



Lewes District Local Plan

Part 2

Site Allocations and Development Management
Policies Sustainability Appraisal (Incorporating
a Strategic Environmental Assessment)

January 2020



Lewes District Council

**Lewes District Local Plan Part 2: Site Allocations and Development
Managements Policies Document**

**Sustainability Appraisal (Incorporating a Strategic Environmental
Assessment)**

Adoption Version

January 2020



Lewes District Council



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Telephone: 01273 471600

Email: ldf@lewes.gov.uk



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List of abbreviations

2003 LDLP	Lewes District Local Plan, March 2003
AQMA	Air Quality Management Area
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
DECC	Department of Energy and Climate Change
DEFRA	Department for the Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
ESCC	East Sussex County Council
ESIF	East Sussex in Figures
EU	European Union
Habitats Directive	Council Directive 92/43/EEC on the Conservation of Natural Habitats and of wild fauna and flora
IMD	Index of Multiple Deprivation
LDC	Lewes District Council
LNR	Local Nature Reserve
Local Plan Part 1/ Joint Core Strategy	Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030, May 2016
LWS	Local Wildlife Site
Local Plan Part 2	Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document
NPPF	National Planning Policy Framework
ONS	Office of National Statistics
PDL	Previously Developed Land
PPPs	Plans, Programmes and Policies
RuSS	Rural Settlement Study
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SDNP	South Downs National Park
SDNPA	South Downs National Park Authority
SEA	Strategic Environmental Assessment
SEP	South East Plan
SHELAA	Strategic Housing and Economic Land Availability Assessment
SHLAA	Strategic Housing Land Availability Assessment
SOA	Super Output Area
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
Topic Papers	Lewes District Local Plan Part 2: Site Allocations and Development Management Policies Issues and Options Topic Papers, November 2013
WTR	Wildlife Trust Reserve



1. Introduction

- 1.1. Lewes District Council (LDC) has prepared a Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document (Local Plan Part 2) for those areas of Lewes District outside the South Down National Park (the Plan Area, Map 1). When adopted, it will allocate land for different types of development (including housing, employment and Gypsy and Traveller accommodation). This document also contains the detailed development management policies, which will replace the 'retained' policies set out in the 2003 Lewes District Local Plan (LDLP).
- 1.2. Town and parish councils within the Plan Area can also choose to set planning policies through a neighbourhood plan. This includes site allocation policies and settlement specific policies. Once a town or parish has been designated as a neighbourhood area, the neighbourhood plan process can start.
- 1.3. In neighbourhood areas where a neighbourhood plan has been adopted or is currently being prepared, the Local Plan Part 2 does not identify settlement specific policies.
- 1.4. Where a neighbourhood plan includes or will include site allocations, the Local Plan Part 2 does not, generally, allocate sites.

Table 1 Summary of neighbourhood plan progress and coverage

Neighbourhood area	Adopted/ emerging neighbourhood plan	Site allocation policies covered by the neighbourhood plan
Seaford	✓	✓
Newhaven	✓	✓
Peacehaven and Telscombe	✓	✓
Ringmer	✓	✓
Newick	✓	✓
Barcombe	✓	✗
Plumpton	✓	✓
Wivelsfield	✓	The neighbourhood area includes two settlements with a planned housing growth, Wivelsfield Green and Edge of Burgess Hill. The Wivelsfield Neighbourhood Plan only covered housing site allocation policies for the settlement of Wivelsfield Green.
Hamsey	✓	✗
Chailey	✓	✗
Ditchling, Streat and Westmeston	✓	n/a The settlement is not within the Plan Area



- 1.5. Until the neighbourhood development plan has been approved at referendum, the 'retained' policies in the 2003 LDLP that are specifically applicable in these designated areas will continue to form part of the development plan for the area.
- 1.6. In accordance with European and National legislation, documents prepared to be part of the Local Plan must be subject to a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA). Therefore, the SA and SEA requirements apply to the production of the Local Plan Part 2.
- 1.7. In order to show that SEA requirements have been complied with, this report signposts where those requirements have been met. An example of a signpost is seen below:

Compliance with SEA Directive's Requirements

This box will sign post which requirements of the SEA Directive's Regulations are being met.

Purpose of the report

- 1.8. This SA Report accompanies the adoption version of the Local Plan Part 2: Site Allocations and Development Management Policies. It follows on from the Scoping Report, published alongside the Issues and Options Topic Papers in November 2013, which was the initial stage of the SA for the Local Plan Part 2 and the subsequent versions of the SA. It updates the submission version and includes the information of the addendum.
- 1.9. The intention of this report is to test the different policy areas and site specific options for the Local Plan Part 2 as well as the policies taken forward against the sustainability framework.

Who prepared this document?

- 1.10. Part 1 of the Local Plan was jointly prepared by LDC and the South Downs National Park Authority (SDNPA) and covered the whole of the district
- 1.11. Part 2 of Local Plan has been produced by LDC and only relates to the non-National Park area of Lewes District. The SDNPA is producing a Local Plan that covers the area of the district within the National Park. The Part 2 Local Plan area will be referred to as the Plan Area (Map 1).

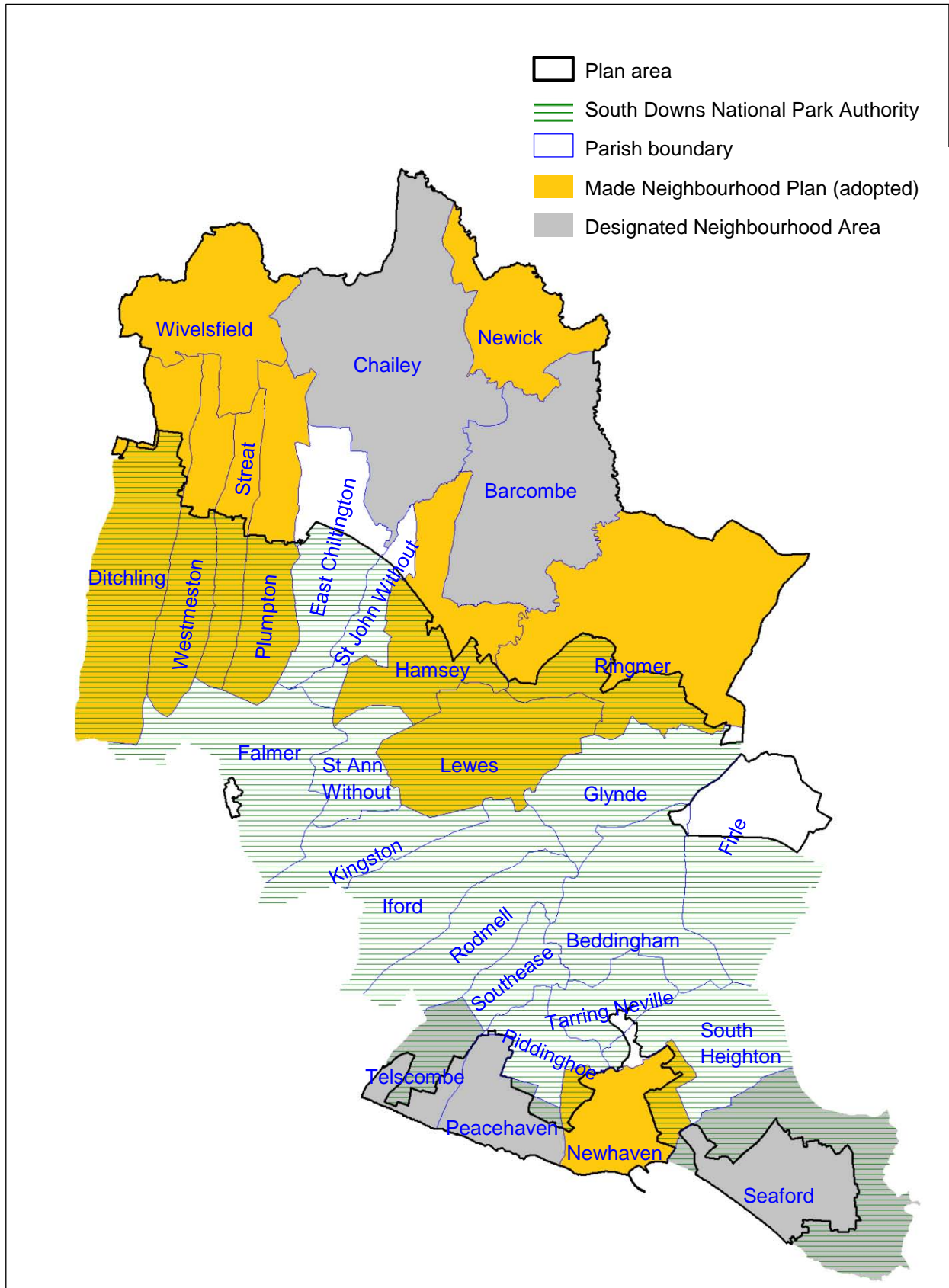


Structure of the report

- [Section 2](#) provides a non-technical summary to the report
- [Section 3](#) provides a background to the production of the Lewes District Local Plan and the need for a Sustainable Appraisal
- [Section 4](#) presents the methodology of the SA, explaining how it has been developed and how it accords with relevant legislation
- [Section 5](#) sets out the baseline information in regard to economic, environmental and social characteristics, presenting a current picture of the district
- [Section 6](#) refers to the plans, programmes and policies (PPPs) that have influenced the formation of the Submission Local Plan Part 2
- [Section 7](#) presents the key sustainability issues affecting the district
- [Section 8](#) presents the sustainability framework used to appraise approaches for the Submission Local Plan Part 2 and the policies
- [Section 9](#) appraised the different approaches for each policy area, identifying the most sustainable options
- [Section 10](#) appraises the Submission Local Plan Part 2 policies, refining them to make them more sustainable
- [Section 11](#) details the monitoring framework that will be used to monitor the sustainability outcome of the Submission Local Plan Part 2 when adopted



Map 1 Local Plan Part 2 Plan Area





2. Non-technical summary

Compliance with SEA Directive's Requirements

"In preparing an environmental report, the information that it gives should include a non-technical summary of the information provided..."

Lewes District Local Plan

- 2.1. Lewes District Council is required to create planning policies that guide development in its area. These policies will be presented in a set of planning documents for Lewes District, to be known as the Lewes District Local Plan.
- 2.2. The Lewes District Local Plan Part 1, the Joint Core Strategy 2010-2030 was prepared and adopted by Lewes District Council and the South Downs National Park Authority. It sets out the strategic level plan for the whole district that other planning documents, such as the Local Plan Part 2 and neighbourhood plans, will have to be in conformity with.
- 2.3. The Submission Local Plan Part 2: Site Allocations and Development Management Policies Development Plan Document comprises the second part of the Local Plan. It supports and seeks to deliver the strategic objectives and spatial strategy of the Local Plan Part 1 for the area of the district that lies outside the South Downs National Park.

Sustainable Development

- 2.4. Sustainable development sits at the core of the planning system. It can be defined as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

The Sustainability Appraisal and Strategic Environmental Assessment

- 2.5. The need to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the Local Plan Part 2 is required by both the European Union and UK law.
- 2.6. A SA aims to understand the economic, social and environmental effects that are likely to arise from plans. It is a process for understanding whether the plan promotes and achieves sustainable development, and for helping it to deliver more sustainable outcomes.



- 2.7. The SEA looks at the environmental effects that are likely to arise from plans. It is a process for assessing and reducing the likely negative environmental impacts. In this report the SEA process has been incorporated into the SA process. Therefore, where this report solely refers to the SA it can be assumed that this also means the SEA.

Methodology

- 2.8. In November 2013, a [SA Scoping Report](#) was produced alongside the Lewes District Local Plan Part 2: Site Allocations and Development Management Policies [Issues and Options Topic Papers](#). It has been subject to consultation with the relevant statutory bodies.
- 2.9. Changes have been made to the sections of the original Scoping report based on the responses received from the previous consultation as well as updates to datasets and the release of new plans and strategies that the Local Plan Part 2 must have regard to.
- 2.10. A [draft SA Report](#) was prepared in order to present the appraisal of the impacts of reasonable options developed for each policy area and site allocations of the Local Plan Part 2, helping to identify the best approach. The draft wording of policies, including for the site allocations, was appraised against sustainability objectives and refined to increase their sustainability credentials.
- 2.11. Further to consultation in November 2017 and October 2018, the draft SA was amended to reflect policy changes, provide clarifications and correct errors. A [submission SA](#) was then submitted alongside the Local Plan in December 2018.
- 2.12. The examination in public of the LPP2 resulted in the recommendation from the Inspector that the Council publish a Schedule of Main Modifications. It has to be subject to sustainability appraisal and public consultation for the plan to be found sound. An [addendum to the SA](#) was prepared in July 2019 to consider the need to revise the appraisal in light of the proposed Main Modifications. The Modifications were assessed in the context of the overall policy and accompanying supporting text being amended.
- 2.13. This report, the adoption version of the SA, does not amend any appraisal but instead collates the stages of the preparation of the SA to show how the policies progressed to their final wording whilst minimising their impacts on the sustainability framework during the plan period.



- 2.14. The SA process has been undertaken in accordance with the requirements of the SEA Regulations and following government guidance.

The Baseline Situation

- 2.15. This section of the report describes the district and plan area (the area of the district not within the South Downs National Park) in environmental, social and economic terms as it is today and attempts to describe what it would be like by 2030 if no plan were put in place. This then sets the context of how the plan can improve the outlook.

Key Sustainable Issues

- 2.16. Key sustainability issues were identified based on the work gathered from the baseline situation. They have been identified to help create the sustainability framework, which is the mechanism to appraise the options for and policies of the Local Plan Part 2. The key issues can be summarised as follow:
- There is a lack of housing and affordable housing.
 - There is a need to protect the environment and landscape.
 - There is a desire for the district to benefit from the designation of the South Downs National Park.
 - There is a need to protect the historic environment.
 - There is a need to reduce waste.
 - There is a need to reduce the risk of flooding for development.
 - There is a need to improve the water quality of the rivers in the Plan Area, which is currently far below the national average.
 - There is a need to improve air quality in and around the Newhaven and to a lesser extent on other parts of the A259 between Seaford and Brighton.
 - There is a need to reduce inequality and improve access to services and facilities.
 - There is a need to provide enough open space and recreation facilities.
 - The ageing population of the Plan Area, 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.
 - Industry and business are suffering in parts of the Plan Area, partly as a result of the recession, causing damage to local economies.
 - Car ownership is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26.



The Sustainability Framework

- 2.17. The sustainability framework, consisting of objectives, indicative questions to consider and indicators, was created in order to appraise the options for and policies of the Local Plan Part 2. The framework is largely based on the one used for the SA for the Local Plan Part 1.
- 2.18. The sustainability framework is available within the main report (Table 15).

Appraising Policy Options

- 2.19. An important part of the SA process is the appraisal of different options for policy areas to help identify the sustainable approaches to be taken forward in the Local Plan Part 2.
- 2.20. For a number of policy areas, different potential approaches were developed and appraised against the sustainability framework to identify the preferred approach. This is shown in Table 2.
- 2.21. The policy areas shown in the list below are not included in Table 2. This is because no options or reasonable alternatives were identified for the inclusion of more detailed policies. In such instances the decision has been made to rely on existing policies in Local Plan Part 1 and therefore no specific policy was carried forward in the Local Plan Part 2.
- Cooksbridge (Hamsey) (housing site allocation)
 - Small-scale development
 - Special housing for older people
 - Gypsy and traveller accommodation (development management policy)
 - Retail development and promoting sustainable town, district and local centres
 - Infrastructure
 - Air quality
 - Renewable and low carbon energy and sustainable use of resources
 - Flood risk
 - Coastal change management area
- 2.22. It was considered that there was only one reasonable option for the policy approach Affordable Homes Exception Sites. Not having a policy was not considered a realistic option due to the allowance under Spatial Policy 2 of the Local Plan Part 1 to provide 125 dwellings on rural exception sites. Therefore the decision to have a policy for Affordable Housing Exception Sites was carried forward in the Local Plan Part 2 and appraised as part of the following stage in the sustainability appraisal process.



- 2.23. It was similarly considered unacceptable to not have an allocation for the provision of permanent Gypsy and Traveller pitches due to the unequivocal requirement set out for Local Plan Part 2 in Core Policy 3 of Local Plan Part 1: “The local planning authority will allocate specific, deliverable sites through the Local Plan Part 2 and the SDNPA Local Plan, unless allocated through Neighbourhood Plans.” It is confirmed that no neighbourhood plans are allocating a sites(s) for this provision. It is therefore concluded that it is not a reasonable alternative to have a policy option of ‘no provision’ and consequently this ‘option’ has not been assessed.



Table 2 Summary of Policy Options considered and carried to policy

Policy Approaches	Approached carried to policy
Housing Site Allocations	
Barcombe Cross A – Hillside Nurseries B – Land Adjacent to High Street C – Land North of High Street D – Land at Bridgelands	A, B and D
North Chailey A – Land South of Station Road, North Chailey B – Land at Glendene Farm, Station Road, North Chailey C – Land at Oxbottom Lane, Newick D – Land South of Fairseat, Station Road, North Chailey E – Land at Oxbottom Lane and Fairseat House F – Land at Layden Hall	B and F
South Chailey G – Land Fronting Mill Lane, South Chailey H – Chailey Brickworks	G
Edge of Burgess Hill A – Land at the Nuggets, Valebridge Road B – Land at Oakfields, Theobalds Road	A
Land South of Valley Road, Newhaven A – Maintain the existing site boundary for the Land South of Valley Road B – Review the existing site boundary for the Land South of Valley Road	B
Land at the Marina, Newhaven A – Allocate the Land at the Marina for 100 units B – Allocate the Land at the Marina for a minimum of 300 units	B



Policy Approaches	Approached carried to policy
Caburn Field, Ringmer A – Maintain the existing site boundary for Caburn field and allocate the site for a minimum of 40 additional units B – Allocate the extended Caburn Field for a minimum of 60 additional units C – Allocate the extended Caburn Field for approximately 90 units	C
Gypsy and Traveller Accommodation	
A – Land south of the Plough	A
Employment Site Allocations	
A – Balcombe Pit, Glynde B – Land Adjacent to American Express Community Stadium, Falmer C – Land at East Quay, Newhaven Port	B and C
Development Management Policies	
Planning Boundaries a) No planning boundaries b) Maintain the existing planning boundaries c) Review existing planning boundaries	c
Development in the countryside a) No policy b) New policy – broad approach c) New policy – development type specific approach	c
Essential need of rural workers a) No policy b) New policy – practical framework	b
Loss of small dwellings in the countryside a) No policy b) New policy – review and update policy on replacement dwellings in the countryside c) New policy – review and update policy on extension in the countryside	b



Policy Approaches	Approached carried to policy
Scale and design of development outside the planning boundaries a) No policy – rely on CP11 b) New policy – broad approach c) New policy – criteria based approach per type of development	c
Sub-division of existing property a) No policy b) New policy – general support c) New policy – practical framework	c
Employment development in the countryside a) No policy – rely on CP4 – general approach b) New policy – approach per type of development c) New policy – restrictive approach	b
Existing Employment sites in the countryside a) No policy – rely on CP4 – general approach b) New policy – criteria based approach	b
Farm diversification a) No policy – rely on CP4 – general approach b) New policy – practical framework	b
Caravan and Camping Sites a) No policy b) New policy – open approach c) New policy – criteria based approach d) New policy – specific policy on ‘glamping’	c
Existing visitor accommodation a) No policy – rely on CP5 – protection policy b) New policy – rational approach	b



Policy Approaches	Approached carried to policy
Green infrastructure a) No policy – rely on CP8 b) New policy – part of the development process c) New policy – considered in isolation d) New policy – review standards to address developer contributions	b
Outdoor playing space - standards a) No policy b) New policy – continue using the standard in RE1 c) New policy – adopt revised Field in Trust benchmark standards for outdoor playing spaces	c
Outdoor playing space – on site provision a) No policy – rely on CP8 b) New policy – threshold for on-site provision of Children’s play space in new housing development	b
Former Lewes/Sheffield Park Railway Line a) No policy b) New policy – protect for use as a public transport corridor c) New policy – encourage recreational uses	c
Recreation and the Rivers a) No policy b) New policy – promotional approach c) New policy – safeguarding approach	b and c
Agricultural Land a) No policy b) New policy – restrictive approach c) New policy – practical framework	c
Pollution Management a) No policy b) New policy –criteria based approach	b



Policy Approaches	Approached carried to policy
Land contamination a) No policy b) New policy	b
Water resource and water quality a) No policy – CP10 b) New policy - practical framework	b
Noise a) No policy b) New policy - practical framework	b
Biodiversity and Geodiversity a) No policy – CP10 b) New policy – practical framework	b
Design a) No policy – rely on CP11 b) New policy - practical framework	b
Refuse and recycling a) No policy b) New policy	b
Landscape Design a) No policy – CP10 b) New policy - practical framework	b
Residential extensions, garages and other building ancillary to existing dwellings a) No policy – rely on CP11 b) New policy – details policy applying principles of high design quality to local context	b
Backland development a) No policy b) New policy – general approach c) New policy – detailed approach	c



Policy Approaches	Approached carried to policy
Advertisements a) No policy b) New policy – general approach	b
Telecommunications Infrastructure a) No policy b) New policy –criteria based approach	b
Heritage Assets a) No policy b) New policy – protection approach c) New policy – enhancing approach	b
Areas of established Character a) No policy b) New policy – safeguarding approach c) New policy – enhancing approach	b
Footpath, cycle and bridleway network a) No policy – rely on CP13 b) New policy – enforceable travel plan c) New policy – protecting approach d) New policy – enhancing approach	c and d
Station parking a) No policy b) New policy – balanced approach c) New policy –protecting approach	c
Former Lewes to Uckfield railway line a) No policy b) New policy – protect for reinstatement of railway line	b



Appraising the Policies

- 2.24. Through the appraisal of the policy options, preferred approaches for each policy area were identified (Table 2). Policies were then developed and final drafts of the policies were fully appraised against the sustainability framework.
- 2.25. Overall the policies allocating sites for housing and gypsy and traveller accommodation will contribute to meeting the social objectives but will perform less well against environmental objectives due to the limited availability of 'brownfield' (undeveloped) land across the district. Consultation on the draft Local Plan Part 2 resulted in further criteria being included to prevent any negative impacts on the biodiversity and environment objectives
- 2.26. Overall the policies allocating sites for employment will contribute to meeting the economic objectives.
- 2.27. Overall the Development Management Policies are likely to have positive impacts on the sustainability framework. There were no significant negative effects identified. However following the consultation on the [Draft Local Plan Part 2](#) and the [Main Modifications](#), the policy wording was refined to ensure the best outcome in relation to the biodiversity and the environment objectives.
- 2.28. When considering the wider effects of the plan's policies as a whole, it is not thought that the adoption Local Plan Part 2 will result in unforeseen impacts on the sustainability framework. This is because it aims at providing more certainty to the delivery of the requirements set out in the Local Plan Part 1.



3. Background

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art.5 Annex 1) “the environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation”

Lewes District Local Plan

- 3.1. Local Planning Authorities are required to create locally-specific planning policies to guide development in their areas. The policies can be contained in either one document or a collection of documents.
- 3.2. The collection of planning policy documents is known as the ‘statutory development plan’ which includes for Lewes District: Local Plan Part 1, the Waste and Minerals Local Plan for East Sussex and adopted Neighbourhood Development Plans.
- 3.3. The Lewes District Local Plan will consist of two parts:
 - Part 1 - the [Joint Core Strategy](#) – applies to the whole of Lewes District and produced in partnership by LDC and the SDNPA
 - Part 2 - the Site Allocations and Development Management Policies Development Plan Document (DPD) – applies only to the parts of the District outside the National Park (the Plan Area) and produced by LDC
- 3.4. At the time of preparing this Report, the Joint Core Strategy has been formally adopted by LDC (11 May 2016) and the SDNPA (23 June 2016).
- 3.5. Part 2 of the Local Plan, the Site Allocations and Development Management Policies DPD is in general conformity with the [National Planning Policy Framework](#) (NPPF) and with [Part 1 of the Local Plan](#). The content of this DPD contributes to meeting some or all of the strategic objectives guiding development in the district to 2030¹. One such objective which is fundamental to delivering the Joint Core Strategy is Objective 3 – delivering the homes and accommodation for the needs of the district.

¹ Section 5 of Local Plan Part 1 or [Appendix C](#) of this report



- 3.6. A number of the policies within the Local Plan Part 1 make reference to the Local Plan Part 2; most notably Spatial Policy 2 (planned housing growth in the settlements). The production of this DPD is an essential component of meeting the Council's obligations under Chapter 5 of the [NPPF](#) (2018), to identify a supply of specific, developable sites for growth. This DPD will, for those areas where neighbourhood development plans are not proposing to allocate sites, identify sites and appropriate timings, phasing and delivery mechanisms to meet the housing targets identified in section 2 and 3 of Spatial Policy 2. A list of the Local Plan Part 1 policies which make reference to the Local Plan Part 2 can be found below:
- Spatial Policy 2 – individual sites to meet the planned level of housing provision for individual settlements will be identified in the Local Plan Part 2 or neighbourhood plans.
 - Core Policy 2 – The Local Plan Part 2 will be expected to identify, where appropriate, sites for special needs housing.
 - Core Policy 3 – The Plan Area's requirement for Gypsy and Traveller accommodation will be allocated through the Local Plan Part 2.
 - Core Policy 4 – The Local Plan Part 2 will allocate sites (within the Plan Area) to contribute towards the district's employment land requirements, where neighbourhood development plans are not allocating employment sites. Existing policies in this respect may need to be further retained until replaced by neighbourhood development plans.
 - Core Policy 8 – The DPD will identify areas within the Plan Area where there is potential to contribute towards the strategic delivery of green infrastructure.
- 3.7. The Local Plan Part 2 will include a set of development management policies that update and replace, where appropriate, those 'saved' and retained from the 2003 LDLP and considers the need for further policy areas that will act as the framework for determining planning applications.
- 3.8. The DPD has been prepared in three formal consultation stages, the first being the Issues and Options Topic Papers, the second being a Draft Plan, both consulted on under Regulation 18 of the Town and Country Planning Regulations and the third being the Pre-Submission Plan published for representations under Regulation 19.
- 3.9. The Local Plan Part 2 was submitted for examination in December 2018 and public hearings enabled the Inspector to discuss on the issues that were of critical importance to the soundness of the plan. Following the hearing sessions, the Inspectors recommended that the Council publish a [Schedule of Main Modifications](#), which had to be subject to sustainability appraisal and public consultation in order for the plan to be found sound.



- 3.10. The Inspector did not propose any modification that resulted in the deletion of any existing policies in the submission LPP2. However, he proposed amendments to the wording of the following policies and their associated supporting text: **NH01** (Land south of Valley Road, Newhaven), **NH02** (Land at The Marina, Newhaven), **BH01** (Land at Nuggets, Valebridge Road, Wivelsfield), **CH02** (Layden Hall, East Grinstead Road, Chailey), **RG01** (Caburn Field, Ringmer), **GT01** (Land South of the Plough), **E1** (Land at East Quay, Newhaven Port), **E2** (Land adjacent to American Express Community Stadium, Falmer), and **DM24** (Protection of Biodiversity and Geodiversity).

Sustainable Development

- 3.11. As paragraph 6 of the NPPF makes clear, “the purpose of planning is to contribute to the achievement of sustainable development.”
- 3.12. The term sustainable development has a worldwide meaning, defined in the World Commission on Environment and Development Report in 1987 (also known as the Brundtland Report), as “*development that meets the needs of the present without compromising the ability of future generations to meet their own needs.*”
- 3.13. The UK government began developing its own strategy for delivering sustainable development following the Rio Earth Summit in 1992. In 2005, the government produced a Sustainable Development Strategy², recognising that considering the long-term social, economic and environmental issues and impacts in an integrated and balanced way was key to delivering sustainable development. The strategy set out five guiding principles to achieve sustainable development. These principles formed the basis for policy in the UK and were as follows:

- Living Within Environmental Limits

Respecting the limits of the planet’s environment, resources and biodiversity – to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations.

- Ensuring a Strong, Healthy and Just Society

Meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all.

² DEFRA (March 2005), *The UK Government Sustainable Development Strategy*.



- Building a Strong, Stable and Sustainable Economy

Providing prosperity and opportunities for all, in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.

- Promoting Good Governance

Actively promoting effective, participative systems of governance in all levels of society – engaging people’s creativity, energy and diversity.

- Using Sound Science Responsibly

Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

- 3.14. The Coalition Government refreshed the vision on sustainable development, which builds upon the principles contained within the 2005 Sustainable Development Strategy, and thus continues to recognise *“the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.”*³

The Sustainability Appraisal and Strategic Environmental Assessment

- 3.15. The commitment to the achievement of sustainable development was set out in legislation introduced at both a European and national level. In 2004 the European Directive on Strategic Environmental Assessment (known as the SEA Directive) was implemented in the UK, as was the Planning and Compulsory Purchase Act. These pieces of legislation set out the requirement for Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) of plans, such as the Local Plan Part 2.
- 3.16. A SA aims to predict and assess the economic, social and environmental effects that are likely to arise from plans. It is a process for understanding whether policies, strategies or plans promote and achieve sustainable development, and for improving them to deliver more sustainable outcomes.
- 3.17. The SEA aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies. It is a process for assessing and

³ Defra (February 2011), *Mainstreaming sustainable development – the Government’s vision and what this means in practice.*



mitigating the likely negative environmental impacts of specific plans and programmes.

- 3.18. For the purposes of undertaking the SA and SEA of the Local Plan Part 2, the SEA process has been incorporated into the SA process. Therefore, where this report solely refers to the SA it can be assumed that this also means the SEA.



4. Methodology

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art. 5 and Annex 1) "...a description of how the assessment was undertaken..."

Stages of the Sustainability Appraisal

- 4.1. The SA process has been undertaken in accordance with the requirements of the SEA Regulations and followed the [SEA guidance](#) produced by the Department for Communities and Local Government (DCLG)⁴. The process of SA is also set out in the [national planning practice guidance](#), which advocates carrying out certain stages when preparing a SA.

Table 3 Stage to a Sustainability Appraisal

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope of the DPD.
Stage B	Developing and refining the options. Consulting on the options and the Scoping Report.
Stage C	Appraising the effects of the plan and producing the SA Report
Stage D	Consulting on the plan and the SA Report
Stage E	Monitoring implementation of the plan

- 4.2. SA reports are produced to accompany plans (in this case the Local Plan Part 2). As such, the production processes of SAs and plans work in tandem. The table below shows the production stages of both documents. The content of each SA report is shown in the following sections.

Table 4 Local Plan Part 2 and Sustainability Appraisal production Process

Local Plan Part 2 Production Stage	Sustainability Appraisal Production Process	When Completed
Issues and Options Topic Papers	Scoping Report	January 2014
Draft Local Plan Part 2	Draft SA	January 2018
Pre-submission consultation	Draft SA	October 2018
Formal submission To Secretary of State	Submission SA report	December 2018
Examination in Public	SA of major modifications of the Local Plan Part 2, if recommended by the examiner	June 2019

⁴ A practical guide to the Strategic Environmental Assessment Directive, Department for Communities and Local Government, 2005



Local Plan Part 2 Production Stage	Sustainability Appraisal Production Process	When Completed
Adoption	This report	February 2020
Monitoring	Monitoring	Minimum yearly

What has been done already?

- 4.3. In November 2013, an [SA Scoping Report](#) was produced alongside the [Topic Papers](#). Like the Topic Papers, the Scoping Report was consulted upon between 22 November 2013 and 17 January 2014.
- 4.4. Further consultation was carried out on the Draft Local Plan Part 2 in November 2017 and October 2018. The consultation also invited comments on the [Draft SA](#).
- 4.5. Among other things, the Draft SA had sections that:
- Collated baseline information, presenting the current picture of Lewes District in terms of economic, environmental and social aspects;
 - Identified PPPs of relevance to the formation of the Local Plan Part 2;
 - Identified the sustainability issues for the district that could be addressed through Local Plan Part 2; and
 - Developed a draft Sustainability Framework, comprising a set of sustainability objectives and indicators to be used to assess the Local Plan Part 2 allocations and policies
 - Assessed the reasonable options identified for housing allocations and development management policies against the sustainability framework
 - Appraised the proposed policies against the sustainability framework and consider the secondary, cumulative and synergetic effects of the Draft Local Plan Part 2
- 4.6. The [SA](#) was submitted alongside the Local Plan Part 2 in December 2018. Following the examination in public, the Inspector recommended that the Council publish a [Schedule of Main Modifications](#) for which an [Addendum to the SA](#) was prepared. It assessed whether the appraisal required to be reviewed in light of the Main Modifications in the context of the overall policy and supporting text being amended.

What is included within this SA Report?

- 4.7. Changes have been made to the sections of the [original Scoping Report](#) based on the responses received from the previous consultation as well as updates to datasets and the release of additional PPPs that the Local Plan Part 2 must have regard to.



- 4.8. The [draft SA Report](#) had been prepared in order to present the appraisal of the impacts of the various reasonable options developed for each policy area and the site allocations of the Draft Local Plan Part 2, helping to identify the best approach. The draft wording of policies, including for the site allocations, has been appraised against the sustainability framework and refined to increase their sustainability credentials.
- 4.9. As a consequence of the consultations, further work was carried on the reasonable options and draft policies. The [SA](#) was subsequently submitted alongside the Local Plan Part 2 for examination and an [Addendum](#) was prepared to accompany the Main Modifications recommended by the Inspector.
- 4.10. This iteration of the SA Report accompanies the adoption version of the Local Plan Part 2. It compiles the various changes made to the previous SA Report during the preparation process to provide a clean version for ease of reference.

Meeting the Requirements of the SEA Directive

Compliance with the SEA Directive's Requirements

“Environmental Reports should be of a sufficient standard to meet the requirements of the SEA Directive” (Article 12)

- 4.11. In preparing this SA Report, the [SEA Directive](#) and the Environmental Assessment of Plans and Programmes Regulations 2004 (The [SEA Regulations](#)), which transpose the Directive into English law, have been followed. The table below shows where in this report the SEA requirements have been met:

Table 5 The SEA Directive's requirements

The SEA Directive's requirements	Where covered in the SA Report
In preparing an environmental report, the information that it gives should include (Art. 5 and Annex 1):	
a) an outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans or programmes;	Section 6 and Appendix B
b) the relevant aspect of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Section 5
c) the environmental characteristics of areas likely to be significantly affected;	



The SEA Directive's requirements	Where covered in the SA Report
d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs);	
e) the environmental protection objectives, established at international, Community or national level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	Section 3
f) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects;	Section 10
g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 10
h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Section 4 , Section 5 and Section 9
i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 11
j) a non-technical summary of the information provided under the above headings	Section 2
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Art. 5.2).	The report is sufficiently detailed and reflects the most up-to-date information.
When preparing the environmental report, consultation should take place with:	
authorities with environmental responsibility, when deciding on the scope and level of detail of the information to be included in the environmental report (Art. 5.4).	English Heritage, Natural England and the Environment
authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the	Agency were consulted on the Local Plan Part 2 and previous



The SEA Directive's requirements	Where covered in the SA Report
draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	iterations of the SA. Members of the public were also invited to comment on the Plan and previous iterations of the SA. (It should be noted that this report only collates the information provided in the previous iterations of the SA)
other EU Member states, where the implementation of the plan or programme is likely to have significant effects on the environment of that country (Art. 7).	This is not applicable for this report as it is not thought likely that the Local Plan Part 2 will have significant effect on another country.
The plan or programme should take into account the environmental report and the results of consultations into account in decision-making (Art. 8).	The Local Plan Part 2 has been influenced by the comments received on the Topic Papers and other background papers.
When the plan or programme is adopted, the public and any countries consulted shall be informed and the following made available to those so informed:	
the plan or programme as adopted;	Requirements will be met when the Local Plan Part 2 is adopted
a statement summarising how environmental considerations have been integrated into the plan or programme (Art. 5 – 8);	
the measures decided concerning monitoring (Art. 9 and 10).	
Environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	This is covered in this table.
To monitor the significant environmental effects of the plans or programme's implementation (Art. 10).	Section 11



5. The Baseline Situation: A portrait of Lewes District

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art.5 Annex 1) “the relevant aspect of the current state of the environment and the likely evolution thereof without implementation of the plan or programme”, “the environmental characteristics of areas likely to be significantly affected” and any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)”

Difficulties in Collecting Data/ Data Limitations

- 5.1. This chapter presents the current baseline information, setting out the social, economic and environmental characteristics of the Plan Area. The most significant limitation encountered during the production of this document concerned the collection of data for the Plan Area. The SDNPA was only formed in 2011. Part 1 of the Local Plan was a joint document encompassing the entire district, however the Local Plan Part 2 is only concerned with the area of the district outside of the National Park and so this involves disaggregating (if possible) the Plan Area data to attain an accurate baseline situation.
- 5.2. This was primarily done by collecting ward level data, however it was not always possible to disaggregate district-level data and therefore the baseline information has to be reported for the entire district. Therefore, unless stated, when referring to the district, it does mean the whole of Lewes District (including the National Park area) as more localised data is not available.
- 5.3. It must also be noted that certain assumptions had to be made when collecting the baseline data for the Plan Area as the National Park boundary does not follow the exact ward boundaries. Therefore, to overcome this, the district's wards were apportioned between the Plan Area and the National Park with those wards that straddle the National Park boundary attributed to the sub-area where the main population centre within that ward is located. For example, the Ouse Valley and Ringmer ward is attributed to the Plan Area as the settlement of Ringmer is situated outside of the National Park. It is recognised that this method is by no means perfect; however, it has brought the total population figure for the Plan Area more in line with the actual figure. The table below shows how the district's wards are split.



Table 6 District's wards split for collecting the data

Plan Area	National Park Wards
Chailey and Wivelsfield	Barcombe and Hamsey
East Saltdean and Telscombe Cliffs	Ditchling and Westmeston
Newhaven Denton and Meeching	Kingston
Newhaven Valley	Lewes Bridge
Newick	Lewes Castle
Ouse Valley and Ringmer	Lewes Priory
Peacehaven East	
Peacehaven North	
Peacehaven West	
Plumpton, Streat, East Chiltington and St John (Without)	
Seaford Central	
Seaford East	
Seaford North	
Seaford South	
Seaford West	

- 5.4. In creating the portrait of the district, we have attempted to use as up-to-date information as possible. Some of the figures have been sourced from Census data, and although the majority of the 2011 data has now been made available, some of the lower level data sets (i.e. ward level) which are required to split the figures between the National Park and Plan Area are not yet available. Therefore, in some instances, 2001 Census data had to be used and consequently may not be as accurate and may not fully represent the current state of the Plan Area of the district with regards to particular characteristics.
- 5.5. As water consumption rates are not collected at the district level, it has not been possible to collect precise information relating to water use. We have used the figures for the Southern region and thus have assumed that water consumption in the district is similar and therefore higher than the national average, whereas this may not be the case. In addition, we are not able to compare the district's water consumption rates to regional or county averages.

General characteristics

- 5.6. Lewes District is located within the county of East Sussex, in the South East region of England, around 45 to 60 miles south of London. The district as a whole extends from the English Channel coast through the South Downs and into the countryside of the Sussex Weald to the north. The Plan Area comprises approximately 129 square kilometres of the entire district area (292 square kilometres), equating to approximately 44% of the entire district.



This area is comprised of two distinct parts, namely the coastal towns to the south and the Low Weald area to the north of the National Park.

- 5.7. The total population of the Plan Area is approximately 78,614⁵, which comprises over three quarters of the entire district population.
- 5.8. The city of Brighton & Hove is located on the western boundary of the southern part of the Plan Area (i.e. the coastal towns area) and exerts a strong influence on the life of this area, as well as the Low Weald area although to a lesser extent, providing employment, shopping and leisure opportunities, together with other services and facilities. The towns of Haywards Heath and Burgess Hill in Mid Sussex District abut the north-western boundary, with the more rural district of Wealden located to the east, beyond which lies the coastal resort of Eastbourne.
- 5.9. The Plan Area benefits from good access to the trunk road network, with the A27/A26 linking the coastal towns to neighbouring Brighton and Eastbourne and the nearby A23/M23 providing access to London, Gatwick and the M25. In addition, the Plan Area is served by a number of key A roads. This includes the A259, which links the coastal communities, and the A26, A272 and A275, which are key routes through the northern part of the district. Newhaven and Seaford are linked by rail connections to London and Gatwick and towns along the Sussex coast and beyond. The port of Newhaven provides cross channel passenger and freight services to Dieppe in France.

Environmental characteristics

- 5.10. The **landscape and historic environment** of the Plan Area of the district is highly valued by both residents and visitors. The coastal towns are tightly enclosed by the National Park and comprise of a coastal environment characterised by chalk cliffs and shingle beaches. The northern section of the Plan Area differs and is typified by a gently undulating low weald landscape, abundant woodland and river valleys. The East Sussex County Landscape Assessment⁶ has identified and defined the landscape character of the County, which includes the Plan Area in more detail (this includes more localised character areas). Problems, pressures and detracting features of the landscape areas are defined, such as the severe impact of the ring road (Newhaven), the removal of hedgerows and damage to ancient woodland (the Low Weald) and the scrub invasion of chalk grassland

⁵ East Sussex In Figures (ESIF), Population estimates, 2001-2016 - SOAs

⁶ ESCC website, <https://www.eastsussex.gov.uk/environment/landscape>



(various). The Landscape Capacity Study⁷, produced by LDC and the SDNPA, also recognises high quality landscape which should be protected.

- 5.11. Within the Plan Area (Map 1), there are 4 **Sites of Special Scientific Interest (SSSIs)**, 3 **Local Nature Reserves (LNRs)**, 1 **Wildlife Trust Reserve (WTR)** and 49 **Sites of Nature Conservation Importance (SNCl)s** (Map 2, [Appendix A](#)). SSSIs are of national importance and are designated based on their nature conservation and/or geological value. Of the 660.5⁸ hectares of land designated as SSSI's, 59% has been assessed to be in a favourable condition and 41% is considered to be in an unfavourable but recovering condition. LNR's cover 189 hectares of land⁹ and have wildlife and/or geological features that are of local importance and allow people the opportunity to learn about and appreciate nature. SNCl's are non-statutory sites designated by local authorities to protect locally important conservation sites. The 35 designated SNCl's cover 655.1 hectares (2.9%) of the Plan Area.
- 5.12. The two internationally important **Special Areas of Conservation (SACs)** (Map 2, [Appendix A](#)), Castle Hill and Lewes Downs, are both located within the National Park (and so not applicable to this document, although the potential impact of the Local Plan Part 2 on these protected sites, as well as others in the locality, such as the Ashdown Forest SPA and SAC, have been considered through the strategic Habitat Regulations Assessment (HRA) in order to meet the requirements of the Habitats Directive). There are no designated Ramsar sites or Special Protection Areas (SPAs) in the district, albeit the Pevensey Levels (Ramsar and SAC) and the Ashdown Forest (SPA and SAC) are located within approximately 12km of the South East corner and 7km of the North East corner of the district respectively.
- 5.13. The [Habitats Regulation Assessment](#) (HRA) concluded that the levels of development set out in the Joint Core Strategy will not have a significant negative effect on the protected sites in the district. It also found that the potentially significant negative recreation impact of the planned development set out in the Joint Core Strategy on the Ashdown Forest SPA can be mitigated against, which has repercussions for the Local Plan Part 2 in terms of the need to identify a site of Suitable Accessible Natural Greenspace (SANG). Subsequent to the adoption of the Joint Core Strategy a challenge was made to the Plan concerning the lack of an in-combination air quality impact assessment for the Ashdown Forest SAC. In response to the consequent High Court judgement an [Addendum to the HRA](#) has been

⁷ LDC website, http://www.lewes.gov.uk/Files/plan_LCS_2012.pdf

⁸ Natural England, October 2017

⁹ Natural England, October 2017



produced that assesses in detail the in-combination effects of the Local Plan Part 1 and its spatial distribution of new development on the Ashdown Forest SAC, which concludes no significant effect. An in-combination assessment of the air quality impacts on the Lewes Downs SAC was carried out as part of the Local Plan Part 1 HRA because a trigger level of additional traffic flows had been reached which directed this assessment; again a conclusion of no significant effect, alone or in combination, was reached and the work was approved by Natural England, the statutory consultee.

- 5.14. **Ancient Woodland** is an important ecological resource that deserves protection. The Plan Area contains the majority of the district's Ancient Woodland (Map 2, [Appendix A](#)), covering a total of 926 hectares. This equates to 7.2% of the Plan Area. The Wealds and Downs Ancient Woodland Survey¹⁰ includes a map of the location of Ancient Woodland areas in the district as a whole, and it is evident that the vast majority of this woodland is located in the Low Weald area of the Plan Area.
- 5.15. Lewes District benefits from a high quality built environment. Within the Plan Area there are 15 **Conservation Areas**, covering an area of 137.7 hectares and 349 **Listed Buildings** (Map 3, [Appendix A](#)). **Grade I** buildings are considered to be of exceptional interest and there are 4 buildings within this classification located within the Plan Area. **Grade II*** are considered to be particularly important buildings of more than special interest and 14 buildings in the Plan Area fall into this category. There are also 331 **Grade II** buildings, which are buildings of special interest, thus warranting every effort to preserve them. The Plan Area also has one **Historic Park and Garden** and 7 **Scheduled Ancient Monuments** (Map 3, [Appendix A](#)).
- 5.16. The generation of energy from non-renewable sources releases greenhouse gases and thus the district's consumption of energy contributes to climate change. As can be seen in the table below, **carbon dioxide emissions per capita** are lower in Lewes District than the national average, which is also the case for gas consumption, although the district's residents on average consume more electricity than the rest of the country. This may be due to the lack of gas connections in many rural areas of the district resulting in a greater reliance on electricity. However, all three datasets have been improving over the last 7 years. There is no ward level data available for this dataset; however, it can be assumed that considering the dataset for CO² emissions is per person, the figure for the Plan Area would be approximately the same, as both the Plan Area and the National Park area of the district have a similar urban-rural mix.

¹⁰ <http://www.highweald.org/about-the-high-weald-unit/our-projects/weald-a-downs-ancient-woodland-survey.html>



Table 7 Energy Consumption

	Lewes District	East Sussex	National
Carbon Dioxide Emissions¹¹ (tonnes per person) (2014)	4.7	4.6	6.0
Gas Consumption¹² (Kilowatts per hour) (2015)	12, 929	13,017	11,816
Electricity Consumption¹³ (Kilowatts per hour)	4,167	4,196	3,245

5.17. The table below shows that on average each person in the district produces far less **waste** than the county’s average and it is also the case that the level of household waste has been steadily decreasing over the last 9 years. No ward level data was available for this dataset, although as the data represents waste per capita, it can be assumed that the Plan Area would have a similar rate of waste generation. Also, the table below that in the district no waste goes to landfill and in East Sussex only a very small proportion of waste produced goes to landfill. Waste going to landfill has significantly decreased in the past four years due to the completion of the Energy from Waste facility located in Newhaven. Consequently, a high proportion of the districts and East Sussex’s waste now goes through the energy from waste process (75.9 and 53.6 respectively).

Table 8 Waste Generation¹⁴

	Lewes District	East Sussex
Domestic waste per capita (kg) ¹⁵	(2015/2016) 291	(2015/16) 450
Percentage recycled	20.5	24.7
Percentage sent to energy recovery	75.9	53.6
Percentage of waste to landfill	0.0	5.0

5.18. Within Lewes District air quality is generally of a good standard. However, there are locations where pollutant levels are high, particularly in areas where there are properties close to the road on either side of the street (i.e. Newhaven). A detailed assessment of air quality in Newhaven was

¹¹ Department of Energy and Climate Change (DECC), July 2013

¹² DECC, <https://www.gov.uk/government/statistics/lower-and-middle-super-output-areas-gas-consumption>, October 2017

¹³ DECC, <https://www.gov.uk/government/statistics/lower-and-middle-super-output-areas-electricity-consumption>, October 2017

¹⁴ ESIF, Household waste arising, 2005-2016 - districts

¹⁵ ESIF Household waste collected per head of population, 2005-2016 – districts



submitted to Department for the Environment, Food and Rural Affairs (DEFRA) in January 2013, this revealed that levels of nitrogen dioxide in the area around Newhaven ring-road were close to exceeding acceptable limits. Consequently this area was designated an Air Quality Management Area (AQMA) and an AQMA Action Plan was implemented, with the aim of reducing atmospheric concentrations of nitrogen dioxide.

- 5.19. The **Strategic Flood Risk Assessment (SFRA)**¹⁶ identified that there is significant risk of flooding in the Plan Area, both from inundation by the sea and by the River Ouse (Map 4, [Appendix A](#)). In total, 4.6% of the Plan Area lies within Flood Zone 2 (Medium Probability of Flooding¹⁷), and 3.8% lies within Flood Zones 3a or 3b (High Probability of Flooding¹⁸ or Functional Floodplain¹⁹). There are 1,215 residential properties in Flood Zone 2 and 890 residential properties in Flood Zone 3. The likelihood of flooding is anticipated to increase due to climate change causing more extreme weather conditions, meaning that dealing with flooding is of high importance. The Environment Agency (EA) has recently (September 2013) issued updated flood risk maps, which overall does show changes to the flood risk zones in the Plan Area, although updated information for the datasets above is not yet available.
- 5.20. The whole of the South East of England, including Lewes District, is classed as a Water Stressed Area, meaning that prudent use of the Plan Area's water resources is sought. Despite this, **water use** in the Southern area of the country is higher than the national average²⁰. As can be seen from the 2013 statistics below²¹, river **water quality** in the district is far below average in all three of the EA's categories for assessing rivers and lakes. On a positive note, the beach at Seaford is rated in the top category ('best') for bathing quality and has consistently achieved this score for over a decade.

Table 9: Water Quality – Percentage of River Length²²

	Biological		Ecological		Physico-Chemical	
	High/ Good	Poor/ Bad	High / Good	Poor/ Bad	High / Good	Poor/ Bad
Lewes District	0	81.0	0	81.0	0	0

¹⁶ <http://www.lewes.gov.uk/planning/sfra.asp>

¹⁷ Rivers: between 1% (1 in 100 years) and 0.1% (1 in 1000 years). Sea: between 0.5% (1 in 200 years) and 0.1% (1 in 1000 years)

¹⁸ Rivers: greater than 1% (1 in 100 years). Sea: greater than 0.5% (1 in 200 years)

¹⁹ Greater than 4% (1 in 25 years)

²⁰ Daily Domestic Water Use. OFWAT, October 2010

²¹ Environment Agency, 22 December 2013.

²² River and Lake Quality (2013), Environment Agency



East Sussex	28.2	33.0	11.4	28.5	32.3	0
National	24.9	31.4	21.8	25.0	41.7	0

- 5.21. Overall Lewes District has a high standard of soil. The majority of which is considered to be “Good to Moderate Quality” (Grade 3) agricultural land in the **Agricultural Land Classification**²³. There are some areas of Grade 1 Agricultural Land (excellent quality) to the North East of Newick. In the South of the district, there is some history of heavy industry in the Plan Area, particularly in Newhaven. Consequently, there are some contaminated sites which can present problems to future development and degrade the soil quality.
- 5.22. The majority of the district’s coastline is within the Plan Area. It mainly consists of high chalk cliffs where the South Downs meet the sea. These cliffs are subject to erosion by wind, wave and tide. Erosion rates are typically 0.3 metres per year. This rate however is not regular, as significant cliff falls are often followed by several years of stability. The focus of the district’s coastal defences is on the frontage from Saltdean to Peacehaven, where a 50 year strategy covering major renewal works for current defences exists. The cliffs between Peacehaven Heights and Newhaven, and at Seaford Head, do not have any coastal defences, nor are any proposed. At these locations, as there is little or no development to protect, the cliffs will continue to erode naturally.
- 5.23. Lewes District as a whole currently has a shortfall in **outdoor playing space** provision when compared with the Council’s adopted standards. There are 131 playing pitches, which equates to one pitch for every 282 adults (the equivalent national figure is one pitch for every 989 adults). However, only 83 of these pitches are regularly available for community use and their quality varies across the District. Changing facilities are frequently inadequate and there are identified deficiencies in the provision of cricket pitches and junior football pitches in areas such as Newhaven and Seaford. All the towns and the majority of villages are provided with equipped children’s play space, but there is a recognised deficiency in the level of provision across the district. The largest deficiency in children’s play space is in Newhaven.

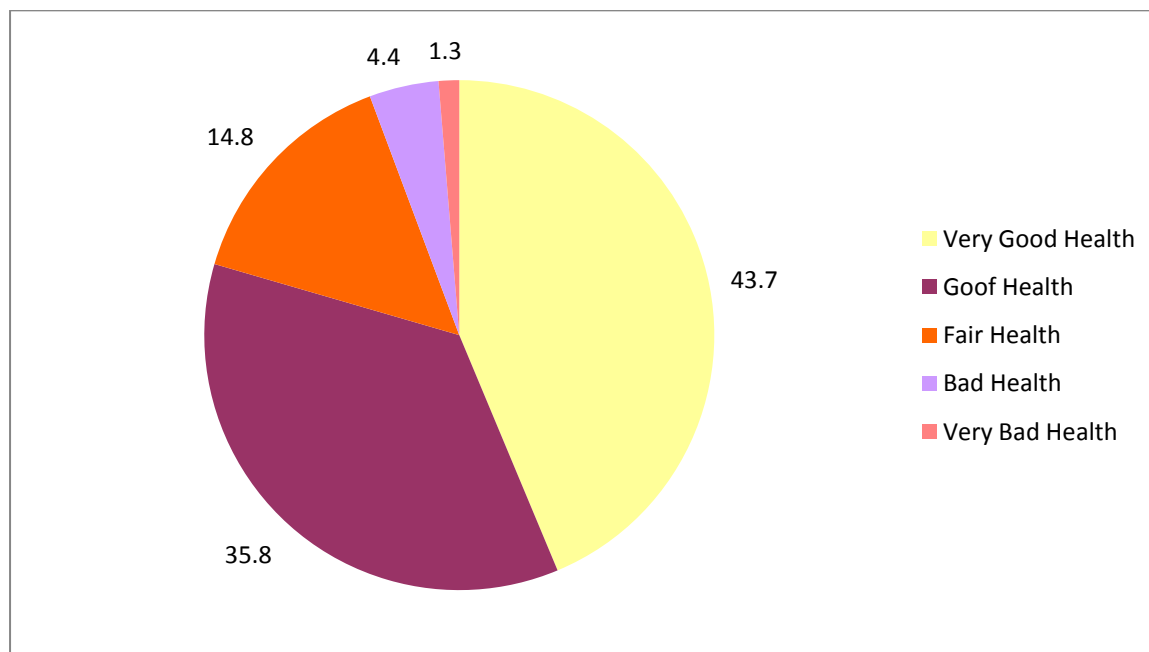
²³ Agricultural Land classification Post 1988
<http://webarchive.nationalarchives.gov.uk/20130402200910/http://archive.defra.gov.uk/foodfarm/landmanage/land-use/documents/alc-guidelines-1988.pdf>



Social characteristics

- 5.24. The Census Population estimations from 2015²⁴ states that the Plan Area has a significantly higher percentage of **residents over 65 years of age** (26.2%) when compared with the National Park area of the district (21.8%) and the national average (17.7%) but is only slightly higher than the East Sussex average (25%). There are wide variations across the Plan Area, for example wards with a particularly high percentage of residents over 65 (Seaford West – 39.0%) and wards with much lower percentages (Newhaven Valley – 15%). This is a significant issue for the Plan Area in terms of planning to meet the needs of an ageing population, with future projections stating that the percentage of residents over 65 is likely to increase.
- 5.25. As Chart 1 and Table 10 show, the **health**, as measured by an individual's own perception of their health, of the Plan Area is in line with county and national averages. There are however large variations across the district, with 8.8% of the residents of Peacehaven East being in bad or very bad health compared to the 2.9% of residents in the Plumpton ward being placed in this category. Table 11 shows that life expectancy in the district is slightly higher than in East Sussex County and nationally.

Chart 1 General Health in the Plan Area, 2011



²⁴ Office of National Statistics (ONS), Population estimates, 2001-2016 - SOAs

**Table 10 General Health in the Plan Area and per ward, 2011²⁵**

	Very Good Health	Good Health	Fair Health	Bad Health	Very Bad Health
percentage					
Plan Area	43.7	35.8	14.8	4.3	1.3
Barcombe and Hamsey	53.1	32.5	10.6	2.7	1.1
Chailey and Wivelsfield	51.7	34.3	10.6	2.4	1
Ditchling and Westmeston	49.5	31.7	14.2	3.6	1.1
East Saltdean and Telscombe Cliffs	45.1	35.2	14.3	4.3	1
Newhaven Denton and Meeching	42.2	37.3	14.8	4.4	1.3
Newhaven Valley	44.4	36.6	13.4	4.2	1.4
Newick	53.3	32.4	10.5	2.6	1.1
Ouse Valley and Ringmer	44.8	36.4	13.9	3.8	1.1
Peacehaven East	37.9	35.1	18.2	6.7	2.1
Peacehaven North	45.9	34.5	13.5	4.5	1.7
Peacehaven West	38.6	35.5	17.4	6.5	1.9
Plumpton	54.1	33.5	9.4	2.5	0.4
Seaford Central	39.8	37.2	16.6	4.9	1.5
Seaford East	38.2	39.2	17.2	4.1	1.3
Seaford North	42.7	36.4	14.9	4.7	1.3
Seaford South	41.1	36.7	16.8	4.2	1.2
Seaford West	37.5	37.4	18.2	5.6	1.2

Table 11 Life Expectancy²⁶

	Lewes District	East Sussex	National
Males	80.9	80.1	79.5
Females	85.3	84	83.1

5.26. The **Index of Multiple Deprivation (IMD)** measures levels of deprivation across a range of factors in the seven ‘domains’ of income, employment, health, education, housing, crime and living environment. Levels of deprivation are calculated using small geographic areas known as Super Output Areas (SOAs). The 2015 IMD²⁷ revealed that Lewes District as a whole is the 201st most deprived local authority. As there are a total of 326 local authority areas, Lewes District should therefore not be considered as a

²⁵ ONS, 2011 Census, Table KS301

²⁶ ONS, Life Expectancy at Birth Statistics, 2013-2015

²⁷ DCLG, ID 2015, Index of Multiple Deprivation - SOAs



deprived area. Nine SOAs in the Plan Area of Lewes rank in the top (least deprived) 20%, with one SOA in Newick being in the top three percent of least deprived areas nationwide. However, some of the SOA's in the Plan Area of the district are in the bottom 30% (most deprived), with an SOA in Newhaven being in the bottom 20%. This disparity between the level of deprivation in the coastal towns and the low weald is an issue which needs to be considered through the Site Allocations and Development Management Policies DPD.

5.27. **Crime** figures suggest that Lewes District can be considered a safe place to live. The 2015/16²⁸ statistics show that there were 43.4 crimes recorded per 1000 residents, which is far lower than the England and Wales Average (66.3 crimes per 1000 residents) and also lower than the East Sussex average (51.1 crimes per 1000 residents). No ward level data was available for this dataset, although as the data represents the crime rate per 1000 of the population, it can be assumed that the Plan Area would have a similar crime rate.

4.27 The **population** of the Plan Area has risen by an average of 4.7% between 2001 and 2011²⁹ and the total number of households in the Plan Area has risen by an average of 5.75%³⁰, to approximately 32,050. In certain wards, these changes have been particularly significant. The bar chart below shows the percentage change for a number of selected wards which have seen significant changes between 2001 and 2011.

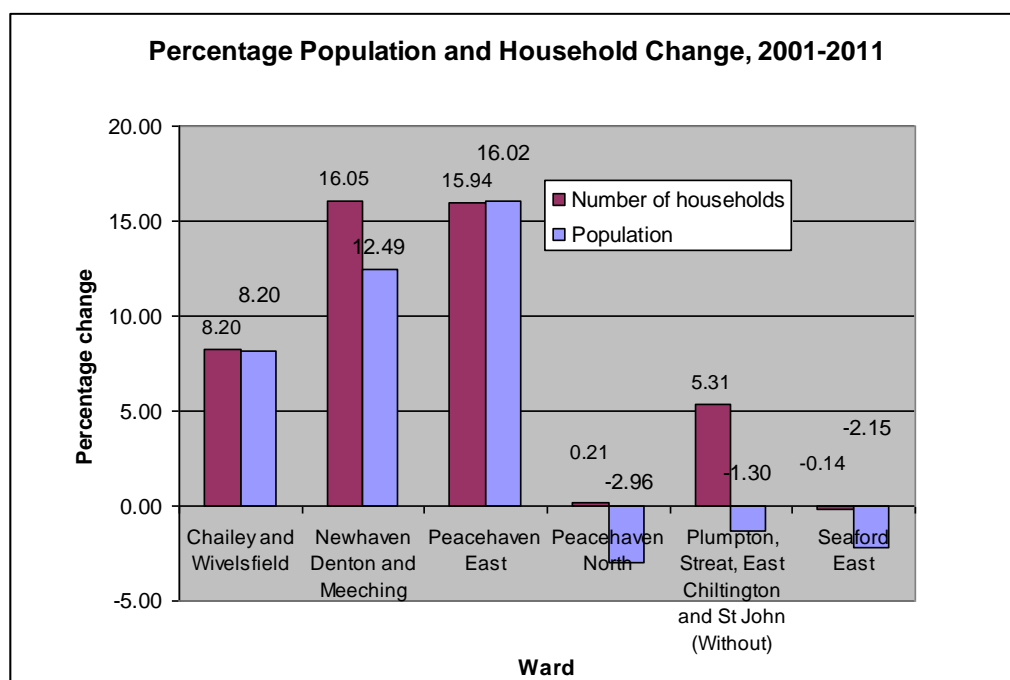
²⁸ Home Office recorded Crime Statistics, Recorded crime by key offences, 2003-2016 - districts

²⁹ ONS Census 2001 & 2011, Ref 793

³⁰ ONS Census 2001 & 2011, Ref 826



Chart 2 Percentage Population and Household Change, 2001-2011



5.28. As of August 2017, there are approximately 707 **households** on the waiting list for local authority housing in the Plan Area. The majority (47.5%) of those households require one bedroom accommodation. In addition, household sizes are steadily decreasing (from 2.29 people per household in 2001 to 2.27 in 2011³¹), suggesting that there is a demand for smaller homes such as one and two bedroom properties. In addition, there are 66 homeless households in temporary accommodation³² across the whole district.

5.29. Lewes District is not considered an affordable district to buy a house when compared with county or national figures. Even during the recession **house prices** are continuing to rise, as does its relationship with earnings. Due to the data available it has not been possible to calculate an affordability ratio for just the plan area. This is a notable limitation because it is thought that the ratio calculated for Lewes District is likely to be skewed due to the inclusion of Lewes town, which is known to be highly unaffordable.

Table 12 Affordability³³

	Lewes District	East Sussex	National
Median House Price (£) (2016)	290,000	250,000	220,000
Median Earnings (£)	29,457	27,305	28,503
House Prices to Earnings Ratio	9:84	9:16	7:72

³¹ ONS, Census 2011

³² DCLG, Housing Live Table 784

³³ ONS 2016 Median and lower quartile affordability ratios, 2002-2016 - districts (23/10/17)



- 5.30. It is evident, through a combination of high house prices, a rising population, households, as well as a rising number of households on the Housing Needs register, that there is a strain on the housing supply in the Plan Area.
- 5.31. 72.6%³⁴ of homes in the district are **owner occupied**, which is almost 10% higher than the national average and 3% higher than the East Sussex average. In 2015 there were 1058 vacant dwellings in the district³⁵. 2.3%³⁶ of the housing within the district has been deemed to be unfit to live in, which compares favourably with the national (4.4%) and East Sussex (4.7%) averages. 79.8%³⁷ of households within the district own at least 1 car, which is higher than the national average (74.3%) and the East Sussex average (78.2%).
- 5.32. **Educational attainment** of the Plan Area's students is slightly higher than the East Sussex Average. 2010/11 statistics³⁸ show that 62.5% of students achieved 5 or more A*-C passes at GCSE level (including Maths and English). This is above the East Sussex average of 58.5%. There is a great deal of variation evident across the wards (even within individual towns), with 84% of student residents in Seaford West ward having achieved 5 or more A* - C passes compared to 45.9% of students resident in Seaford East gaining such results.
- 5.33. The figures³⁹ below identify that the working age population of the district is well qualified with a relatively high percentage having achieved a degree, albeit a higher than average amount have no qualifications.

Table 13 Qualifications

Percentage	Lewes District	East Sussex	National
Percentage with degrees	37.3	31.3	32.9
Percentage with no qualifications	11.6	10.5	10.6

- 5.34. There are two key east to west **road routes** within the district. Although it does not run through the Plan Area of the district, the A27 is the primary route connecting Brighton to Eastbourne and so is of significance in linking the sub-region as a whole, including the Plan Area of the district. The A259 connects the coastal towns of Telscombe, Peacehaven, Newhaven and

³⁴ ONS, 2011 Census, Table KS402EW

³⁵ DCLG Vacant dwellings, 2004-2015 - districts

³⁶ DCLG, 2006

³⁷ ONS, Census 2011, Table KS404 EW

³⁸ Children's Services Department, East Sussex County Council (ESCC), June 2012

³⁹ Nomis/ONS, Annual Population Survey, August 2011



Seaford to both Brighton and Eastbourne. The district also has two main north to south routes. The A26 runs from Newhaven, through the eastern side of the town of Lewes and north towards Uckfield. The A275 runs north from Lewes town towards Chailey and beyond and the A272 provides a link from Newick and North Chailey and into Haywards Heath and Uckfield.

- 5.35. Whilst the district benefits from major road routes, congestion is a feature particularly during peak times on the A259. Along this route, there are particular congestion problems around the Newhaven Ring Road, which will be affecting air quality. In addition the A27, which carries an average daily traffic flow of 57,000 vehicles through the district, is expected to exceed available road capacity by 2026⁴⁰. Traffic congestion is an issue within the Plan Area's towns.
- 5.36. The Plan Area is well served by **rail**. Stations at Seaford, Newhaven Harbour and Newhaven Town have regular services to Lewes, Brighton and further beyond to coastal towns to the west and the Gatwick area and London to the north. There are direct services in the weekday to London Victoria and Eastbourne from Cooksbridge and Plumpton, although these services are only run once an hour after peak hours. The provision of reasonable road and rail links partly explains the high rate of out-commuting to jobs outside of the district.
- 5.37. The towns within the Plan Area generally have regular **bus** services both within the Plan Area and to neighbouring towns and cities such as Lewes, Brighton, Burgess Hill, Eastbourne, Haywards Heath, Hastings and Uckfield. The population of Peacehaven and Telscombe are wholly reliant on bus services if they are to use public transport as they are not served by rail.
- 5.38. While the urban areas do have good public transport links, the rural settlements within the Plan Area are known to have varying levels of provision. Thus, the population depends heavily on private vehicles. This is of particular concern to those settlements without basic services and facilities, such as shops, schools, health centres, etc. A **Rural Settlements Study** (RuSS) has been undertaken which, among other things, has identified settlements within the district that suffer from poor accessibility to services and have infrequent public transport services, for example Plumpton Green and Barcombe Cross which both fall within the Plan Area. The RuSS is part of the evidence base used to inform the Joint Core Strategy and other development plan documents, such as the Local Plan Part 2.

⁴⁰ Highways Agency, Regional Network Report, 2008

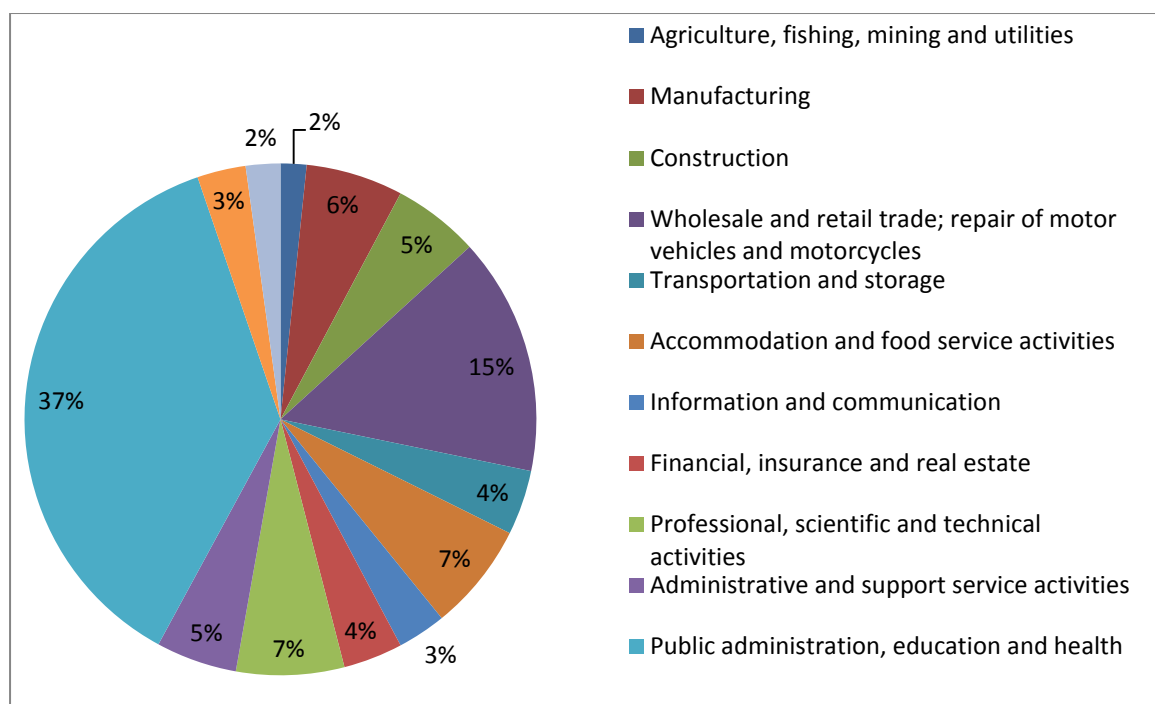


5.39. In addition to the above, the Plan Area benefits from a significant amount of **Rights of Way**. Within the Plan Area there is a total 169 miles of Rights of Way, of which 141 miles are footpaths, 27 miles are bridleways, and there is 1 mile of byways.

Economic characteristics

5.40. Of the 4,360⁴¹ **business enterprises** located within Lewes District (as of 2015), 90% of which employ less than 10 people. The chart below⁴² indicates that a sizeable proportion of the district's workforce can be found in predominantly public sector industries. The manufacturing sector is receding across the district, particularly in Newhaven which traditionally has had a strong manufacturing employment base, although now this is currently lower than the national average of 8%.

Chart 3 Industry of employment in Lewes District, 2015



5.41. Due to relatively high household incomes and a fairly low unemployment and Job Seekers Allowance (JSA) claimant rate, the Plan Area can be seen as prosperous. This is shown in the table below. However, this does not present the full picture as it is thought that there are still areas within the Plan Area that have significantly higher unemployment rates and lower levels of

⁴¹ ONS/Inter Departmental Business Register (IDBR) enterprises by size of business, 2004-2017 - districts

⁴² ONS, Industry of Employment (2015-2016)- districts



household income. Although data have not been published since the last census, in 2011 4.5% of all economically active people were unemployed in Newhaven against 1.8% in Plumpton⁴³.

Table 14 Household Income, Unemployment Rate and JSA Claimants

	Lewes District	East Sussex	National
Mean Household Income 2016 ⁴⁴	£26,032	£26,167	£28,788
Unemployment estimate (percentage of all economically active people who are unemployed) Jul 2016-Jun 2017 ⁴⁵	3.5	4.9	4.6
JSA Claimants rate (percentage of the working age population) Jun 2016 ⁴⁶	0.7	1	1.3

- 5.42. It must also be pointed out that the JSA claimant rate attributed to the towns of Newhaven, Peacehaven and Seaford is over 60% of all claimants. And so being the principle towns of the Plan Area, this is an issue that this SA Report needs to draw attention to.
- 5.43. Lewes District is a net exporter of labour, with more residents travelling out of the district to work elsewhere than workers commuting into the district. In 2001⁴⁷, 17,400 residents (57% of the working population) commuted out of the district, predominantly to Brighton & Hove, Crawley/Gatwick and London. Whereas, 12,200 (43%) commuted into the district, primarily from Brighton, Wealden and Mid-Sussex.
- 5.44. An **Employment and Economic Land Assessment (EELA)** was undertaken in 2010 and updated in 2012 to assess the provision of employment land in Lewes District. The majority of employment space within the district is Industrial space and this is primarily located in the coastal towns (mainly Newhaven), whereas most of the office space is located within the National Park (in Lewes Town). It identified that there was no quantitative need for new floorspace within the Plan Area (and the district as a whole), although provision of small scale, flexible business units remains appropriate in the coastal towns. However, the EELA also suggested that there was a qualitative shortfall of industrial and office space across the district, although the document found that this would be best served by small sites in or near Lewes Town, within the National Park to meet the shortfall.

⁴³ ESIF, Unemployment in 2011 – parishes, ONS

⁴⁴ ESID, Annual Survey of Hours and Earnings (ASHE), ONS, 2016

⁴⁵ ESIF, Model-based estimates of unemployment, Nomis/ONS

⁴⁶ ESIF, ONS/NOMIS

⁴⁷ ONS, 2001



- 5.45. Surveys of the district's town centres were undertaken in both 2009 and 2010. In that time the vacancy rate in retail units dropped at Seaford Town Centre and Peacehaven/Telscombe. The vacancy rate remained unchanged at the Meridian Centre at Peacehaven. The amount of vacant retail units in Newhaven increased however, suggesting that the town's local economy is not performing well. In addition, some of Newhaven's factories and industrial units are no longer in operation, a number that has been added to by the closure of the Parker Pen factory in 2010. The **Lewes District Shopping and Town Centre Study** was published in 2012 and found that there was no shortage of retail space (although a lack of quality retail space) in the south coast towns and thus there is unlikely to be a need to allocate land for retail uses. However, it also recommended that planning policies for Newhaven Town Centre and the South Coast Road in Peacehaven should be made less stringent to allow for non-retail uses. This matter will be considered through the relevant neighbourhood plans.
- 5.46. **Tourism** is of high importance to the district's economy, employing almost 3,500 people. In 2014⁴⁸, tourism generated £178,334,000 worth of income for local businesses in the entire district. Tourism is expected to increase within parts of the district, due to the creation of the South Downs National Park (SDNP), which is likely to provide additional income for the sector.

Predicted future without the Local Plan Part 2

- 5.47. The [SA for Part 1 of the Local Plan](#) set out the predicted future without the Joint Core Strategy. This used projections, estimates and trend-based information to set out the expected state of the district without an adopted Core Strategy. The purpose of the Local Plan Part 2 is to allocate the sites and outline the development management policies needed to support the implementation of the Joint Core Strategy and achieve its spatial vision (within the Plan Area). The Local Plan Part 1 sets out the minimum growth requirement that will need to be achieved by 2030. On this basis it is considered that the predicted future without the Local Plan Part 2 would be different from the predicted future without the Local Plan Part 1⁴⁹.
- 5.48. The Local Plan Part 2 does have a particular role as mentioned above and so future predictions without this specific DPD need to be considered in line with what this document is looking to achieve. Firstly, it must be pointed out that sites are allocated within the Proposed Submission DPD taking into account the views of stakeholders (public consultation) and background

⁴⁸ Tourism South East, 2014

⁴⁹ paragraph 5.38 the Local Plan Part 1 SA



documents. They have been assessed as part of the SA process; have mitigation measures proposed and have been and continue to be scrutinized by statutory consultees as well as other stakeholders. Furthermore, the impacts of developing these sites will be monitored. If sites were not allocated in this way, less suitable sites could be put forward through the planning application process, leading to potentially less sustainable development within the Plan Area.

- 5.49. Without the Site Allocations and Development Management Policies DPD, the cumulative impacts of development sites on their settlements would not be assessed. The Local Plan Part 2 proposes the most appropriate levels and locations of development in and around individual settlements and through the application of SA takes into account the cumulative impact of these sites as a whole. Whereas without the DPD, development would come forward on an ad hoc basis, based upon minimum requirements set out in Spatial Policy 2 (SP2) of the Local Plan Part 1 and more detailed environmental constraints and the level of service and infrastructure provision, for example, would not be taken into account. The Local Plan Part 2 will play a key role in ensuring development is of an appropriate scale and nature, as well as ensuring all issues are considered at the earliest possible stage by reviewing the planning boundaries and including the relevant mitigation measures within the policy wording to avoid adverse impact on the sustainability objectives.
- 5.50. The Local Plan Part 2 also provides the detailed development management policies which provide the necessary direction to ensure new development in the Plan Area is of an appropriate nature and in line with local priorities. Without this detailed policy guidance, development would be determined in line with the saved policies of the 2003 LDLP and higher-level policies (for example the NPPF), therefore development could come forward that is not entirely in keeping with the up to date policy position in relation to the distinct characters of the Plan Area's settlements.



6. Plans, Programmes and Policies

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art.5 Annex 1) “an outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans or programmes.”

- 6.1. In order to establish a clear scope for the SA it is necessary to review and develop an understanding of the plans, programmes and policies (PPPs) that are of relevance to the Site Allocations and Development Management Policies DPD.
- 6.2. The Local Plan Part 2 will be influenced by numerous PPPs, including national planning policy and guidance, strategies and guidance produced locally and the strategic plan for the district, which is the Joint Core Strategy. In addition, the content of the PPPs has also been used to inform some of the key sustainability issues facing the Plan Area and in turn, the sustainability objectives of this SA Report.
- 6.3. The higher tier SA for Part 1 of the Local Plan – the Joint Core Strategy – set out a detailed section on the PPPs that influenced the preparation of the development document. Most of these PPPs are also relevant to the Local Plan Part 2, and considering the higher level SA was published in January 2013, it was not considered necessary to repeat this section. Instead, only the relevant PPPs that have been recently updated, published or were not included in the Joint Core Strategy SA will be highlighted in the table found in Appendix B of this document. Some of the key recent changes are outlined below.
- 6.4. In March 2013 the South East Plan was (SEP) formally revoked. The Plan influenced the production of the Joint Core Strategy (particularly during the early stages of plan preparation), and as a result had some indirect influence on the Local Plan Part 2, however it is no longer a statutory planning document. At the regional level, South East Water has published their Draft Water Resources Management Plan for consultation which helps to inform issues such as infrastructure provision. Also, the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan was adopted in February 2013. The vision, objectives and policies of the Plan fed into the Local Plan Part 2.
- 6.5. At the local level, a number of Neighbourhood Areas have been designated within the plan area. The Town and Parish Councils which have decided to undertake a Neighbourhood Plan have the option of allocating sites to meet



their housing target and identify employment floorspace. Therefore the Local Plan Part 2 was influenced by emerging and adopted Neighbourhood Plans insofar as whether the Local Plan Part 2 needed to look at site allocations in these areas.

- 6.6. The full list of PPPs that have influenced the production of both parts of the Local Plan can be found in [Appendix 1 of the SA for the Joint Core Strategy](#). The list of additional PPPs that have influenced the production of the Local Plan Part 2 can be found in [Appendix B](#).

Air Quality Management Area

- 6.7. Following the declaration of an Air Quality Management Area (AQMA) for the centre of Newhaven, an Air Quality Action Plan has been prepared to address the high concentrations of nitrogen dioxide which people are exposed to alongside the busy roads on the centre of Newhaven. Broad areas of action have been established to help deliver better air quality.

Habitat Regulations Assessment

- 6.8. In March 2017, a high court ruling against the Local Plan Part 1 concluded that the method that had been used in the HRA to rule out the potential for 'in-combination' air quality effects from the Local Plan Part 1 on Ashdown Forest SAC was legally flawed, whether or not it complied with Natural England's advice. This is because it relied on examining traffic flows arising from the Local Plan Part 1 in isolation and took no account of the potential accumulation of growth from multiple authorities all affecting flows through the SAC and the role of the Local Plan Part 1 in any cumulative effect. In other words the HRA used a short hand assessment method, agreed with Natural England, to conclude the contribution was too small to make any meaningful contribution to 'in combination' effects. This was as opposed to demonstrating the same conclusion through quantifying the effect in terms of changes in air quality⁵⁰.
- 6.9. Subsequently work was commissioned to model the traffic flows through the Forest that would arise from the quantum and spatial distribution of growth in the Local Plan Part 1 in addition to the cumulative growth in traffic expected

⁵⁰ For the avoidance of doubt the Local Plan Part 1 HRA is considered to be legally compliant in its assessment of air quality impacts on the Lewes Downs SAC, which did quantify the in-combination effects.



from other local authorities around Ashdown Forest and further afield⁵¹. The assessment considers traffic growth on a series of road links within 200m of the Ashdown Forest SAC by 2033 irrespective of origin and so the air quality calculations are therefore inherently 'in combination'.

- 6.10. The [HRA Addendum 2017](#) concludes that no adverse effect upon the integrity of Ashdown Forest SAC is expected to result from the development provided by Local Plan Part 1, even in combination with other plans and projects. This is due to a combination of a) an expected net improvement in air quality over the Local Plan period and b) the fact that, whether or not that improvement occurs to the extent forecast, the contribution of the Local Plan Part 1 to changes in roadside air quality is demonstrably ecologically negligible due to the very small magnitude. In the words of Mr. Justice Jay in his judgement regarding the Local Plan Part 1 Judicial Review, when discussing when a '*de minimis*' conclusion would be appropriate: "...if it is known that specific impacts are very low indeed, or are likely to be such, these can properly be ignored...". This therefore supports the original conclusion of the HRA of the Local Plan Part 1.
- 6.11. Following consultation on the Draft Plan between November 2017 and January 2018, the Council undertook a review of the HRA Addendum 2017. This was undertaken to address the comments received from Wealden District Council regarding technical aspects of the methodology used within the HRA. The outcome resulted in a [2018 HRA Addendum](#), which supersedes the 2017 Addendum and undertakes further sensitivity testing that verifies the conclusions. Appendix E to the 2018 HRA provides a robust response to the comments made by Wealden and justifies why their representation does not undermine the conclusions of the HRA, which uses best and nationally agreed, established scientific methods to assess the Plan's air quality impacts. The conclusion of the HRA 2018, which is endorsed by Natural England, is that of no adverse effect on integrity of Ashdown Forest or Lewes Downs SAC. An HRA for Local Plan Part 2 was undertaken at Draft Plan stage and received endorsement from Natural England on the conclusions of no Likely Significant Effect. The HRA for the Pre-Submission Local Plan Part 2 and Neighbourhood Plans has been updated and the conclusions remain the same.
- 6.12. Further to the Examination in Public, the LPP2 was modified to ensure consistency with the HRA. Natural England highlighted the inconsistency at the Pre-Submission Regulation 19 consultation stage and the Council

⁵¹ In order to adopt a precautionary approach, inflated growth allowances reflecting the Objectively Assessed Needs in Tunbridge Wells, Sevenoaks, Wealden, Mid Sussex and Tandridge have been used in the traffic model



proposed a minor modification, which the Inspector elevated to main modification.

6.13. Natural England Identified in their representation:

“We advise that the Habitats Regulations Section presented in the Pre-Submission document does not concur with the findings accompanying Habitat Regulations Assessment for the Local Plan Part2. Although Natural England agrees with the findings of the attached HRA, following the recent People Over Wind European Judgement, aspects of the HRA and its interpretation within the core document need to be amended.”

6.14. This is a procedural amendment to ensure that the mitigation measures for the recreation impacts on the Ashdown Forest, identified at Local Plan Part 1 stage are considered at the Appropriate Assessment stage rather than the screening stage of the HRA and so the consequent correct terminology when presenting this information is a conclusion of no adverse effect on integrity rather than no likely significant effect.



7. Sustainability Issues affecting Lewes District

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art. 5 and Annex 1) "...any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)..."

- 7.1. Identifying the key sustainability issues facing the Plan Area is an important part of the SA process as it helps in preparing the sustainability framework which is used to test the options considered through Local Plan Part 2 and to see whether policies will bring about sustainable development.
- 7.2. The key sustainability issues have been identified by the information gathered from both the collection and analysis of the baseline information ([section 5](#)) and the content of the PPPs that impact on development within the Plan Area ([section 6](#) and [Appendix B](#)).
- 7.3. The key sustainability issues are summarised as follows:
 - There is pressure to supply additional housing within the Plan Area, particularly in the affordable housing sector, as well as reducing the affordability gap (difference between earning and average house prices). There is also a need to provide housing suitable for smaller households and an ageing population.
 - There is a need to protect and enhance the most important landscapes, areas of biodiversity and other protected areas. Of particular importance are the significant areas of Ancient Woodland which the Plan Area is home to.
 - The recent designation of the SDNP, 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 fully realised within the area surrounding the National Park.
 - It is important to ensure that the Historic Buildings and features of the Plan Area are conserved and enhanced.
 - 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 is fully operational. 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.



- There is a pressure to locate new development on previously developed land (PDL), thus avoiding the unnecessary loss of greenfield land, which is often locally sensitive to change, and valuable agricultural land.
- Flooding presents a clear risk to many parts of the Plan Area, including significant areas of many of the larger settlements, for example Newhaven. Along the coast there are also areas that are at a significant risk from coastal erosion.
- There is a need to improve the water quality of the rivers in the Plan Area, which is currently far below the national average.
- There is a need to improve air quality within the Plan Area, in particular in and around the Newhaven AQMA (and also to a lesser extent on other parts of the A259 between Seaford and Brighton).
- There are clear disparities between the most deprived and more prosperous parts of the Plan Area in terms of issues such as job unemployment and health. Accessibility to, as well as retaining and improving, important services and facilities is also a significant issue, particularly in some rural areas.
- The provision of open space varies across the Plan Area, with identified deficiencies in the provision of cricket pitches and children's play space in certain settlements.
- The ageing population of the Plan Area, 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.
- Industry and business are suffering in parts of the Plan Area, partly as a result of the recession, causing damage to local economies. This is particularly evident in areas along the coastal strip. Accessibility to jobs will be key in reducing the high Job Seekers Allowance rate in certain parts of the Plan Area as well as tackling the high out-commuting rate.
- Car ownership is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26.



8. The Sustainability Framework: the Sustainability Objectives, Questions and Indicators

- 8.1. With the principal aim of the planning system to deliver sustainable development, the SA must assess the ability of the Site Allocations and Development Management Policies DPD to contribute to sustainable development.
- 8.2. The objectives, questions and indicators are collectively known as the sustainability framework (see Table 15 below) and are used to test the options considered and the policies set out in the Local Plan Part 2. The framework is largely based on the one that was incorporated into the SA for the Local Plan Part 1. Comments received during consultation exercises on the aforementioned SA have therefore fed into this process. Comments will now be sought on this document, and so any representations on the objectives and indicators of the framework will be considered in forthcoming versions of the SA. It must also be mentioned that some of the indicators in the table below are not specific to the Plan Area; rather the data available is for the district as a whole. More information on the difficulties in collecting data / limitations can be found in [section 5](#) of this report.
- 8.3. As mentioned in earlier sections of this report, the SEA aims to assess the environmental effects of the Plan, with the SA expanding on this to incorporate social and economic impacts. As such, the sustainability objectives have been placed into one of the three categories; although many of the objectives cover more than one category (e.g. objective 6 has an economic function as well as a social function). Where an objective relates to an SEA Directive topic, this has been indicated.
- 8.4. The objectives in the tables which appraise options ([section 9](#)) and policies ([section 10](#)) have had to be shortened in name to save space. The shortened names of the objectives are shown in brackets in the table below.



Table 15 The Sustainability Framework

OBJECTIVES	QUESTIONS TO CONSIDER	INDICATORS	SEA FACTORS
SOCIAL			
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home. (Housing)	Does the approach add to the housing stock? Does the approach help meet affordable housing needs? Does the approach meet the needs of all members of the community? Does the approach lead to more sustainably constructed homes?	<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 	Population
2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the Plan Area. (Deprivation)	Does this approach benefit the most deprived areas of the district? Does the approach support social inclusion?	<ul style="list-style-type: none"> • Rank and change in rank of Lewes District in the Index of Multiple Deprivation • Number and location of SOAs in the Plan Area considered to be in the most deprived 30% in the country 	Population
3. To increase travel choice and accessibility to all services and facilities. (Travel)	Does this approach encourage sustainable modes of transport? Will this approach have an impact on out-commuting? Will the approach increase congestion?	<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 • Mode of travel to work • Levels of out-commuting • Percentage of the district connected to the internet 	Population Material Assets
4. To create and sustain vibrant, safe and distinctive communities.	Will the approach impact on the happiness of the community? Does the approach impact on	<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 	Population Material Assets Human Health



OBJECTIVES	QUESTIONS TO CONSIDER	INDICATORS	SEA FACTORS
(Communities)	community safety? Does the approach create additional community facilities?	facilities • Change in the amount of public open space • Crime rate per 1000 of the population	
5. To improve the health of the Plan Areas population. (Health)	Will the approach benefit the health of the population? Does the approach reflect the needs of the elderly and disabled population?	• Life expectancy at birth • Percentage of population not in good health • Percentage of the population over 65	Human Health Population
6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services. (Education)	Will the approach increase attainment at schools? Will the approach increase the skill levels of the district? Will the approach improve access to educational services?	• 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	Population Material Assets
Environmental			
7. To improve efficiency in land use through the re-use of PDL and existing buildings and minimising the loss of valuable greenfield land. (Land efficiency)	Does the approach bring vacant units back into use? Does the approach promote the best use of brownfield land? Will the approach protect quality agricultural land?	• Percentage of new homes built on PDL • Number of empty homes • Density of new dwellings • Amount of grade 1, 2 and 3 agricultural land lost to new development ⁵²	Soil Landscape Material Assets
8. To conserve and enhance the biodiversity	Will the approach affect nationally important wildlife and geological	• Condition and size of SSSIs • Number and extent of LWSs and LNRs	Fauna Flora

⁵² 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 LPP2 using this indicator.



OBJECTIVES	QUESTIONS TO CONSIDER	INDICATORS	SEA FACTORS
of the Plan Area. (Biodiversity)	sites? Does the approach seek to protect LNRs and LWSs? Does the approach protect areas of ancient woodland?	<ul style="list-style-type: none"> • Area of ancient woodland 	Biodiversity
9. To protect, enhance and make accessible the Plan Area's countryside and historic environment. (Environment)	Does the approach have an impact on listed buildings? Does the approach allow access to the countryside? Will the approach impact on the valued landscape?	<ul style="list-style-type: none"> • Number of listed buildings on the buildings at risk register • Amounts of Rights of Way • Low/negligible sites in Plan Area as identified in the Landscape Capacity Study 	Landscape Cultural Heritage Archaeological Heritage
10. To reduce waste generation and disposal, and achieve the sustainable management of waste. (Waste)	Will the approach reduce the generation of waste? Will the approach increase recycling rates?	<ul style="list-style-type: none"> • Domestic waste produced per head of population • Percentage of waste that is recycled or reused 	Material Assets Human Health
11. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management. (Water)	Does the approach encourage the reduction in water consumption? Will the approach have a positive impact on water quality?	<ul style="list-style-type: none"> • Biological, ecological and physico-chemical quality of water • Bathing water quality • Water consumption per capita 	Water
12. To reduce the emissions of greenhouse gases, to reduce energy consumption and increase the proportion	Will the approach reduce carbon dioxide emissions? Does the approach reduce energy consumption? Will the approach increase the proportion of energy from renewable	<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 	Air Climatic Factors Material Assets



OBJECTIVES	QUESTIONS TO CONSIDER	INDICATORS	SEA FACTORS
of energy generated from renewable sources. (Energy)	sources?	<ul style="list-style-type: none"> • Carbon dioxide emissions per sector 	
13. To improve the Plan Area's air quality. (Air quality)	<p>Does the approach increase air pollution?</p> <p>Will the approach lead to any additional AQMA designations?</p> <p>Will the approach lead to negative impact on the existing AQMA?</p>	<ul style="list-style-type: none"> • Number of Air Quality Management Areas • Air Quality Action Plan Indicators? 	Air Human Health
14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. (Flooding)	<p>Will the approach impact on flooding?</p> <p>Does the approach reduce the risk of flooding?</p>	<ul style="list-style-type: none"> • Number of residential properties at risk of flooding • 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 Plan Area's coverage • Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial) 	Human Health Water Climatic Factors Material Assets
15. To ensure that the Plan Area is prepared for the impacts of coastal erosion and tidal flooding. (Coastal Erosion)	<p>Will the approach have an impact on or be impacted by coastal erosion?</p> <p>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) 	Water Climatic Factors Human Health Material Assets
Economic			
16. To promote the economic growth of the	Will the amount of employment land increase?	<ul style="list-style-type: none"> • New business registration rate • Floorspace developed by employment 	Population



OBJECTIVES	QUESTIONS TO CONSIDER	INDICATORS	SEA FACTORS
Plan Area by encouraging vitality and regenerating and strengthening the economies of the coastal towns. (Economy)	<p>Will this approach create jobs?</p> <p>Will the policies / allocations help bring about the regeneration of the coastal towns?</p> <p>Will this approach reduce the high unemployment rates in the coastal towns?</p> <p>Will the approach reduce retail vacancy rates?</p>	<p>type by PDL in coastal towns</p> <ul style="list-style-type: none"> • Losses of employment land in employment regeneration areas • Retail unit vacancy rates in town centres • Number of vacant sites brought back into use in coastal towns • Amount of completed retail, office and leisure floorspace (net) 	
17. To support and expand the rural economy. (Economy)	Does the approach support the rural economy?	<ul style="list-style-type: none"> • Commercial permissions in rural areas. 	Population
18. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)	<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 	Population



9. Appraising the Policy Options

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art.5 Annex 1) “an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”

- 9.1. An important part of the SA process is the appraisal of the policy options. This is to identify the sustainability implications for the choices available for each policy area and help with the identification of the preferred approach to be taken forward.

Housing Site Allocation Options

- 9.2. This section sums up the SA results of the Housing Site Allocation options. Detailed appraisal results are contained in [appendix E](#).
- 9.3. The Housing Site Allocation options were first identified in the [Topic Papers](#) which derived from:
- the Strategic Housing Land Availability Assessment (SHLAA)⁵³ 2013,
 - sites suggested through the Local Plan Part 1 public consultation stages;
 - Call for sites (carried by the Council or as part of the preparation of a neighbourhood development plan)
- 9.4. Housing sites identified through the annual [Strategic Housing and Economic Land Availability Assessment](#) (SHELAA)⁵⁴ process since publicising the Topic Papers were also considered. All sites have been appraised against the sustainability framework to highlight impacts of the potential policies.
- 9.5. The tables below show how the options were appraised.

⁵³ The SHLAA provided information about potential future sources of land for housing.

⁵⁴ The SHELAA is similar to a SHLAA but also includes consideration of employment land.



Table 16 Site Allocation Options Appraisal Key

Symbol	Meaning	Symbol	Meaning
++	Likely significant positive effect	S	Short term impact (approximately 2013 – 2018)
+	Likely positive effect	M	Medium term impact (approximately 2018 – 2024)
0	No likely effect	L	Long term impact (approximately 2025 – 2030)
?	Uncertain effect		
-	Likely negative effect		
--	Likely significant negative effect		

Table 17 Method for assessing Site Allocation Options

Table X Settlement – Option X

Objectives	S	M	L	Explanation
Objective 1	-	+?	++	In this example, the approach would have a likely negative effect on objective 1 on the short-term, a possible positive effect on the objective in the medium term and would likely have a significant positive effect by the end of the plan period.

- 9.6. Although the housing requirement is expressed as an overall figure for the Lewes district in Spatial Policy 1 of the Joint Core Strategy, Spatial Policy 2 sets out the distribution of the planned level of housing growth across the settlements. Therefore this section considers the housing site options by settlement.
- 9.7. The below settlements are within a designated neighbourhood area for which a neighbourhood plan has identified, or intends to allocate housing sites that fulfil the housing requirement of Local Plan Part 1. Therefore housing site options have not been appraised for these settlements within this SA report but are, or will be, considered through the neighbourhood planning process.
- Seaford
 - Newhaven
 - Peacehaven and Telscombe
 - Ringmer and Broyle Side
 - Newick
 - Plumpton Green
 - Wivelsfield Green
- 9.8. This approach does not apply to unimplemented 2003 LDLP housing site allocations listed below. This is because they have not been, or will not be, considered through neighbourhood plans.



- Policy NH4: South of Valley Road, Newhaven
- Policy NH6: Land at the Marina, Newhaven
- Policy RG1: Caburn Field, Ringmer

- 9.9. All the housing sites identified have been subject to the same initial filters as used in the early assessment stages of the SHLAA/SHELAA⁵⁵. The filters ensure that sites which are fundamentally unsuitable for further consideration or allocation are removed. Sites subject to planning permission have also been filtered.
- 9.10. It should be noted that sites that fall below the threshold of six units (small sites) will be considered on their own merit through planning applications.
- 9.11. A list of filtered housing site options can be viewed in [appendix D](#).

Barcombe Cross

- 9.12. The Local Plan Part 1 identifies a minimum housing requirement of 30 net additional units for Barcombe Cross over the plan period. Four sites in Barcombe Cross were identified as suitable in the 2017 SHELAA and have been assessed against the sustainability framework (Table 15).
- 9.13. Further to the consultation on the 2017 Draft Local Plan Part 2, the site promoter for option A confirmed their intention to develop the site for 10 units and incorporate public amenity land to enable provision of future recreational facilities. The assessment of the option was therefore updated to reflect this.

Table 18 Housing Site Options for Barcombe Cross

Option	Site Reference	Site Name	Site Yield
A	BA/A01	Hillside Nurseries	10
B	BA/A02	Land Adjacent to High Street	25
C	BA/A03	Land North of High Street	10
D	BA/A04	Land at Bridgelands	7

- 9.14. Table 19 provides a summary of the housing site options appraisal. All the sites considered are greenfield and so scored negatively against the land efficiency objective. Although the effects are uncertain, the sites scored neutrally against the travel objective as the sites are likely to be car-dependant and due to their location it is not thought that development of the sites will promote the use of sustainable modes of transport. Site B and C are surrounded by a conservation area, listed buildings and particularly prominent from the south west entrance to the village and so appraised

⁵⁵ i.e. whether the site is within and international or national biodiversity designation, unrelated to an existing settlement (more than 500 metres from a planning boundary), and less than 6 net units.



negatively against the environment objective. Option A and B score positively against the housing objective and would provide some affordable housing. Although option D could make a small contribution to the housing stock, it is not considered to be a significant enough contribution for it to have an impact upon this indicator. There are uncertainties on the deliverability of options C and D due to unresolved access issues.

Table 19 Summary of Housing Site Options Appraisal for Barcombe Cross

Options	Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
A	+	0	0?	+	0	0	-	0	0?	0	0	0	0	0	0	0	0	0	0
B	+	0	0?	0?	0	0	-	0?	-	0	0	0	0	0	0	0	0?	0	0
C	0?	0	0?	0?	0	0	-	0?	-?	0	0	0	0	0	0	0	0	0	0
D	0?	0	0?	0?	0	0	-	0?	0?	0	0	0	0	0	0	0	0	0	0

9.15. To ensure that Local Plan Part 2 conforms to the requirements set in the Local Plan Part 1, multiple sites will need to be allocated in Barcombe Cross. The settlement has a sensitive built environment and Sites A, B and C (albeit this site is incorporated within Site B) are likely to impact on the conservation area and listed buildings within the vicinity. Development would therefore need to be designed appropriately to avoid a detrimental impact on these designations.

Alternatives selected for Barcombe Cross: Options A, B and D

9.16. Option A, B and D are taken forward to the next stage with the caveat that the policy wording should recognise the high sensitivity of the conservation area. It should be noted that option B and C overlap. Option C, the smaller site, was submitted to the SHELAA process first due to the potential effect on the conservation area. However it was considered that this issue could be overcome and therefore the larger site (option B) was also included in the SHELAA. Option B was selected to ensure that the housing requirement is met in Barcombe.

North Chailey

9.17. The Local Plan Part 1 identifies a minimum housing requirement of 30 net additional units for North Chailey over the plan period. Options have been identified as potential sites to meet this minimum requirement, all of which have been identified through the SHELAA process, with the exception of site E (CH/A07) which was identified through the Local Plan Part 2 – Call for sites 2013. The six sites were considered suitable in the 2017 SHELAA. The options were assessed against the sustainability framework (Table 15).



Table 20 Housing Site Options for North Chailey

Option	Site Reference	Site Name	Site Yield
A	CH/A02	Land South of Station Road, North Chailey	20
B	CH/A03	Land at Glendene Farm, Station Road, North Chailey	10
C	CH/A04	Land at Oxbottom Lane, Newick	20
D	CH/A06	Land South of Fairseat, Station Road, North Chailey	15
E	CH/A07	Land at Oxbottom Lane and Fairseat House	30
F	CH/A08	Land at Layden Hall	6

9.18. Table 21 provides a summary of the housing site options appraisal. All the options scored fairly similarly. All of the sites scored negatively against the land efficiency objective as they are greenfield and against the travel objective. This is because the sites are likely to be car-dependant despite the regular bus service available within close proximity of the site. Due to their rural location it is not thought that development of the sites will promote the use of sustainable modes of transport. Sites A, B, C, D and E (combination of options C and D) scored positively against the housing objective as they would provide a substantial amount of housing against the settlement requirement if brought forward.

Table 21 Summary of Housing Site Options Appraisal for North Chailey

Options	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	+	0	-	-	0	0	-	0	0?	0	0	0	0	0	0	0	0?	0
B	+	0	-	0?	0	0	-	0?	0?	0	0	0	0	0?	0	0	0	0
C	+	0	-	-	0	0	-	0?	0?	0	0	0	0	0	0	0	0?	0
D	+	0	-	-	0	0	-	0?	0?	0	0	0	0	0	0	0	0?	0
E	+	0	-	-	0	0	-	0?	0?	0	0	0	0	0	0	0	0?	0
F	0?	0	-	0?	0	0	-	0?	0	0	0	0	0	0	0	0	0	0

9.19. Most of the sites are located in a green gap separating the village from neighbouring settlement of Newick (site A, C, D and E). If all of these sites were to be developed this would not only shift the focus of development away from the existing settlement of North Chailey, but also result in the loss of the green gap separating the two settlements which would have a negative impact on the communities objective.

Alternatives selected for North Chailey: Options B and F

9.20. Options B and F are the only sites adjacent the existing settlement boundary or within the built up area and are the most sustainable options in term of access to local services and community facilities. Although options A, C, D and E were assessed in this SA report to contribute to the housing requirement for North Chailey, these sites are not within or adjacent to the



settlement and therefore they are seen to be isolated from the settlement of North Chailey.

- 9.21. One of the housing site options initially considered, the Kings Head development, centrally located within North Chailey, has now been approved for 15 units and is under construction. Given the limited number of site options within or adjacent to the settlement of North Chailey, the Kings Head development will contribute towards the identified minimum 30 dwellings.

South Chailey

- 9.22. The Local Plan Part 1 identifies a minimum housing requirement of 10 net additional units for South Chailey over the plan period. Two options were identified suitable in the 2017 SHELAA and assessed against the sustainability framework (Table 15).

Table 22 Housing Site Options for South Chailey

Option	Site Reference	Site Name	Site Yield
G	CH/A01	Land Fronting Mill Lane, South Chailey	10
H	CH/A05	Chailey Brickworks	48

- 9.23. Table 23 provides a summary of the housing site options appraisal. Both sites scored negatively against the travel objective as there are likely to be car dependant due to their location and therefore it is not thought that development on these sites will promote the use of sustainable modes of transport. Site H scored positively against the housing indicator, due to the considerable number of units (48) that could be delivered. It also scored positively against the land efficiency indicator as it is a brownfield site. It did however score negatively against the rural economy indicator as development of the site would result in the loss of an allocated employment site. Site G scored positively against the housing objective and neutrally against the majority of objectives, although scored negatively against the land efficiency indicator as it is a greenfield site.

Table 23 Summary of Housing Site Options Appraisal for South Chailey

Options	Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
G	+	0	-	0?	0	0	-	0	0?	0	0	0	0	0	0	0	0	0	0
H	+?	0	-	0?	0?	0	+	0?	0	0	0	0	0	0	0	0	0	-?	0

Alternative selected for South Chailey: Option G

- 9.24. Option G is the only site available for South Chailey. The 2017 SHELAA found that option H is no longer available and will not come forward for residential development during the plan period.



Cooksbridge (Hamsey)

- 9.25. The Local Plan Part 1 identifies a minimum housing requirement of 30 net additional units for the settlement of Cooksbridge over the plan period. The 2017 SHELAA, along with previous assessments, identified a limited number of suitable sites to meet the planned level of housing growth for Cooksbridge. Of the three potential suitable sites identified within the SHELAA, one is within the SDNP, one is now designated a Local Green Space within the Hamsey Neighbourhood Plan and the remaining site, Chatfields Yard, has planning approval for 27 dwellings (LW/16/0935) and is currently under construction.
- 9.26. This means that there are no reasonable alternatives for housing site allocations at Cooksbridge. Therefore the approved Chatfields Yard development will contribute to the settlement's planned housing figure. The shortfall of three additional dwellings cannot be currently met at Cooksbridge. However it is likely that this shortfall will be balanced by other nearby settlements exceeding their planned housing figure.

Edge of Burgess Hill

- 9.27. The Local Plan Part 1 identifies a minimum housing requirement of 100 net additional units for the area on the edge of Burgess Hill over the plan period. The 2017 SHELAA, as well as previous assessments, identified a limited number of suitable sites to meet the planned level of housing for the Edge of Burgess Hill area. Two of the potential housing site options, land at Medway Gardens for 27 net dwellings and land rear of the Rosery for 54 net dwellings, have now been approved for residential development. Given the limited number of suitable housing site options to meet the minimum 100 net additional dwellings at the Edge of Burgess Hill, the above two developments will contribute towards the identified minimum 100 dwellings. Therefore there remains a need for 19 dwellings to be identified to be allocated on a further site(s).
- 9.28. Two options were identified through the 2017 SHELAA process. However following the consultation on the Draft Local Plan Part 2, the owner of the site at land at Oakfield, Theobalds Road stated his intention to develop the site for 3 units which is under the allocation threshold (6 units). This resulted in the site being filtered and only one site assessment remained valid for the Edge of Burgess Hill.

Table 24 Housing Site Options for Edge of Burgess Hill

Option	Site Reference	Site Name	Site Yield
A	BH/A01	Land at the Nuggets, Valebridge Road	14
B	BH/A04	Land at Oakfields, Theobalds Road	40



9.29. Table 25 provides a summary of the assessment. The site scores negatively against the land efficiency objective as it is greenfield land. It would bring forward a small number of units including some affordable housing. There are uncertainties on the potential impacts of the development of the site on the biodiversity and the environment objectives. It is considered that this could be mitigated and therefore this should be reflected through the policy wording.

Table 25 Summary of Housing Site Options Appraisal for Edge of Burgess Hill

Options	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	+	0	0	0?	0	0	-	0?	0?	0	0	0	0	0	0	0	0?	0

9.30. Although developing the area to the East of Burgess Hill would result in the loss of greenfield land, the social benefits of comprehensive development in this sustainable location are likely to outweigh any adverse environmental impacts.

Alternative selected for the Edge of Burgess Hill: Option A

9.31. Option A is the only alternative at the Edge of Burgess Hill to meet the housing requirement set in the Local Plan Part 1 at the Edge of Burgess Hill.

Unimplemented 2003 LDLP housing site allocations

9.32. Spatial Policy 2 of the Local Plan Part 1 sets out the housing requirement for 2010-2030. This includes commitments. Commitments are defined in the Local Plan Part 1 (Appendix 1 of the Local Plan Part 1) as “*all proposals for development that are the subject of a current full or outline planning permission, or are unimplemented allocation in the existing Local Plan*”.

9.33. Therefore the unimplemented 2003 LDLP housing site allocations listed below must be reviewed...

- Policy NH4: South of Valley Road, Newhaven
- Policy NH6: Land at the Marina, Newhaven
- Policy SF5: Land at Blatchington Road, Seaford
- Policy RG1: Caburn Field, Ringmer

9.34. They can be reviewed through the Local Plan Part 2 process or the neighbourhood plan process. Seaford Town Council indicated that its neighbourhood plan will cover the review of Policy SF5 of the 2003 LDLP.

9.35. The assessments of the options identified focus on the objective for which the options score differently.



Land South of Valley Road, Newhaven

- 9.36. Newhaven Town Council is preparing a neighbourhood plan which will include housing site allocations to fulfil the requirement sets out in Spatial Policy 2 of the Local Plan Part 1 to identify an additional 425 units for the settlement of Newhaven. This does not include completions, commitments and the strategic allocation. The Newhaven Neighbourhood Plan is not reviewing the unimplemented 2003 LDLP housing site allocations, which form part of the commitments identified with the Local Plan Part 1.
- 9.37. The Land South of Valley Road was allocated in the 2003 LDLP for 24 units. Part of the original allocation has been constructed; however there is still an area within the allocation which remains to be developed. It is thought that the number initially included in the 2003 LDLP can be achieved on a slightly smaller site.
- 9.38. The following options were identified:
- Option A – Maintain the existing site boundary for the Land South of Valley Road
 - Option B – Review the existing site boundary for the Land South of Valley Road

Table 26 Summary of Options Appraisal for Land South of Valley Road

Options	Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
A	+	+	0	0	0	0	-	0	0	0	0	0	-?	0	0	0	0	0	0
B	+	+	0	0	0	0	-	0	0	0	0	0	-?	0	0	0	0	0	0

Alternative selected for Land South of Valley Road: Option B

- 9.39. The appraisal of the options against the sustainability framework did not highlight significant difference between the two alternatives. Option B is considered to be the best approach as it will reflect an up-to-date context for the site.

Land at the Marina, Newhaven

- 9.40. The Land at the Marina was allocated in the 2003 LDLP for 100 units. When preparing the Local Plan Part 1, the site had planning permission for 331 units. This was counted within the Local Plan Part 1 as a commitment.
- 9.41. Following the consultation on the Draft Local Plan Part 2, comments were received requiring that the principle of the allocation is reviewed so that further consideration is given to flood risk. Additional evidence gathering was carried and presented to the Environment Agency. It was confirmed that the



Flood Risk Assessment work provided for the purpose of obtaining planning permission at this location in 2012 was sufficient to allocate it within the Local Plan Part 2, even at a higher capacity. The additional investigation work carried out is included within appendix F.

9.42. The following options were identified:

- Option A – Allocate the Land at the Marina for 100 units
- Option B – Allocate the Land at the Marina for a minimum of 300 units

Table 27 Summary of Options Appraisal for Land at the Marina, Newhaven

Options	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	+	+	+	0?	0?	0	+	0?	0	0	0	0	-?	-?	0	+	0	0
B	++	+	+	0?	0?	0	++	0?	0	0	0	0	-?	-?	0	+	0	0

Alternative selected for Land at the Marina: Option B

9.43. Option B is considered to be the most sustainable option as it will have a greater positive impact on the housing and land efficiency objective. Moreover the site was until recently subject to planning permission for 331 additional units. Therefore it is thought that option B will also reflect an up-to-date position for the development of this site.

Caburn Field, Ringmer

9.44. There is an adopted neighbourhood plan covering Ringmer Parish which includes housing site allocations for the settlement of Ringmer and Broyle Side.

9.45. The Ringmer Neighbourhood Plan identifies land for 295 additional dwellings up to 2030, 26 of which were counted towards completions and commitments in the Local Plan Part 1 and 86 were superseded following the allocation of Land north of Bishops Lane in the Local Plan Part 1 (Spatial Policy 6). Therefore it is considered that the Ringmer Neighbourhood Plan allocates land for 183 additional dwellings over the plan period.

9.46. The examination of the Ringmer Neighbourhood Plan took place prior to the adoption of the Local Plan Part 1. This means that the plan was not tested against the policies of the Local Plan Part 1 even though the reasoning and evidence informing the Local Plan Part 1 process such as the up-to-date housing needs evidence were relevant to the preparation of the neighbourhood plan. The proposed level of housing for the Ringmer and Broyle Side settlement was based on the finding that there is limited capacity of the Earwig Corner.



- 9.47. At the examination of the Local Plan Part 1, the Inspector recommended that the proposed level of housing for the settlement should be increased to 385 additional units over the plan period which led to a planned housing growth of 215 additional units being distributed to Ringmer and Broyle Side in Spatial Policy 2 of the Local Plan Part 1. This means that an additional 32 units needed to be identified for the settlement, 20 of which were highly likely to be delivered at Caburn Field (unimplemented 2003 LDLP housing site allocation for 40 units) due to potential additional capacity identified following the release of adjoining land.
- 9.48. During the consultation on the Draft Local Plan Part 2, the site promoter informed of its intention to develop the site, including the adjoining land, for approximately 90 units. It was thought that this option should be considered.
- 9.49. The following options were considered:
- Option A: Maintain the existing site boundary for Caburn field and allocate the site for a minimum of 40 units
 - Option B: Allocate the extended Caburn Field for a minimum of 60 units
 - Option C: Allocate the extended Caburn Field for approximately 90 units

Table 28 Summary of Options Appraisal for Caburn Field, Ringmer

Options	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	+	0	0	0?	0	0	-	0	0	0	0	0	0	0	0	0	+	0
B	+	0	0	0?	0	0	-	0	0	0	0	0	0	0	0	0	+	0
C	++	0	0	0?	0	0	-	0	0	0	0	0	0	0	0	0	+	0

Alternative selected for Caburn Field: Option C

- 9.50. The appraisal of the options against the sustainability framework did not highlight significant difference between the three alternatives apart from the opportunity to deliver a greater number of new homes through option C. On the whole option C is considered to be the best approach as it will reflect an up-to-date context for the site.

Overall housing provision

- 9.51. Table 2 of the Submission Local Plan Part 2 clarifies the amount of development required to be identified within the Local Plan Part 2. Table 29 below summarises the level of development proposed based on the alternatives selected against these requirements. It is based on table 3 and 4 of the Submission Local Plan Part 2.



Table 29 Summary of the proposed allocations

	Housing growth to be identified in LPP2	Units allocated in LPP2
Settlements (SP2 Part 2)		
Edge of Burgess Hill	19 (81)*	14
Barcombe Cross	30	42
North Chailey	16 (14)*	16
South Chailey	10	10
Cooksbridge	3 (27)*	0
Ringmer and Broyle Side	32	50
To be determined (SP2 Part 3)	17 (183)*	0
Total	127	132

* The figures in brackets indicate the number of dwellings that have already been delivered or granted planning permissions against the SP2 figures.

9.52. The Local Plan Part 2 is required to deliver a minimum of 127 net additional dwellings. Overall, it is over-delivering against the minimum required figures. This takes into account sites committed in the Joint Core Strategy. However the minimum figures are not met for all locations.

9.53. Two settlements, Edge of Burgess Hill and Cooksbridge, will be providing less development than the minimum required due to a lack of suitable sites available at these locations.

9.54. With regard to the 200 net additional dwelling in locations 'to be determined' required under part 3 of Spatial Policy 2, a total of 183 have now been committed further to the grant of outline planning permission at the former Newlands School, Seaford (LW/16/0800). This is because the site came forward after the strategic site allocations and the levels of planning housing growth for settlements being established. Had the site been identified earlier in the plan-making process, it may have been included as a strategic allocation, or this capacity for net additional dwellings added to Seaford's settlements number in Spatial Policy 2. There is however another 17 units to be allocated in locations to be determined.

9.55. The following options were considered:

- Option A: Rely on the over-allocation in other settlements
- Option B: Allocate additional sites in other settlements to cover the shortfall

Objectives

Options	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
B	0	0	0?	-	0	0	0?	0?	0?	0	0	0	0?	0?	0	0	0	0



Alternative selected for the overall housing provision: Option A

- 9.56. The appraisal of the options showed that option A was unlikely to have impacts on the sustainability framework. Option B may have impacts on a number of objectives depending on the location of the sites. It is also thought that it will impact negatively against the community objective in particular in areas where a neighbourhood plan has been or is being prepared.
- 9.57. The Sustainability Appraisal for the Joint Core Strategy assessed the appropriate distribution of housing for a number of settlements based on the Rural Settlement Study, the SHELAA, the physical capacity of the settlements and other evidence documents such as the Landscape Capacity Study. The most sustainable option was selected for each settlement and carried forward in the Joint Core Strategy. Allocating significantly more sites for residential development above the level required under Spatial Policy 2 is likely to have negative impacts on the sustainability framework.

Gypsy and Traveller Accommodation Options

- 9.58. This section sums up the SA results in relation to Gypsy and Traveller accommodation options. Detailed appraisal results are contained in [appendix H](#).
- 9.59. A number of potential suitable sites for Gypsy and Traveller Accommodation were first identified through two site assessment studies (2011 and 2012) including for those areas within the SDNP. As part of the consultation on the Issues and Options [Topic Papers](#), consultees were invited to submit additional sites that should be considered for use as Gypsy and Traveller accommodation and to comment on potential sites identified. A new 'call for sites' for Gypsy and Traveller permanent pitches was carried out during the consultation on the Draft Local Plan Part 2.
- 9.60. All potential Gypsy and Traveller accommodation sites were subject to the same initial filters in line with national guidance. This is to ensure that sites which would be unsuitable for residential use are removed from the outset. These initial filters included sites at risk of flooding, within a SSSI designation, on or adjacent to incompatible uses for residential consideration.
- 9.61. Sites that could accommodate less than four pitches were also filtered from further assessment.
- 9.62. A list of filtered Gypsy and Traveller Accommodation options can be viewed in [appendix G](#).



- 9.63. Core Policy 3 of the Joint Core Strategy sets out a requirement for five permanent pitches for Gypsies and Travellers to serve the area outside the South Downs National Park.
- 9.64. At the time of adopting the Local Plan Part 1 (2016), no suitable pitches had been identified for allocation despite undertaking two sites assessment studies including in those areas within the SDNP. Therefore Core Policy 3 sets out criteria to be considered in any future assessment of potential Gypsy and Traveller pitch allocations and requires that the Local Plan Part 2 or neighbourhood plans allocate land to fulfil the identified need.
- 9.65. To-date no allocations for permanent pitches for Gypsy and Traveller accommodation have been identified within ‘made’ or emerging neighbourhood plans. Consequently, the five permanent pitches remain to be allocated through Local Plan Part 2.
- 9.66. The ‘call for sites’ undertaken as part of the Draft Local Plan Part 2 consultation did not attract any potential site submissions. Further collaborative work between the Council and East Sussex County Council resulted in the Council being able to identify the below site as the only reasonable option available for allocation in Local Plan Part 2 for the provision of permanent pitches for Gypsy and Traveller use.

Table 30 Gypsy and Traveller Accommodation Options

Option	Site
A	Land south of the Plough

- 9.67. The tables below show how the option was appraised.

Table 31 Site Allocation Options Appraisal Key

Symbol	Meaning	Symbol	Meaning
++	Likely significant positive effect	S	Short term impact (approximately 2013 – 2018)
+	Likely positive effect	M	Medium term impact (approximately 2018 – 2024)
0	No likely effect	L	Long term impact (approximately 2025 – 2030)
?	Uncertain effect		
-	Likely negative effect		
--	Likely significant negative effect		



Table 32 Method for assessing Site Allocation Options

Table X Settlement – Option X

Objectives	S	M	L	Explanation
Objective 1	-	+?	++	In this example, the approach would have a likely negative effect on objective 1 on the short-term, a possible positive effect on the objective in the medium term and would likely have a significant positive effect by the end of the plan period.

9.68. Table 33 provides a summary of the assessment of the option considered for gypsy and traveller accommodation. It would have a positive impact on the housing, deprivation, health and education objectives and a negative impact on the travel objective as well as the land efficiency objective as the site is greenfield land. There are uncertainties in relation to the biodiversity and environment objective. However it is thought that this could be mitigated subject to appropriate criteria within the policy wording.

Table 33 Summary of the Gypsy and Travellers Accommodation Options Appraisals

Options	Objectives																		
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
A	++	+	-	0	+	+	-	0	0	0	0	0	0	0	0	0	0	0	0

Alternative selected for Gypsy and Traveller Accommodation: Options A

9.69. Option A scores relatively well against the sustainability framework in particular in relation the social objectives and would allow to meet the need identified within the Joint Core Strategy.

Employment Site Allocation Options

9.70. This section sums up the SA results of testing the Employment Site Allocation options. Detailed appraisal results are contained in [appendix J](#).

9.71. The Employment Sites considered as options were first identified in the [Topic Papers](#) and included:

- Unimplemented employment site allocations from the Lewes District Local Plan (2003),
- Sites submitted during the call for sites exercise carried out in Spring 2013;
- Sites identifies through the neighbourhood planning process carried out by Ringmer Parish Council



9.72. All sites have been appraised against the sustainability framework to highlight impacts of the potential policies.

9.73. The tables below show how the options were appraised.

Table 34 Site Allocation Options Appraisal Key

Symbol	Meaning	Symbol	Meaning
++	Likely significant positive effect	S	Short term impact (approximately 2013 – 2018)
+	Likely positive effect	M	Medium term impact (approximately 2018 – 2024)
0	No likely effect	L	Long term impact (approximately 2025 – 2030)
?	Uncertain effect		
-	Likely negative effect		
--	Likely significant negative effect		

Table 35 Method for assessing Site Allocation Options

Table X Settlement – Option X

Objectives	S	M	L	Explanation
Objective 1	-	+	++	In this example, the approach would have a likely negative effect on objective 1 on the short-term, a possible positive effect on the objective in the medium term and would likely have a significant positive effect by the end of the plan period.

9.74. The requirement for employment floorspace (B1, B2 and B8) is set out as an overall figure for the Lewes district in Spatial Policy 1 of the Local Plan Part 1. Whilst there is no identified requirement for additional employment sites within the plan area, Core Policy 4 of the Joint Core Strategy contains a presumption in favour of retaining the unimplemented employment site allocations from the 2003 LDLP. Therefore work mainly focussed on reviewing the deliverability and suitability of the existing employment site allocations. Where suitable, new opportunities were also considered.

9.75. As described previously (para 1.4), areas where a neighbourhood plan includes or will include site allocations are outside the scope of Local Plan Part 2. Therefore the following unimplemented employment allocations of the 2003 Local Plan will continue to be saved until those neighbourhood plans are formally made.

- Policy NH10: Eastside Business Area
- Policy PT6: Meridian and Bolney Avenue Industrial Estates Link
- Policy SF8: Cradle Hill Industrial Estate

9.76. All the employment site options have been subject to the same initial filters as used. This is to ensure that sites fundamentally unsuitable for further



consideration or allocation on the grounds of environmental protection are removed. Sites subject to planning permission have also been filtered.

- 9.77. A list of filtered employment site options can be viewed in [appendix I](#).
- 9.78. The options considered are listed in Table 36.

Table 36 Employment Site Options

Option	Site
A	Balcombe Pit, Glynde
B	Land Adjacent to American Express Community Stadium, Falmer
C	Land at East Quay, Newhaven Port

- 9.79. Table 37 provides a summary of the appraisal of the options considered for employment site allocations. All three options would have a positive impact on the economic objectives. Options B and C are likely to have a positive impact on the travel objective due to their good link with the road network however they are unlikely to promote the use of more sustainable mode of transport. Unlike option C, options A and B would allow the development of brownfield site. The initial appraisal of option C shows that development on the site could have impact on the biodiversity and environment objectives which will need to be considered within the policy to minimise potential negative effects.

Table 37 Summary of the Employment Site Options Appraisals

Options	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	0	0	0	0	0	0	++	0	-	0	0	0	0	0	0	0	+	0
B	0	0	+	+	0?	0	++	0	0	0	0	0	0	0	0	0	+	0
C	0	0	+	0	0	0	-	-?	-?	0	0	0	0	0	0	+	0	0

Alternative selected for employment site allocations: Options B and C

- 9.80. It is considered that Core Policy 4 and the proposed Policy DM11 (Existing Employment Sites in the Countryside) provide an appropriate policy framework for the consideration of development proposals on such sites hence the decision not to allocate option A within the Local Plan Part 2.
- 9.81. Option B scores well against the sustainability framework. It is located within the boundaries of both Lewes District Council and Brighton & Hove City Council. The Brighton & Hove City Plan Part 2 is proposing to allocate the part of the site in its administrative area for the employment use. Its proposed allocation within the Submission Local Plan part 2 follows joint working with a neighbouring authority.



9.82. Option C is currently a saved allocation of the 2003 LDLP. Core Policy 4 contains a presumption in favour of retaining the unimplemented site allocations from the 2003 LDLP. As the site remains deliverable and suitable for employment development, its retention within the Submission Local Plan Part 2 is considered appropriate.

Development Management Policy Options

9.83. A number of development management policy options could be implemented in order to meet the Local Plan Part 1 Strategic objectives ([appendix C](#)). Some options were first identified at the [Topic Papers](#) stage. These options were refined in light of the responses received during the consultation and assessed to identify the most sustainable choice available for each policy area.

9.84. The development management policy options are set out in Table 41, together with the reasons for selecting the alternatives. Table 38 shows the key used to indicate the outcome of the options selection.

Table 38 Outcome of development management policy options considered key

	No options considered/identified – rely on existing policies
	Alternative selected
	Other approached considered
	Ruled out approach

9.85. It should be noted that the selection of options has been based on those which stem from the Local Plan Part 1, as this sets the broad approach for development in the Plan Area.

9.86. A 'no policy' option was considered for a number of issues. This means that the proposed approach is to rely on existing policies which include the [NPPF](#) and the development plan. As the Local Plan Part 2 aims at reviewing the retained saved policies, these policies have not been included when considering existing policies. Where the 'no policy' alternative involves relying on a Local Plan Part 1 policy, the policy reference will be specified.

9.87. Following the identification of the options set out in Table 41, they were assessed against the sustainability framework (Table 15). The detailed assessments of the options that led to the policies are set out in [appendix K](#). The tables below show how the policy options were appraised.



Table 39 Development Management Policy Options Appraisal Key




Symbol	Meaning
	Likely positive impact
	Neutral impact
	Likely negative impact

Table 40 Method for assessing Development Management Policy Options

Table XX Issue XX – Issue’s Title



Objectives	Option a)	Option b)	Option c)
Objective 1	 Option a) is likely to have a negative impact on objective 1	It is thought that option b) will have a neutral impact on objective 1.	 Option c) will have a positive impact on objective1



Table 41 Summary of Development Management Policy Options considered

Issues	Options	Reasons for selecting the alternatives
1. Planning Boundaries	a) No planning boundaries	Option a) is likely to have negative impact on the housing, travel and environmental objectives but could contribute to protect greenfield land around the district and may encourage the redevelopment of brownfield land outside the built-up area. Option b) and c) are likely to have similar positive impact on travel and economy of the coastal towns but it is thought that option b) would have a greater positive impact on land efficiency and on the environment. However, although there is little capacity to review the planning boundaries around the coastal towns, the review is needed to ensure the delivery of the housing requirement including the provision of affordable housing in the rural areas of the district and should have a positive impact on the rural economy.
	b) Maintain the existing planning boundaries	
	c) Review existing planning boundaries	
2. Development in the countryside	a) No policy	The three options would have a negative impact on the travel objective. Option b) is also likely to have negative impacts on land efficiency and the environment due to the lack of flexibility of the approach. Option a) and b) score similarly against the sustainability framework however option c) would allow a context specific approach. The negative impact on the travel objective could be mitigated with policy wording on the distance from settlement where relevant.
	b) New policy – broad approach	
	c) New policy – development type specific approach	
3. Essential need of rural workers	a) No policy	The options score similarly against the travel and the rural economy objectives however it is thought that option b) would provide stronger guidance to ensure a positive impact against the land efficiency objective and to protect the valued countryside of the district.
	b) New policy – practical framework	
4. Affordable Homes	a) No policy	The Local Plan Part 1 SP1 includes an allowance for rural



Issues	Options	Reasons for selecting the alternatives
Exception Sites	b) New policy – review policy RES10 and update criteria based approach	exceptions sites and therefore option a) is considered to be unrealistic and option b) to be essential.
5. Loss of small dwellings in the countryside	a) No policy b) Support dwelling replacement with similar unit c) Restrain residential extension in the countryside	Option a) would have a negative impact on the housing, land efficiency and environmental objective. Options b) and c) are likely to have a positive impact on the land efficiency objective. However, it is considered that the general approach for householder extensions can apply whether it is in or outside the planning boundary and thus option c) will be covered under the wider issues of residential extensions.
6. Scale and design of development outside the planning boundaries	a) No policy – rely on CP11 b) New policy – broad approach c) New policy – criteria based approach per type of development	Option b) could have negative impact on the environment objective due to the lack of flexibility of the approach. Both option a) and c) could have a positive impact on the environment objective however option c) could have a greater positive impact by allowing a context specific approach.
7. Small-scale development	a) No policy b) New policy – context specific approach	Option b) was ruled out due to insufficient evidence to define 'small-scale development' in the Lewes district context therefore option a) is the only option and is carried forward.
8. Sub-division of existing property	a) No policy b) New policy – general support c) New policy – practical framework	Option a) scores negatively against the land efficiency objective as it could lead to large units being under-occupied and although it does not mean that planning permission would not be granted, it brings less certainty on getting planning permission and therefore. On the whole option b) and c) score well against the sustainability framework, option c) would have additional positive impact on the environment objective.
9. Specialist housing for older people		Lack of evidence to bring forward a specific policy



Issues	Options	Reasons for selecting the alternatives
10. Gypsy and Traveller Accommodation		No evidence to suggest that this is necessary
11. Employment development in the countryside	a) No policy – rely on CP4 – general approach	Option c) would conflict with the Local Plan Part 1 and therefore was not assessed. Option a) and b) would have a positive impact on the rural economy objective, however option b) could have a positive impact on land efficiency and on the environmental objective.
	b) New policy – approach per type of development	
	c) New policy – restrictive approach	
12. Existing Employment sites in the countryside	a) No policy – rely on CP4 – general approach	Option a) and b) would have positive impacts on the land efficiency and the rural economy objective however option b) could also have a positive impact on the natural and built environment.
	b) New policy – criteria based approach	
13. Farm diversification	a) No policy – rely on CP4 – general approach	Option a) and b) would support the economy in the rural area of the plan area. However option b) could have additional positive impact on the land efficiency by directing new or replacement building within close proximity of other existing. This should also help to ensure to protect the rural setting.
	b) New policy – practical framework	
14. Caravan and Camping Sites	a) No policy	There was no evidence to indicate a need to differentiate camping from glamping (option d)). Option a) scores neutrally against the sustainability framework as policy CP5 only addresses the retention and improvement of camping and caravan sites. Option b) and c) could impact positively against the rural economy and the tourism objective. However option c) would better meet the environmental, land efficiency and travel objectives.
	b) New policy – open approach	
	c) New policy – criteria based approach	
	d) New policy – specific policy on ‘glamping’	
15. Existing visitor accommodation	a) No policy – rely on CP5 – protection policy	Option a) and b) score similarly however option b) should have a positive impact on the land efficiency objective.
	b) New policy – rational approach	



Issues	Options	Reasons for selecting the alternatives
16. Retail development and promoting sustainable town, district and local centres		
17. Infrastructure		
18. Green infrastructure	a) No policy – rely on CP8 b) New policy – part of the development process c) New policy – considered in isolation d) New policy – review standards to address developer contributions	Option d) is not considered relevant due to the adoption of the Community Infrastructure Levy (CIL) charging schedule. Option a) and b) score well against the environmental objectives however it is thought that option b) is likely to have greater positive and more certain effect than option c). On a long term, option c) may result in positive effect on the environmental objectives. Option b) is more likely to have a positive impact on the communities' objective.
19. Outdoor playing space – other approach considered	a) New policy – consider partnership working between the district council and parish councils	Option a) is considered irrelevant due to the adoption of the CIL charging schedule. This is considered through the CIL governance.
20. Outdoor playing space - standards	a) No policy b) New policy – continue using the standard in RE1 c) New policy – adopt revised Field in Trust benchmark standards for outdoor playing spaces	Option b) is considered unrealistic as policy RE1 is based on standards which are not obsolete. Options a) and C) score similarly against the sustainability framework however option c) would provide more specific guidance regarding outdoor playing spaces.
21. Outdoor playing space – on site provision	a) No policy – rely on CP8 b) New policy – threshold for on-site provision of Children's play space in new housing development	Both options score well against the communities and the health objectives however option b) would bring more certainty around the delivery of children's play space in a time manner within close proximity of new housing development.
22. Former	a) No policy	Option b) is unrealistic as parts of the track have been



Issues	Options	Reasons for selecting the alternatives
Lewes/Sheffield Park Railway Line	b) New policy – protect for use as a public transport corridor	developed. Option a) scores neutrally and option c) is likely to have positive impact on the sustainability framework and would not preclude a future return to use as a public transport corridor should other circumstances allow.
	c) New policy – encourage recreational uses	
23. Recreation and the Rivers	a) No policy	Option a) scores neutrally against the sustainability framework. There are strengths and weaknesses in both options b) and c), with the former more aligned with economic and, to a degree, social objectives, while the latter would better meet the environmental objectives.
	b) New policy – promotional approach	
	c) New policy – safeguarding approach	
24. Air quality	a) No policy – rely on CP9	To be considered when Local Plan Part 1 will be under review however guidance can be promoted without reliance on amending CP9 – no other approach identified
	b) Amend CP9 to include reference to Air Quality and Mitigation Guidance for Sussex Authorities (2003)	
25. Agricultural Land	a) No policy	Option b) would not be consistent with the NPPF. Option c) is likely to have positive impact on the land efficiency objective as it includes consideration of alternative locations and ensure that the development will bring benefit.
	b) New policy – restrictive approach	
	c) New policy – practical framework	
26. Pollution Management	a) No policy	It is not thought that option a) would have impact on the sustainability framework. Option b) is likely to have positive impact on the health and biodiversity objectives.
	b) New policy – criteria based approach	
27. Land contamination	a) No policy	On the whole, option a) scores neutrally on the sustainability framework. Option b) could have positive impacts on the health and land efficiency objectives.
	b) New policy	
28. Water resource and water quality	a) No policy – CP10	Although the NPPF includes policies on water resource and water quality, and a no policy approach could be acceptable, it is thought that option b) could have a direct positive impact on the sustainability framework.
	b) New policy - practical framework	
29. Noise	a) No policy	Although the NPPF includes policies on noise, and a no policy



Issues	Options	Reasons for selecting the alternatives
	b) New policy - practical framework	approach could be acceptable, it is thought that option b) could have a direct positive impact on the sustainability framework.
30. Biodiversity and Geodiversity	a) No policy – CP10	Options a) scores neutrally against the sustainability framework whereas option b) score positively against the biodiversity objective. This is because option b) would give move certainty on the measures that would need to be taken to ensure that new development does not impact on the biodiversity designations.
	b) New policy – practical framework	
31. Design	No policy – rely on CP11	It Is thought that both approaches would contribute to achieving the environment objective. Option b) will provide additional guidance and could therefore bring more certainty for gaining planning permission to development proponent complying with the policy. This should contribute to the community's happiness.
	b) New policy - practical framework	
32. Refuse and recycling	a) No policy	Option a) scores neutrally against the sustainability framework. Option b) should have a positive impact on the waste objective as it will help the council meeting its recycling targets.
	b) New policy	
33. Landscape Design	a) No policy – CP10	Option a) scores neutrally against the sustainability framework. Option b) is likely to have a positive impact on the environment objective.
	b) New policy - practical framework	
34. Residential extensions, garages and other building ancillary to existing dwellings	a) No policy – rely on CP11	Option a) score neutrally against the sustainability framework. Option b) would have a positive impact on the land efficiency and the environment objective.
	b) New policy – details policy applying principles of high design quality to local context	
35. Backland development	a) No policy	Option a) and b) have uncertain impact on the communities and environment objectives whereas option c) would ensure



Issues	Options	Reasons for selecting the alternatives
	b) New policy – general approach c) New policy – detailed approach	that development does not have adverse impacts on these objectives. Option b) and c) are likely to have a positive impact on the housing objective in particular on the long term. On the whole a more detailed approach should be more sustainability in terms on amenities benefits, while reliance on existing policy or a general approach leave more uncertainties due to interpretation.
36. Advertisements	a) No policy b) New policy – general approach	Both options should have a positive impact on the economy of coastal towns and the rural economy however option a) could have a negative impact on the environment objective.
37. Telecommunications Infrastructure	a) No policy b) New policy –criteria based approach	Both approaches should have a positive impact on the plan area’s economy in particular in the rural area however option a) could have a negative impact on the environment objective.
38. Heritage Assets	a) No policy b) New policy – protection approach c) New policy – enhancing approach	Option a) may result to negative impact on the environment objective. Option b) would ensure that heritage assets are no subject to adverse impact due to development and therefore scores neutrally against the sustainability framework. Option c) would allow development that would make a positive contribution to heritage assets and therefore scores positively against the sustainability framework.
39. Areas of established Character	a) No policy b) New policy – safeguarding approach c) New policy – enhancing approach	Option c) is not considered to be a reasonable option as it would not fit the purpose of the designation of areas of established character. Option a) could have negative impact on the environment objective. Option b) scores neutrally against the sustainability framework.
40. Footpath, cycle and bridleway network	a) No policy – rely on CP13 b) New policy – enforceable travel plan c) New policy – protecting approach	Option b) is considered to be unrealistic as the council cannot impose sanctions on schools, employers and existing attractions. Option a) scores neutrally against the sustainability framework. Option c) and d) would have a positive impact on



Issues	Options	Reasons for selecting the alternatives
	d) New policy – enhancing approach	the travel and communities objective in particular on the long term for option c).
41. Station parking	a) No policy	Option a) and b) are likely to score negatively against the communities objective as parking surrounding stations is often regarded as an important issue. Option b) would score positively against the travel and communities objectives.
	b) New policy – balanced approach	
	c) New policy –protecting approach	
42. Former Lewes to Uckfield railway line	a) No policy	Option a) scores neutrally against the sustainability framework. It is thought that in the long term option b) could have a positive impact on the travel, communities and rural economy objective.
	b) New policy – protect for reinstatement of railway line	
43. Renewable and low carbon energy and sustainable use of resources		
44. Flood risk		
45. Coastal change management area	a) No policy	A 'Brighton to Newhaven Western Harbour Arm Coastal Management Implementation Plan', currently being developed by the District Council, which will eventually act as route map setting out what works should be undertaken, and at what time, in order to assist the Council with its future management of this stretch of coastline. However, the preparation of this plan is a long process, with stringent Government regulations and guidance that need to be followed. At this stage, the work is not sufficiently advanced to inform planning policy formulation and hence option b is not considered appropriate.
	b) New policy – designate an area	



10. Appraising the Policies

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art.5 Annex 1) “the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects” and “the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme”.

- 10.1. An integral part of the SA process is improving and refining a plan's policies in order to aid a plan in achieving sustainable development based on appraisals of the policies. In addition, the SEA Directive requires the process to reduce the significant negative impacts that the plan may cause.
- 10.2. Following the identification of the preferred policy approaches ([section 9](#)) work began on developing draft version of the site allocations and development management policies. The policies were then appraised against the sustainability framework (Table 15).
- 10.3. Throughout the drafting of the policies, consideration was given to the need to deliver sustainable development and of the SA process. As a result the appraisals that were carried out gave mostly positive results, reducing the need to make changes and to provide mitigation.
- 10.4. The tables below show how the policies were appraised.

Table 42 Policies Appraisal Key

Symbol	Meaning	Symbol	Meaning
++	Likely significant positive effect	S	Short term impact (approximately 2013 – 2018)
+	Likely positive effect	M	Medium term impact (approximately 2018 – 2024)
0	No likely effect	L	Long term impact (approximately 2025 – 2030)
?	Uncertain effect		
-	Likely negative effect		
--	Likely significant negative effect		



Table 43 Method for assessing Policies

Table X Settlement – Option X

Objectives	S	M	L	Explanation
Objective 1	-	+?	++	In this example, the policy would have a likely negative effect on objective 1 on the short-term, a possible positive effect on the objective in the medium term and would likely have a significant positive effect by the end of the plan period.

Housing Site Allocations

- 10.5. This section sums up the SA results of the Housing Site Allocations. Detailed appraisal results are contained in [appendix L](#).
- 10.6. Local Plan Part 2 only allocates additional sites for housing to fulfil the requirements of the Local Plan Part 1 in areas where parish councils are not preparing a neighbourhood plan allocating sites for housing development (i.e. Barcombe Cross, edge of Burgess Hill, North Chailey and South Chailey) and in areas where 2003 LDLP housing allocations have not been implemented or are not being reviewed through a neighbourhood plan.
- 10.7. After consulting with town and parish councils, Seaford Town Council advised that their neighbourhood plan will be reviewing the unimplemented 2003 LDLP housing site allocation policy SF5 Land at Blatchington Road. The remaining unimplemented 2003 LDLP housing site allocations have been reviewed and assessed against the sustainability framework:
- Policy NH4: South of Valley Road, Newhaven
 - Policy NH6: Land at the Marina, Newhaven
 - Policy RG1: Caburn Field, Ringmer

Appraisals

- 10.8. The Submission Local Plan Part 2 includes the following Housing Site Allocations (the policies in bold are the reviewed unimplemented 2003 LDLP housing site allocations):
- **NH01: Land south of Valley Road, Newhaven**
 - **NH02: Land at The Marina, Newhaven**
 - BH01: Land at the Nuggets, Valebridge Road, Wivelsfield
 - BA01: Land at Hillside Nurseries, High Street, Barcombe Cross
 - BA02: Land adjacent to the High Street, Barcombe Cross
 - BA03: Land at Bridgelands, Barcombe Cross
 - CH01: Glendene, Station Road, North Chailey



- CH02: Layden Hall, East Grinstead Road, North Chailey
- CH03: Land at Mill Lane, South Chailey
- **RG01: Caburn Field, Ringmer**

Table 44 Summary of Housing Site Allocations Appraisals

Policies	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
NH01	+	+	0	0	0	0	-	0	0	0	0	0	-?	0	0	0	0	0
NH02	++	+	+	0?	0	0	++	+	0	0	0	0	-?	0?	0	+	0	0
BH01	+	0	0	0?	0	0	-	0	0	0	0	0	0	0	0	0	0?	0
BA01	+	0	0?	+	0	0	-	0	0?	0	0	0	0	0	0	0	0	0
BA02	+	0	0?	0?	0	0	-	0	0?	0	0	0	0	0	0	0	0?	0
BA03	0?	0	0?	0?	0	0	-	0	0?	0	0	0	0	0	0	0	0	0
CH01	+	0	-	0?	0	0	-	0	0?	0	0	0	0	0	0	0	0	0
CH02	0?	0	-	0?	0	0	-	0?	0	0	0	0	0	0	0	0	0	0
CH03	+	0	-	0?	0	0	-	0	0	0	0	0	0	0	0	0	0	0
RG01	++	0	0	+	0	0	-	0	0	0	0	0	0	0	0	0	+	0

- 10.9. Overall the proposed Housing Site Allocations score positively against the housing objective. Policies BA01, BA03 and CH02 will only have a limited positive impact on this objective as they will deliver less than 10 units, with uncertainty for policy BA03 due to unknown achievability of the access and for policy CH02 considering the likely cost of the required pedestrian access. Policies NH02 and RG01 should have a significant positive impact on the housing objective as they will deliver close to or over 100 additional units.
- 10.10. Most proposed Housing Site Allocations score neutrally against the deprivation objective, except for Policies NH01 and NH02 which score positively against this objective. This is due to the fact that Policies NH01 and NH02 aim at delivering new homes including affordable housing in Newhaven which contains some of the districts most deprived wards in the Plan Area. Other policies will deliver housing in the rural areas of the Plan Area which are fairly affluent (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
- 10.11. The impact on the travel objective varies due to the location of the sites allocated. Policy NH02 is expected to have a positive impact on this objective due to the proximity with services and the availability of public transport. Although sites located in Barcombe Cross (Policy BA01, BA02 and BA03) are likely to be car dependant, impacts on this objective are considered to be uncertain due to services available in the village. Sites located in Chailey (Policies CH01, CH02 and CH03) are likely have a negative impact on this objective due to the limited access to services in the North Chailey and South Chailey.



- 10.12. All Housing Site Allocations except for Policy NH02 will have a negative impact on the land efficiency objective as they will result in the loss of greenfield land.
- 10.13. There are uncertainties around the possible impact of sites allocated in Barcombe Cross (Policy BA01, BA02 and BA03) and North Chailey (Policies CH01) on the environment objective. There are uncertainties on the impact of Policy CH02 on the biodiversity objective.
- 10.14. Development of the sites allocated in Newhaven (Policies NH01 and NH02) may impact the air quality objective. Policies NH02 and RG01 are likely to support respectively the coastal and the rural economy due to their scale.

Mitigations

- 10.15. There are no significant negative effects that necessitate mitigation.
- 10.16. Whilst all policies except Policy NH02 noted a negative impact relating to the loss of greenfield land, this cannot be mitigated against.
- 10.17. Although the proposed Housing Site Allocations for Chailey and Barcombe have negative and uncertain effect on the travel objective, it is not thought that this can be entirely mitigated against; however the policy wording will ensure that appropriate pedestrian and cyclist access will be provided with the scheme to encourage the use of alternative mode of transport.
- 10.18. Policies BA01, BA02, BA03 and CH01 include provision to avoid detrimental impact on the environment objective.
- 10.19. Further to the consultation on the Draft Local Plan Part 2, requirements for ecological impact assessments have been added to all housing site allocations to ensure that development of the site does not result in negative impact against the biodiversity objective.
- 10.20. Policies NH01 and NH02 are subject to compliance with all appropriate development policies which includes CP9 of the Local Plan Part 1 which should contribute to mitigating negative impacts on the air quality objective.
- 10.21. There is uncertainty as for the potential impact of Policy NH02 on the flooding objective. It was confirmed that the Flood Risk Assessment work provided for the purpose of obtaining planning permission at this location in 2012 was sufficient to allocate it within the Local Plan Part 2, even at a higher capacity. However additional work will be required which has been reflected within the policy wording to mitigate the potential impact of the policy on this objective.



Gypsy and Traveller Accommodation

10.22. This section sums up the SA results of the Gypsy and Traveller Accommodation/ details appraisals results are contained in [appendix M](#).

Appraisals

10.23. The Submission Local Plan Part 2 includes the following Gypsy and Traveller Accommodation:

- GT01: Land south of the Plough

Table 45 Summary of Gypsy and Traveller Accommodation Appraisals

Options	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
A	++	+	-	0	+	+	-	0	0	0	0	0	0	0	0	0	0	0

Mitigations

10.24. There are no significant negative effects that necessitate mitigation.

Employment Site Allocations

10.25. This section sums up the SA results of the Employment Site Allocations. Detailed appraisal results are contained in [appendix N](#).

10.26. The Local Plan Part 2 only reviews the 2003 LDLP unimplemented employment allocations in areas where parish councils are not preparing a neighbourhood plan are not reviewing them. A new opportunity for employment development was also identified.

Appraisals

10.27. The Submission Local Plan Part 2 includes the following Employment Site Allocations:

- E1: Land at East Quay, Newhaven Port
- E2: Land Adjacent to American Express Community Stadium, Village Way, Falmer

Table 46 Summary of Employment Site Allocations Appraisals

Policies	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
E1	0	0	+	0	0	0	-	0	0	0	0	0	0	0	0	+	0	0
E2	0	0	+	+	0	0	++	0	0	0	0	0	0	0	0	0	+	0



Mitigations

10.28. There are no significant negative effects that necessitate mitigation.

Development Management Policies

10.29. This section sums up the SA results of the Development Management policies. Detailed appraisal results are contained in [appendix O](#).

Appraisals

10.30. The Submission Local Plan Part 2 includes the following Development Management policies:

- DM1: Planning Boundary
- DM2: Affordable Homes Exception Sites
- DM3: Accommodation for Agricultural and Other Rural Workers
- DM4: Residential Conversions in the Countryside
- DM5: Replacement Dwellings in the Countryside
- DM6: Equestrian Development
- DM7: Institutional Sites
- DM8: Residential Sub-Divisions and Shared Housing
- DM9: Farm Diversification
- DM10: Employment Development in the Countryside
- DM11: Existing Employment Sites in the Countryside
- DM12: Caravan and Camping Sites
- DM13: Existing Visitor Accommodation
- DM14: Multi-functional Green Infrastructure
- DM15: Provision for Outdoor Playing Space
- DM16: Children's Play Space in New Housing Development
- DM17: Former Lewes/Sheffield Park Railway Line
- DM18: Recreation and Rivers
- DM19: Protection of Agricultural Land
- DM20: Pollution Management
- DM21: Land Contamination
- DM22: Water Resources and Water Quality
- DM23: Noise
- DM24: Protection of Biodiversity and Geodiversity
- DM25: Design
- DM26: Refuse and Recycling
- DM27: Landscape Design
- DM28: Residential Extensions



- DM29: Garages and other buildings ancillary to existing dwellings
- DM30: Backland Development
- DM31: Advertisements
- DM32: Telecommunications Infrastructure
- DM33: Heritage Assets
- DM34: Areas of Established Character
- DM35: Footpath, Cycle and Bridleway Network
- DM36: Station Parking
- DM37: Former Lewes to Uckfield Railway Line

Table 47 Summary of Development Management Policies Appraisals

Policies	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
DM1	0	+	+	+	0	+	+	0	+	0	0	+	0	0	0	+	+	+
DM2	+	+	0	0	0	0	-	0	0	0	0	0	0	0	0	0	0	0
DM3	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
DM4	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
DM5	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
DM6	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0
DM7	+	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0
DM8	+	+	+	+	0	0	++	0	0	0	0	0	0	0	0	0	0	0
DM9	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0
DM10	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0
DM11	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	+	0
DM12	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
DM13	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+
DM14	0	0	0	+	+	0	0	+	+	0	0	0	0	+	0	0	0	0
DM15	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
DM16	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
DM17	0	0	+	+	0	0	0	0	+	0	0	0	0	0	0	0	0	0
DM18	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DM19	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0	0
DM20	0	0	0	0	+	0	0	+	0	0	0	0	0	0	0	0	0	0
DM21	0	0	0	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0
DM22	0	0	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0
DM23	0	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0
DM24	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0	0
DM25	0	0	0	+	0	0	0	0	++	0	0	0	0	0	0	0	0	0
DM26	0	0	0	+	0	0	0	0	0	+	0	0	0	0	0	0	0	0
DM27	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
DM28	+	0	0	0	0	0	+	0	+	0	0	0	0	0	0	0	0	0
DM29	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
DM30	+	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DM31	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	+	0
DM32	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	+	0
DM33	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0



Policies	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18
DM34	0	0	0	0	0	0	0	0	+	0	0	0	0	0	0	0	0	0
DM35	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DM36	0	0	+	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
DM37	0	0	+	+	0	0	0	0	0	0	0	0	0	0	0	0	+	0

10.31. Overall the Development Management Policies are likely to have positive impacts on the sustainability framework.

Mitigations

10.32. There are no significant negative effects that necessitate mitigation. Although this did not result in significant changes of the scoring against the sustainability framework, following the consultation on the Draft Local Plan Part 2, the wording of policies DM5, DM6, DM11, DM17, DM18 and DM24 was refined to improve the protection of the biodiversity and the environment.

10.33. Whilst the appraisal of Policy DM2 noted a negative impact relating to the loss of greenfield land, this cannot be mitigated.

Secondary, Cumulative and Synergetic Effects

10.34. The SEA Directive requires that the secondary, cumulative and synergistic effects of the plan are considered to ensure sustainable outcomes. These effects are defined as follows:

- Secondary effects – ‘effects that are not the direct result of the plan, but occur away from the original effect or as a result of a complex pathway’
- Cumulative effects – ‘arise, for instance, where several developments each have insignificant effects but altogether have a significant effect, or where several individual effects of the plan...have a combined effect’
- Synergistic effects – ‘interact to produce a total effect greater than the sum of the individual effects’

10.35. It is not thought that the Submission Local Plan Part 2 will result in unforeseen impacts on the sustainability framework. This is because it aims at providing more certainty to the delivery of the requirements set out in the Local Plan Part 1.



11. Monitoring Framework

Compliance with SEA Directive's Requirements

“Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.”

- 11.1. Monitoring is an important part of the plan process and helps in gauging the success of the Plan, its progress towards its objectives and its trend towards sustainable development. The Monitoring Framework for the SA, much like the monitoring framework for the Local Plan Part 1, consists of a number of objectives (SA Objectives), indicators and targets.
- 11.2. The SA is key to predicting the significant environmental, economic and social impacts, both positive and negative, that could result from the implementation of the plan. A SA, therefore, is necessary to ascertain the extent to which those impacts have arisen, as well as identifying any unforeseen effects. Monitoring can also help to measure the performance of any mitigations measures.
- 11.3. Monitoring is an ongoing process which is implemented through the [Authority Monitoring Report](#). If any significant negative impacts resulting from the Local Plan Part 1 and subsequent parts of the Local Plan are identified or if a plan is not achieving its predicted impacts, it may be necessary to review policies and make modifications to negate these effects.

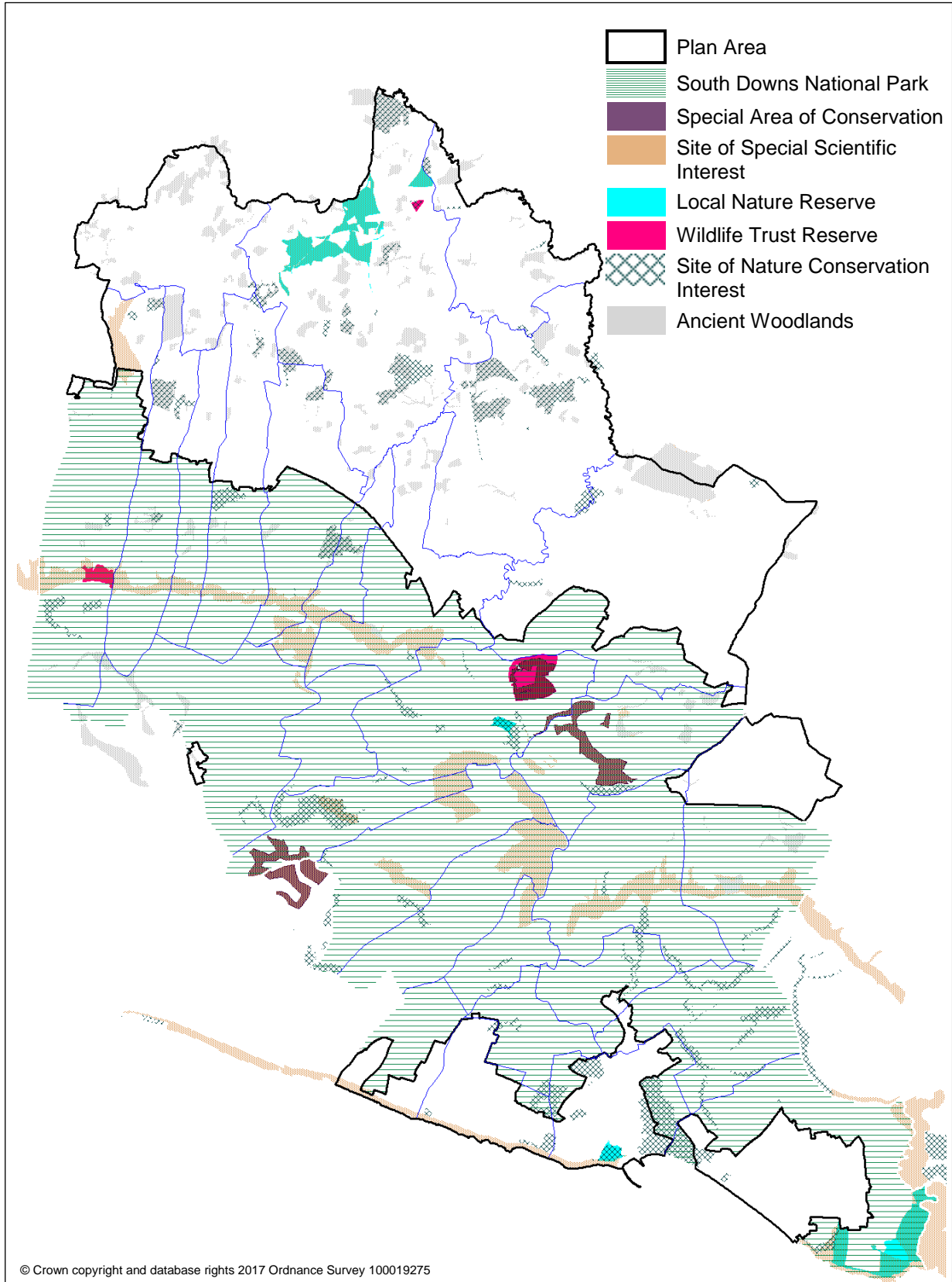


Appendices



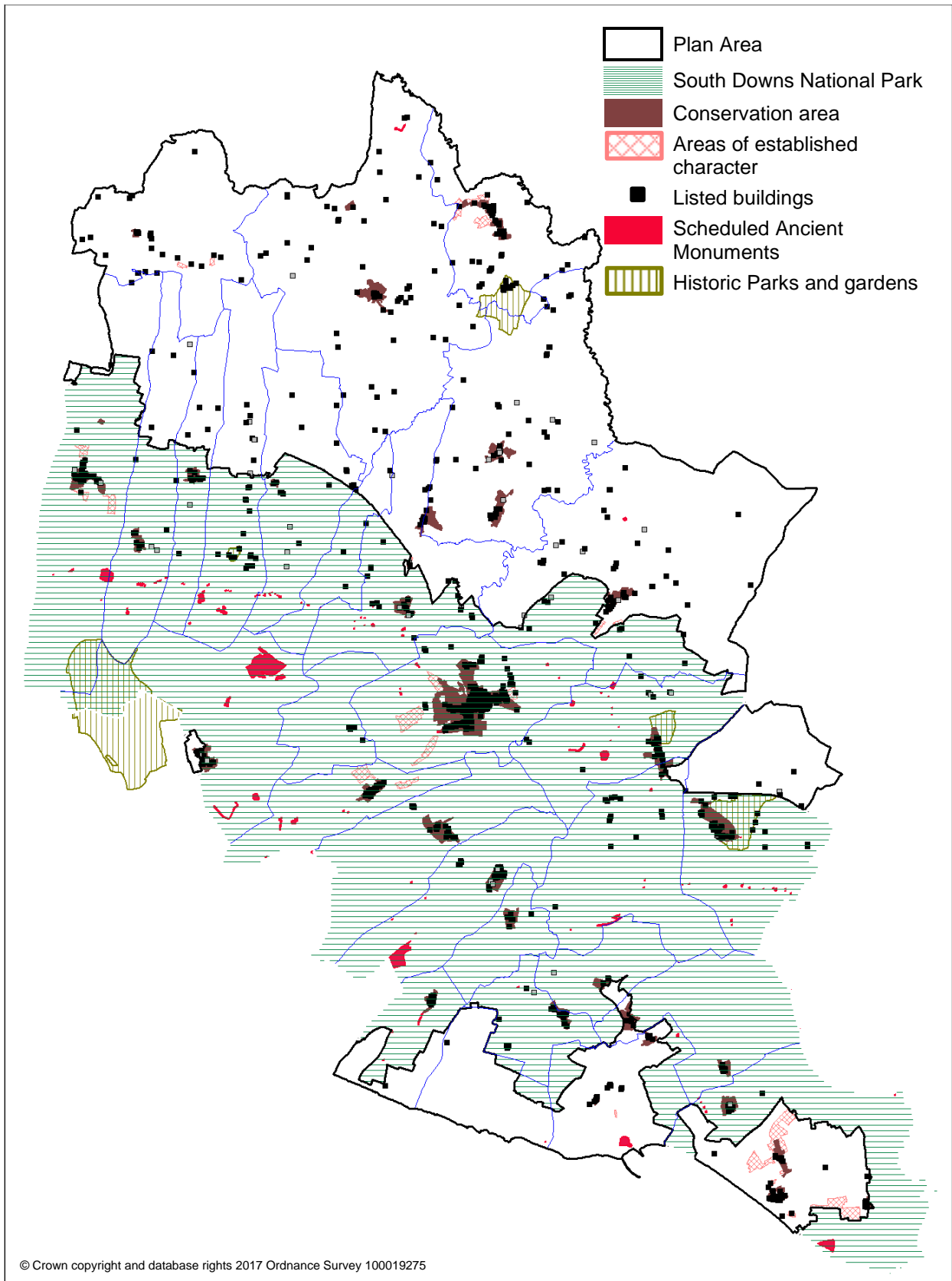
A. Baseline Data Maps

Map 2 Biodiversity Designations



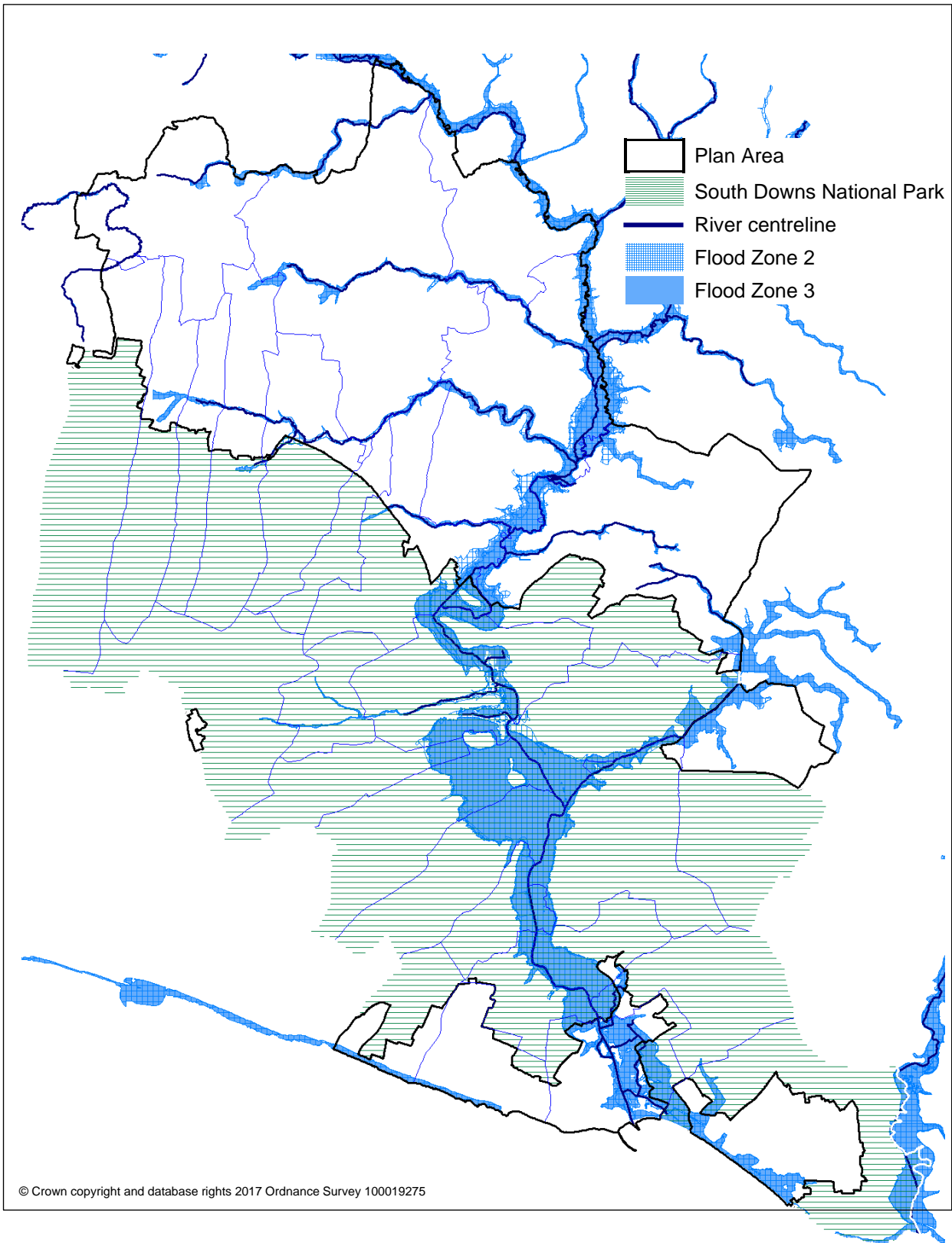


Map 3 Built Environment





Map 4 Flood Zones





B. List of additional Plans, Policies and Programmes

Name of PPP	Broad aims/ relevant policies	Implications on Local Plan Part 2/ Sustainability Appraisal
Overarching PPPs		
Lewes District Local Plan Part 1 Joint Core Strategy 2010-2030 (2016)	Sets out the strategic level plan for the whole Lewes district	The Local Plan Part 1 sets out the direction that other plans have to conform with. This includes the level and distribution of growth the in the Lewes District.
National Planning Policy Framework (2018)		
Planning Practice Guidance	Guides the planning system	Impact of the production of the document
Neighbourhood Planning Act (2017)	Initiates a more efficient planning system, which also helps communities plan for the homes that they require	
Habitat Regulations Assessment Addendums (2017 and 2018)	Identify whether particular site allocations and DM policies have the potential to cause an adverse effect on Natura 2000 or European designated sites (Special Areas of Conservation, SACs, Special Protection Areas, SPAs, and Ramsar sites designated under the Ramsar convention), either in isolation or in combination with other plans and projects, and to determine whether site-specific mitigation measures are required.	The Local Plan Part 2 has been developed taking into account the findings of the Habitat Regulations Assessment.
South Marine Plans	Enable sustainable economic growth, whilst respecting local communities and protecting the marine environment	The Local Plan Part 2 will take account of these plans.
Housing, employment and settlement specific policies		
Newick Neighbourhood Plan (2015)	- Allocate sites for residential development meeting the planned housing growth set out within Local Plan Part 1, and/or the provision of employment floorspace	The Local Plan Part 2 does not allocate housing and employment sites nor includes settlement specific development management policies for the settlement that have been planned for through adopted
Ringmer Neighbourhood Plan (2016)		



Name of PPP	Broad aims/ relevant policies	Implications on Local Plan Part 2/ Sustainability Appraisal
Hamsey Neighbourhood Plan (2016)	- Include local development management policies	neighbourhood plans.
Wivelsfield Neighbourhood Plan (2016)		
Plumpton Neighbourhood Plan (2018)		
Ditchling, Streat and Westmeston Neighbourhood Plan (2018)		
Newhaven Neighbourhood Plan (2019)		
Emerging Seaford Neighbourhood Plan	- Intend to allocate sites for residential development to meet the planned housing growth identified for each settlement within Local Plan Part 1 and/or to provide additional employment floorspace	The Local Plan Part 2 does not allocate housing and employment sites for those settlements where a Town or Parish Council is preparing a neighbourhood plan that will allocate sites for housing and employment development. It also will not include settlement specific development management policies for those areas.
Emerging Peacehaven and Telscombe Neighbourhood Plan	- Intend to development local development management policies	
Emerging Chailey Neighbourhood Plan		
Emerging Barcombe Neighbourhood Plan		
Water		
Draft Water Resources Management Plan (South East Water, 2008)	Sets out in details how the company proposes to ensure that there is sufficient security of water supplies to meet the anticipated demands of all its customers.	The Local Plan Part 2 will take account of these plans.
Waste		
East Sussex,	This document sets out the	The Local Plan Part 2 complements



Name of PPP	Broad aims/ relevant policies	Implications on Local Plan Part 2/ Sustainability Appraisal
South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)	strategy for waste management and planning in the city of Brighton & Hove, the South Downs and East Sussex, of which the plan area is a part.	this plan.
East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan – Sites Plan (2017)		
Air Quality		
Newhaven Air Quality Action Plan (2016)	address the high concentrations of nitrogen dioxide which people are exposed to alongside the busy roads on the centre of Newhaven	



C. Local Plan Part 1 Strategic Objectives

1. To stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for the rural economy and ensuring that the economy is underpinned by a balanced sector profile.
2. To maintain and enhance the vitality and viability of the district's town centres, retail centres and local centres as hubs for shopping, business, entertainment, cultural and community life.
3. To deliver the homes and accommodation for the needs of the district and ensure the housing growth requirements are accommodated in the most sustainable way.
4. To take advantage of the richness and diversity of the district's natural and heritage assets to promote and achieve a sustainable tourism industry in and around the district.
5. To work with other agencies to improve the accessibility to key community services and facilities and to provide the new and upgraded infrastructure that is required to create and support sustainable communities.
6. To conserve and enhance the high quality and character of the district's towns, villages, and rural environment by ensuring that all forms of new development are designed to a high standard and maintain and enhance the local vernacular and 'sense of place' of individual settlements.
7. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area.
8. To maximise opportunities for re-using suitable previously developed land and to plan for new development in the highly sustainable locations without adversely affecting the character of the area.
9. To reduce the need for travel and to promote a sustainable system of transport and land use for people who live in, work in, study in and visit the district.
10. To ensure that the district reduces causes of climate change and is proactive regarding climate change initiatives.
11. To reduce the district's vulnerability to the impacts of climate change, particularly by seeking to reduce the number of properties, community assets and infrastructure that are at an unacceptable risk of flooding, or coastal erosion.



D. Filtered Housing Sites

Settlement	Site Name	Reason
Chailey North	Land adjoining Millfield, Lewes Road	Not suitable within 2017 SHELAA
Chailey North	Waspbourne Farm, Sheffield Park (new settlement)	Possibility of a new settlement were explored through the preparation of the Joint Core Strategy, with other LPAs, but not pursued. Due to its strategic nature Local Plan Part 2 does not seek to identify a suitable new settlement
Cooksbridge	Land south of Beechwood Lane	Not available within SHELAA 2017 following allocation as a Local Green Space
Cooksbridge	Land north of Beechwood Lane	Within the SDNP and therefore outside the Plan Area
Cooksbridge	Land north of Cooksbridge	Not suitable within 2017 SHELAA
Cooksbridge	New' Cooksbridge	Possibility of a new settlement were explored through the preparation of the Joint Core Strategy, with other LPAs, but not pursued. Due to its strategic nature Local Plan Part 2 does not seek to identify a suitable new settlement
Edge of Burgess Hill	Land at The Nuggets and Homestead Lane	Part of the site was granted planning permission and is currently under construction
Edge of Burgess Hill	Land at Oakfield, Theobalds Road	Filtered (below the 6 units threshold) following the November 2017/January 2018 consultation
Edge of Haywards Heath	Land south of Asylum Wood	No additional planned level of housing for Edge of Haywards Heath



E. Assessments of the Housing Site Allocation Options

Table 48 Barcombe Cross - Option A Hillside Nurseries

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site could bring forward 10 units and would have a positive impact on this objective.
2.Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0?	0?	0?	Acceptable solutions are available to ensure appropriate access onto the High Street although an agreement would need to be with the adjacent landowner to widen the narrow driveway which is currently unsuitable for two vehicles. <ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office, although the nearest GP surgery is approximately 2 miles away at Lewes. There is also a small supermarket within walking distance. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4.Communities	+	+	+	Development has potential to amenity land for the future delivery of needed recreational facilities.
5.Health	0	0	0	The site is located adjacent to outdoor playing space and sports facilities although it is not thought that there would be a significant impact on this objective.
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land.
8.Biodiversity	0	0	0	This site would not impact on any biodiversity designations.
9.Environment	0?	0?	0?	The site is located within Barcombe Cross Conservation Area and within the vicinity of a Grade 2 Listed Building. The site is well screened by vegetation and residential development, although it is more exposed to views from the North. The site is within an area of medium archaeological potential.
10.Waste	0	0	0	



Objectives	S	M	L	Explanation
11. Water	0	0	0	
12. Energy	0	0	0	
13. Air Quality	0	0	0	
14. Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective.
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural Economy	0	0	0	Residents are likely to use local services; however it is unlikely to have a significant positive impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 49 Barcombe Cross - Option B Land Adjacent to High Street

Objectives	S	M	L	Explanation
1. Housing	+	+	+	Development at this site could bring forward 25 units. It is likely that this would include affordable housing and could be brought forwards within the next five years.
2. Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3. Travel	0?	0?	0?	Access is likely to be via a bordering track. Widths and visibility of access points are considered achievable by the highways authority with maintenance of vegetation along the southern road. <ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office and a small local supermarket, although the nearest GP surgery is approximately 2 miles away at Lewes. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4. Communities	0?	0?	0?	



Objectives	S	M	L	Explanation
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land.
8.Biodiversity	0?	0?	0?	There is a SNCI within the vicinity, however it is not thought that there would be a significant adverse impact on this objective.
9.Environment	-	-	-	The site rises to the north east without much screening, making it a prominent location from the south west entrance to the village. However there are no long views into or out of the site. It has been identified in the 2012 landscape capacity study as an area with a low capacity for change, meaning that development in this area is undesirable. The site is surrounded on three sides by a conservation area, and there is a grade 2 listed building within the vicinity of the site, as well as several buildings of local interest, one adjacent to the site. A small portion of the site is within an archaeological notification area and the site lies within an area of medium archaeological potential.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	It is possible that a development of this size could have a positive effect on the economy of Barcombe, being a small village with local services, which the residents would be likely to use.
18. Tourism	0	0	0	



Table 50 Barcombe Cross - Option C Land North of High Street

Objectives	S	M	L	Explanation
1.Housing	0?	0?	0?	Development at this site could bring forward 10 dwellings. It is likely that this could be brought forwards within the next five years. Access is thought to be in different ownership and so the achievability of the site is unknown.
2.Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0?	0?	0?	Access is likely to be via a bordering track. Widths and visibility of access points are considered achievable by the highways authority with maintenance of vegetation along the southern road. <ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office and a small local supermarket, although the nearest GP surgery is approximately 2 miles away at Lewes. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land.
8.Biodiversity	0?	0?	0?	There is a SNCI within the vicinity, however it is not thought that there would be a significant adverse impact on this objective.
9.Environment	-?	-?	-?	The site is a smaller section of option B and so the same landscape concerns are evident, although to a lesser extent due to the smaller size of the site which is tucked in to the existing built up area boundary. The site rises to the north east without much screening, making it a prominent location from the south west entrance to the village. However there are no long views into or out of the site. It has been identified in the 2012 landscape capacity study as an area with a low capacity for change, meaning that development in this area is undesirable. The site is surrounded on three sides by a



Objectives	S	M	L	Explanation
				conservation area, and there is a grade 2 listed building within the vicinity of the site, as well as several buildings of local interest, one adjacent to the site. As such any development would need to be sensitive to this conservation area designation and the listed buildings.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	Residents are likely to use local services; however being a small development of only 10 units, this impact is not likely to be significant.
18. Tourism	0	0	0	

Table 51 Barcombe Cross - Option D Land at Bridgelands

Objectives	S	M	L	Explanation
1.Housing	0?	0?	0?	Development at this site could bring forward 7 dwellings. Although the site would make a small contribution to the housing stock, it is not considered to be a significant enough contribution for it to have an impact upon this indicator. The achievability of the site is currently unknown as it is unclear whether an agreement has been made on accessing the site via a private road.
2.Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0?	0?	0?	Access is via a private road and it is currently unclear whether an agreement is in place to access the site.



Objectives	S	M	L	Explanation
				<ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office and a small local supermarket, although the nearest GP surgery is approximately 2 miles away at Lewes. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land (grade 3).
8.Biodiversity	0?	0?	0?	The site is adjacent to a SNCI, although it is expected that an appropriately designed development could be accommodated on the site without a significant adverse impact on the designation.
9.Environment	0?	0?	0?	The site is located adjacent to a conservation area and so any development would need to be sensitive to this designation. There are Grade 2 listed buildings to the east although it is not likely that they would be impacted upon. The site covers two areas that are identified in the 2012 landscape capacity study as having a low capacity for change, meaning that development in this area is undesirable. However, the site is enclosed and a robust tree line along the eastern and northern boundaries prevents views into and out of the site to the conservation areas to the east. There is a TPO in the centre of the site.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal	0	0	0	



Objectives	S	M	L	Explanation
Towns				
17.Rural Economy	0	0	0	New development is likely to have a positive effect on the economy of Barcombe, being a small village with local services, which the residents would be likely to use. However, being a small development of only 7 units, this impact is not likely to be significant.
18. Tourism	0	0	0	

Table 52 North Chailey - Option A Land South of Station Road

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would create 20 units. It is likely that this would include affordable housing however the achievability of the site is unknown due to access issues.
2.Deprivation	0	0	0	The site lies between two of the most affluent settlements in the District; Newick and North Chailey. Although an affordable housing need may still exist it is unlikely that development would have a significant effect on this objective.
3.Travel	-	-	-	Access is an issue for this site, although access could be provided on to the A272, ESCC highways wish to avoid further access points onto the road. Alternatively, access may be achieved onto Oxbottom Lane however this is dependent on the adjacent site being brought forward for development and it should be noted that a number of trees, including the entire eastern boundary, are now protected by TPO group and TPO designations. <ul style="list-style-type: none"> - The site is just over the 800m threshold distance of a primary school. - The site is not within walking distance of a secondary school or any other local services, with the nearest shop being 1km away - A regular bus service stops just outside of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	-	-	-	The site is not within or adjacent to the settlement boundary of North Chailey and forms part of a green gap between the settlements of North Chailey and Newick and so may be seen as undesirable for development by members of the local community.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land	-	-	-	The site is predominantly greenfield land and potentially high grade agricultural land.



Objectives	S	M	L	Explanation
Efficiency				
8.Biodiversity	0	0	0	
9.Environment	0?	0?	0?	The site is very well screened on all sides by mature trees and so will not impact on the wider landscape significantly; this is reflected by the Landscape Capacity Study 2012 which identifies the area as having a medium capacity for change. The site is however surrounded on 3 sides (North, East and South) by TPO groups and has 3 individual TPO's within its boundary. There is also a Grade 2 listed building just to the east of the site.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 53 North Chailey - Option B Land at Glendene Farm, Station Road

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would include 10 units. It is likely that this could be brought forward in the next five years.
2.Deprivation	0	0	0	North Chailey is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	-	-	-	Access onto the A272 is considered achievable.



Objectives	S	M	L	Explanation
				<ul style="list-style-type: none"> - There is a nursery school within the 800m threshold, however there is not a primary or secondary school within walking distance - There are some local services within walking distance such as a restaurant and a shop - A regular bus service runs within walking distance of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0?	0?	0?	The site does not include biodiversity designation but protected species have been recorded adjacent to the site and further surveys identified other population that will require the implementation of suitable mitigation measures.
9.Environment	0?	0?	0?	The site is bordered by ancient woodland to the North and the areas to the east and west are fairly densely covered by trees, this helps to screen it from long views. It also slopes down to the North quite steeply, away from the A272 which helps to contain the site. In the 2012 Landscape Capacity Study the area adjacent to the site is designated as having a low capacity for change, although the site itself may be considered differently if assessed as such. A small development is unlikely to adversely impact on this objective. Potential contamination issues investigated as part of planning application (LW/15/0550).
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0?	0?	0?	The site is located within Flood Zone 1. Surface water flooding may be an issue on this site and would need to be investigated however mitigation is thought to be achievable.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal	0	0	0	



Objectives	S	M	L	Explanation
Towns				
17.Rural Economy	0	0	0	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 54 North Chailey - Option C Land at Oxbottom Lane, Newick

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would include 20 units. It is likely that this would include affordable housing and could potentially be brought forward within the next 5 years.
2.Deprivation	0	0	0	The site lies between two of the most affluent settlements in the District; Newick and North Chailey. Although an affordable housing need may still exist it is unlikely that development would have a significant effect on this objective.
3.Travel	-	-	-	ESCC highways consider access onto Oxbottom Lane achievable. <ul style="list-style-type: none"> - The site is within the 800m threshold distance of a primary school. - The site is not within walking distance of a secondary school or any other local services, with the nearest shop being 1km away - A regular bus service stops just outside of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	-	-	-	The site is not within or adjacent to the settlement boundary of North Chailey and forms part of a green gap between the settlements of North Chailey and Newick and so may be seen as undesirable for development by members of the local community.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0?	0?	0?	Habitat survey work indicated slow worms and grass snake presence (in low numbers) and site foraged by common bat. Mitigation would be required.
9.Environment	0?	0?	0?	The site is very well screened to the East and West by mature trees; the northern edge fronting the A272 is also fairly well screened by vegetation. In addition the land slopes away to the



Objectives	S	M	L	Explanation
				South, limiting the visibility of any development from the road to the North. Overall the site is well contained and would not impact on any long views; this is reflected by the Landscape Capacity Study 2012 which identifies the area as having a medium capacity for change. The site has a small TPO group on the South Western border however a sensitively designed development could mitigate any impact upon these. There are also 2 listed buildings in the vicinity of the site, one being adjacent to it.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 55 North Chailey - Option D Land South of Fairseat, Station Road

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would include 15 units. It is likely that this would include affordable housing and could potentially be brought forward within 5 years.
2.Deprivation	0	0	0	The site lies between two of the most affluent settlements in the District; Newick and North Chailey. Although an affordable housing need may still exist it is unlikely that development would have a significant effect on this objective.
3.Travel	-	-	-	Access is an issue for this site; it is landlocked with no direct access onto a highway therefore it is reliant upon the adjacent site to the east being brought forward for development in order to



Objectives	S	M	L	Explanation
				<p>achieve suitable access onto Oxbottom Lane.</p> <ul style="list-style-type: none"> - The site is within the 800m threshold distance of a primary school. - The site is not within walking distance of a secondary school or any other local services, with the nearest shop being 1km away - A regular bus service stops just outside of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	-	-	-	The site is not within or adjacent to the settlement boundary of North Chailey and forms part of a green gap between the settlements of North Chailey and Newick and so may be seen as undesirable for development by members of the local community.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0?	0?	0?	Habitat survey work indicated slow worms and grass snake presence (in low numbers) and site foraged by common bat. Mitigation would be required.
9.Environment	0?	0?	0?	The site is well screened on all sides by mature trees, as a result it is well contained and its development would not significantly impact upon any long views into or out of the site. The area is identified as having a medium capacity for change in the Landscape capacity study 2012. To the west and the south east the site is bordered by TPO groups although these could be retained as part of a sensitive development. There is also a Grade 2 listed building adjoining the site to the North.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal	0	0	0	



Objectives	S	M	L	Explanation
Towns				
17.Rural Economy	0?	0?	0?	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 56 North Chailey - Option E Land at Oxbottom Lane and Fairseat House

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site (combination of option C and D) would include 30 units. This would include market and affordable housing and could potentially be brought forward within the next 5 years.
2.Deprivation	0	0	0	The site lies between two of the most affluent settlements in the District; Newick and North Chailey. Although an affordable housing need may still exist it is unlikely that development would have a significant effect on this objective.
3.Travel	-	-	-	ESCC highways consider access onto the A272 to be undesirable, alternative access onto Oxbottom Lane is considered achievable. Development of these sites together has the benefit of providing access to landlocked site CH/A06. <ul style="list-style-type: none"> - The site is within the 800m threshold distance of a primary school. - The site is not within walking distance of a secondary school or any other local services, with the nearest shop being 1km away - A regular bus service stops just outside of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting y car.
4.Communities	-	-	-	The site is not within or adjacent to the settlement boundary of North Chailey and forms part of a green gap between the settlements of North Chailey and Newick and so may be seen as undesirable for development by members of the local community.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0?	0?	0?	Habitat survey work indicated slow worms and grass snake presence (in low numbers) and site foraged by common bat. Mitigation would be required.



Objectives	S	M	L	Explanation
9.Environment	0?	0?	0?	The site is very well contained, surrounded on all sides by mature trees and also development to the south. In addition to this the site slopes away to the south, offering further screening from view of the A272. There are no long views into or out of the site; it is identified as an area with a medium capacity for change in the 2012 Landscape Capacity Study. There are several TPO groups bordering the site to the west and the south and two Grade 2 listed buildings in the immediate area, one adjacent to the site to the north.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 57 North Chailey - Option F Land at Layden Hall

Objectives	S	M	L	Explanation
1.Housing	0?	0?	0?	Development at this site would create 6 units. It is likely that this could be brought forward in the next five years.
2.Deprivation	0	0	0	The site lies within the relatively affluent settlement of North Chailey; although an affordable housing need may still exist it is unlikely that development would have a significant effect on this objective.
3.Travel	-	-	-	Access would be onto the A275, this is a derestricted stretch of road and due to the slight bend to the north it may be difficult to ensure sufficient visibility splays.



Objectives	S	M	L	Explanation
				<ul style="list-style-type: none"> - There is a Nursery school within the 800m threshold, however there is not a primary or secondary school within walking distance - There are some local services within walking distance such as a restaurant and a shop - A regular bus service runs within walking distance of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0?	0?	0?	The site is within the Western Ouse Streams and Ashdown Forest Biodiversity Opportunity Area, and close to (other side of the A275) the Chailey Common LNR and SSSI.
9.Environment	0	0	0	The site is adjacent to landscape character area designated as having medium capacity for change (2012 Landscape Capacity Study). A small development is unlikely to adversely impact on this designation. The site is almost completely covered by trees, those on the southern and western borders screen the site very effectively from view meaning that it is well contained with no views into or out of the site. Despite the dense tree cover there are no TPO's on the site.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	



Table 58 South Chailey - Option G Land Fronting Mill Lane

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would include 10 units. It is likely that this would be brought forward in the next five years.
2.Deprivation	0	0	0	South Chailey is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	-	-	-	Access may be an issue as it is likely to be on a bend and on a 'fork'. Congestion is likely to be an issue at school hours along Mill lane. Some local services are located in South Chailey, for example a GP surgery, whereas other key services such as the grocery store are located at South Street (just within 800m). The site is within walking distance of a secondary school but the nearest primary school is at Chailey. The site is within walking distance of regular bus services but not a railway station and so may encourage out-commuting by car
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0	0	0	
9.Environment	0?	0?	0?	The site is surrounded by development to the east and south. The north of the site is prominent due to the openness of the landscape. This area of the site is considered to have negligible to low capacity for change within the 2010 Landscape Capacity Study, however the site slopes southwards towards Mill lane and so on the whole is fairly well concealed. Considering the potential yield is only 10 units it is probable that development could be accommodated in this southern section without a significant landscape impact. It must also be noted that the site lies within an Archaeological Notification Area.
10.Waste	0	0	0	



Objectives	S	M	L	Explanation
11. Water	0	0	0	
12. Energy	0	0	0	
13. Air Quality	0	0	0	
14. Flooding	0	0	0	
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural Economy	0	0	0	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 59 South Chailey - Option H Chailey Brickworks

Objectives	S	M	L	Explanation
1. Housing	+	+	+	Development at this site would include 48 units in market and affordable housing. The site is currently in employment use and it is unlikely that the site will become available with the plan period. Achievability is also unknown.
2. Deprivation	0	0	0	South Chailey is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3. Travel	-	-	-	An access point onto the A275 is already in place servicing the brickworks. Some local services are located in South Chailey, for example a GP surgery, whereas other key services such as the grocery store are located at South Street (within 800m). The site is within walking distance of a secondary school but the nearest primary school is at Chailey. The site is within walking distance of regular bus services but not a railway station and so may encourage out-commuting by car
4. Communities	0?	0?	0?	



Objectives	S	M	L	Explanation
5.Health	0?	0?	0?	Due to land contamination, the impact o this objective is uncertain.
6.Education	0	0	0	
7.Land Efficiency	+	+	+	Development at this site would promote the use of brownfield land and so scores positively against this objective.
8.Biodiversity	0?	0?	0?	The site is approximately 200m from the Markstakes Common SNCI.
9.Environment	0	0	0	The site is well screened on all sides by vegetation and housing to the south. It is a well contained site.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	-?	-?	-?	The site is currently subject to 2003 LDLP policy CH1 which grants permission for business (B1) and industrial (B2) purposes should the brickworks close. Therefore, residential development would at this time result in the loss of an existing employment site and override a saved policy promoting business and industrial use. The brickworks is an important established employer within the area and helps support other local businesses and shops.
18. Tourism	0	0	0	

Table 60 Edge of Burgess Hill - Option A Land at the Nuggets

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would deliver 14 units including market and affordable homes. The site could be brought forwards in the early part of the plan period.
2.Deprivation	0	0	0	Burgess Hill (Wivelsfield Parish) is a fairly affluent area of the district (although that is not to say



Objectives	S	M	L	Explanation
				that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0	0	0	Access to the site would be via an existing property on Valebridge Road. The road bends to the north, consequently shortening visibility along the derestricted stretch of road; however it is likely to be suitable. The site is within walking distance of a bus service. The site is roughly 1km away from the nearest station and just over 1km away from the nearest school and services. However, it must be acknowledged that a wide range of services are available at Burgess Hill (identified as a District Centre, although not located within Lewes District) and so could be considered a sustainable location.
4.Communities	0?	0?	0?	It is unknown whether there will be any impact upon the local or wider community resulting from development at this site.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	This site does contain some brownfield land although is predominantly greenfield.
8.Biodiversity	0?	0?	0?	The site does not form part of a formal biodiversity designation but local records indicate presence of bats, dormouse, barn owls and reptiles. The site is bordered by a group TPO and sections of ancient woodland which contribute to the local green infrastructure and irreplaceable habitat network supporting local biodiversity.
9.Environment	0?	0?	0?	Parts of the site have already been developed, and so redevelopment of these areas will have little environmental impact. The site is very well contained by mature trees on all sides and screened to the east and south east by ancient woodland, development should be sensitive to this and kept to the western end of the site. The general area has been identified in the 2012 landscape capacity study as an area with a medium/high capacity for development. The County archaeologist identifies the site to be within an area of medium archaeological potential.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	



Objectives	S	M	L	Explanation
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	Burgess Hill accommodates a wider range of services and facilities, it is highly likely that residents would support these; however it is unlikely that development on a scale such as this will have much of an impact.
18. Tourism	0	0	0	

Table 61 Newhaven – Options for Land South of Valley Road

Objectives	Option A			Option B			Explanation
	S	M	L	S	M	L	
1.Housing	+	+	+	+	+	+	Both options will include 24 units in market and affordable housing.
2.Deprivation	+	+	+	+	+	+	Newhaven town contains some of the districts most deprived wards when measured against the Indices of Multiple Deprivation (IMD). Development of this site may encourage further regeneration and investment in the town, having a positive impact on the town and its more deprived communities.
3.Travel	0	0	0	0	0	0	
4.Communities	0	0	0	0	0	0	
5.Health	0	0	0	0	0	0	
6.Education	0	0	0	0	0	0	
7.Land Efficiency	-	-	-	-	-	-	
8.Biodiversity	0	0	0	0	0	0	There are SNCIs within the vicinity of the site, although it is unlikely that there



Objectives	Option A			Option B			Explanation
	S	M	L	S	M	L	
							would be any negative impact on these designations. There is a TPO group located 100m south west of the site.
9.Environment	0	0	0	0	0	0	
10.Waste	0	0	0	0	0	0	
11.Water	0	0	0	0	0	0	
12.Energy	0	0	0	0	0	0	
13.Air Quality	-?	-?	-?	-?	-?	-?	
14.Flooding	0	0	0	0	0	0	
15.Coastal Erosion	0	0	0	0	0	0	
16.Economy of the Coastal Towns	0	0	0	0	0	0	
17.Rural Economy	0	0	0	0	0	0	
18. Tourism	0	0	0	0	0	0	

Table 62 Newhaven - Options for Land at the Marina

Objectives	Option A			Option B			Explanation
	S	M	L	S	M	L	
1.Housing	+	+	+	++	++	++	Both options are likely to have a positive impact on this objective however option A would result in the delivery of a minimum of 100 units against a minimum of 300 units for option B. The later option will therefore have a greater positive impact on this objective by delivering an additional minimum of 200 units.
2.Deprivation	+	+	+	+	+	+	
3.Travel	+	+	+	+	+	+	
4.Communities	0?	0?	0?	0?	0?	0?	



Objectives	Option A			Option B			Explanation
	S	M	L	S	M	L	
5. Health	0?	0?	0?	0?	0?	0?	The site is within proximity to Newhaven East Wastewater Treatment Works which could have impact on the future occupiers' health due to odour and noise pollution.
6. Education	0	0	0	0	0	0	
7. Land Efficiency	+	+	+	++	++	++	Both options will result in the development of a brownfield land and therefore score positively against this objective. However it is not thought that option A would make the best use of land due to its low density (just above 22 dwelling per hectare). Option B would result in a denser scheme than required by Core Policy 2 of the Local Plan Part 1 which is justified by the context of the site therefore option B is likely to have a greater positive impact on this objective.
8. Biodiversity	0?	0?	0?	0?	0?	0?	This site includes areas of intertidal mudflats which is a priority habitat. Development of the site may have an impact on this objective.
9. Environment	0	0	0	0	0	0	
10. Waste	0	0	0	0	0	0	
11. Water	0	0	0	0	0	0	
12. Energy							
13. Air Quality	-?	-?	-?	-?	-?	-?	
14. Flooding	-?	-?	-?	-?	-?	-?	This site is in flood zone 3 and the proposed development may present a risk for future occupiers. However a sequential and exception test has been carried out that demonstrates the sustainability benefits of developing this site.
15. Coastal Erosion	0	0	0	0	0	0	
16. Economy of the Coastal Towns	+	+	+	+	+	+	Although the difference between the options is unlikely to be significant, option B should have a greater positive impact on this objective.
17. Rural Economy	0	0	0	0	0	0	
18. Tourism	0	0	0	0	0	0	



Table 63 Ringmer - Options for Caburn Field

Objectives	Option A			Option B			Option C			Explanation
	S	M	L	S	M	L	S	M	L	
1.Housing	+	+	+	+	+	+	++	++	++	Although not significantly different, option B is likely to have a greater positive impact on this objective. Option C will provide a greater number of new homes to achieve the requirements of the Joint Core Strategy.
2.Deprivation	0	0	0	0	0	0	0	0	0	
3.Travel	0	0	0	0	0	0	0	0	0	
4.Communities	0?	0?	0?	0?	0?	0?	0?	0?	0?	The site is currently allocated within the Lewes District Local Plan and its development will result in the loss of a key community facility in the centre of the village. However, the intention is to provide at least equivalent facilities elsewhere in the parish so it is not thought that the options will have an impact on this objective. Additional policy criteria could help achieving a positive impact on this objective.
5.Health	0	0	0	0	0	0	0	0	0	
6.Education	0	0	0	0	0	0	0	0	0	
7.Land Efficiency	-	-	-	-	-	-	-	-	-	
8.Biodiversity	0	0	0	0	0	0	0	0	0	
9.Environment	0	0	0	0	0	0	0	0	0	
10.Waste	0	0	0	0	0	0	0	0	0	
11.Water	0	0	0	0	0	0	0	0	0	
12.Energy	0	0	0	0	0	0	0	0	0	
13.Air Quality	0	0	0	0	0	0	0	0	0	
14.Flooding	0	0	0	0	0	0	0	0	0	
15.Coastal Erosion	0	0	0	0	0	0	0	0	0	
16.Economy of	0	0	0	0	0	0	0	0	0	



Objectives	Option A			Option B			Option C			Explanation
	S	M	L	S	M	L	S	M	L	
the Coastal Towns										
17.Rural Economy	+	+	+	+	+	+	+	+	+	Although the difference between the options is unlikely to be significant option C should have a greater positive impact on this objective.
18. Tourism	0	0	0	0	0	0	0	0	0	

Table 64 Options for the overall housing provision

Objectives	Option A			Option B			Explanation
	S	M	L	S	M	L	
1.Housing	0	0	0	0	0	0	Option A is likely to provide more certainty to ensure the provision of additional units. However the shortfall identifies at the Edge of Burgess Hill and in Cooksbridge accounts for 8 units and therefore the allocation of additional sites is likely to a limited impact on this objective.
2.Deprivation	0	0	0	0	0	0	
3.Travel	0	0	0	0?	0?	0?	
4.Communities	0	0	0	-	-	-	Option B is likely to impact negatively on this objective in particular in areas where a neighbourhood plan has been or is being prepared.
5.Health	0	0	0	0	0	0	
6.Education	0	0	0	0	0	0	
7.Land Efficiency	0	0	0	0?	0?	0?	
8.Biodiversity	0	0	0	0?	0?	0?	
9.Environment	0	0	0	0?	0?	0?	
10.Waste	0	0	0	0	0	0	
11.Water	0	0	0	0	0	0	
12.Energy	0	0	0	0	0	0	



Objectives	Option A			Option B			Explanation
	S	M	L	S	M	L	
13.Air Quality	0	0	0	0?	0?	0?	
14.Flooding	0	0	0	0?	0?	0?	
15.Coastal Erosion	0	0	0	0	0	0	
16.Economy of the Coastal Towns	0	0	0	0	0	0	
17.Rural Economy	0	0	0	0	0	0	
18. Tourism	0	0	0	0	0	0	



F. Flood Risk Assessment – Land at the Marina, Newhaven

1. The land at the Marina (The Marina) was allocated in the 2003 LDLP for a target minimum of 100 units under policies RES2 and NH6. A planning application for mixed residential and commercial development of the site was submitted in 2007⁵⁶. These plans included the development of 331 units and 973sqm of commercial floorspace. Planning permission for The Marina development was granted in 2012 and was therefore an existing commitment at the point of submitting the Joint Core Strategy for examination.
2. However, with planning permission expiring in July 2015, it has become necessary to review the original 2003 allocation and, in particular given comments received from the Environment Agency (EA) to the Draft Local Plan Part 2 consultation, ensure the appropriateness of the site in terms of flood risk.
3. Due to the timings and status of The Marina site, highlighted above, it was not included within the Joint Core Strategy Sequential and Exception Tests Document. However, following discussions with the EA the below information is included in the Local Plan Part 2 SA to provide context and clarification as to the retention of the allocation.
4. Within the 2009 Lewes District Strategic Flood Risk Assessment (SFRA), on the Flood Zone Map (map 12 of SFRA 002 Flood Risk Zones), it is shown that the Marina site lies on the border, outside of Flood zone 3b, defined as the Functional Floodplain. Following the completion of the flood defences proposed for the development of this site the Environment Agency have confirmed the site will be wholly within Flood Zone 3.
5. Accompanying the 2007 planning application, Hemsley Orrell Partnership (HOP) submitted a site specific flood risk assessment (FRA), including a sequential test and an exception test for The Marina.

Sequential Test

6. A Sequential Test is applied by Local Planning Authorities to demonstrate that there are no alternative locations in areas with a lower probability of flooding that would be suitable for the type of development or land use proposed.

⁵⁶ LW/07/1475: Erection of 319 residential apartments & 12 town houses arranged in 11 blocks (between 3 & 9 storeys high) with car parking; 973sqm of commercial floorspace (including A3 restaurant &/or A1 marina related shops; marina facilities (including office, clubroom etc);



7. Within the Newhaven Town boundary the 2007 FRA identified 3 sites available for residential development. These are set out in the below table.

	Site	Development potential (Units)	Flood zone
1	South of Valley Road	24	1
2	Meeching Quarry	125	1
3	Kings Avenue	8	1

None of these sites offered the development potential of The Marina. Sites of the size required to achieve similar levels of development to The Marina proposal are either existing public open space (recreation grounds) or an area of local heritage (Newhaven Fort and Castle Hill) and therefore not available for development. In addition, the Meeching Quarry site, previously considered a potential alternative, is now superseded by the Joint Core Strategy strategic housing allocation Spatial Policy 7: Land at Harbour Heights. The Kings Avenue site is now partly built out.

8. The next stage of the HOP FRA was to apply the exception test, this was carried out in accordance with the then Planning Policy Statement 25: Development and Flood Risk (PPS25). It has since been considered against the 2018 National Planning Policy Framework (NPPF) and National Guidance.

Exceptions Test

9. In exceptional situations, there may be well-founded reasons for a development type which is not entirely compatible with the level of flood risk at a particular site to nevertheless be considered. In these circumstances, it will be necessary for the Local Planning Authority or developer to demonstrate that the site qualifies for development in the manner proposed by passing all elements of the Exception Test. It must be demonstrated that:
- the development provides wider sustainability benefits to the community that outweigh flood risk;
 - the development must be on brownfield; and
 - it must be demonstrated that the development will be safe – without increasing flood risk elsewhere, and where possible, reduce flood risk overall.
10. The Marina site passes at all three elements:



- It is of wider benefit to the local area. It regenerates a run-down area and protects existing housing and municipal areas from flooding.
- The site is on previously developed land.
- The FRA demonstrates that the flood defences close off the flood cell and make the site safe. The development will also protect houses and amenity space also within the flood cell.

Flood Management Measures

11. The Marina site is currently at risk from coastal flooding. Predicted flood levels in this area have continually risen over the last 10 years and top levels in this locality are recommended by the Environment Agency to be 5.6m Above Ordnance Datum (AOD) for residential uses and 5.2m AOD for commercial uses.
12. The Standard Approach for Finished Floor Levels (FFL) is: the design flood level + 300mm. It is confirmed that the predicted flood level for residential properties at the site for 2015 will be 5.6 m AOD and that residential FFL would be required to be set at a minimum level of 5.9m AOD providing 300mm freeboard to the flood level. For the southern end of the site a FFL of 6.4m AOD is required.
13. Site levels at the Marina are generally in the region of 4m AOD and consequently a strategy for flood defence is required. Implementation of the proposed scheme, outlined in the 2007 FRA, for the Marina would complete a series of flood defence measures implemented through phases 1 and 2 to close off a flood cell from the flood plain. The benefits of this development would reach beyond the Marina site itself.
14. Between 2007 and 2018 the NPPF Guidelines for Flood Risk Assessment have changed. In any future FRA it should be demonstrated how flood risk will be managed now and over the development's lifetime, taking climate change into account, and with regard to the vulnerability of its users. The modelling available from EA for the area is from 2012 and it suggests a flood level of around 5.54m AOD for the 0.5% Annual Exceedance Probability (AEP) (=1 in 200 year event) plus Climate Change (in 2115). This is for tidal levels, the fluvial elements show significantly lower levels, even with the increased 2016 updated Climate Change allowances (all 35, 45 and 105 %). Flood management measures outlined in the 2007 FRA therefore remain appropriate to modelling undertaken under more recent guidance.

Conclusion

16. The EA has confirmed that the results of the Flood Risk Assessment, executed by HOP in 2007 are still accurate and are confident that the 2007



FRA is sufficient for the purposes of taking forward the Marina site as an allocation, at a higher capacity, within LPP2.



G. Filtered Gypsy and Traveller Site Options, as part of Joint Core Strategy Assessment (2012)

Site Name	Reason
Glendene, Station Road, Chailey	Topographical constraints and unknown availability.
Land at the Paddock, Chailey	ESCC Highway Authority objection – required visibility splays cannot be achieved at junction with A275, Showstopper.
Layden Hall, A275, Chailey	Not available for consideration as proposed use.
Balcombe Pit, Station Road, Glynde	Not available for consideration as proposed use.
Land at Flyover, A259, Newhaven	Environment Agency objection – site is within flood zone 3. Not suitable for permanent residential use.
Land at Lewes Road, Newhaven	Environment Agency objection – site is within flood zone 3 and is a former landfill waste site. Not suitable for permanent residential use.
Land at Grubbs Fields, Newick	Environment Agency objection – site is within flood zone 3. Not suitable for permanent residential use.
Land north of Rushy Hill, Peacehaven	ESCC Highway Authority Objection – suitable access cannot be achieved and significant topographical constraints – showstopper.
Land at Valley Road (parcel 622), Peacehaven	No suitable access. Un adopted roads, narrow and in poor condition. Abnormal costs with required infrastructure provision. Significant topographical constraints - showstopper.
Land at Plumpton Depot, South Road, Plumpton	ESCC Highway Authority Objection suitable access cannot be achieved due to visibility splays required for the speed of this road.
All Land (4.4ha) between The Plough and the Old Brickworks, Station Road, Plumpton	ESCC Highway Authority objection to accessing the land from St Helena Lane and at the point where the Public Right of Way intersects Station Rd – both would require visibility splays, which are not considered achievable for the proposed use at these entrance points to the land. Possibility of land contamination to the south of the land, due to former use as Brickworks, however land gradient would indicate leachate is not a concern for the land itself, which is on higher ground.
Land at Ham Farm, Ringmer	Not available.
Tarring Neville Quarry, A26, Tarring Neville	Environment Agency and Environmental Health concerns over stability of cliff faces, further investigation required.
Land west of Slugwash Lane, Wivelsfield	ESCC Highway Authority objection – required visibility splays not considered achievable due to alignment of road. Showstopper.



H. Assessment of the Gypsy and Traveller Accommodation Site Option

Table 65 Option A Land South of the Plough (0.69ha) (South East Corner Only)

Objectives	S	M	L	Explanation
1.Housing	++	++	++	This option, only the south east corner of the larger SHELAA site (reference 03PL) would provide 5 permanent gypsy and traveller pitches. It would fully meet the identified need for the plan area and therefore would have a positive impact on this objective.
2.Deprivation	+	+	+	This option would meet the need identified and support social inclusion
3.Travel	-	-	-	This site is 1.2 km from the nearest settlement, the village of Plumpton Green where some key services are available. Including a primary school, a convenience store and a post office. Further services can be accessed from other settlements via bus (within 200m of the site) and train (1.8km from Plumpton Green train station). Overall it is not thought that this option would have as significant impact on congestion. However due to its rural location, this allocation may not encourage the use of alternative mode of transport and therefore score negatively against this objective.
4.Communities	0	0	0	Less than half a dozen residential properties lie within 100m of the site. Station Road to the east and the neighbouring commercial estate to the south acting as a boundary containing the site. The site for 5 pitches would ideally suit a single family and provide a good living environment being in a semi-rural location and not next to adverse (noisy, dirty, smelly) neighbouring uses. Therefore it is thought that this allocation would have a neutral impact on this objective.
5.Health	+	+	+	The provision of permanent accommodation will help to improve access to health facilities, tackling known issues such as long term illness and lower life expectancy, which are often below the national average in Gypsy and Traveller communities.
6.Education	+	+	+	The provision of permanent accommodation will improve the opportunities for members of the Gypsy and Traveller community to attend school and further education.
7.Land Efficiency	-	-	-	The site is greenfield land.
8.Biodiversity	0	0	0	The site does not form part of a formal biodiversity designation. However local records indicate the presence of notable and protected species including bats and other notable invertebrates



Objectives	S	M	L	Explanation
				and vascular plants in the wider area.
9.Environment	0	0	0	The site appears open as it forms part of a larger site. However it could be well contained with effective landscaping bunds. The provision of accommodation is therefore unlikely to have impact on the valued landscape of the district such as the National Park. Whilst the site does not lie within any historical designation, the wider area has evidence of historical activity.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is within flood zone 1, low risk; however a risk of surface water flooding has been identified and will need to be addressed through sustainable drainage measures.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	



I. Filtered Employment Sites

Site Name	Reason
Chailey Brickworks, South Chailey	Not available
Hamsey Brickworks	Received planning permission for mixed use development
Woodgate Dairy, Sheffield Park	Not suitable on environmental grounds



J. Assessment of the Employment Site Allocation Options

Table 66 Option A Balcombe Pit, Glynde

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	The site is located near Glynde train station with regular direct links to Lewes and Eastbourne and within 1km from the A27 through residential area. It is also within 200 metres of a bus stop but the bus service is infrequent. It is unlikely that development of the site would significantly impact congestion in the area. It is not thought that other modes of sustainable transport would be encouraged by the development of the site due to its location.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	++	++	++	Development of this site would promote the best use of a brownfield land currently considered under-utilised and run-down in appearance.
8.Biodiversity	0	0	0	Lewes Downs SSSI/SAC is located approximately 1km to the east of the site. Beddingham Grazing Marsh and Glynde Reach SNCI is within the vicinity of the site. However, it is thought that development of the site is unlikely to impact upon these designated sites.
9.Environment	-	-	-	The site is adjacent to Beddingham and Glynde Conservation Area and the South Downs National Park. The site is well screened by rock outcrop and vegetation and therefore development would not impact on the view from the conservation but is visible from the Downs. There are a number of listed buildings in the vicinity of the site and in the Conservation Area. Despite the pit being well screened, it is visible from Glynde Place (Grade1). The site is within an Archaeological Notification Area therefore an appropriate assessment will be required upon development of the site to ensure that it would not have negative impact on heritage assets.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	



Objectives	S	M	L	Explanation
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	+	+	+	The development would support the rural economy.
18. Tourism	0	0	0	

Table 67 Option B Land Adjacent to the American Express Community Stadium, Falmer

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	+	+	+	The site is adjacent to the American Express Community Stadium and straddles the boundary between Lewes District and Brighton and Hove City. It is well located in terms of strategic road network with the A27 to the north of the site which provides access to Lewes and Brighton. It is not thought that development on this site would encourage walking and cycling however other sustainable means of transport are available around the site. It is within walking distance from bus stops offering direct services to Brighton, Lewes, Ringmer and Uckfield and from Falmer Train Station with a direct link to Brighton, Lewes and Eastbourne.
4.Communities	+	+	+	Development of this site would introduce variety of active uses in this location which would contribute to create and sustain vibrant communities.
5.Health	0?	0?	0?	The site is within proximity of the A27 and the railtrack and is therefore exposed to noise pollution which could impact on the amenity of people occupying the site.
6.Education	0	0	0	
7.Land Efficiency	++	++	++	This is a brownfield land and therefore development on this site would contribute to the re-use of previously developed land.
8.Biodiversity	0	0	0	The site is within proximity to Westplain Plantatin SNCI but it is not thought that development



Objectives	S	M	L	Explanation
				will have negative impact on this site.
9.Environment	0	0	0	The site is located within close proximity of the South Downs National Park and a conservation area including listed buildings (grade 2) lies to the east. There is a dense boundary of trees to the north and east of the site. The site forms part of an already developed area and is surrounded by development therefore it is not thought that development of this site would constitute an encroachment into the country side of the National Park or impact on the setting of the conservation area.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	+	+	+	The development would continue supporting the rural economy and would contribute to the diversification of the business offer in the area.
18. Tourism	0	0	0	

Table 68 Option C - Land at East Quay, Newhaven Port

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	+	+	+	The site benefits from relatively good access to the A26 and is within 800m from Newhaven Harbour train station.
4.Communities	0	0	0	
5.Health	0	0	0	



Objectives	S	M	L	Explanation
6.Education	0	0	0	
7.Land Efficiency	-	-	-	The site is mostly greenfield land.
8.Biodiversity	-?	-?	-?	The site is within an SNCI. Therefore development on the site could have impact biodiversity.
9.Environment	-?	-?	-?	The site is open land adjacent and visible from the South Downs National Park. Development on this site could impact on the setting of the National park. Due to the site being within the planning boundary, it was not assessed within the Landscape Capacity Study however it adjacent to a site (Ouse Estuary Nature Reserve) which is considered to be a highly visible and sensitive area with no capacity for change. The site is adjacent to an archaeological notification area.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	Part of the site is within flood zone 2 and surrounding areas are within flood zone 3. However future use of the site is likely to be water compatible.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	+	+	+	Development of the site would support the expansion and enhancement of the Newhaven Port and allow the port to remain competitive by offering modern facilities to future investors and customers. It would have a positive impact on this objective.
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	



K. Assessments of Development Management Policy Options

Table 69 Issue 1 - Planning boundaries










Objectives	Option a) No planning boundaries	Option b) Maintain existing planning boundaries	Option c) Review existing planning boundaries
1.Housing	Uncertainty as to whether development is likely to be involved to respond to identified need	Clarifies where development can come forward however unlikely to be sufficient land available within the existing planning boundary to respond to identified need	Existing planning boundary likely to be extended to include adjacent sites to be allocated for housing to respond to identified need.
2.Deprivation	Uncertain	Uncertain	Provision of additional affordable housing
3.Travel	May result in unnecessary car dependant development in the countryside	Directs development where services are provided. Encourage use of sustainable transport and limits development of car dependent sites.	Development of new sites on the edge of settlement should rely on existing network and may contribute to its improvement
4.Communities			
5.Health			
6.Education			
7.Land Efficiency	May result in development of more brownfield land	Reinforce presumption in favour of development within the planning boundary, encouraging intensification and redevelopment of urban and/or brownfield site	Similar as option b but may also result in inclusion of greenfield sites within the planning boundary although unlikely to be of high value
8.Biodiversity			
9.Environment	May undermine	Directs development away	Directs development away



	environmental conservation and protection of the countryside.	from the countryside within the existing planning boundary, protecting high value greenfield land.	from the isolated countryside and within close proximity of the existing boundary, protecting high value greenfield land and landscape.
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns		Focus growth in urban areas	Focus growth in urban areas as planning boundaries around the coastal towns are limited by the National Park
17.Rural Economy	Provide larger customer base for rural businesses	Existing planning boundaries are tight around settlements in the rural area of the district which is likely to limit the provision of additional units for potential customers for rural businesses	May enlarge existing settlement in the rural area of the District
18. Tourism		Directs development away from the district's high value countryside and supports the provision of services and facilities	Directs development away from the district's high value countryside and supports the provision of services and facilities



Table 70 Issue 2 - Development in the countryside

Objectives	Option a) No policy	Option b) New policy – broad approach	Option c) New policy – development type specific approach
1.Housing	The NPPF aims at limiting the provision of new homes in the countryside but allows it under specific circumstances for small scale development	Could help to respond to housing need but it is not thought that it would have a significant impact on this objective	Could help to respond to housing need but it is not thought that it would have a significant impact on this objective
2.Deprivation			
3.Travel	 Likely to be car dependent sites	 Likely to be car dependent sites	 Likely to be car dependent sites
4.Communities			
5.Health			
6.Education			
7.Land Efficiency	 Exceptions allowed in the NPPF are mostly to encourage the need of existing building.	 broad approach may not allow for enough flexibility to allow the best use of land	 Tailored approach would allow to set acceptability criteria for development in the countryside and ensure the best use of land
8.Biodiversity			
9.Environment	 Exceptions allowed in the NPPF include the erection of new dwelling of exception quality or innovative nature of design which would make a positive contribution to the environment.	 may not allow for enough flexibility to make the best contribution to the built and natural environment	 Would allow to consider the appropriate approach compatible with the type of development to make a positive contribution on the built and natural environment
10.Waste			



11. Water			
12. Energy			
13. Air Quality			
14. Flooding			
15. Coastal Erosion			
16. Economy of the Coastal Towns			
17. Rural Economy	Unlikely to be significant to make a positive contribution	Unlikely to be significant to make a positive contribution	Unlikely to be significant to make a positive contribution
18. Tourism			

Table 71 Issue 3 - Essential need for rural workers

Objectives	Option a) No policy	Option b) New policy – practical framework
1. Housing	Respond to need but unlikely to have a significant impact on this objective	Respond to need but unlikely to have a significant impact on this objective
2. Deprivation		
3. Travel	Reduces car use by rural workers	Reduces car use by rural workers
4. Communities		
5. Health		
6. Education		
7. Land Efficiency		Guarantee the best use of land by making sure that the need cannot met in the area and that the dwelling is suitably located
8. Biodiversity		
9. Environment		Ensure that the proposed dwelling ins in keeping with the surroundings
10. Waste		
11. Water		
12. Energy		










13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy	 Enables rural workers to live on or near their place of work	 Enables rural workers to live on or near their place of work
18. Tourism		




Table 72 Issue 5 - Loss of small dwellings in the countryside

Objectives	Option a) No policy	Option b) Support dwelling replacement with similar unit	Option c) Restrain residential extension in the countryside
1.Housing			
2.Deprivation	 Larger units will be more expensive and therefore unlikely to be affordable for most people		
3.Travel			
4.Communities			
5.Health			
6.Education			
7.Land Efficiency	 May lead to development sprawl in the countryside	 Protects greenfield land	 Protects greenfield land
8.Biodiversity			
9.Environment	 Could result in degradation of the rural character of an area.	Maintains the rural character of an area.	Avoid development sprawl in the countryside
10.Waste			
11.Water			
12.Energy			



13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism			

Table 73 Issue 6 - Scale and design of development outside the planning boundaries

Objectives	Option a) No policy – rely on CP11	Option b) New policy – broad approach	Option c) New policy – development type specific approach
1.Housing			
2.Deprivation			
3.Travel			
4.Communities			
5.Health			
6.Education			
7.Land Efficiency			
8.Biodiversity			
9.Environment	 Ensuring the good design of the built environment is essential in the NPPF	 may not allow for enough flexibility to ensure a positive contribution to the built and natural environment	 Would allow to consider the appropriate approach compatible with the type of development to make a positive contribution on the built and natural environment
10.Waste			
11.Water			
12.Energy			



13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism	Ensure that the valued landscape of the district that attract tourism is protected		Ensure that the valued landscape of the district that attract tourism is protected

Table 74 Issue 8 – Sub-division of existing property

Objectives	Option a) No policy	Option b) New policy – general support	Option c) New policy – practical framework
1.Housing		Increases housing supply in rural areas	Increases housing supply in rural areas
2.Deprivation		Smaller housing units may be more affordable than the large properties that tend to occur in rural areas.	Smaller housing units may be more affordable than the large properties that tend to occur in rural areas.
3.Travel			criteria regarding parking spaces may have a long-term positive impact
4.Communities			
5.Health			
6.Education			
7.Land Efficiency	Could lead to under-occupied dwellings	provide more accommodation on PDL	provide more accommodation on PDL
8.Biodiversity			



9.Environment			Would contribute to maintaining or improving the character of an area
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy		Unlikely to be significant to make a positive contribution	Unlikely to be significant to make a positive contribution
18. Tourism			

Table 75 Issue 11 - Employment development in the countryside

Objectives	Option a) No policy – rely on CP4	Option b) New policy – approach per type of development
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency	Encourage the development of employment sites	Encourages the development of employment sites, the regeneration of existing rural buildings and directs development to brownfield land
8.Biodiversity		



9.Environment		Environmentally sensitive design of buildings
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy	Supports economic growth	Supports economic growth
18. Tourism		

Table 76 Issue 12 - Existing employment sites in the countryside

Objectives	Option a) No policy – rely on CP4	Option b) New policy – Criteria based approach
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency	Encourages regeneration and intensification of existing employment sites	Encourages regeneration and intensification of existing employment sites by directing it to brownfield sites
8.Biodiversity		
9.Environment		Promotes development which would be in keeping with the rural character of the area
10.Waste		
11.Water		
12.Energy		



13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy	Supports economic growth	Supports economic growth
18. Tourism		

Table 77 Issue 13 - Farm diversification

Objectives	Option a) No policy – rely on CP4	Option b) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		Directs development to brownfield sites.
8.Biodiversity		
9.Environment		Sensitive design of new buildings would protect the rural character of the area
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		



17.Rural Economy	Supports economic growth	Supports economic growth
18. Tourism		

Table 78 Issue 14 - Caravan and camping sites

Objectives	Option a) No policy	Option b) New policy – open approach	Option c) New policy – criteria based approach
1.Housing			
2.Deprivation			
3.Travel			Ensures the accessibility to the site
4.Communities			
5.Health			
6.Education			
7.Land Efficiency			Would primarily rely on existing facilities to limit the development of greenfield land
8.Biodiversity		May have negative impact on biodiversity of an area	
9.Environment	Only addresses camping and caravan sites in the National Park	May have negative impact on the natural setting	expansion of caravan and camping sites will not detract from the character and landscape of an area and give a direct access to the countryside
10.Waste			
11.Water			
12.Energy			
13.Air Quality			



14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns		May benefit coastal areas	May benefit coastal areas
17.Rural Economy	Maintain economic growth	Supports economic growth	Supports economic growth
18. Tourism	Supports the retention and improvement of existing visitor accommodation stock including camping and caravan sites to maintain the number of visitor	Increases accommodation capacity which could attract more visitors	Increases accommodation capacity which could attract more visitors

Table 79 Issue 15 - Existing visitor accommodation

Objectives	Option a) No policy – rely on CP4	Option b) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		This approach would allow for the best use of land if the existing visitor accommodation was no longer suitable, viable or needed.
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		



14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns	Aims to maintain existing visitor accommodation which should support the economy	Aims to maintain existing visitor accommodation which should support the economy
17.Rural Economy	Aims to maintain existing visitor accommodation which should support the economy	Aims to maintain existing visitor accommodation which should support the economy
18. Tourism	Supports maintenance of visitor accommodation which may encourage greater numbers of tourists	Supports maintenance of visitor accommodation which may encourage greater numbers of tourists but may result in the loss of visitor accommodation

Table 80 Issue 18 - Green Infrastructure

Objectives	Option a) No policy	Option b) New policy – Part of the development process	Option c) New policy – consider in isolation
1.Housing			
2.Deprivation			
3.Travel			
4.Communities	Maintains and aims to provide green space for communities to utilise.	Requires green infrastructure to come forward as part of development proposals.	positive impact when green infrastructure is delivered, however if development comes forward without the provision of green infrastructure it would have a negative impact
5.Health	Maintains and aims to provide green space which can be used for recreational activities such as exercise.	Provision of green infrastructure will have a positive impact of public health because it encourages activities such as walking,	Provision of green infrastructure will have a positive impact of public health, however if sites fail to come forward in a timely



		running and cycling.	manner alongside other developments to positive impact would only arise on the long term.
6.Education			
7.Land Efficiency			
8.Biodiversity	Biodiversity would be maintained and could improve	Biodiversity would be maintained and could improve through provision of green infrastructure alongside development	Could have positive impact if a green infrastructure development comes forward by itself but may have limited positive impact if it fails to come forward in a timely manner to mitigate impact of development
9.Environment	Aims to enhance the natural character of an area	Aims to enhance the natural character of an area	Aims to enhance the natural character of an area which could be limited if it fails to come forward in a timely manner to mitigate impact of development
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism			



Table 81 Issue 20 - Outdoor playing space standards







Objectives	Option a) No policy	Option c) New policy – adopt revised Field in trust benchmark standards for outdoor playing spaces
1.Housing		
2.Deprivation		
3.Travel		
4.Communities	 Maintains and aims to provide green space for communities to utilise.	 Maintains and aims to provide green space for communities to utilise. Safeguards facilities.
5.Health	 Provides area to exercise.	 Promotes healthy communities.
6.Education		
7.Land Efficiency	 Protects greenfield land.	 Protects greenfield land.
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 82 Issue 21 - Outdoor playing space on-site provision

Objectives	Option a) No policy – rely on CP8	Option c) New policy – threshold for on-site provision
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		of children's play space in new housing development
1.Housing		
2.Deprivation		
3.Travel		
4.Communities	Aims to provide opportunities for outdoor sport and recreation spaces.	Provides greater numbers of play areas. Also ensures that children's play spaces is delivered in a timely manner where need is suddenly increased.
5.Health	Provides space which can be used for exercise.	Provides space which can be used for exercise.
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 83 Issue 23 - Former Lewes/Sheffield Park railway line

Objectives	Option a) No policy	Option c) New policy – Encourage recreation use
1.Housing		
2.Deprivation		



3.Travel		
4.Communities		Permits informal recreational uses such as walking, cycling and horse riding.
5.Health		Encourages recreational usage such as exercise.
6.Education		
7.Land Efficiency		Maintains greenfield land.
8.Biodiversity		
9.Environment		Maintains greenfield land.
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 84 Issue 24 Recreation and the Rivers

Objectives	Option a) No policy – rely on CP8	Option b) New policy – promotional approach	Option c) New policy – safeguarding approach
1.Housing			
2.Deprivation			
3.Travel			
4.Communities			
5.Health		Promotes recreational uses	



		and regular physical activity	
6.Education			
7.Land Efficiency		Supports the use of available land	
8.Biodiversity		Could result in adverse impact on the biodiversity	Encourages protective measures which will safeguard biodiversity
9.Environment			Aims to maintain the natural setting
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism			

Table 85 Issue 25 - Agricultural land

Objectives	Option a) No policy	Option c) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		



7.Land Efficiency	The NPPF aims at protecting the most versatile agricultural land where development of agricultural land is needed poorer quality land should be prioritise.	Protect the most versatile agricultural land in the Plan Area and encourage the best use of land by ensuring the suitability of the site for development
8.Biodiversity		
9.Environment	Could impact on the setting of the countryside but would prevent the unnecessary loss of agricultural land	Could impact on the setting of the countryside but would prevent the unnecessary loss of agricultural land
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 86 Issue 26 - Pollution management

Objectives	Option a) No policy	Option b) New policy – criteria based approach
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		Prevent impact on health
6.Education		
7.Land Efficiency		



8.Biodiversity		Prevent impact of pollution on biodiversity
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 87 Issue 27 - Land contamination

Objectives	Option a) No policy	Option b) New policy – criteria based approach
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		Likely long term health improvement
6.Education		
7.Land Efficiency		Ensure that appropriate work is carried prior to development coming forward to allow the best use of land
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		



12. Energy		
13. Air Quality		
14. Flooding		
15. Coastal Erosion		
16. Economy of the Coastal Towns		
17. Rural Economy		
18. Tourism		

Table 88 Issue 28 - Water resource and water quality

Objectives	Option a) No policy – rely on CP10	Option b) New policy – practical framework
1. Housing		
2. Deprivation		
3. Travel		
4. Communities		
5. Health		
6. Education		
7. Land Efficiency		
8. Biodiversity		
9. Environment		
10. Waste		
11. Water		
12. Energy		
13. Air Quality		
14. Flooding		
15. Coastal Erosion		
16. Economy of		



the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 89 Issue 29 - Noise

Objectives	Option a) No policy	Option b) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		



Table 90 Issue 30 - Biodiversity and Geodiversity

Objectives	Option a) No policy – rely on CP10	Option b) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		Provide framework to ensure the protection of the biodiversity and geodiversity in the district
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 91 Issue 31 - Design

Objectives	Option a) No policy – rely on CP11	Option b) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		



4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 92 Issue 32 - Refuse and Recycling

Objectives	Option a) No policy	Option b) New policy
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment		



10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 93 Issue 33 - Landscape design

Objectives	Option a) No policy – rely on CP10	Option b) New policy – practical framework
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment		Ensure that developments make a positive contribution to landscape
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		



15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 94 Issue 34 - Residential extensions, garages and other building ancillary to existing dwellings

Objectives	Option a) No policy – rely on CP11	Option b) New policy – detailed policy applying principle of high design quality to local context
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		Avoid disproportionate additional building to existing property and make the best use of land
8.Biodiversity		
9.Environment		Achieve a coherence in design
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		



17.Rural Economy		
18. Tourism		

Table 95 Issue 35 - Backland development

Objectives	Option a) No policy	Option b) New policy – general approach	Option c) New policy – detailed approach
1.Housing		Could help to address the housing need on the land term	Could help to address the housing need on the land term
2.Deprivation			
3.Travel			
4.Communities	Uncertain impact as it would be subject to interpretation	Uncertain impact as it would be subject to interpretation	Ensure no adverse impact on amenities of neighbouring properties
5.Health			
6.Education			
7.Land Efficiency			
8.Biodiversity			
9.Environment	Uncertain impact as it would be subject to interpretation	Uncertain impact as it would be subject to interpretation	Maintain existing natural and built character
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			



17.Rural Economy			
18. Tourism			

Table 96 Issue 36 - Advertisements






Objectives	Option a) No policy	Option b) New policy – general approach
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment	 Likely to impact on built and natural environmental	Ensure no adverse impact on built and natural environment
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns	 Should help support the economy	 Should help support the economy
17.Rural Economy	 Should help support the economy	 Should help support the economy
18. Tourism		



Table 97 Issue 37 - Telecommunications infrastructure

Objectives	Option a) No policy	Option b) New policy – criteria based approach
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment	<div style="background-color: red; width: 20px; height: 15px; display: inline-block;"></div> Likely to impact on built and natural environmental	Ensure no adverse impact on built and natural environment
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy	<div style="background-color: green; width: 20px; height: 15px; display: inline-block;"></div> Should help support the economy	<div style="background-color: green; width: 20px; height: 15px; display: inline-block;"></div> Should help support the economy
18. Tourism		

Table 98 Issue 38 - Heritage Assets

Objectives	Option a) No policy	Option b) New policy – safeguarding approach	Option c) New policy – enhancing approach
1.Housing			
2.Deprivation			



3.Travel			
4.Communities			
5.Health			
6.Education			
7.Land Efficiency			
8.Biodiversity			
9.Environment	Uncertainty but could result in adverse impact on this objective	Would ensure that new development does not have adverse impacts on heritage asset	This policy would contribute to the improvement of heritage assets.
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism			

Table 99 Issue 39 Areas of established character

Objectives	Option a) No policy	Option b) New policy – safeguarding approach
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		



6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment	Potential impact on built environmental within areas of established character	Ensure no adverse impact on built environment within areas of established character
10.Waste		
11.Water		
12.Energy		
13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		

Table 100 Issue 40 - Footpath, cycle and bridleway network

Objectives	Option a) No policy	Option b) New policy – protecting approach	Option c) New policy – enhancing approach
1.Housing			
2.Deprivation			
3.Travel			
4.Communities			
5.Health			
6.Education			
7.Land Efficiency			
8.Biodiversity			
9.Environment			



10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism			

Table 101 Issue 41- Station Parking

Objectives	Option a) No policy	Option b) New policy – balanced approach	Option c) New policy – protecting approach
1.Housing			
2.Deprivation			
3.Travel			May encourage people to use trains to reduce travel time by car if parking spaces remain available
4.Communities	This approach may be seen negatively by local communities as parking surrounding station is often identify as an issue	Parking surrounding station is often identified as an issue by local community and the loss of parking spaces near the station would have a negative impact on this objective.	This approach would have a positive impact on this objective.
5.Health			
6.Education			
7.Land Efficiency			



8.Biodiversity			
9.Environment			
10.Waste			
11.Water			
12.Energy			
13.Air Quality			
14.Flooding			
15.Coastal Erosion			
16.Economy of the Coastal Towns			
17.Rural Economy			
18. Tourism			

Table 102 Issue 42 - Former Lewes to Uckfield railway line

Objectives	Option a) No policy	Option b) New policy – protect for reinstatement of railway line
1.Housing		
2.Deprivation		
3.Travel		
4.Communities		
5.Health		
6.Education		
7.Land Efficiency		
8.Biodiversity		
9.Environment		
10.Waste		
11.Water		
12.Energy		



13.Air Quality		
14.Flooding		
15.Coastal Erosion		
16.Economy of the Coastal Towns		
17.Rural Economy		
18. Tourism		



L. Assessment of the Housing Site Allocations

Table 103 Policy NH01: Land South of Valley Road, Newhaven

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site could include 24 units in market and affordable housing in the early part of the plan period.
2.Deprivation	+	+	+	Newhaven town contains some of the districts most deprived wards when measured against the Indices of Multiple Deprivation (IMD). Development of this site may encourage further regeneration and investment in the town, having a positive impact on the town and its more deprived communities.
3.Travel	0	0	0	Access to the site via Valley Road could be an issue and may need upgrading to make suitable. <ul style="list-style-type: none"> - The site is located just over the recommended walking distance (800m) of the town centre with its wide range of services and facilities. - The site is located near to frequent bus services and even though the site is located over 1km from Newhaven Town railway station, the range of public transport services in the town would be seen in a positive light against this objective. - The site is located within walking distance of the nearest primary but not secondary school.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	This site is a greenfield site and so scores negatively against this objective.
8.Biodiversity	0	0	0	There are LWSs within the vicinity of the site, although it is unlikely that there would be any negative impact on these designations. There is a TPO group located 100m south west of the site. To ensure that habitats are protected, the policy requires that an ecological impact assessment is carried.
9.Environment	0	0	0	The site is fairly well screened on all sides, although there are some long views to the north and north east. However the policy encourages excavation to be carried out to ensure that the development blends into the existing form of the surrounding development and landscape. The site is near to the boundary of the SDNP.



Objectives	S	M	L	Explanation
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	-?	-?	-?	Newhaven Air Quality Management Area covers the area inside the town centre ring road. It is likely that all new development in the town will impact on this designation and so would be expected to incorporate measures that aim to improve air quality.
14.Flooding	0	0	0	Development on this site will be required to provide appropriate surface water mitigation to ensure that flood risk is not created or exacerbated. This should have a neutral effect on this objective.
15.Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	Newhaven town centre does have a wide range of services and facilities, although there is a vacancy rate of approximately 20%. Increasing the customer base may help to support the existing services/facilities, reduce vacancy rates and provide jobs although it is unlikely that this development in isolation will make a significant positive contribution to this objective
17. Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 104 Policy NH02: Land at the Marina, Newhaven

Objectives	S	M	L	Explanation
1.Housing	++	++	++	Development at this site could include a minimum of 300 units in market and affordable housing.
2.Deprivation	+	+	+	Newhaven town contains some of the districts most deprived wards when measured against the Indices of Multiple Deprivation (IMD). Development of this brownfield site may encourage further regeneration and investment in the town, having a positive impact on the town and its more deprived communities.
3.Travel	+	+	+	Up until recently, the site had planning permission for 331 units, which included proposals for a suitable site access, although this permission has since expired. A development of this scale could impact on the already heavily constrained A259 and town centre ring road and so



Objectives	S	M	L	Explanation
				mitigation measures would be required. <ul style="list-style-type: none"> - This site is located within walking distance (800m) of the town centre with its wide range of services and facilities. - The site is located near to frequent bus services and even though the site is located over 1km from Newhaven Town railway station, the range of public transport services in the town would be seen in a positive light against this objective. - The site is located within walking distance of the nearest primary and secondary school.
4.Communities	0?	0?	0?	The site is located within the vicinity of industrial uses which may be considered 'bad neighbours' resulting in a poor perception of the development.
5.Health	0	0	0	The policy wording was strengthened to ensure that a noise and odour impact assessment is undertaken as well as further investigation is carried in relation to potential contamination. This should reduce the risk on the future occupiers' health.
6.Education	0	0	0	
7.Land Efficiency	++	++	++	This site is brownfield land and so scores positively against this objective. It must also be noted that, being located on brownfield land, development of the site may reduce the pressure on greenfield land on the edge of the district's towns and settlements.
8.Biodiversity	-	0	+	The site includes areas of intertidal mudflats which is a priority habitat. To ensure that habitats are protected, the policy requires that an ecological impact assessment is carried. This aims at avoiding net loss and the policy encourages providing net gain to biodiversity. Where adverse impacts arise and may affect biodiversity in the short term, mitigation and/or compensatory measures would be required to rectify the situation over medium to long term. It is considered that the modifications are likely to have a positive impacts on the on the long term biodiversity of the mudflats, once construction phase in complete and any new habitats have been established.
9.Environment	0	0	0	Providing that development does not exceed 3/4 storeys in height, thus dominating views from the surrounding area, it is unlikely that there would be an adverse impact on this objective. Being located on brownfield land, development of the site may reduce the pressure on more environmentally sensitive landscape on the edge of the district's towns and settlements.
10.Waste	0	0	0	
11.Water	0	0	0	The policy reduces the risk to water quality by requiring the provision of appropriate services for new berths. This should ensure that development does not impact on water quality.



Objectives	S	M	L	Explanation
12. Energy	0	0	0	
13. Air Quality	-?	-?	-?	Newhaven Air Quality Management Area covers the area inside the town centre ring road. It is likely that all new development in the town will impact on this designation and so would be expected to incorporate measures that aim to improve air quality.
14. Flooding	0?	0?	0?	The site is located within Flood Zone 3 which scores negatively against this objective. However Newhaven Flood Alleviation Works are currently underway, due to be completed by Autumn 2019. A sequential and exception test has been carried out that demonstrates the sustainability benefits of developing this site. The policy includes the requirements for site-specific Flood Risk Assessment to ensure that appropriate works are carried for a safe future use of the site.
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	+	+	+	Newhaven town centre does have a wide range of services and facilities, although there is a vacancy rate of approximately 20%. Increasing the customer base on this scale would help to support the existing services/facilities, reduce vacancy rates and provide jobs. It must also be noted that development on this site could result in the loss of employment premises (marina and retail) and associated jobs, however it is felt that the benefits to the local economy would outweigh this.
17. Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 105 Policy BH01: Land at the Nuggets, Valebridge Road, Wivelsfield

Objectives	S	M	L	Explanation
1. Housing	+	+	+	Development at this site would deliver 14 units including market and affordable homes. The site could be brought forwards in the early part of the plan period.
2. Deprivation	0	0	0	Burgess Hill (Wivelsfield Parish) is a fairly affluent area of the district (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.



Objectives	S	M	L	Explanation
3.Travel	0	0	0	<p>Access to the site would be via an existing property on Valebridge Road. The road bends to the north, consequently shortening visibility along the derestricted stretch of road; however it is likely to be suitable.</p> <ul style="list-style-type: none"> - The site is within walking distance of a bus service. - The site is roughly 1km away from the nearest station and just over 1km away from the nearest school and services. <p>However, it must be acknowledged that a wide range of services are available at Burgess Hill (identified as a District Centre, although not located within Lewes District) and so could be considered a sustainable location.</p>
4.Communities	0?	0?	0?	It is unknown whether there will be any impact upon the local or wider community resulting from development at this site.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	This site does contain some brownfield land although is predominantly greenfield.
8.Biodiversity	0	0	0	To ensure that habitats are protected, the policy requires that an ecological impact assessment is carried. This should ensure that development of the site does not impact on this objective.
9.Environment	0	0	0	<p>Parts of the site have already been developed, and so redevelopment of these areas will have little environmental impact. The site is very well contained by mature trees on all sides and screened to the east and south east by ancient woodland, development should be sensitive to this and kept to the western end of the site to provide the required buffer in line with the policy. The general area has been identified in the 2012 landscape capacity study as an area with a medium/high capacity for development. There are no recorded heritage assets within the site but it could include archaeological interest therefore an additional criteria within the policy to ensure that appropriate assessment and evaluation of archaeological potential are carried. This will help limiting any detrimental impact on this objective.</p>
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	



Objectives	S	M	L	Explanation
14.Flooding	0	0	0	Development on this site will be required to provide appropriate surface water mitigation to ensure that flood risk is not created or exacerbated. This should have a neutral effect on this objective.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	Burgess Hill accommodates a wider range of services and facilities, it is highly likely that residents would support these; however it is unlikely that development on a scale such as this will have much of an impact.
18. Tourism	0	0	0	

Table 106 Policy BA01: Land at Hillside Nurseries, High Street, Barcombe Cross

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site could bring forward 10 units and would have a positive impact on this objective.
2.Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0?	0?	0?	Acceptable solutions are available to ensure appropriate access onto the High Street although an agreement would need to be with the adjacent landowner to widen the narrow driveway which is currently unsuitable for two vehicles. <ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office, although the nearest GP surgery is approximately 2 miles away at Lewes. There is also a small supermarket within walking distance. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4.Communities	+	+	+	Development of the site will include the provision of 1600sqm of public amenity space to allow



Objectives	S	M	L	Explanation
				for the provision of equipped and informal play space with link to the existing recreation ground. This offers the opportunity to address the shortfall that exists in Barcombe Cross which is exacerbated when the pitches are in use therefore it scores positively against this objective.
5.Health	0	0	0	The site is located adjacent to outdoor playing space and sports facilities although it is not thought that there would be a significant impact on this objective.
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land.
8.Biodiversity	0	0	0	To ensure that habitats are protected, the policy requires that an ecological impact assessment is carried. This should ensure that development of the site does not impact on this objective.
9.Environment	0?	0?	0?	The site is located within Barcombe Cross Conservation Area and within the vicinity of a Grade 2 Listed Building. Therefore the policy wording is supporting the provision of high quality design that respects the qualities of the Conservation Area. The site is well screened by vegetation and residential development, although it is more exposed to views from the North. The site is within an area of medium archaeological potential which will need to be addressed through an appropriate assessment and evaluation of archaeological potential. Overall, it is considered that there are uncertain potential impacts on this objective although the policy wording will reduce risks significantly.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective.
15.Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural	0	0	0	Residents are likely to use local services; however it is unlikely to have a significant positive



Objectives	S	M	L	Explanation
Economy				impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 107 Policy BA02: Land adjacent to the High Street, Barcombe Cross

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site could bring forward 25 units. It is likely that this would include affordable housing and could be brought forwards within the next five years.
2.Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0?	0?	0?	Access is likely to be via a bordering track. Widths and visibility of access points are considered achievable by the highways authority with maintenance of vegetation along the southern road. <ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office and a small local supermarket, although the nearest GP surgery is approximately 2 miles away at Lewes. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land.
8.Biodiversity	0	0	0	There is a SNCI within the vicinity. The policy should ensure that appropriate work is carried to avoid negative impact on this objective.



Objectives	S	M	L	Explanation
9.Environment	0?	0?	0?	The site rises to the north east without much screening, making it a prominent location from the south west entrance to the village. It has been identified in the 2012 landscape capacity study as an area with a low capacity for change, meaning that development in this area is undesirable. The site is surrounded on three sides by a conservation area, and there is a grade 2 listed building within the vicinity of the site, as well as several buildings of local interest, one adjacent to the site. As such any development would need to be sensitive to this conservation area designation and the listed buildings. The policy includes provisions regarding the height of the buildings and the character of the development which should help avoiding adverse impact on this objective. A small portion of the site is within an archaeological notification area and the site lies within an area of medium archaeological potential. As such an appropriate assessment is required within the policy. Overall the potential impacts of the development on this objective are uncertain.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective. However the site currently experiences issues of surface water flooding which will need to be assessed to ensure that the situation is not exacerbated by the development and mitigations implemented.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0?	0?	0?	It is possible that a development of this size could have a positive effect on the economy of Barcombe, being a small village with local services, which the residents would be likely to use.
18. Tourism	0	0	0	



Table 108 Policy BA03: Land at Bridgelands, Barcombe Cross

Objectives	S	M	L	Explanation
1.Housing	0?	0?	0?	Development at this site could bring forward 7 dwellings. The achievability of the site is currently unknown as it is unclear whether an agreement has been made on accessing the site via a private road.
2.Deprivation	0	0	0	Barcombe Cross is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0?	0?	0?	Access is via a private road and it is currently unclear whether an agreement is in place to access the site. <ul style="list-style-type: none"> - Barcombe Cross does have a small number of key local services including a Post Office and a small local supermarket, although the nearest GP surgery is approximately 2 miles away at Lewes. - The site is within walking distance of a primary school - The village has a bus service, albeit infrequent and so is likely to be a car-dependent site
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land (grade 3).
8.Biodiversity	0	0	0	The site is adjacent to a SNCI, although the policy will ensure that development can be accommodated without a significant adverse impact on the designation.
9.Environment	0?	0?	0?	The site is located adjacent to a conservation area and so any development would need to be sensitive to this designation. There are Grade 2 listed buildings to the east. The site covers two areas that are identified in the 2012 landscape capacity study as having a low capacity for change, meaning that development in this area is undesirable. However, the site is enclosed and a robust tree line along the eastern and northern boundaries prevents views into and out of the site to the conservation areas to the east. There is a TPO in the centre of the site. The policy will ensure that the development does not impact on this objective; however the overall assessment considers that the potential impacts of the development remain unknown at this stage.



Objectives	S	M	L	Explanation
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1 and so should not have a negative impact on this objective. However the site currently experiences issues of surface water flooding which will need to be assessed to ensure that the situation is not exacerbated by the development and mitigations implemented.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	New development is likely to have a positive effect on the economy of Barcombe, being a small village with local services, which the residents would be likely to use. However, being a small development of only 7 units, this impact is not likely to be significant.
18. Tourism	0	0	0	

Table 109 Policy CH01: Glendene, Station Road, North Chailey

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would include 10 units. It is likely that this could be brought forward in the next five years.
2.Deprivation	0	0	0	North Chailey is a relatively affluent settlement (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	-	-	-	Access onto the A272 is considered achievable. <ul style="list-style-type: none"> - There is a nursery school within the 800m threshold, however there is not a primary or secondary school within walking distance - There are some local services within walking distance such as a restaurant and a shop



Objectives	S	M	L	Explanation
				- A regular bus service runs within walking distance of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0	0	0	To ensure that habitats are protected, the policy requires that an ecological impact assessment is carried. This should ensure that development of the site does not impact on this objective.
9.Environment	0?	0?	0?	The site is bordered by ancient woodland to the North and the areas to the east and west are fairly densely covered by trees, this helps to screen it from long views. It also slopes down to the North quite steeply, away from the A272 which helps to contain the site. In the 2012 Landscape Capacity Study the area adjacent to the site is designated as having a low capacity for change, although the site itself may be considered differently if assessed as such. A small development is unlikely to adversely impact on this objective. Potential contamination issues investigated as part of planning application (LW/15/0550) and the policy will ensure that consideration is given to the local character to avoid adverse impact on this objective. The site does not lie within any historical designation but is within vicinity of an archaeological notification area hence the requirement for an appropriate assessment and evaluation of the site's archaeological and historical interest.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is located within Flood Zone 1. Surface water flooding may be an issue on this site and would need to be investigated however mitigation is thought to be achievable and the requirement for such mitigation have been included in the policy.
15.Coastal Erosion	0	0	0	
16.Economy of	0	0	0	



Objectives	S	M	L	Explanation
the Coastal Towns				
17.Rural Economy	0	0	0	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 110 Policy CH02: Layden Hall, East Grinstead Road, North Chailey

Objectives	S	M	L	Explanation
1.Housing	0?	0?	0?	Development at this site would create 6 units. It is likely that this could be brought forward in the next five years. The pedestrian access requirement may have an impact on the viability of the development for six units. However the policy provides sufficient flexibility should an extra unit be required to ensure that deliverability of the scheme.
2.Deprivation	0	0	0	The site lies within the relatively affluent settlement of North Chailey; although an affordable housing need may still exist it is unlikely that development would have a significant effect on this objective.
3.Travel	-	-	-	Access would be onto the A275, this is a derestricted stretch of road and due to the slight bend to the north it may be difficult to ensure sufficient visibility splays. <ul style="list-style-type: none"> - There is a Nursery school within the 800m threshold, however there is not a primary or secondary school within walking distance - There are some local services within walking distance such as a restaurant and a shop - A regular bus service runs within walking distance of the site, but there are no railway stations within the vicinity of the site which may encourage out-commuting by car.
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0?	0?	0?	The site is within the Western Ouse Streams and Ashdown Forest Biodiversity Opportunity Area, and close to (other side of the A275) the Chailey Common Local Nature Reserve and



Objectives	S	M	L	Explanation
				SSSI. This policy requires for a survey to be carried out to ensure that potential negative impact on the biodiversity are considered as part of the development and ensure that development does not adversely impact on this objective. However due to the proximity with biodiversity designated site, this likely impact on this objective remains uncertain.
9.Environment	0	0	0	The site is adjacent to landscape character area designated as having medium capacity for change (2012 Landscape Capacity Study). A small development is unlikely to adversely impact on this designation. The site is almost completely covered by trees, those on the southern and western borders screen the site very effectively from view meaning that it is well contained with no views into or out of the site. This policy will ensure that boundary trees are retained to maintain the setting. Despite the dense tree cover there are no TPO's on the site.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 111 Policy CH03: Land at Mill Lane, South Chailey

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this site would include 10 units. It is likely that this would be brought forward in the next five years.
2.Deprivation	0	0	0	South Chailey is a relatively affluent settlement (although that is not to say that an affordable



Objectives	S	M	L	Explanation
				housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	-	-	-	<p>Access may be an issue as it is likely to be on a bend and on a 'fork'. Congestion is likely to be an issue at school hours along Mill lane.</p> <ul style="list-style-type: none"> - Some local services are located in South Chailey, for example a GP surgery, whereas other key services such as the grocery store are located at South Street (just within 800m). - The site is within walking distance of a secondary school but the nearest primary school is at Chailey. - The site is within walking distance of regular bus services but not a railway station and so may encourage out-commuting by car
4.Communities	0?	0?	0?	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	Development at this site would result in the loss of greenfield land which is potentially high grade agricultural land
8.Biodiversity	0	0	0	The site does not include formal biodiversity designation. However local records indicate presence of protected species. The policy should ensure that appropriate work is carried to avoid negative impact on this objective.
9.Environment	0?	0?	0?	The site is surrounded by development to the east and south. The north of the site is prominent due to the openness of the landscape. This area of the site is considered to have negligible to low capacity for change within the 2010 Landscape Capacity Study however the site slopes southwards towards Mill lane and so on the whole is fairly well concealed. Considering the potential yield is only 10 units it is probable that development could be accommodated in this southern section without a significant landscape impact. It must also be noted that the site lies within an Archaeological Notification Area which should be addressed at the planning application stage through an appropriate assessment and evaluation of the site's archaeological and historic interest.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	



Objectives	S	M	L	Explanation
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	The increase in customer base would help to support local services, although a development of this size is unlikely to have a particularly significant impact on the village or wider rural economy.
18. Tourism	0	0	0	

Table 112 Policy RG01: Caburn Field, Ringmer

Objectives	S	M	L	Explanation
1.Housing	++	++	++	Development at this site could include approximately 90 units in market and affordable housing in the early part of the plan period.
2.Deprivation	0	0	0	Ringmer is a fairly affluent area of the district (although that is not to say that an affordable housing need does not exist) and so development would not have a significant effect on this objective.
3.Travel	0	0	0	An access point is already in place which currently serves the football club and adjacent local services. <ul style="list-style-type: none"> - The site is centrally located in the village and near to local services. - The site is located within walking distance (800m) of the nearest primary and secondary school. - The site is within walking distance of regular bus services (but not a railway station and so may encourage out-commuting) - Measures are likely to be included to encourage sustainable modes of transport although it is likely to be a car dependent site
4.Communities	+	+	+	Part of the site is currently allocated within the Lewes District Local Plan for residential development. Although it will result in the loss of community facilities, the policy requires the



Objectives	S	M	L	Explanation
				provision of a replacement playing field of equivalent area and quality in a suitable location prior to the development being carried. It is thought that this is likely to result in the improvement of the facilities and therefore this policy scores positively against this objective.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	The site is classified as greenfield land which would score negatively against this objective.
8.Biodiversity	0	0	0	The site does not include formal biodiversity designation. However local records indicate presence of protected species. The policy should ensure that appropriate work is carried to avoid negative impact on this objective.
9.Environment	0	0	0	The site is located in the centre of the village and is surrounded by residential development and so would not impact on the natural landscape significantly. The site is located within the vicinity of the Ringmer Conservation Area although a sensitively designed development in line with the policy requirement should mitigate any potential adverse impact. The site is also located within an archaeological notification area which will be addressed at the planning application stage through an appropriate assessment and evaluation of the site's archaeological and historic interest.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	Development on this site will be required to provide appropriate surface water mitigation to ensure that flood risk is not created or exacerbated. This should have a neutral effect on this objective.
15.Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural	+	+	+	Ringmer is home to a wide range of services and facilities and so the increase in customer base



Objectives	S	M	L	Explanation
Economy				could have the knock on effect of supporting the retention of these services or possibly the creation of additional ones. This could also be said for the wider rural area. However, it is likely that most services and shops will be accessed in nearby larger towns such as Lewes.
18. Tourism	0	0	0	



M. Assessment of the Gypsy and Traveller Accommodation

Table 113 Policy GT01: Land south of the Plough (0.69ha)

Objectives	S	M	L	Explanation
1.Housing	++	++	++	This policy, allocating the south east corner of the larger SHELAA site (reference 03PL) would provide 5 permanent gypsy and traveller pitches. It would fully meet the identified need for the plan area and therefore would have a positive impact on this objective.
2.Deprivation	+	+	+	This policy would meet the need identified and support social inclusion.
3.Travel	-	-	-	This site is 1.2 km from the nearest settlement, the village of Plumpton Green where some key services are available. Including a primary school, a convenience store and a post office. Further services can be accessed from other settlements via bus (within 200m of the site) and train (1.8km from Plumpton Green train station). Overall it is not thought that this policy would have as significant impact on congestion. However due to its rural location, this allocation may not encourage the use of alternative mode of transport and therefore score negatively against this objective.
4.Communities	0	0	0	Less than half a dozen residential properties lie within 100m of the site. Station Road to the east and the neighbouring commercial estate to the south acting as a boundary containing the site. The site for 5 pitches would ideally suit a single family and provide a good living environment being in a semi-rural location and not next to adverse (noisy, dirty, smelly) neighbouring uses. Therefore it is thought that this allocation would have a neutral impact on this objective.
5.Health	+	+	+	The provision of permanent accommodation will help to improve access to health facilities, tackling known issues such as long term illness and lower life expectancy, which are often below the national average in Gypsy and Traveller communities.
6.Education	+	+	+	The provision of permanent accommodation will improve the opportunities for members of the Gypsy and Traveller community to attend school and further education.
7.Land Efficiency	-	-	-	The site is greenfield land.
8.Biodiversity	0	0	0	The site does not form part of a formal biodiversity designation. However local records indicate the presence of notable and protected species including bats and other notable invertebrates



Objectives	S	M	L	Explanation
				and vascular plants in the wider area. The policy requires ecological investigation prior to works commencing.
9.Environment	0	0	0	The site appears open as it forms part of a larger site. However the policy requires effective landscaping bunds. The provision of accommodation is therefore unlikely to have impact on the valued landscape of the district such as the National Park. Whilst the site does not lie within any historical designation, the wider area has evidence of historical activity and the policy requires appropriate archaeological investigation prior to works commencing.
10.Waste	0	0	0	
11.Water	0	0	0	The modification to require connection to the nearest sewer should ensure that no adverse effects on nearby watercourses and the impacts on this SA Objective remain neutral.
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is within flood zone 1, low risk; however a risk of surface water flooding has been identified and will need to be addressed through sustainable drainage measures. The policy requires a surface water drainage strategy to be agreed prior to commencement and implemented as part of the development.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	



N. Assessment of the Employment Allocations

Table 114 Policy E1: Land at East Quay, Newhaven Port

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	+	+	+	The site benefits from relatively good access to the A26 and is within 800m from Newhaven Harbour train station.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	-	-	-	The site is mostly greenfield land.
8.Biodiversity	0	0	+	The site is within the Tide Mills LWS. The main modification stage required the removal of the vegetated shingle habitat, which is a priority habitat, from the allocation south of the bunded footpath. This element of the modification to this policy will have a positive effect on preserving the most important irreplaceable habitat. Development on the site will take place within the LWS and so the new criterion to provide an ecological impact assessment and ensure mitigation measures can be implemented to achieve overall a net gain in biodiversity will ensure no adverse effect against this SA objective. The buffer zone identified in the modification to the Local Nature Reserve (LNR) to the east of the site will also have a positive effect for ensuring no degradation or harm to the newly created LNR.
9.Environment	0	0	0	The site is open land adjacent and visible from the South Downs National Park. Development on this site could impact on the setting of the National park. Due to the site being within the planning boundary, it was not assessed within the Landscape Capacity Study however it adjacent to a site (Ouse Estuary Nature Reserve) which is considered to be a highly visible and sensitive area with no capacity for change. The stronger safeguards for visual and landscape impacts within the modifications should minimise the potential for adverse impacts on landscape. The site is adjacent to an archaeological notification area and an appropriate assessment and evaluation of archaeology will be essential to avoid any detrimental effects.



Objectives	S	M	L	Explanation
				The removal of the vegetated shingle from the allocation will also preserve that part of the WW1 sea plan base that lies within this habitat. The heritage impact assessment should ensure no harm to the setting of Newhaven Fort.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	The site is mainly within flood zone 1, except for a small area within flood zone 2. The area of land surrounding the site is within flood zone 3. A sequential test has therefore been undertaken at the request of the Environment Agency. This can be found in appendix P to this report. However future use of the site is likely to be water compatible. The removal of the vegetated shingle habitat from the allocation would help to minimise risks of future flooding and coastal erosion.
15.Coastal Erosion	0	0	0	The removal of the vegetated shingle habitat from the allocation would help to minimise risk of future flooding and coastal erosion.
16.Economy of the Coastal Towns	+	+	+	Development of the site would support the expansion and enhancement of the Newhaven Port and allow the port to remain competitive by offering modern facilities to future investors and customers. It would have a positive impact on this objective. Whilst the site has been reduced in size following by the modification for the removal of the vegetated shingle habitat from the allocation, this should not affect the overall ability of the site to deliver the required employment floorspace set out in the Local Plan Part 1.
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 115 Policy E2: Land Adjacent to the American Express Community Stadium, Falmer

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	



Objectives	S	M	L	Explanation
3.Travel	+	+	+	The site is adjacent to the American Express Community Stadium and straddles the boundary between Lewes District and Brighton and Hove City. It is well located in terms of strategic road network with the A27 to the north of the site which provides access to Lewes and Brighton. It is not thought that development on this site would encourage walking and cycling however other sustainable means of transport are available around the site. It is within walking distance from bus stops offering direct services to Brighton, Lewes, Ringmer and Uckfield and from Falmer Train Station with a direct link to Brighton, Lewes and Eastbourne. The policy requires sustainable transport infrastructure which could be simple measures such as real time passenger information or pedestrian and cycle linkages, which should encourage the use of rail and bus, walking and cycling from this sustainable location.
4.Communities	+	+	+	Development of this site would introduce variety of active uses in this location which would contribute to create and sustain vibrant communities.
5.Health	0	0	0	The site is within proximity of the A27 and the railtrack and is therefore exposed to noise pollution which could impact on the amenity of people occupying the site. The policy does not include reference to addressing adjacent noise issue however the supporting text make reference to draft policy DM23 which should limit the impact on this objective.
6.Education	0	0	0	
7.Land Efficiency	++	++	++	This is a brownfield land and therefore development on this site would contribute to the re-use of previously developed land.
8.Biodiversity	0	0	0	The site is within proximity to Westplain Plantatin LWS but it is not thought that development will have negative impact on this site.
9.Environment	0	0	0	The site is located within close proximity of the South Downs National Park and a conservation area including listed buildings (grade 2) lies to the east. There is a dense boundary of trees to the north and east of the site. The site forms part of an already developed area and is surrounded by development. Although it is not thought that development of this site would constitute an encroachment into the country side of the National Park or impact on the setting of the conservation area, the policy require development to preserve and where possible enhance the setting of the National Park as well as be of a high quality design that respects downland character.
10.Waste	0	0	0	



Objectives	S	M	L	Explanation
11. Water	0	0	0	
12. Energy	0	0	0	
13. Air Quality	0	0	0	
14. Flooding	0	0	0	
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural Economy	+	+	+	The development would continue supporting the rural economy and would contribute to the diversification of the business offer in the area.
18. Tourism	0	0	0	



O. Assessment of the Development Management Policies

Table 116 Policy DM1: Planning Boundary

Objectives	S	M	L	Explanation
1.Housing	0	0	0	This policy aims to limit new development to within the designated planning boundaries whilst allowing for appropriate uses outside of those boundaries. New housing development is one such use that would be restricted outside of planning boundaries, however the policy does allow for the affordable housing on exception sites outside of planning boundaries which would have a positive impact.
2.Deprivation	+	+	+	This policy extends the possibility to allow development of affordable housing outside the planning boundaries. This policy could increase affordable housing delivery in the rural area of the district which is harder to access for people with lower incomes.
3.Travel	+	+	+	This policy directs development such as new housing within the existing planning boundaries where these services and facilities already exist which should reduce the need to travel. The policy also directs new services to these planning boundaries where needs exist. However the impact on this objective is hard to identify as it strongly depends on the location of a new development.
4.Communities	+	+	+	This policy aims to direct new development, including services and facilities, to existing planning boundaries and so should improve the choice and provision for local populations. The policy also allows for necessary and appropriate community facilities in areas outside of existing planning boundaries to the benefit of local communities.
5.Health	0	0	0	
6.Education	+	+	+	This policy could increase the access to educational services as it allows for necessary and appropriate institutional sites outside of planning boundaries where needs may exist. However the impact on this objective is hard to identify as it strongly depends on the location of a new development.
7.Land Efficiency	+	+	+	This policy directs development to existing planning boundaries, hence encourages the use of brownfield land. It therefore will help to preserve the character and quality of the countryside taking into account the most appropriate use for lands. It scores well against this objective in that sense. However, it could also result in the loss of some greenfield land (in appropriate



Objectives	S	M	L	Explanation
				circumstances) which could potentially be high grade agricultural land.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on environmental designations, however directing development to existing planning boundaries should reduce the risk of impact on environmental designations
9.Environment	+	+	+	This policy aims to direct development to existing planning boundaries and restrict inappropriate development outside, therefore will protect the district's valued countryside and heritage assets. However, this is a district-wide policy and so it is not known whether the policy would impact on those areas that are most sensitive to change as identified through the landscape capacity study or on specific heritage assets.
10.Waste	0	0	0	This policy does allow for necessary infrastructure development within and outside of planning boundaries, although it is not thought that this approach would impact upon this objective
11.Water	0	0	0	This policy does allow for necessary infrastructure development within and outside of planning boundaries, although It is not thought that this approach would impact upon this objective.
12.Energy	+	+	+	This policy could increase the proportion of energy from renewable sources.
13.Air Quality	0	0	0	This is a Plan Area-wide policy and so it is not known whether the policy would impact on areas that suffer from poor air quality and ultimately on this objective
14.Flooding	0	0	0	This is a Plan Area-wide policy and so it is not known whether the new development would be located in flood zone area.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	+	+	+	This policy encourages new development, including employment uses, in the planning boundaries and allows appropriate and small-scale development outside of planning boundaries
17.Rural Economy	+	+	+	This policy allows for appropriate rural uses such as equine and forestry activities and farm diversification and allows for small scale employment development and the expansion of existing business sites which should benefit the rural economy. Also, the policy supports the provision of appropriate services and uses outside of existing planning boundaries which could also help to support the rural economy.
18. Tourism	+	+	+	Protecting the Plan Area's most valued countryside and supporting the appropriate provision of



Objectives	S	M	L	Explanation
				services and facilities in rural areas (within and outside of planning boundaries) including new caravan and camping sites could increase the amount of jobs in the tourism sector and attract more visitors in the district.

Table 117 Policy DM2: Affordable Homes Exception Sites

Objectives	S	M	L	Explanation
1.Housing	+	+	+	This policy aims to increase the house stock outside planning boundaries by delivering various sizes, types and tenures affordable house to meet local needs.
2.Deprivation	+	+	+	This policy aims to provide permanent affordable housing, in particular for those residents who are on low income or having difficulties accessing the housing market. It would therefore help to address deprivation and support social inclusion and so would score well against this objective. This would have a particular benefit in the Plan Area's rural areas which generally have higher house prices and home ownership which can also prevent people with lower incomes accessing the housing market.
3.Travel	0	0	0	This is a Plan Area-wide policy. Impacts on this objective would highly depend on the development's location. This policy is likely to see new development on the outskirts of existing settlements which could make the access to services and facilities harder. Moreover affordable housing developments are able to benefit from relief from the Community Infrastructure Levy and therefore are less likely to contribute to improving or providing transport infrastructure. This issue should be partly mitigated by the requirement for this type of development to be within, adjacent to, or well related to an existing settlement. This should increase the chance of new development being within walking distance of a school, convenience store, a bus stop or a train station. Impacts on out-commuting and congestion should therefore be limited.
4.Communities	0	0	0	This policy allows for affordable housing delivery outside of existing planning boundaries to meet local needs. It specifically targets households with a local connection. The policy aims to satisfy local communities as well as people with lower incomes who would want to live in an area despite its high cost.
5.Health	0	0	0	



Objectives	S	M	L	Explanation
6.Education	0	0	0	
7.Land Efficiency	-	-	-	This is a district-wide policy and so it is not known whether the policy would impact this objective. However, it is thought that affordable homes exception sites are likely to be greenfield site and therefore development could result in the loss of some greenfield land which could be high grade agricultural land.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on environmental designations.
9.Environment	0	0	0	This policy would ensure that new affordable exception sites are not out of character with the surrounding area and are of an appropriate scale and design. It is therefore unlikely that new affordable exception sites would have an adverse impact on this objective.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	This is a Plan Area-wide policy and so it is not known whether the policy would impact on some areas that suffer from poorer air quality however the only AQMA within the Plan Area is well within the planning boundary and therefore it is not going to adversely affect the Newhaven AQMA.
14.Flooding	0	0	0	This is a Plan Area-wide policy and so it is not known whether the new development would be located in flood zone area.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	This policy targets the area outside the planning boundaries which are essentially in the rural area of the district council. It is not thought that this approach would impact upon this objective.
17.Rural Economy	0	0	0	Increasing the affordable housing stock may help to support the local economy as more people could afford to live and work in the district. This policy could provide more customers for local businesses and greater ease recruiting and retaining staff. However, this policy is likely to result in fairly small development coming forwards and therefore it is not sought that it will have a



Objectives	S	M	L	Explanation
				significant impact on this objective.
18. Tourism	0	0	0	

Table 118 Policy DM3: Accommodation for Agricultural and other rural workers

Objectives	S	M	L	Explanation
1.Housing	+	+	+	This policy aims to permit new dwellings outside planning boundaries for those employed in agriculture, forestry or other enterprise located in the countryside when specific conditions are met. Therefore, building of new dwellings for agricultural and other rural workers remains very restricted and relies on the functional need of the enterprise. Occupancy conditions would be imposed on new dwellings to contain their use and make sure they actually fulfil a functional need. Removal of these conditions would be restricted.
2.Deprivation	0	0	0	This policy would only benefit particular groups of worker and so it is not thought that this approach would significantly impact upon this objective
3.Travel	0	0	0	This is a Plan Area-wide policy. Impacts on this objective would highly depend on the development's location. However there is a good chance that new dwelling permitted on the basis of this policy would be located in the countryside and so away from services and facilities forcing people to use their car. On the other hand, this policy aims to provide accommodation for agricultural and other rural worker that would reduce their commuting. This policy remains an exception and should have limited consequences on this objective.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	This is a Plan Area-wide policy and so it is not known whether the policy would impact this objective. Building of a new dwelling in the countryside could result in the loss of some greenfield land which could potentially be high grade agricultural land. However, this policy is referred as an exception and therefore does not aim to support disproportionate development. New dwellings would only be permitted where no other existing suitable and available accommodation exists in the area or on the concerned unit. New dwelling will have to be



Objectives	S	M	L	Explanation
				appropriate to the area and future use.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on environmental designations.
9.Environment	0	0	0	The policy allows appropriate accommodation for agricultural and rural workers subject to a number of criteria; however it also introduces a number of criteria to ensure that any new development does not have an adverse impact on the district's countryside and valued landscape.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	+	+	+	This policy allows appropriate new accommodation necessary for the functioning of rural businesses and so would score positively against this objective.
18. Tourism	0	0	0	

Table 119 Policy DM4: Residential Conversions in the Countryside

Objectives	S	M	L	Explanation
1.Housing	0	0	0	This policy allows the appropriate conversion of agricultural and other rural buildings to residential use outside the planning boundaries, although it is unlikely there would be a notable impact on this objective



Objectives	S	M	L	Explanation
2.Deprivation	0	0	0	
3.Travel	0	0	0	This is a Plan Area-wide policy. Impacts on this objective would highly depend on the development's location. This type of existing building would be located in the countryside and so most likely away from services and facilities forcing people to use their car to access them. However, the policy only concerns building which are not isolated and which could rely on existing roads and access. Therefore, it is not thought that this policy will have disproportionate impacts of this objective.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	This policy aims to re-use existing building in the countryside, which may be vacant, and therefore avoid the loss of valuable greenfield land. Additional conditions to avoid future transformation of the building could be imposed. This policy scores well against this objective.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on environmental designations.
9.Environment	0	0	0	This policy allows the appropriate conversion of agricultural buildings in the countryside subject to a number of criteria ensuring new development is in keeping with its countryside setting and preventing any adverse environmental impacts.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	



Objectives	S	M	L	Explanation
17.Rural Economy	0	0	0	This policy would help to support the local economy and could provide more customers for local businesses but it's not thought that this approach would significantly impact this objective.
18. Tourism	0	0	0	

Table 120 Policy DM5: Replacement Dwellings in the Countryside

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	This is a Plan Area-wide policy. The dwelling would be located in the countryside and so most likely away from services and facilities forcing people to use their car to access them. However, the replacement dwelling would benefit from the existing roads and access available for the previous one and therefore should not be an additional burden. The policy allows alternative position for the new dwelling when it helps highway access or local amenity benefits which could have a positive impact of this objective. It's not thought that this approach would significantly impact this objective.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	This policy directs development to existing brownfield outside planning boundaries, hence encourages the re-use of PDL. The criteria of the policy should help to preserve the character and quality of the countryside.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any specific impacts on local biodiversity.
9.Environment	0	0	0	This policy allows the appropriate replacement of existing dwelling in the countryside subject to a number of criteria to avoid significant alteration area and prevent any adverse environmental



Objectives	S	M	L	Explanation
				impacts.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 121 Policy DM6: Equestrian Development

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	This is a Plan Area-wide policy and so it is not known whether the new development would impact this objective. The policy is aimed to avoid isolated locations which should insure an easy access to the new development.
4.Communities	+	+	+	This policy is aimed at providing new leisure and sport infrastructure and should therefore positively impact on this objective.
5.Health	0	0	0	It is not thought that this approach would impact upon this objective, albeit improved access to outdoor and sporting facilities would be beneficial to health



Objectives	S	M	L	Explanation
6.Education	0	0	0	
7.Land Efficiency	0	0	0	Developments permitted through this policy may result in the loss of some greenfield land which could potentially be high grade agricultural land; however the policy acknowledges that equestrian development (subject to the criteria in the policy) is appropriate to a countryside location.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on local biodiversity or environmental designations. The policy however required that considerations are given to the potential impacts on the biodiversity which should limit impacts on this objective.
9.Environment	0	0	0	This is a Plan Area-wide and so it is not known whether the policy would impact on those areas that are most sensitive to change as identified through the landscape capacity study. However this policy is aimed to protect the rural character of the locality and encourage maintaining a design unity.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	+	+	+	This policy allows for equine activities which should benefit the rural economy.
18. Tourism	0	0	0	



Table 122 Policy DM7: Institutional Sites

Objectives	S	M	L	Explanation
1.Housing	0	+	+	This policy aims to direct change of use and conversion of existing institutional sites outside the planning boundaries. The policy could increase the housing stock and provide affordable housing. However it is not thought that it will have a significant impact on this objective in terms of the numbers of new dwellings it would yield in the short term.
2.Deprivation	0	0	0	
3.Travel	0	0	0	This is a Plan Area-wide policy. Impacts on this objective would highly depend on the development's location. However, the sites where the policy would be applicable are in the countryside and so most likely away from services and facilities. The policy could encourage the improvement of travel choices depending on the new use of the site.
4.Communities	+	+	+	The policy allows for change of use or conversion of existing institutional sites outside planning boundaries and so could help to meet local need providing more accommodations or community facilities. The policy should have a positive impact on this objective.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	This policy directs development on existing institutional sites outside the planning boundaries hence encourage the re-use of PDL and existing buildings. The policy should have a positive impact on this objective.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on local biodiversity or environmental designations. The policy aims at converting existing sites and so impacts should be minimised or short term.
9.Environment	0	0	0	This policy allows appropriate change of use and conversion of existing institutional sites unless it would affect the character of the site.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	



Objectives	S	M	L	Explanation
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	This policy could help bring forward new employment sites and provide new jobs in the coastal towns. However it is not thought that it will have a significant impact on this objective as it would affect a limited number of sites.
17.Rural Economy	0	0	0	This policy may help to support the local economy and could provide more customers for local businesses or additional services and facilities.
18. Tourism	0	0	0	Protecting existing buildings on institutional sites in the countryside and supporting their conversion could result in the provision of new attractive sites appropriate for activities and visits. The policy could increase the amount of jobs in the tourism sector and attract more visitors in the district.

Table 123 Policy DM8: Residential Sub-Divisions and Shared Housing

Objectives	S	M	L	Explanation
1.Housing	0	0	+	This policy aims to increase the housing stock by supporting residential sub-division and shared housing. This policy should help to provide smaller accommodation which are particularly in demand in the district and offer a more varied choice of housing type. This policy would allow more flexibility to respond to the demand throughout the plan period and so positively impact this objective on the long term.
2.Deprivation	+	+	+	This is a Plan Area-wide policy and it is not known whether there would be any impact on the most deprived area of the district. However, the district is known for having a high proportion of large properties with high price which tend to exclude people with low to medium incomes to live in the district. This policy would help to provide more accommodation for smaller household who cannot afford what is currently on offer in the district. Moreover residential subdivisions are exempt from CIL and so this should also help to keep the cost down and not get passed onto the purchaser.
3.Travel	0	0	+	The policy requires an adequate provision for car parking and storage for bicycle and seems to rely on existing space to avoid a large increase in traffic which could have a positive impact of



Objectives	S	M	L	Explanation
				the long term. Accessibility to services and facilities would essentially depend on the existing infrastructure but could benefit from improvement if more people are likely to use the current facilities.
4.Communities	+	+	+	This policy should improve the choice and provision of accommodation for potential and local population.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	++	++	++	This policy aims at providing more accommodation using existing building and so scores well against this objective.
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	Increasing house stock may help to support the local economy as more people could afford to live and work in the district. This policy could provide more customers for local businesses and support the rural economy.
18. Tourism	0	0	0	



Table 124 Policy DM9: Farm Diversification

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	This policy aims to restrain development that would have a disproportionate/adverse impact on the local traffic.
4.Communities	0	0	0	The policy aims at providing new activities and businesses in the rural area of the district that could benefit the local community or make it more aware of its local resources.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	The policy aims to make more efficient use of land through improving the viability of farms and through directing development of new buildings to within areas where other buildings are already located on the farm.
8.Biodiversity	0	0	0	
9.Environment	0	0	0	The policy aims to protect the rural character of the area by making sure new developments would keep with the surroundings and prevent any adverse impact on the environment.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	



Objectives	S	M	L	Explanation
17.Rural Economy	+	+	+	This policy allows appropriate diversification of farm's activities to support the ongoing viability of farm business by generating new activities and possibly even new jobs in the rural area of the district.
18. Tourism	0	0	0	This policy may create new activities which could attract more visitors in the area and support green tourism.

Table 125 Policy DM10: Employment Development in the Countryside

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	This policy aims to restrain development that would have a disproportionate/adverse impact on the local traffic. The provision of new jobs within the district could also help reducing out-commuting.
4.Communities	0	0	0	The policy aims at providing new activities in the rural area that could benefit the local community (when it includes leisure).
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	This policy aims to re-use vacant building or replace existing building outside the planning boundaries and therefore avoid the loss of valuable greenfield land. This policy scores well against this objective.
8.Biodiversity	0	0	0	
9.Environment	0	0	0	Considerations of the rural character and landscape of the area would be essential where modification of buildings or highway works will be necessary. The policy aims at preventing any harm, impact or inappropriate alteration of the environment and protects the district's valued countryside.
10.Waste	0	0	0	
11.Water	0	0	0	



Objectives	S	M	L	Explanation
12. Energy	0	0	0	
13. Air Quality	0	0	0	
14. Flooding	0	0	0	
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural Economy	+	+	+	This policy allows for small scale employment development outside the planning boundaries in the countryside and therefore supports the provision of the appropriate services and facilities to support the rural economy.
18. Tourism	0	0	0	This policy aims at providing new facilities for visitors. It would increase the amount of jobs in the tourism sector and could result in a gain of visitors for the district.

Table 126 Policy DM11: Existing Employment Sites in the Countryside

Objectives	S	M	L	Explanation
1. Housing	0	0	0	
2. Deprivation	0	0	0	
3. Travel	0	0	0	This policy would support the provision or improvement of public transport outside planning boundaries to avoid congestion.
4. Communities	0	0	0	
5. Health	0	0	0	The policy ensures that the redevelopment or intensification of existing employment sites would not increase the pollution coming from noise, dust or fumes. It should therefore avoid negative impacts on this objective.
6. Education	0	0	0	
7. Land Efficiency	+	+	+	This policy allows for redevelopment and intensification of existing businesses on pre-used land. It could bring back into use vacant units or encourage the best use of brownfield land outside



Objectives	S	M	L	Explanation
				the existing planning boundaries. However, the policy also allows for the expansion of existing sites under a number of conditions which could result in the loss of some greenfield land, although this is mitigated somewhat by the policy requirement to secure environmental gains.
8.Biodiversity	0	0	0	
9.Environment	0	0	0	This policy aims to protect the valued countryside of the Plan Area and intends to limit any adverse impact on the landscape of the rural area.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	+	+	+	This policy allows for expansion of existing business sites outside the planning boundaries under certain conditions and therefore supports the provision of the appropriate services and facilities to support the rural economy.
18. Tourism	0	0	0	

Table 127 Policy DM12: New Touring Caravan and Camping Sites

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	



Objectives	S	M	L	Explanation
6.Education	0	0	0	
7.Land Efficiency	0	0	0	The policy aims to provide additional sites for touring caravan and camping under certain criteria which may be greenfield land. However, the policy prevents a permanent occupation of these sites which should easily recover their natural character. It also supports the use of existing buildings and structures which should help containing new development and prevent the loss of greenfield land.
8.Biodiversity	0	0	0	
9.Environment	0	0	0	The policy aims to provide additional sites for touring caravan and camping under certain criteria to avoid inappropriate development that could have consequences on the district's landscape and valued countryside. It should prevent adverse environmental impact.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	The policy could result in an increase of the visitor flow and create a need for seasonal jobs in the coastal towns of the district.
17.Rural Economy	+	+	+	This policy could result an increase of the visitors flow and would help to support the rural economy providing a temporary costumer base for local businesses.
18. Tourism	+	+	+	This policy allows new or extended touring caravan and camping sites subject to a number of criteria and would attract more visitors in the district. It would also provide additional jobs in the tourism sector. This policy should have a positive impact on this objective.

Table 128 Policy DM13: Existing Visitor Accommodation

Objectives	S	M	L	Explanation
1.Housing	0	0	0	



Objectives	S	M	L	Explanation
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	This policy aims at maintaining the stock of visitor accommodation available in the district when possible and relevant. Exceptions could be made where it is proved that the existing visitor accommodation tend to be a burden for the local economy. The policy protects the existing tourism industry and helps ensure that visitors spend money in the district (at least for their accommodation). As this policy focusses on avoiding or limiting loss it is not thought that it would directly impact on this objective.
17.Rural Economy	+	+	+	
18. Tourism	0	+	+	This policy aims to avoid the loss of visitor accommodation and so intends to maintain the current available facilities in order to avoid a decrease in the visitor flow. On the medium to long term, securing visitor accommodation would maintain the image of a visitor friendly area and should positively impact on this objective.

Table 129 Policy DM14: Multi-functional Green Infrastructure

Objectives	S	M	L	Explanation
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Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	+	+	+	This policy aims to provide additional green infrastructure, including outdoor playing space that would benefit the whole of the community.
5.Health	+	+	+	The policy could result in the provision of new facilities which could encourage local communities to do more physical activities and may have positive impact on this objective on the medium to long term
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	+	+	+	The policy aims to support the provision of new green infrastructure alongside new development to protect and enrich the district's biodiversity.
9.Environment	+	+	+	This policy would ensure that appropriate green infrastructure is provided where development is permitted to protect the character of the area, avoid adverse environmental impact and provide access to the countryside.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	+	It is not thought that this approach would impact upon this objective in short or medium term; although multi-functional use of green infrastructure often involves providing flood storage capacity for extreme events and on a more localised scale with surface water flooding where there is an increase in impermeable surfaces due to development and therefore this policy may have a positive impact on this objective on the long term.
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	



Objectives	S	M	L	Explanation
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 130 Policy DM15: Provision for Outdoor Playing Space

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	+	+	+	The policy sets a threshold for the provision of outdoor playing space and aims to offer additional outdoor playing space that would potentially benefit the whole of the community.
5.Health	+	+	+	The policy would increase the amount of outdoor playing space and sport facilities and more importantly secure their provision alongside new development. It ensures that enough facilities are available for the population to encourage regular physical activity. This policy should have a positive impact on this objective.
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of	0	0	0	



Objectives	S	M	L	Explanation
the Coastal Towns				
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 131 Policy DM16: Children’s Play Space in New Housing Development

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	This policy aims to provide an easy access to children’s play space through pedestrian routes.
4.Communities	+	+	+	This policy sets a threshold to ensure the provision of children’s playing space on new residential development sites that would generate a demand. It would guaranty a regular distribution of recreational space for children in the district and contribute to ensuring that everyone has the possibility to benefit from equivalent facilities without overcrowding existing play spaces. The policy is likely to have a positive impact on community happiness.
5.Health	+	+	+	The policy would increase the amount of outdoor playing space proportionally to new larger scale (20+) development ensuring safe and secured locations for play. Children’s play space also encourages regular physical activity. This policy should positively impact this objective.
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	



Objectives	S	M	L	Explanation
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 132 Policy DM17: Former Lewes/Sheffield Park Railway Line

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	+	This policy supports the provision informal recreational uses which also are alternative travel choices. However there is no known proposal and therefore it is not thought that this policy would have appositive impact on the short to medium term.
4.Communities	+	+	+	This policy supports the provision of additional informal recreational uses which would benefit the local community and offer alternative ways to access local facilities and amenities. This policy should contribute to the community happiness.
5.Health	0	0	0	This policy may encourage people to engage in new or additional physical activities.
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	This policy supports the provision of additional informal recreational uses subject to maintaining or enhancing the biodiversity value of the route. Therefore it should avoid negative impacts on this objective but could in time have a positive impact on it.
9.Environment	+	+	+	This policy supports the provision of additional informal recreational uses that which improve access to the countryside.
10.Waste	0	0	0	



Objectives	S	M	L	Explanation
11. Water	0	0	0	
12. Energy	0	0	0	
13. Air Quality	0	0	0	
14. Flooding	0	0	0	
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 133 Policy DM18: Recreation and Rivers

Objectives	S	M	L	Explanation
1. Housing	0	0	0	
2. Deprivation	0	0	0	
3. Travel	0	0	0	
4. Communities	+	+	+	The policy allows new recreational activities on the River Ouse under specific conditions and therefore could provide benefit to the community.
5. Health	0	0	0	
6. Education	0	0	0	
7. Land Efficiency	0	0	0	
8. Biodiversity	0	0	0	This policy prevents adverse impacts on wildlife and ecosystem that could result from activities on the River Ouse.
9. Environment	0	0	0	This policy prevents adverse environmental impacts that could result from activities on the River Ouse contributing to protecting the Plan Area's valued countryside.



Objectives	S	M	L	Explanation
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 134 Policy DM 19: Protection of Agricultural Land

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	The policy is aimed at preventing the loss of the Plan Area's best and most versatile agricultural land and so scores well against this objective.
8.Biodiversity	0	0	0	This is a Plan Area-wide policy and so it is not known whether there would be any impact on environmental designations. However, the policy is aimed at preventing the loss of the district's best and most versatile agricultural land and should contribute to minimise adverse impact on the district's biodiversity assets.



Objectives	S	M	L	Explanation
9.Environment	0	0	0	This is a Plan Area-wide policy and so it is not known whether the policy would impact on areas that are most sensitive to change as identified through the landscape capacity study. However, the policy prevents the unnecessary loss of agricultural land and so should help to protect the district's most valued countryside.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 135 Policy DM20: Pollution Management

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	This policy ensures that development does not have an unacceptable impact on neighbouring land use which may include local communities. It would prevent adverse impact on the community happiness.
5.Health	+	+	+	The policy aims to limit pollution or consequences of polluting development on public health.
6.Education	0	0	0	
7.Land	0	0	0	



Objectives	S	M	L	Explanation
Efficiency				
8.Biodiversity	+	+	+	This policy aims at preventing unacceptable impact of soil pollution and therefore would avoid adverse impact on the local biodiversity. This policy should have a positive impact on this objective.
9.Environment	0	0	0	This policy indirectly aims at protecting the district's natural environment ensuring that development does not cause unacceptable impact which could reflect on the district's valued landscape.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 136 Policy DM21: Land Contamination

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	+	+	+	This policy should help to protect communities and individuals from the spread of existing contaminants and ensure appropriate remediation. The policy clearly provides for the communities' safety and would also positively impact the Plan Areas communities in terms of



Objectives	S	M	L	Explanation
				safeguarding amenity and local environment.
5.Health	0	0	+	This policy should ensure no detriment to human health.
6.Education	0	0	0	
7.Land Efficiency	+	+	+	This policy requires reasonable work to be carried out on contaminated land to reduce risks in future development and ensure the best use of land is granted planning permission.
8.Biodiversity	0	0	0	Land remediation could help the local ecosystem and the local biodiversity however it is unlikely to create significant biodiversity gains.
9.Environment	0	0	0	This policy aims to set a framework for appropriate risk assessment of remediation measures where development is proposed for as well as avoiding that contaminated land adversely impact neighbouring land and the district natural environment in general.
10.Waste	0	0	0	
11.Water	0	0	0	This policy only allows new development where water contamination can be avoided and therefore where water quality can be guaranteed.
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 137 Policy DM22: Water Resources and Water Quality

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	



Objectives	S	M	L	Explanation
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	This policy ensures that new development would not impact water quality. As much of the public water supply in this area is from ground water the policy contributes to preventing adverse impact on public health through poor water quality.
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	+	+	+	This policy aims to maintain and protect the water quality and quantity in the district and would therefore limit development that could have adverse impact on this objective. This policy should have a positive impact on this objective.
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 138 Policy DM23: Noise

Objectives	S	M	L	Explanation
1.Housing	0	0	0	



Objectives	S	M	L	Explanation
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	+	+	+	This policy aims to prevent construction of new residential development in areas subject to noise pollution which should have a positive impact on any new communities' happiness. Noise-generating developments will be subject to a number of conditions to mitigate adverse impact on the communities' happiness. Overall, this policy could have a positive impact on this objective.
5.Health	0	+	+	This policy aims to avoid or limit daily exposure to noise pollution. Although impacts may not be significant on a short term, it is thought that in the medium to long term it would be beneficial for public health.
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	



Table 139 Policy DM24: Protection of Biodiversity and Geodiversity

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	+	+	+	This policy aims to protect the district's biodiversity and geodiversity and prohibit development which would have adverse impact on biodiversity designations individually or in combination with other developments. Where it is thought that new development could affect the biodiversity alternative measures should be taken to mitigate potential adverse impact.
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	



Table 140 Policy DM25: Design

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	+	+	+	This policy encourages development with high quality design to contribute to local character and distinctiveness and promotes the use of high quality and sustainable materials. It should, therefore have a positive impact on this objective as it should contribute to raising the quality of settlements and promote vibrancy economically, socially and culturally. For residents in general it should provide a framework to ensure new development positively contributes to the setting of the area they live in.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	++	++	++	This policy will ensure that new developments respond well to their environment through high quality design and the use of high quality materials. This policy aims to achieve coherence in design within each of the Plan Area's settlements to protect their local character and distinctiveness.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural	0	0	0	



Objectives	S	M	L	Explanation
Economy				
18. Tourism	0	0	0	Although it is not thought that this objective would be significantly impacted, this policy would enhance the Plan Area's historic environment. This should have a positive impact on the image visitors have of the district.

Table 141 Policy DM26: Refuse and recycling

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	+	+	+	This policy aims to ensure that waste and recycling facilities are considered at an early stage of the planning application process so that it meets the needs of future occupiers. Convenient access to recycling facilities and easy to use waste facilities would help to maintain the happiness of the local community through contributing to community hygiene, health and safety.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	This policy aims to ensure that waste and recycling facilities are well incorporated within new development to avoid negative impact on street-scene.
10.Waste	+	+	+	This policy will help the Council to meet its recycling target and therefore scores positively against this objective.
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	



Objectives	S	M	L	Explanation
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 142 Policy DM27: Landscape Design

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	This policy supports development which contributes to the high quality landscape design in the district. It could have a positive impact on this objective especially for current owners as it could contribute to maintain or even increase the value of their properties.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	+	+	+	This policy will ensure that new developments are compatible with and contribute positively to the landscape by providing elements to deliver a high quality of landscape design. It aims to protect the features of the district's landscape and support the provision of new elements in keeping with the surroundings. The policy is also beneficial in supporting the Plan Area's adaptation to climate change through encouraging landscaping to include trees for carbon capture, green spaces for flood storage
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	



Objectives	S	M	L	Explanation
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 143 Policy DM28: Residential Extensions

Objectives	S	M	L	Explanation
1.Housing	0	0	+	This policy should help to address the housing need on the long term.
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	This policy shouldn't have any adverse impact on this objective as it aims to avoid inappropriate constructions that would be conflicting or discordant with the surroundings.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	+	+	+	This policy sets conditions regarding the size of dwelling extensions and alterations outside planning boundaries to avoid disproportionate extensions and alterations and prevent the loss of greenfield land. The policy aids in improving the efficiency of land through permitting and guiding residential extensions that will allow people to remain in their homes as their families grow, resulting in more efficient use of space
8.Biodiversity	0	0	0	
9.Environment	+	+	+	This policy aims to achieve design unity where dwelling extensions and alterations are permitted and so scores well against this objective.
10.Waste	0	0	0	



Objectives	S	M	L	Explanation
11. Water	0	0	0	
12. Energy	0	0	0	
13. Air Quality	0	0	0	
14. Flooding	0	0	0	
15. Coastal Erosion	0	0	0	
16. Economy of the Coastal Towns	0	0	0	
17. Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 144 Policy DM29: Garages and other buildings ancillary to existing dwellings

Objectives	S	M	L	Explanation
1. Housing	0	0	0	
2. Deprivation	0	0	0	
3. Travel	0	0	0	
4. Communities	0	0	0	This policy allows erection of garages and ancillary buildings under specific conditions. It aims to avoid inappropriate constructions that would be conflicting or discordant with the surroundings and therefore shouldn't have any adverse impact on this objective. Permission to build garages to existing dwellings could be seen positively by the community as it could contribute to reducing street parking which tends to be unpopular.
5. Health	0	0	0	
6. Education	0	0	0	
7. Land Efficiency	0	0	0	This policy sets conditions regarding the position of new garages and other ancillary buildings outside the planning boundaries to ensure that in the long term there ancillary buildings cannot be separated off to form new dwellings and to not suburbanise the countryside.
8. Biodiversity	0	0	0	



Objectives	S	M	L	Explanation
9.Environment	0	0	+	This policy aims to achieve design unity where garages and other ancillary buildings are permitted and so scores well against this objective on the long term.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 145 Policy DM30: Backland Development

Objectives	S	M	L	Explanation
1.Housing	0	0	+	This policy should help to address the housing need on the long term.
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	+	This policy allows backland development where it would not have an adverse impact for the neighbourhood and so aims to maintain a peaceful and respectful community. It also has concerns for the future occupiers' safety.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	



Objectives	S	M	L	Explanation
8.Biodiversity	0	0	0	This policy aims to prevent any adverse impact on the district biodiversity that could result from backland development.
9.Environment	0	0	0	This policy allows appropriate backland development to avoid any negative environmental impact and ensure that it is in keeping with the surroundings.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 146 Policy DM31: Advertisements

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	This policy aims to ensure that permitted advertisements are in keeping with public safety and therefore it is not thought that this policy would have adverse impact upon this objective.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land	0	0	0	



Objectives	S	M	L	Explanation
Efficiency				
8.Biodiversity	0	0	0	
9.Environment	0	0	0	This policy aims to mitigate the adverse visual impact that advertisement could have in the Plan Area and ensure that permitted advertisement would not be out of character and disproportionate with the surroundings. This is particularly important when considering the historic environment. This policy should prevent adverse impact on this objective.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	+	+	+	This policy should have positive impact on this objective on the long term.
17.Rural Economy	0	0	+	This policy should have positive impact on this objective on the long term.
18. Tourism	0	0	0	

Table 147 Policy DM32: Telecommunications Infrastructure

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	



Objectives	S	M	L	Explanation
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	This policy aims to guide the provision of telecommunication apparatus to limit and reduce visual pollution from new infrastructures in the district's landscape. The policy protects the district's historic environment and prevents adverse impacts on heritage assets.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	+	Ensuring the provision of telecommunications masts in rural areas would be beneficial to the rural economy.
18. Tourism	0	0	0	

Table 148 Policy DM33: Heritage Assets

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	



Objectives	S	M	L	Explanation
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	+	+	+	This policy allows development affecting heritage asset, after the appropriate assessment, where it would have a positive contribution. It aims at protecting the district's heritage asset and supports its conservation and enhancement. The policy also sets conditions to guarantee replacement of heritage assets where the loss was justified. This policy should have a positive impact on the historic environment and on this objective.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 149 Policy DM34: Areas of Established Character

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	0	
4.Communities	0	0	0	
5.Health	0	0	0	



Objectives	S	M	L	Explanation
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	+	The policy allows development with Areas of Established Character if it is in keeping with the surroundings and the particular features of the area. The policy aims at maintaining the particular design unity of Area of Established Character to prevent adverse environmental impact.
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 150 Policy DM35: Footpath, Cycle and Bridleway Network

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	+	+	+	This policy aims at protecting the existing or proposed footpath, cycle or bridleway network. It only allows developments which ensure that it is maintained, replaced or improved and therefore encourages the use of alternative means of locomotion. This policy should have a positive



Objectives	S	M	L	Explanation
				impact on this objective.
4.Communities	+	+	+	This policy has regard to the community safety and aims at providing additional or improved public ways that respond to safety criteria.
5.Health	0	0	0	This policy could have a positive impact on the district health by providing new or safer routes which could encourage a more regular use of active modes of transport.
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	

Table 151 Policy DM36: Station Parking

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	



Objectives	S	M	L	Explanation
3.Travel	+	0	0	This policy aims to maintain the public car parking spaces around the railway stations which are usually used for journeys combining the use of car and train. In this sense, the policy aims at reducing (or at least not increasing) car journey by limiting it between residential area and the station rather than residential area and destination point. Where possible the policy supports the use of trains and therefore encourages the use of sustainable transport. However it is thought that this approach would only have a positive impact on this objective on a short term as these parking areas tend to be already extremely busy and therefore not necessarily capable to accommodate additional customers.
4.Communities	0	0	0	
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	This policy would avoid aggravating the air quality in the district by maintaining existing public car parking spaces available to current users and therefore avoid increasing the portion of journeys made by car.
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	
17.Rural Economy	0	0	0	
18. Tourism	0	0	0	



Table 152 Policy DM37: Former Lewes to Uckfield railway line

Objectives	S	M	L	Explanation
1.Housing	0	0	0	
2.Deprivation	0	0	0	
3.Travel	0	0	+	This policy prohibits development that would hamper the reopening of the former Lewes to Uckfield railway line. Its purpose on the long term is to provide a sustainable mode of transport between Lewes and Uckfield which could help reduce congestion and offer a new option for commuters. However the reopening of this railway line is a long term idea and project that will not materialise in the near future. Therefore this policy could have positive impact only on long term.
4.Communities	0	0	+	This policy aims to provide new mode of transport and ease travel between Uckfield and Lewes. It would be beneficial for the community as a whole and would only have a positive impact on this objective on long term.
5.Health	0	0	0	
6.Education	0	0	0	
7.Land Efficiency	0	0	0	
8.Biodiversity	0	0	0	
9.Environment	0	0	0	
10.Waste	0	0	0	
11.Water	0	0	0	
12.Energy	0	0	0	
13.Air Quality	0	0	0	
14.Flooding	0	0	0	
15.Coastal Erosion	0	0	0	
16.Economy of the Coastal Towns	0	0	0	



Objectives	S	M	L	Explanation
17.Rural Economy	0	0	+	This policy could help support the rural economy providing jobs for the work that need to be done to reopen the line and for maintenance, operating trains and offer services in the stations. It could help accessing the rural area of the district and wider hiring possibilities to people who does not own a car.
18. Tourism	0	0	0	Reinstatement of the former Lewes to Uckfield railway line would help access the rural land of the district and therefore could positively impact on this objective if the project comes to a successful conclusion.



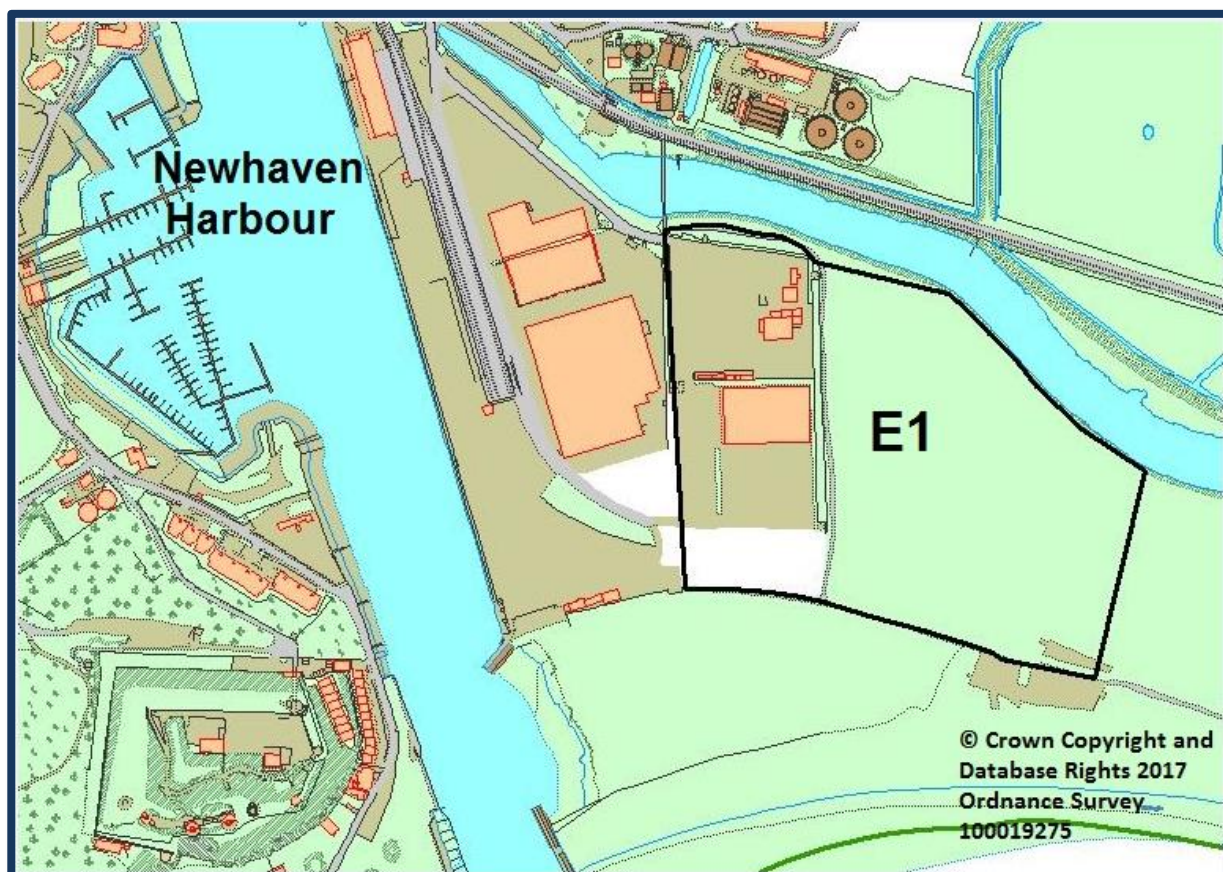
P. Sequential Test of Policy E1, Land at East Quay, Newhaven Port

Background

Draft Policy E1 (Land at East Quay, Newhaven Port) of the Submission Lewes District Local Plan Part 2 allocates a site for employment uses associated with Newhaven Port. It essentially carries forward 'saved' Policy NH20 of the Lewes District Local Plan 2003, which was retained when the Lewes District Local Plan Part 1 was adopted in 2016 (see Appendix 2 and Proposals Map Inset 2: Newhaven of the Local Plan Part 1).

However, Draft Policy E1 covers a significantly reduced area of land in comparison with 'saved' Policy NH20. This is because it excludes the existing operational port land and buildings and the area that is currently under construction for a new berth, slipway and associated offices, warehouses and workshops (Planning Application ref. LW/15/0034).

Following the Local Plan Part 2 Examination in Public Hearings, the District Council has proposed a further reduction in the area of the allocated site to exclude the area of vegetated coastal shingle located within Flood Zone 3. This proposed modification (reference MM20) is set out in the Schedule of Main Modifications, which the Council has published for consultation during a six period between 8 July and 19 August 2019. The revised site area is illustrated below.





The site allocated by Draft Policy E1 (as proposed to be modified) comprises mainly undeveloped land located immediately to the east of the existing Newhaven Port facilities and associated uses, including the Rampion Wind Farm operations and maintenance base. All the land is within the freehold ownership of Newhaven Port & Properties Ltd (NPP), who is the Statutory Harbour Authority responsible for the operation and management of Newhaven Port.

Newhaven Port is an important strategic asset, both for Lewes District and the wider region. NPP has identified a continued demand for additional land to support the expansion and modernisation of the port but there are only limited sites within the operational port area that can be made available for new business opportunities. The Port Masterplan, approved by NPP in 2012, identifies land at East Quay as having potential for new warehousing, storage and distribution facilities, and light industry.

Draft Policy E1 supports development of the above uses and is therefore in accordance with Core Policy 4 of the adopted Local Plan Part 1, which sets out the Council's support for the Port Masterplan's expansion and modernisation proposals. The allocated site also makes a significant contribution towards meeting the potential supply of the employment land identified in the Local Plan Part 1 (Table 3, page 49) to meet the district's employment floorspace requirements set out in Spatial Policy 1.

Sequential Test

The sequential test is intended to ensure that sites at little or no risk of flooding are developed in preference to areas at high risk of flooding and informs the production of local plans. It is applied to demonstrate that there are no reasonable available sites in areas of a lower probability of flooding that would be appropriate to the type of development or land use proposed.

The sequential test is a high level assessment of sites falling wholly or partly within Flood Zones 2 and 3 and is based on the information available at the time. Further work will need to be undertaken by site developers to meet the requirements of the NPPF and Core Policy 12 of the adopted Lewes District Local Plan Part 1.

The majority of the site allocated by Draft Policy E1 (as proposed to be modified) is located within Flood Zone 1, although a small area is located within Flood Zone 2. Employment uses, including light industry, storage and distribution as identified in the Port Master Plan, fall within the less vulnerable category of development in Table 2 of the NPPF Technical Guidance on Development and Flood Risk. The employment development proposed by Draft Policy E1 is therefore considered to be appropriate in Flood Zone 2, in accordance with Table 3 of the NPPF Technical Guidance on Development and Flood Risk.

There are no reasonably available alternative sites that are situated in a lower flood risk level, nor any alternative sites within the same Flood Zone and subject to a lower



probability of flooding from all sources. The Lewes District Employment and Economic Land Assessment, published in 2010 (and updated in 2012) to inform the preparation of the Local Plan, did not identify any alternative sites elsewhere within the Newhaven planning boundary that would be suitable to accommodate the specific port-related uses proposed by Draft Policy E1, or that would make a similar contribution towards meeting the district's identified employment floorspace requirements over the period to 2031, as set out in Spatial Policy 1 of the adopted Local Plan Part 1. The land allocated by Draft Policy E1 (as proposed to be modified) is the only greenfield site which is both immediately adjacent to the operational area of Newhaven Port and will be serviced by the new Port Access Road (currently under construction and programmed for completion in 2020).