Percentage of population who are long-term unemployed or who have never worked • Number of business enterprises 	<p>Population</p>

<p>17. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)</p>	<p>Will the approach increase the amount of jobs in the tourism sector?</p> <p>Will more people visit the district as a result of this approach?</p>	<ul style="list-style-type: none"> • Number of jobs in the tourism sector • Contribution to the district's economy made by visitors 	<p>Population</p>
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