



Lewes District Local Plan

Part 1

**Joint Core Strategy – Proposed Submission Document
Sustainability Appraisal
(Incorporating a Strategic Environmental Assessment)**

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This Sustainability Appraisal Report has been issued for consultation alongside the Proposed Submission Core Strategy. In line with the consultation period on the Core Strategy, comments on this Sustainability Appraisal Report should be made between Friday, 11 January 2013 and Friday, 22 March 2013.

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List of abbreviations

Whilst care has been taken to limit the use of acronyms and abbreviations, a number have been used. A list of some abbreviations used can be seen below.

BAP Biodiversity Action Plan
CFMP Catchment Flood Management Plan
CIL Community Infrastructure Levy
CLG Department for Communities and Local Government
DEFRA Department for the Environment, Food and Rural Affairs
EA Environment Agency
ESCC East Sussex County Council
EU European Union
GOSE Government Office for the South East of England
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
LDF Local Development Framework
LNR Local Nature Reserve
NNR National Nature Reserve
NPPF National Planning Policy Framework
ONS Office of National Statistics
PAS Planning Advisory Service
PCT Primary Care Trust
PDL Previously Developed Land
PPG Planning Policy Guidance Note
PPP Plans, Programmes and Policies
PPS Planning Policy Statement
RSS Regional Spatial Strategy
RuSS Rural Settlements Study
SA Sustainability Appraisal
SAC Special Area of Conservation
SCI Statement of Community Involvement.
SDNPA South Downs National Park Authority
SEA Strategic Environmental Assessment
SEERA South East England Regional Assembly
SEP South East Plan
SHLAA Strategic Housing Land Availability Assessment
SHMA Strategic Housing Market Assessment
SNCI Site of Nature Conservation Importance
SOA Super Output Area
SPA Special Protection Area
SSSI Site of Special Scientific Interest
Topic Papers Core Strategy Issues and Emerging Options Topic Papers, 2010
WTR Wildlife Trust Reserves

1. Introduction

- 1.1 Lewes District Council, together with the South Downs National Park Authority, has prepared the proposed submission version of its Core Strategy. Once adopted, the Core Strategy will contain the strategic planning policies for Lewes District.
- 1.2 In accordance with European and national legislation, planning documents such as the Core Strategy must be subject to the Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) processes. Thus, this SA Report incorporates the SEA requirements set out by the SEA Directive¹ and has been prepared to accompany the proposed submission version of the Core Strategy.
- 1.3 In order to show that SEA requirements have been complied with, this report signposts where requirements have been met. An example of a signpost is seen below:

Compliance with SEA Directive's Requirements

This box will signpost which requirement of the SEA Directive's Regulations are being met.

- 1.4 This SA report builds upon the SA Scoping Report that supported the Core Strategy Issues and Emerging Options Topic Papers as well as the SA Report that accompanied the Emerging Core Strategy.
- 1.5 The report is structured as follows:
- Section 2 provides a non-technical summary of the report.
 - Section 3 provides a background to the production of the Core Strategy and the need for an SA.
 - 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 that have influenced the formation of the Core Strategy.
 - Section 7 presents the key sustainability issues affecting the district.
 - Section 8 presents the sustainability framework used to appraise approaches for the Core Strategy's policy areas.
 - Section 9 appraises the relationship between the objectives of the Core Strategy and the SA

¹ 'The SEA Directive' refers to Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment

- Section 10 appraises the different approaches for each policy area, identifying the most sustainable options.
- Section 11 appraises the Core Strategy's policies, refining them to make them more sustainable.
- Section 12 details the monitoring framework that will be used to monitor the Core Strategy when adopted.

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..."

The Core Strategy

- 2.1 Lewes District Council and South Downs National Park Authority are required to create planning policies that guide development in Lewes District. The two planning authorities will produce a set of planning documents for Lewes District, to be known as the Lewes District Local Plan.
- 2.2 The key part of the set of documents is the Core Strategy as it will contain the strategic policies that other planning documents, such as Neighbourhood Plans, will have to conform with.
- 2.3 Previous versions of the Core Strategy have been made available for consultation and the responses to the consultations as well as the completion of evidence base documents have influenced its contents.

Sustainable Development

- 2.4 Sustainable development is at the core of the planning system. It has a worldwide meaning, defined in the World Commission on Environment and Development Report, as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

The Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

- 2.5 The need to carry out a Sustainability Appraisal and Strategic Environmental Assessment of the Core Strategy is required by both EU and UK law.
- 2.6 A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from plans, such as a Core Strategy. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.

- 2.7 The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies, such as a Core Strategy. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. The SEA process has been incorporated into the SA process. Therefore, where this report refers to the SA it can be assumed that this also means the SEA.

Methodology

- 2.8 This report is based upon previous versions of the Sustainability Appraisal that have accompanied consultation versions of the Core Strategy and has been subject to consultation with the relevant statutory bodies throughout its production. In particular, this report has:
- Reappraised the various policy options for the policy areas against the sustainability framework.
 - Appraised the draft wording of policies against the sustainability framework and refined policies to increase their sustainability.
 - Set out the monitoring framework to monitor the effectiveness of the Core Strategy.
- 2.9 It was written to meet the relevant European Directives and the related UK Regulations that have transposed certain requirements in English law.

The Baseline Situation

- 2.10 A portrait of the district was created, taking into account environmental, social and economic factors, to determine what the current state of the district is and what would happen with the Core Strategy being adopted.

Environmental

- Over half of the district is in the South Downs National Park
- The district is home to many environmental designations, including 2 Special Areas of Conservation
- Large parts of the district is at risk of flooding and erosion is taking place along the coast
- Carbon dioxide emissions, energy consumption and waste generation is lower on a per capita basis than average, although recycling rates are low
- Air Quality in the district is good, although there is an Air Quality Management Area in Lewes and there is potential for another in Newhaven
- There is high water usage in the region and the district's water quality is poor

Social

- Lewes District has 97,500 residents and has an above average number of residents over 65
- The health of residents is good and life expectancy is higher than national average
- The district as a whole is not considered to be deprived, although there are pockets of deprivation, mostly on the coast
- House prices are high in the district and the ratio of house prices to earnings far exceeds the national figure
- GCSE attainment in the district is slightly higher than the county average and the working population has an above average amount of people with degrees
- The towns have decent bus and rail service, although Peacehaven/Telscombe is without a rail service. The A26, A27 and A259 are the main routes that connect the district to neighbouring towns and cities, although congestion is a feature at peak times
- The villages are known to have poor public transport provision and thus the population are generally reliant on private vehicles for access to services and jobs

Economic

- Over a third of the jobs in the district are in the public administration, education and health sector. Manufacturing is declining, particularly in Newhaven, and is now below the national average
- Mean household incomes exceed national and county averages
- There is a shortage of quality employment space in the district
- Retail vacancy rates in most of the town centres dropped between 2009 and 2010
- The Retail vacancy rate in Newhaven Town Centre increased between 2009 and 2010, while Newhaven also has some large industrial sites that are vacant
- Tourism is of high importance to the economy of the district, generating an income of over £155 million and employing 2,300 people

2.11 Projections, estimates and trend-based information have been used to set out the expected state of the district without an adopted Core Strategy:

- The population of the district is projected to stabilise
- The number of households in the district is projected to increase by over 3,000
- A large increase in the elderly population
- Household size will continue to fall
- A rise in the affordability gap between income and house prices
- A continuation of the increase of the amount of people in housing need.
- Continued rise in life expectancy
- An Increase in car ownership and car use

- Continued out-commuting
- The district will still be home to many environmental designations
- A reduction in energy consumption and carbon dioxide emissions on a per capita basis
- Continued high water consumption
- An increase in the amount of land and population at risk of flooding
- Continued low crime rates
- Continued fall in manufacturing jobs
- Continued rise in employment and retail vacancies in Newhaven
- Continued shortfall in quality office and employment space

Plans, Programmes and Policies

2.12 A number of plans, programmes and policies have influenced the content of the Core Strategy and have been used to identify some of the key sustainability issues facing the district, helping to create the sustainability framework.

2.13 Particular regard has been given to the National Planning Policy Framework, although the Core Strategy had earlier been influenced by previous national planning documents that have since been replaced.

2.14 The South East Plan has had a major influence on the Core Strategy and is still a statutory part of the planning system. However, the South East Plan will soon be revoked and the imminent revocation has been taken into account when developing the Core Strategy.

Key Sustainability Issues

2.15 Key sustainability issues were identified based on the work gathered from the previous sections of the report. They have been identified to help create the sustainability framework, the mechanism to appraise the options and policies of the Core Strategy:

- There is a need to protect and enhance the district's important landscapes, areas of biodiversity and other protected areas.
- The recent designation of the South Downs National Park, of which 55.6% of Lewes District is a part of, is likely to increase the attractiveness of the area as a place to visit. A key issue will be ensuring that the economic benefits to be gained from this are realised without being of detriment to the National Park or surrounding area.
- It is important to ensure that the district's Historic Buildings and features 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 has been built. Despite this, there is a need to further promote prudent use of resources, including water, energy and waste materials by

increasing the amount of recycling of waste and, where possible, the re-use of waste materials in new developments and in renovation.

- There is pressure to locate new development on previously developed land, thus avoiding the unnecessary loss of greenfield land and valuable agricultural land.
- Flooding presents a clear risk to many parts of the district, including significant areas of many of the larger settlements of the district. Along the coast there are also areas that are at a significant risk from coastal erosion.
- There is a need to improve the water quality of the rivers in the district, which is currently far below the national average.
- There are clear disparities between the most deprived areas and more prosperous parts of the District. Accessibility to important services and facilities is also a significant issue in parts of the District, particularly in some rural areas.
- The ageing population of Lewes District, which is already high, is likely to increase further, resulting in an additional strain on health and social care, particularly residential nursing care and intensive home care.
- Industry and business are suffering in parts of Lewes District, partly because of the recession, causing damage to local economies. This is particularly evident in areas along the coastal strip.
- Car ownership in the District is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26. Parking is a problematic issue across the District's towns. This is particularly the case in Lewes town.

The Sustainability Framework

2.16 The sustainability framework, consisting of objectives, questions and indicators were created in order to appraise options and policies of the Core Strategy. The framework is shown below.

Table 1: The Sustainability Framework

Objectives	Questions to consider	Indicators
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
2. To reduce poverty and	Does this approach benefit the most deprived areas of the district?	<ul style="list-style-type: none"> • Rank and change in rank of Lewes District in the Index of Multiple

social exclusion and close the gap between the most deprived areas and the rest of the district. (Deprivation)	Does the approach support social inclusion?	Deprivation <ul style="list-style-type: none"> • Number and location of Super Output Areas in the District considered to be in the most deprived 30% in the country
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
4. To create and sustain vibrant, safe and distinctive communities. (Communities)	Will the approach impact on the happiness of the community? Does the approach impact on community safety? Does the approach create additional community facilities?	<ul style="list-style-type: none"> • Percentage of people satisfied with their local area as a place to live • Change in number of community meeting facilities • Change in the amount of public open space • Crime rate per 1000 of the population
5. To improve the health of the District's population. (Health)	Will the approach benefit the District's health? Does the approach reflect the needs of the elderly and disabled population?	<ul style="list-style-type: none"> • Life expectancy at birth • Percentage of population not in good health • Percentage of the population over 65
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?	<ul style="list-style-type: none"> • Students achieving 5 or more A*-C GCSE grades (including Maths and English) • Numbers of adult learners • Percentage of adults without any qualifications • Percentage of adults with degree level (or equivalent) qualification
Environmental		
7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and minimising the loss of	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?	<ul style="list-style-type: none"> • Percentage of new homes built on previously developed land • Number of empty homes • Density of new dwellings • Amount of grade 1, 2 and 3 agricultural land lost to new development

valuable greenfield land. (Land efficiency)		
8. To conserve and enhance the District's biodiversity. (Biodiversity)	<p>Will the approach affect internationally and nationally important wildlife and geological sites?</p> <p>Does the approach seek to protect local nature reserves and sites of nature conservations?</p> <p>Does the approach protect areas of ancient woodland?</p>	<ul style="list-style-type: none"> • Condition and size of Sites of Special Scientific Interest and Special Areas of Conservation • Number and extent of SNCIs and LNRs • Area of ancient woodland
9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park. (Environment)	<p>Does the approach have an impact on listed buildings?</p> <p>Does the approach allow access to the countryside?</p> <p>Will the approach impact on the valued landscape?</p> <p>Does the approach relate to the National Park purposes?</p>	<ul style="list-style-type: none"> • Number of listed buildings on the buildings at risk register • Amounts of Rights of Way • Capacity for change as defined by Landscape Character Study
10. To reduce waste generation and disposal, and achieve the sustainable management of waste. (Waste)	<p>Will the approach reduce the generation of waste?</p> <p>Will the approach increase recycling rates?</p>	<ul style="list-style-type: none"> • Domestic waste produced per head of population • Percentage of waste that is recycled or reused
11. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management. (Water)	<p>Does the approach encourage the reduction in water consumption?</p> <p>Will the approach have a positive impact on water quality?</p>	<ul style="list-style-type: none"> • Biological, ecological and physico-chemical quality of water • Bathing water quality • Water consumption per capita
12. To reduce the emissions of greenhouse gases, to reduce energy consumption and increase the proportion of energy	<p>Will the approach reduce carbon dioxide emissions?</p> <p>Does the approach reduce energy consumption?</p> <p>Will the approach increase the proportion of energy from renewable sources?</p>	<ul style="list-style-type: none"> • Annual consumption of energy per user • Percentage of waste converted to energy • Number of grants for renewable energy installations obtained • Number of planning applications received relating to renewable energy • Carbon dioxide emissions per sector

generated from renewable sources. (Energy)		
13. To improve the District's air quality. (Air quality)	Does the approach increase air pollution? Does the approach have an effect on the AQMA?	<ul style="list-style-type: none"> Number of Air Quality Management Areas
14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. (Flooding)	Will the approach impact on flooding? Does the approach reduce the risk of flooding?	<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 district's area Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial)
15. To ensure that the District is prepared for the impacts of coastal erosion and tidal flooding. (Coastal Erosion)	Will the approach have an impact on or be impacted by coastal erosion? Will the approach increase the risk of tidal flooding?	<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)
Economic		
16. To promote and sustain economic growth in successful areas, and to revive the economies of the most deprived areas. (Economy)	Will the approach reduce retail vacancy rates? Will the amount of employment land increase? Will this approach create jobs?	<ul style="list-style-type: none"> Retail unit vacancy rates in town centres Net amount of floorspace developed for employment land Unemployment Rate Percentage of population who are long-term unemployed or who have never worked Number of business enterprises
17. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)	Will the approach increase the amount of jobs in the tourism sector? Will more people visit the district as a result of this approach?	<ul style="list-style-type: none"> Number of jobs in the tourism sector Contribution to the district's economy made by visitors

Appraising the Core Strategy's Strategic Objectives

- 2.17 The strategic objectives of the Core Strategy were compared against the sustainability objectives in order to see if there were any conflicts between the two.
- 2.18 Overall, it was found that most objectives either complemented each other or had no direct relationship. There were potential clashes between the strategic objective that related to housing delivery and some of the sustainability objectives that related to the environment. Similarly, the sustainability objective that relates to the provision of homes had a negative relationship with the strategic objectives that relate to climate change and the environment.
- 2.19 Whilst it was noted that there were some negative relationships, it was recognised that the wording of the respective objectives did include wording that seeks to encourage sustainable housebuilding.

Appraising Policy Options

- 2.20 An important part of the SA process is the appraisal of different options for policy areas to help identify the most sustainable approaches to be taken forward in the Core Strategy.
- 2.21 For some of the policy areas, a number of different potential approaches were developed and appraised against the sustainability framework to identify the preferred approaches. This is shown in table 2.
- 2.22 There were some policy areas, shown in the list below, where only 1 potential approach emerged and where not having a policy was not considered a realistic option given the need to achieve the strategic objectives of the plan. In such instances, the policy approach was carried forward in the Core Strategy and appraised as part of the following stage in the sustainability appraisal process.
- Presumption in Favour of Sustainable Development
 - Core Policy 3 - Gypsy and Traveller Accommodation
 - Core Policy 4 – Encouraging Economic Development and Regeneration
 - Core Policy 5 – The Visitor Economy
 - Core Policy 7 – Infrastructure
 - Core Policy 8 – Green Infrastructure
 - Core Policy 9 – Air Quality
 - Core Policy 10 – Natural Environment and Landscape Character
 - Core Policy 12 – Flood Risk, Coastal Erosion and Sustainable Drainage
 - Core Policy 13 – Sustainable Travel

Table 2: Summary of Policy Options Appraisals

Policy Approaches	Most Sustainable	Approach Carried to Policy
<p><u>Provision of Housing</u> – 3 options considered: A – To deliver 4,500 additional homes between 2010 and 2030 B – To deliver 6,000 additional homes between 2010 and 2030 C – To deliver 9,000 additional homes between 2010 and 2030</p>	A	A
<p><u>Provision of Employment Land</u> – 3 options considered for <u>Industrial space</u>: A – To provide around 1,000 metres² between 2012 and 2031 B – To provide around 60,000 metres² between 2012 and 2031 C – To provide around 92,000 metres² between 2012 and 2031</p> <p>2 options considered for <u>Office Space</u>: A – To provide around 14,000 metres² between 2012 and 2031 B – To provide around 12,000 metres² between 2012 and 2031</p>	B	B
<p><u>Distribution of Housing</u> – 4 options considered for development in <u>Ringmer</u>: A – To have a planned level of growth of 601 homes B – To have a planned level of growth of 130 homes C – To have a planned level of growth of 200 – 230 homes D – To have a planned level of growth of 300 – 330 homes</p> <p>2 options considered for development in <u>Newick</u>: A – To have a planned level of growth of approximately 100 homes B – To have a planned level of growth of approximately 154 homes</p> <p>3 options considered for development in <u>Plumpton Green</u>: A – To have a planned level of growth of approximately 30 homes B – To have a planned level of growth of approximately 45-60 homes C – To have a planned level of growth of approximately 100 homes</p>	C	C

Policy Approaches	Most Sustainable	Approach Carried to Policy
<p>3 options considered for development in <u>Peacehaven/Telscombe (P/T) and Newhaven:</u> A – P/T should have a planned level of growth of 220 homes and Newhaven 905 homes (Overall 1,125) B – Higher level of growth in P/T than option A that reduces homes in Newhaven (Overall less than 1,125) C – Lower level of growth in P/T than option A that increases homes in Newhaven (Overall less than 1,125)</p> <p>2 options consideration for development in <u>Lewes Town:</u> A – To provide housing in the built up area of the town with modest expansion into less sensitive landscape areas (would provide a level of housing that falls short of meeting the town’s needs) B – To provide housing that meets needs but would be at the expense of other land uses and would expand into less sensitive landscape areas</p>	<p>A</p> <p>A</p>	<p>A</p> <p>A</p>
<p><u>Strategic Development/ Broad Locations for Growth – 4 options considered for development in North Street and adjacent Eastgate Area, Lewes:</u> A – To retain the area for employment use, upgrading and redeveloping the existing buildings for employment use as opportunities arise. B – Comprehensive redevelopment to create a new neighbourhood for the town, with a mix of housing, employment and other uses, which is able to generate sufficient value to provide all necessary supporting infrastructure, including upgraded hard flood defences. C – Clearance of the existing buildings from the area and utilising it for flood storage and/or low key uses such as open space or surface car parking. In effect, this restores the flood plain in this location. D – Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected, lower risk, locations within the site and integrate this with a wider package of flood risk management both</p>	<p>B</p>	<p>B</p>

Policy Approaches	Most Sustainable	Approach Carried to Policy
<p>on-site and off-site.</p> <p>10 options considered for <u>strategic housing sites/locations</u>:</p> <p>A – Old Mallig Farm, Lewes (up to 225 residential units)</p> <p>B – South of Lewes Road, Ringmer (up to 154 residential units)</p> <p>C – North of Bishops Lane, Ringmer (up to 286 residential units)</p> <p>D – Fingerpost Farm, Ringmer (up to 100 residential units)</p> <p>E – Valley Road, Peacehaven (up to 158 residential units)</p> <p>F – Lower Hoddern Farm, Peacehaven (up to 350 residential units)</p> <p>G – Land east of Valebridge Road, Burgess Hill, within Wivelsfield Parish (up to 150 residential units)</p> <p>H – Land at Greenhill Way/Ridge Way, Haywards Heath, within Wivelsfield Parish (up to 140 residential units)</p> <p>I – Land at Harbour Heights, Newhaven (up to 450 residential units)</p> <p>J – North of Bishops Lane, Ringmer (western section), (up to 120 residential units).</p>	N/A	<p>H and I – sites carried forward based on appraisals of sites and appraisals of housing distribution. Other sites could be brought forward further in the plan period – site J will be released depending on the success of the Ringmer Neighbourhood Plan.</p>
<p><u>Core Policy 1 – Affordable Housing</u> – 5 options considered:</p> <p>A – In the rural areas, there would be an affordable housing requirement of 40% and a threshold of 5 dwellings. In the urban areas the threshold would be 15 dwellings. In the coastal towns the requirement would be 30% affordable, whilst in Lewes Town the affordable requirement would be 35%.</p> <p>B – The affordable housing requirement for the whole district would be 40% and the threshold would be 3, with a staggered approach up to 10 units.</p> <p>C – The affordable requirement for the urban areas would be 40% and the requirement for the rural part would be 50%. The threshold would be 3.</p>	B	B

Policy Approaches	Most Sustainable	Approach Carried to Policy
<p>developments must meet or exceed. C – To reflect the regional density target from the South East Plan. D – Not to set density targets.</p>		
<p><u>Core Policy 6 – Retail and Sustainable Town and Local Centres – 2 options</u> were considered for an approach at <u>Newhaven (town centre)</u>: A – Reclassify Newhaven town centre as a local centre and then reinforce its role as a local centre. B – Maintain Newhaven town centre’s classification.</p> <p>2 options were considered for an approach at <u>Peacehaven (South Coast Road)</u>: A – Reclassify the South Coast Road (A259) as a local centre so to complement the role of the Meridian Centre as the main district centre in Peacehaven. B – To maintain the current policy approach for the South Coast Road (A259) at Peacehaven.</p>	<p>A</p> <p>A</p>	<p>A</p> <p>A</p>
<p><u>Core Policy 11 – Built and Historic Environment – 3 options</u> were considered: Option A consisted of the following:</p> <ul style="list-style-type: none"> • To prepare generic design and built environment policy to ensure a quality of design in all development because of the likely revocation of national and regional planning policy. • To consider setting design standards with regard to matters such as crime reduction, private outdoor space, connectivity and local distinctiveness. • Retain Local Plan Policy ST3 for development management purposes until a Development Management DPD is adopted. 	<p>A</p>	<p>A</p>

Policy Approaches	Most Sustainable	Approach Carried to Policy
<ul style="list-style-type: none"> • Protect, restore, conserve and enhance the historic environment and recognise the role that nationally and locally important historic assets play in the distinctive character of the District’s diverse settlements. • Propose the retention of saved Local Plan Policies H2, H3, H4, H5, H7, H12, H13 and H14 for Development Management purposes until such time as a Development Management DPSD is adopted. <p>B – Continue with existing saved Local Plan design related policies, particularly Policy ST3 but not prepare generic design and built environment policy.</p> <p>C – Prepare generic design and built environment policy, but not to retain saved Local Plan policies relating to this policy area.</p>		
<p><u>Core Policy 14 – Renewable Energy and Low Carbon Energy and Sustainable Use of Resources – 3 options were considered:</u></p> <p>A – To rely on the Building Regulations to secure improvements in the sustainability of new developments.</p> <p>B – To require all new developments to meet full Code for Sustainable Homes Standards, of at least Code Level 3 from the point of adoption of this plan, and then at least Code Level 4 once further updates to Part L come into effect. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM ‘Very Good’ standard.</p> <p>C – To require all developments to meet Code Level 6 standards Code for Sustainable Homes Standards, from the point of adoption.</p>	B	B

Appraising the policies

2.23 Through appraisal of the policy options, preferred approaches for each policy area were identified. Policies were then developed and final drafts of the policies were fully appraised against the sustainability framework.

2.24 The summary table of the policy appraisals can be seen below (Table 3). As demonstrated they generally score positively although there are a few potential negative impacts in regards to the land use objective.

Table 3: Summary Table of Core Strategy Policy Appraisals

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP1	+	++?	?	?	?	?	?	?	?	?	?	?	?	?	0	++	0
SP2	++	++	+	+	?	?	?	0	?	?	?	?	?	0	0	++	0
SP3	++	+	+	+	?	?	++	0	+	?	+	?	?	++	0	+	+
SP4	+	0	+	?	?	?	-?	0	0	0	0	0	0	+	0	+	0
SP5	+	0	+	?	?	?	-?	+	0?	0	+	0	0	+	0	+	0
SP6	++?	+	+	?	?	?	-	0	0	0	0	0	0	+	0	+	0
CP1	++	++	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0
CP2	+	+	0	+	?	0	++	0	++	0	0	0	0	0	0	0	0
CP3	+	+	+	0?	+	+	0?	0	0	0	0	0	0	0	0	0	0
CP4	0	++	+	0	0	+	+	0	0	0	0	++	+	0	0	++	+
CP5	0	0	+	?	0	0	0	0	+	0	0	0	0	0	0	++	++
CP6	+	+	+	+	0	0	++	0	0	0	0	0	0	0	0	++	0
CP7	+	?	+	+	+	+	0	0	?	0	0	0	0	0	0	++	0
CP8	0	0	+	+	+	0	+	+	++	0	0	0	0	0	0	0	+
CP9	0	0	+	+	+	0	0	+	+	0	0	0	++	0	0	0	0
CP10	0	0	0	0	0	0	0	++	++	0	++	0	0	0	0	0	+
CP11	+	0	0	+	0	0	+	0	++	+	+	+	0	+	0	0	0
CP12	0	0	0	0	+	0	0	+	+	0	+	0	0	++	++	+	0
CP13	0	+	++	+	+	0	0	0	0	0	0	0	+	0	0	0	0
CP14	+	0	0	0	0	0	-?	0	+	++	++	++	0	+	0	0	0

2.25 Throughout the drafting of policies, consideration was given to the need to deliver sustainable development and of the sustainability appraisal process. As a result, the appraisals of the individual policy areas gave mostly positive results, reducing the need to make changes to policies and to provide mitigation to any significant effects.

2.26 When considering the cumulative effect of the plan's policies, it was appraised that the Core Strategy would have positive impact covering a wide range of social, environmental and economic issues (see paragraphs 11.69 -11.73 and Table 57 which summarises these effects).

Monitoring Framework

- 2.27 A monitoring framework has been created in order to see whether the Core Strategy, as well as other, subsequent parts of the Local Plan, will achieve their predicted impacts or cause significant negative effects.
- 2.28 The monitoring framework is based mostly on the sustainability framework and includes targets. If the targets are not being achieved or if significant negative impacts are found, then it may be necessary to review certain policies of the Local plan so that changes can be made to improve a policy's performance.

3. Background

The Core Strategy

- 3.1 Local planning authorities are required to create locally based planning policies to guide development in their areas. The policies can be contained in either one document or a range of documents. Lewes District Council and the South Downs National Park Authority will produce a set of planning documents for Lewes District.
- 3.2 The set of documents were known as a Local Development Framework (LDF), although recent changes to the planning system mean that this term will no longer be used. The set of documents may be supplemented by Neighbourhood Plans, developed by Town and Parish Councils. The collection of documents will be known as the Lewes District Local Plan.
- 3.3 The Core Strategy will be the key part of the set of planning documents as it will contain the district's strategic policies which all other documents will have to accord with. As such, work began on preparing the document in 2004, progressing to the Preferred Strategy stage in 2006.
- 3.4. Due to fundamental concerns being raised with the original Preferred Strategy, a decision was made to start afresh on the document. As a result, the District Council went back to the first stage of the Core Strategy production process by producing the Core Strategy Issues and Emerging Options Topic Papers in 2010. Work continued on its production and the Emerging Core Strategy was published in 2011.
- 3.5 Responses received from the consultations in 2010 and 2011, the completion of evidence base documents and recent changes to the planning system have influenced the content of the Core Strategy, which this report accompanies.

Sustainable Development

- 3.6 As paragraph 6 of the National Planning Policy Framework makes clear, "the purpose of planning is to contribute to the achievement of sustainable development."
- 3.7 The term sustainable development has a worldwide meaning, defined in the World Commission on Environment and Development Report in 1987, as "development that meets the needs of the present without compromising the ability of future generations to meet their own needs."
- 3.8 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. In the strategy, it 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.

- **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.

- 3.9 The new Coalition Government has a refreshed 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 (SA) and Strategic Environmental Assessment (SEA)

- 3.10 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

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

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

requirement for Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA).

- 3.11 A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from plans, such as a Core Strategy. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.
- 3.12 The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies, such a Core Strategy. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. The SEA process has been incorporated into the SA process. Therefore, where this report 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...”*

- 4.1 Producing the Sustainability Appraisal (SA) has been carried out according to the Sustainability Appraisal Section of the Communities and Local Government Plan Making Manual. This section has replaced the sustainability appraisal guidance produced in November 2005 by the Office of the Deputy Prime Minister (ODPM) on the subject⁴.
- 4.2 Notwithstanding the above, the ODPM's guidance has been used to help with the production of this SA report, as has the Planning Advisory Service's (PAS) guide⁵ on SAs and best practice examples from other authorities.
- 4.3 SAs are produced to accompany plans (in this case the Core Strategy). As such, their production processes work in tandem. The table below shows the production stages of both documents. The content of each SA production stage is shown in the following sections.

Table 4: Core Strategy/SA Production Process

Core Strategy Production Stage	Sustainability Appraisal Production Stage	When Completed
Issues and Emerging Options	Scoping Report	May 2010
Emerging Core Strategy	Emerging Core Strategy SA Report	September 2011
Proposed Submission	This Report	Autumn 2012
Formal Submission	Final SA Report	Spring 2013
Examination	SA of major modifications of the Core Strategy, if recommended by Inspector	Summer 2013
Adoption	Monitoring of the Core Strategy	Autumn 2013

⁴ ODPM (2005) *Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents*

⁵ PAS (2010) *Sustainability Appraisal Guidance Note*

What had been done already?

- 4.4 In May 2010, an SA Scoping Report was produced alongside the Issues and Emerging Options Topic Papers (hereafter known as the Topic Papers). Like the Topic Papers, the Scoping Report went out for consultation between May 21 and July 16, 2010.
- 4.5 Amongst other things, the SA Scoping Report had sections that:
- Collated baseline information, presenting the current picture of Lewes District in terms of economic, environmental and social aspects.
 - Identified plans, programmes and policies of relevance to the formation of the Core Strategy.
 - Developed a draft sustainability framework, comprising of a set of sustainability objectives and indicators to be used to assess the Core Strategy's policies.
- 4.6 The SA that accompanied the Emerging Core Strategy built upon the Scoping Report, making changes to the above sections to reflect comments received during consultation, updates to datasets and statistics as well as the release of additional plans, programmes and policies. Like the Emerging Core Strategy, it went out for consultation between September 30 and December 2, 2011 and invites were sought from any interested body including English Heritage, Natural England and the Environment Agency – the statutory bodies in relation to the SA.
- 4.7 In addition to updating the sections which the SA Scoping Report covered, the Emerging Core Strategy SA Report had sections that:
- Appraised various options for the emerging policy areas against the sustainability framework.
 - Set out a draft monitoring framework to monitor the effectiveness of the final version of the Core Strategy post adoption.

What this SA includes

- 4.8 This SA Report has updated sections of the SA that accompanied the Emerging Core Strategy to reflect recent up-to-date information and changes to planning policy. In particular, this report has:
- Reappraised the various policy options for the policy areas against the sustainability framework.
 - Appraised the draft wording of policies against the sustainability framework and refined policies to increase their sustainability.
 - Set out the monitoring framework to monitor the effectiveness of the Core Strategy.

Meeting the Requirements of the SEA Report

Compliance with SEA Directive's Requirements

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

4.9 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, has been followed. The table below shows where in this report the SEA requirements have been met:

Table 5: SEA Directive 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;	Main objectives of the Core Strategy (Section 9 and Appendix 2), Relationship with other plans (Section 6 and Appendix 1)
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;	
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 9
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 11
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;	The methodology is shown in Section 4. Section 5 details the difficulties in compiling information. Section 10 assesses options and alternatives (where they exist) for each policy area
i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Section 12

The SEA Directive's Requirements	Where covered in the SA Report
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 Agency have been consulted on the various versions of the SA and Core Strategy. Members of the public have also been able to comment on the Plan and SA
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 draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2).	
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 Core Strategy will have significant effects 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 Core Strategy has been influenced by the comments received on previous versions of the Core Strategy.
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 Core Strategy 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).	This is covered in this table.
Environmental reports should be of a sufficient standard to meet the requirements of the SEA Directive (Art. 12).	
To monitor the significant environmental effects of the plan's or programme's implementation (Art. 10).	Section 12

5. The baseline situation: A portrait of Lewes District

Compliance with SEA Directive's Requirements

*The Environmental Report should provide (Art. 5 and Annex 1):
“the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”*

General characteristics

- 5.1 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 covers an area of 292 sq km, extending from the English Channel coast through the South Downs and into the countryside of the Sussex Weald to the north.
- 5.2 The total population of the district is 97,500⁶, of which just over three quarters live in the five urban areas of Lewes, Newhaven, Peacehaven, Seaford and Telscombe Cliffs/East Saltdean. The remainder of the population live in 23 predominantly rural parishes. 55.6%⁷ of the District lies within the South Downs National Park, which came into being on the 1st April 2010. The population of this area is approximately 22,500.
- 5.3 The city of Brighton & Hove is located on the south-western boundary and exerts a strong influence on the life of the District, 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.
- 5.4 The District benefits from good access to the trunk road network, with the A27/A26 linking Lewes and Newhaven to neighbouring Brighton and Eastbourne and the nearby A23/M23 providing access to London, Gatwick and the M25. In addition, the District 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. Lewes, 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.

⁶ ONS, Census 2011, 16 July 2012

⁷ ESCC/GLUD. April 2010

Environmental characteristics

Compliance with SEA Directive's Requirements

*The Environmental Report should provide (Art. 5 and Annex 1):
“the relevant aspect of the current state of the environment and... the environmental characteristics of areas likely to be significantly affected”*

- 5.5 The **landscape and historic environment** of the District is highly valued by both residents and visitors. There is a diverse and attractive countryside, including chalk cliffs, shingle beaches, downland, heathland, river valleys and flood plains. The District has two distinct landscape character areas, as identified in the National Character Assessment, which are the South Downs and the Low Weald. The East Sussex County Landscape Assessment has identified and defined the landscape character of the County, which includes Lewes District, 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), traffic and parking difficulties (Lewes), the removal of hedgerows and damage to ancient woodland (the Low Weald) and the scrub invasion of chalk grassland (various). The Landscape Capacity Study, produced by the District Council and National Park Authority, also recognises high quality landscape which should be protected.
- 5.6 In addition to over 55% of the District lying within the **South Downs National Park**, Lewes District is home to 16 **Sites of Special Scientific Interest (SSSIs)**, 2 **National Nature Reserves (NNRs)**, 4 **Local Nature Reserves (LNRs)**, 3 **Wildlife Trust Reserves** and 98 **Sites of Nature Conservation Importance (SNCIs)**. SSSIs are of national importance and are designated based on their nature conservation and/or geological value. Of the 2,437⁸ hectares of land designated as SSSI in Lewes District, 57.5% has been assessed to be in a favourable condition and 42% is considered to be in an unfavourable but recovering condition. 0.4% of SSSI designated land within Lewes District is considered to be in an unfavourable and stable condition, whilst 0.2% of SSSI designated land in Lewes District has been found to be in an unfavourable and declining state. LNR's in Lewes District cover 354 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. SNCIs are non-statutory sites designated by local authorities to protect locally important

⁸ Natural England, June 2011

⁹ Sussex Biodiversity Record Centre, December 2011

conservation sites. There are 115¹⁰ in the District covering 1,236 hectares¹¹ (4.2%) of the District's Land.

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)"*

- 5.7 There are two internationally important **Special Areas of Conservation** (SACs); Castle Hill and Lewes Downs. SACs are areas that have been given special protection under the European Union's Habitats Directive, helping to increase the protection for a variety of animals, plants and habitats and are seen as a vital part of the global effort to conserve the world's biodiversity. There are no designated Ramsar sites or Special Protection Areas (SPAs) in the District, albeit the Pevensey Levels (Ramsar) and the Ashdown Forest (SPA and SAC) are located nearby. A Habitats Regulation Assessment has been undertaken and has found that the Core Strategy will not have a significant negative effect on the protected sites in the district. It also found that the significant negative impact that the Core Strategy could cause on the Ashdown Forest can be mitigated against.
- 5.8 **Ancient woodland** is an important ecological resource that deserves protection. The District is home to 1,156¹² hectares of ancient woodland (3.93% of the District's area) and approximately one third of the District lies within 500 metres of this important biodiversity source.
- 5.9 The District is home to significant amounts of important species and habitats. There have been over 11,000 records of species that the **Sussex Biodiversity Action Plan** (BAP) has identified as important and are thus subject to protection under British and European legislation. There have also been 2,016 records of rare species and 483 records of protected species. Lewes District contains important BAP habitats, most notable of which is the large amount of lowland calcareous grassland that covers over 5% of the District.
- 5.10 Lewes District Council is a signatory of the Nottingham Declaration on Climate Change. Thus it has pledged to tackle the causes of climate change and prepare for its consequences. The generation of energy from

¹⁰ Natural England, ESCC GIS System, July 2011

¹¹ Sussex Biodiversity Record Centre, December 2010

¹² Weald and Downs Ancient Woodland Survey, 2010

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 as is gas consumption. However residents, on average, consume more electricity in Lewes District than the rest of the country. Both the consumption of energy resources and carbon dioxide emissions in the District are falling.

Table 6: Energy Consumption

	Lewes District	East Sussex	National
Carbon Dioxide Emissions¹³ (tonnes per person)	5.5	5.4	7.2
Gas Consumption¹⁴ (Kilowatts per hour)	14,463	14,654	15,383
Electricity Consumption¹⁵ (Kilowatts per hour)	4,405	4,439	4,152

5.11 Lewes District benefits from a high quality built environment. There are 35 **Conservation Areas** in the district, covering an area of 493 hectares. Lewes District is home to 1,710 **Listed Buildings**. **Grade I** buildings are considered to be of exceptional interest and there are 30 buildings within this classification in Lewes District. **Grade II*** are considered to be particularly important buildings of more than special interest and 63 buildings in Lewes District fall into this category. **Grade II** buildings are buildings of special interest, thus warranting every effort to preserve them. Lewes District has 1,617 Grade II buildings. In addition, there are 65 Locally Listed Buildings, which although do not have statutory protection are regarded as having some special local interest. There are 22 buildings in the District considered to be at risk. Of these, one is a Grade I listed building, three are Grade II* listed buildings and eleven are Grade II listed buildings. The remaining seven buildings at risk are not listed. The District also has four **Historic Parks and Gardens**, 120 **Scheduled Ancient Monuments** and is home to a **Registered Battlefield** which lies to the west of the town of Lewes (1264).

5.12 As the table below shows, while on average each person in the district produces far less **waste** than the County's average, a very high proportion of the waste goes to landfill. However, the recently completed Energy from Waste Incinerator in Newhaven is likely to reduce the amount of domestic waste sent to landfill and increase the amount of energy that is recovered from waste in the district.

Table 7: Waste Generation¹⁶

	Lewes District	East Sussex
Domestic waste per capita (kg)	311	375
Percentage of waste to landfill	73%	37%

¹³ Department of Energy and Climate Change (DECC), 15 September 2011

¹⁴ DECC, March 2011

¹⁵ DECC, March 2011

¹⁶ East Sussex County Council, 3 November 2011

- 5.13 In general, **air quality** across the District is good. However, there does exist an Air Quality Management Area (AQMA) in Lewes town centre, with motor vehicles comprising the main source of pollution. There is a possibility that the area around the ring-road in Newhaven will also be designated an AQMA, as the levels of nitrogen dioxide found in this location are close to exceeding acceptable limits.
- 5.14 The **Strategic Flood Risk Assessment** (SFRA) identified that there is significant risk of flooding in Lewes District both from inundation by the sea and by the River Ouse. In total, 11.1% of the District lies within Flood Zone 2 (Medium Probability of Flooding¹⁷), of which 9.9% lies within Flood Zones 3a or 3b (High Probability of Flooding¹⁸ or Functional Floodplain¹⁹). There are 2,528 residential properties in Flood Zone 2 and 2,075 residential properties in Flood Zone 3. The high risk of flooding is highlighted by the large scale flooding of Lewes in October 2000. The likelihood of flooding is anticipated to increase due to climate change causing more extreme weather conditions, meaning that dealing with flooding in Lewes and elsewhere in the district is of high importance.
- 5.15 The whole of the South East of England, including Lewes District, is classed as a Water Stressed Area, meaning that prudent use of the District'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 2009 statistics below²¹, river **water quality** in the District is far below average in all three of the Environment Agency'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 8: Water Quality

	Biological		Ecological		Physico-Chemical	
	High	Poor/Bad	High	Poor/Bad	High	Poor/Bad
Lewes District	0	63.9	0	51.3	0	0
East Sussex	8.1	30.9	0	21.1	9.0	0
National	10.6	35.7	0.1	20.8	24.7	0

- 5.16 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**. There is some history of heavy industry in the District, particularly in Newhaven, and therefore there are some contaminated sites which can present problems to future

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 OFWAT, October 2010

²¹ Environment Agency, 22 December 2009.

development and degrade the soil quality. Lewes District Council seeks to redevelop a high proportion of previously developed land (PDL) and in the process remediate contaminated sites. Between 1st April 2010 and 31st March 2011, 67% of new and converted dwellings were built on PDL. Although the majority of these completions were not on contaminated land, it is indicative of the fact that the District Council is committed to protecting and improving soil quality throughout the District as well as avoiding agricultural land for new housing where feasible.

5.17 The protection from **erosion** of 9.7km of the District's 14.5km of coastline rests with Lewes District Council. Most of the District's coast 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.

Social characteristics

5.18 The recent Census Population data from 2011²² states that Lewes District has a significantly higher percentage of **residents over 65 years of age** (22.8%) when compared with the national average (16.4%) but is only slightly higher than the East Sussex average (22.7%). This represents a growing concern for Lewes District, 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.

5.19 As the table below shows the **health** of the district is good, with the district performing higher than national and county averages. There are however large variations across the district, with 12.8% of the residents of Peacehaven East not being in good health compared to the 4.3% of residents in the Plumpton, Streat, East Chiltington and St. John (Without) ward being placed in this category.

Table 9: Health

		Lewes District	East Sussex	National
Life Expectancy ²³	Males	81.0	79.4	78.5
	Females	85.1	83.5	82.5
Percentage of population not in good health ²⁴		8.5%	9.1%	9.2%

²² ONS, 2011 Census, 16 July 2012

²³ ONS, Life Expectancy at Birth Statistics, 19 October 2011

²⁴ ONS, 2001 Census, Table UV20

5.20 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 2010 IMD²⁵ revealed that Lewes District is the 179th most deprived local authority. As there are a total of 326 local authority areas, Lewes District should therefore not be considered as a deprived area. Around a sixth of SOAs in Lewes rank in the top (least deprived) 20%, with an SOA in Newick being in the top two percent of least deprived areas nationwide. This is not to say that there is not deprivation in the District, as around a tenth of all SOAs in Lewes District are considered to be in the bottom (most deprived) 30%, with an SOA in Peacehaven being in the bottom 24%.

5.21 **Crime** figures suggest that Lewes District should be considered a safe place to live. The 2009/10²⁶ statistics show that there were 49.17 crimes recorded per 1000 residents, which is far lower than the England and Wales Average (78.0 crimes per 1000 residents) and slightly lower than the East Sussex average (58.6 crimes per 1000 residents). This is not to say that crime should not be considered an important issue. Lewes District Council’s Community Safety Partnership has highlighted priorities for action between 2011 and 2014. They include tackling anti-social behaviour, such as alcohol related issues and violence associated with the night time economy.

5.22 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.

Table 10: Affordability

	Lewes District	East Sussex	National
Median House Price (£)²⁷	243,500	205,000	175,000
House Prices to Earnings Ratio²⁸	8.56:1	7.69:1	5.38:1

5.23 The Census data from 2011 states that there are 42,200²⁹ **households** in Lewes District. 78.2%³⁰ of homes in Lewes District are owner occupied, which is over 9% higher than the national average and just over 3% higher than the East Sussex average. 2011 figures from the Empty Homes

²⁵ DCLG, 2011

²⁶ Home Office recorded Crime Statistics, November 2010

²⁷ DCLG, Live Table 582, April 2011

²⁸ Land Registry/ONS/NOMIS, December 2011

²⁹ ONS, Census 2011, 16th July 2012

³⁰ ONS, 2001 Census, Table KS18

Agency³¹ reveal that there are 1,131 empty homes in the District, of which 332 are long term vacancies that are privately owned. 2.3%³² 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. 78.7%³³ of households within the District own at least 1 car higher than the national average (73.2%) and the East Sussex average (76.6%).

5.24 Based on 2012 figures, there are 2,154 **households** on the waiting list for local authority housing in Lewes District, a figure which has been growing at the rate of around 100 per year since 1998. The majority (81.8%) of those households require accommodation for up to 2 bedrooms in size. In addition, household sizes are steadily decreasing (from 2.38 people per household in 1981 to 2.31 in 2011³⁴), suggesting that there is a demand for smaller homes such as one and two bedroom flats. In addition, there are 62 homeless households in temporary accommodation³⁵.

5.25 **Educational attainment** of the district's students is slightly higher than the East Sussex Average. 2010/11 statistics³⁶ show that 62.9% 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 are however high variations within the district. 100% of students resident in the Kingston ward achieved 5 or more A* - C passes compared to 48.7% of students resident in Newhaven gaining such results.

5.26 As figures³⁷ show, 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 11: Qualifications

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

5.27 There are two key east to west **road routes** within the District. The A27 connects the central part of Lewes District to Brighton and Eastbourne. It runs to the south of Lewes town, exiting the District at Falmer Parish (West) and Firle Parish (East). The A259 connects the coastal towns of Telscombe, Peacehaven, Newhaven and Seaford to both Brighton and Eastbourne. The District also has two main north to south routes. The A26

³¹ Empty Homes Agency, 2011

³² DCLG, 2006

³³ ONS, Census 2001, Table KS17

³⁴ ONS, Census 2011, 16th July 2012

³⁵ DCLG, Housing Live Table 784, June 2011

³⁶ Children's Services Department, East Sussex County Council, June 2012

³⁷ Nomis/ONS, Annual Population Survey, August 2011

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.

- 5.28 Whilst the District benefits from major road routes, congestion is a feature during peak times, particularly on the A259. In addition the A27, which carries an average daily traffic flow of 57,000 vehicles though the district is expected to exceed available road capacity by 2026³⁸. Traffic congestion is an issue within the towns, whilst parts of the District, particularly Lewes town, suffer from lack of parking spaces. The provision of road links partly explains the high rate of out-commuting to jobs outside of the district.
- 5.29 Lewes District is well served by **rail**. Lewes town has regular services to London Victoria, Gatwick Airport, Ashford International, Eastbourne and Hastings. Stations at Seaford, Bishopstone, Newhaven Harbour, Newhaven Town, Southease, as well as Lewes, have regular services to Brighton. There are direct services in the weekday to London Victoria and Eastbourne from Plumpton and Cooksbridge, although such service to Cooksbridge is infrequent after peak hours.
- 5.30 The towns of the District generally have regular **bus** services both within the District and to neighbouring towns and cities such as 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.
- 5.31 While the urban areas do have good public transport provision, the district's rural settlements are known to have poor public transport links. Thus, the population depends heavily on private vehicles. This is of particular concern to settlements which are 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. The RuSS is part of the evidence base for the LDF and thus has been used to inform the Core Strategy.
- 5.32 In addition to the above, the District benefits from a significant amount of **Rights of Way**. In total, there are 361 miles of Rights of Way in Lewes District, of which 234 miles are footpaths, 112 miles are bridleways, 9 miles are restricted bridleways and there are 6 miles of byways.

³⁸ Highways Agency, Regional Network Report, 2008

Economic characteristics

5.33 Of the 3,800³⁹ **business enterprises** located within Lewes District, the vast majority employ less than 10 people. Using 2010 figures⁴⁰, more workers can be found in the public sector than any other sector. The manufacturing sector is receding across the district, particularly in Newhaven and is currently lower than the national average.

Table 12: Employment by Sector

	Lewes District	National
Public Administration, Education and Health	36.0%	27.3%
Wholesale and Retail Trade, Vehicle Repair	16.1%	16.2%
Manufacturing	7.5%	8.5%

5.34 Due to relatively high household incomes and a fairly low Job Seekers Allowance claimant rate, the district can be seen as prosperous. This is shown in the table below.

Table 13: Household Income and JSA Claimants

	Lewes District	East Sussex	National
Mean Household Income ⁴¹	£36,619	£34,817	£35,992
Unemployment Estimates ⁴²	5.5%	5.9%	8.1%

5.35 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. It found that there was enough industrial space to meet future needs to 2031 in terms of quantity but there was a shortfall of quality space and suggested that a 1-1.5ha site in or near Lewes Town would meet that shortfall. It also found a shortfall of quality office space and suggested that a 1-1.25 ha site in or near Lewes Town would meet this deficit.

5.36 Surveys of the district's town centres were undertaken in both 2009 and 2010. In that time the vacancy rate dropped in Lewes Town Centre, Seaford Town Centre and Peacehaven/Telscombe and remained unchanged at the Meridian Centre. 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 district and thus no need to allocate land in the Core Strategy

³⁹ Office for National Statistics (ONS)/Inter Departmental Register (IDBR), September 2010

⁴⁰ ONS/Nomis, Business Register and Employment Survey, October 2011.

⁴¹ CACI PayCheck data, July 2012

⁴² ONS/Nomis, July 2012

for retail uses. It 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.

5.37 **Tourism** is of high importance to the District's economy. In 2009⁴³, tourism generated £155,958,000 worth of income for local businesses. It is thought that 2,300 people are employed in tourism related jobs in Lewes District. Tourism is likely to increase within parts of the District, due to the creation of the South Downs National Park, which is likely to provide additional income for the sector.

Predicted future without the Core Strategy

5.38 Projections, estimates and trend-based information have been used to set out the expected state of the District without an adopted Core Strategy. This can be seen below:

- The population of the district is projected to stabilise⁴⁴
- The number of households in the district is projected to increase by over 3,000⁴⁵
- A large increase in the elderly population (will comprise of around a third of the district's population)
- Household size will continue to fall
- A rise in the affordability gap between income and house prices
- A continuation of the increase of the amount of people in housing need.
- Continued rise in life expectancy
- An increase in car ownership and car use
- Continued out commuting
- The district will still be home to many environmental designations
- A reduction in energy consumption and carbon dioxide emissions (on a per capita basis)
- Continued high water consumption (see paragraph 5.39)
- An increase in the amount of land and population at risk of flooding
- Continued low crime rates
- Continued fall in manufacturing jobs
- Continued rise in employment and retail vacancies in Newhaven
- Continued shortfall in quality office and employment space

⁴³ Tourism South East, 2009

⁴⁴ ESCC, 22 July 2012

⁴⁵ ESCC, 22 July 2012

Difficulties in Collecting Data/ Data Limitations

Compliance with SEA Directive's Requirements

*The Environmental Report should include (Art. 5 and Annex 1):
“...any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.”*

- 5.39 As water consumption rates are not collected at a District level, it has not been possible to collect precise information relating to water use for Lewes District. 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, whilst 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.
- 5.40 In creating the portrait of the district, we have attempted to use as up-to-date information as possible. Some of the figures have however been sourced from Census data. Although the Census was undertaken in 2011, at the time of writing very little of the data has been released. As a result, a number of figures are sourced from the 2001 Census and therefore some of the information may not be particularly accurate and analysis from such figures may not fully represent the state of the district with regards to particular characteristics.

6. Plans, Programmes and Policies

Compliance with SEA Directive's Requirements

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

Introduction

- 6.1 In order to establish a clear scope for the sustainability appraisal it is necessary to review and develop an understanding of the plans, programmes and policies (PPPs) that are of relevance to the Core Strategy.
- 6.2 The Core Strategy has been influenced by numerous PPPs. In addition, the content of the PPPs have also been used to inform some of the key sustainability issues facing the District and in turn, the sustainability objectives of this SA Report.
- 6.3 The PPPs which have been relevant to the formulation of the Core Strategy are set out in the table found in Appendix 1. As can be seen in Appendix 1, the various PPPs collectively cover a wide range of topic areas. As a result of this, the tables are split into topic categories, whilst there is a category in relation to PPPs which cover a range of different topics.

Changes to the planning system

- 6.4 The Core Strategy has been prepared during a period of change to the planning system. As a result it had earlier been influenced by Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs) that have since been replaced by the National Planning Policy Framework and its Technical Guidance document.
- 6.5 One plan which has had a large affect on the formation of the Core Strategy was the South East Plan (SEP), the Regional Spatial Strategy (RSS) for the South East. Among other things, the SEP stated the District's housing target (4,400 homes to be delivered in the District between 2006 and 2026) and looked to distribute the housing around the district.
- 6.6 At the time of writing the SEP remains a statutory part of the planning system and thus, the Core Strategy should be in general conformity with it. In addition, some of its background information is current and can be used in the formation of planning policy.

6.7 However, the Government has announced its intention to get rid of the regional tier of planning, including the SEP, in the Localism Act. In light of this, as well as the production of pieces of up-to-date and locally derived pieces of evidence, the District Council and National Park Authority have considered alternative options to SEP policies that have been assessed as part of the SA process.

7. Sustainability issues affecting Lewes District

- 7.1 Identifying the key sustainability issues facing Lewes District is an important part of the Sustainability Appraisal (SA) process as it helps in preparing the sustainability framework which is used to test the options of the Core Strategy 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 plans, programmes and policies that impact on development in the District (section 6).
- 7.3 The key sustainability issues are summarised as follows:
- There is pressure to supply additional housing within Lewes District, particularly in the affordable housing sector, whilst there is also a need to provide housing suitable for smaller households.
 - There is a need to protect and enhance the District's important landscapes, areas of biodiversity and other protected areas.
 - The recent designation of the South Downs National Park, of which 55.6% of Lewes District is a part, is likely to increase the attractiveness of the area as a place to visit. A key issue will be ensuring that the economic benefits to be gained from this are realised without being of detriment to the National Park or surrounding area.
 - It is important to ensure that the District's Historic Buildings and features 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 has been built. Despite this, there is a need to further promote prudent use of resources, including water, energy and waste materials by increasing the amount of recycling of waste and, where possible, the re-use of waste materials in new developments and in renovation.
 - There is pressure to locate new development on previously developed land, thus avoiding the unnecessary loss of greenfield land and valuable agricultural land.
 - Flooding presents a clear risk to many parts of the district, including significant areas of many of the larger settlements of the district. Along the coast there are also areas that are at a significant risk from coastal erosion.

- There is a need to improve the water quality of the rivers in the District, which is currently far below the national average.
- There are clear disparities between the most deprived areas and more prosperous parts of the District. Accessibility to important services and facilities is also a significant issue in parts of the District, particularly in some rural areas.
- The ageing population of Lewes District, which is already high, is likely to increase further, resulting in an additional strain on health and social care, particularly residential nursing care and intensive home care.
- Industry and business are suffering in parts of Lewes District, partly because of the recession, causing damage to local economies. This is particularly evident in areas along the coastal strip.
- Car ownership in the District is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26. Parking is a problematic issue across the District's towns. This is particularly the case in Lewes town.

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 Sustainability Appraisal (SA) must assess the ability of the Core Strategy to contribute to sustainable development.
- 8.2 Along with the key sustainability issues identified previously in this report, the comments received on the objectives and indicators during consultation of previous versions of the SA have been used to create the sustainability objectives and indicators. The objectives, questions and indicators are collectively known as the sustainability framework and are used to test the options for each of the Core Strategy's policy areas. In addition, the sustainability framework has been used to appraise the Core Strategy's policies.
- 8.3 As mentioned in earlier sections of this report, the SA is to incorporate the Strategic Environmental Assessment (SEA) process to predict and assess the social, environmental and economic effects that are likely to arise from Development Plan Documents (DPDs), such as the Core Strategy. 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 topic, this has been indicated.
- 8.4 The objectives on the tables which appraise policy options (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 14: 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 	Population

		<p>considered homeless</p> <ul style="list-style-type: none"> • Percentage of unfit dwellings • Net additions Gypsy and Traveller pitches 	
<p>2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the district. (Deprivation)</p>	<p>Does this approach benefit the most deprived areas of the district? Does the approach support social inclusion?</p>	<ul style="list-style-type: none"> • Rank and change in rank of Lewes District in the Index of Multiple Deprivation • Number and location of Super Output Areas in the District considered to be in the most deprived 30% in the country 	Population
<p>3. To increase travel choice and accessibility to all services and facilities. (Travel)</p>	<p>Does this approach encourage sustainable modes of transport? Will this approach have an impact on out-commuting? Will the approach increase congestion?</p>	<ul style="list-style-type: none"> • Number of large development completions estimated to be within 30 minutes of public transport and walking and cycling journey time of services • Mode of travel to work • Levels of out-commuting • Percentage of the district connected to the internet 	Population Material Assets
<p>4. To create and sustain vibrant, safe and distinctive communities. (Communities)</p>	<p>Will the approach impact on the happiness of the community? Does the approach impact on community safety? Does the approach create additional community facilities?</p>	<ul style="list-style-type: none"> • Percentage of people satisfied with their local area as a place to live • Change in number of community meeting facilities • Change in the amount of public open space • Crime rate per 1000 of the population 	Population Material Assets
<p>5. To improve the health of the District's population. (Health)</p>	<p>Will the approach benefit the District's health? Does the approach reflect the needs of the elderly and disabled population?</p>	<ul style="list-style-type: none"> • Life expectancy at birth • Percentage of population not in good health • Percentage of the population over 65 	Human Health Population

<p>6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services. (Education)</p>	<p>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?</p>	<ul style="list-style-type: none"> • Students achieving 5 or more A*-C GCSE grades (including Maths and English) • Numbers of adult learners • Percentage of adults without any qualifications • Percentage of adults with degree level (or equivalent) qualification 	<p>Population Material Assets</p>
<p>Environmental</p>			
<p>7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and minimising the loss of valuable greenfield land. (Land efficiency)</p>	<p>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?</p>	<ul style="list-style-type: none"> • Percentage of new homes built on previously developed land • Number of empty homes • Density of new dwellings • Amount of grade 1, 2 and 3 agricultural land lost to new development⁴⁶ 	<p>Soil Landscape Material Assets</p>
<p>8. To conserve and enhance the District's biodiversity. (Biodiversity)</p>	<p>Will the approach affect internationally and nationally important wildlife and geological sites? Does the approach seek to protect local nature reserves and sites of nature conservations? Does the approach protect areas of ancient woodland?</p>	<ul style="list-style-type: none"> • Condition and size of Sites of Special Scientific Interest and Special Areas of Conservation • Number and extent of SNCIs and LNRs • Area of ancient woodland 	<p>Fauna Flora</p>
<p>9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park. (Environment)</p>	<p>Does the approach have an impact on listed buildings? Does the approach allow access to the countryside? Will the approach impact on the valued landscape? Does the approach</p>	<ul style="list-style-type: none"> • Number of listed buildings on the buildings at risk register • Amounts of Rights of Way • Capacity for change as defined by Landscape Character Study 	<p>Landscape Cultural Heritage</p>

⁴⁶ Planning policy seeks to protect the best and most versatile land, this represents grades 1-3a in the agricultural land use classification. Our GIS system does not distinguish between 3a(good) and 3b(moderate) and thus it will be difficult to accurately assess the impact of the Core Strategy using this indicator.

	relate to the National Park purposes?		
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
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 physic-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 of energy generated from renewable sources. (Energy)	Will the approach reduce carbon dioxide emissions? Does the approach reduce energy consumption? Will the approach increase the proportion of energy from renewable sources?	<ul style="list-style-type: none"> • Annual consumption of energy per user • Percentage of waste converted to energy • Number of grants for renewable energy installations obtained • Number of planning applications received relating to renewable energy • Carbon dioxide emissions per sector 	Air Climatic Factors Material Assets
13. To improve the District's air quality. (Air quality)	Does the approach increase air pollution? Does the approach have an effect on the AQMA?	<ul style="list-style-type: none"> • Number of Air Quality Management Areas 	Air Human Health
14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. (Flooding)	Will the approach impact on flooding? Does the approach reduce the risk of flooding?	<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 	Human Health Water Climatic Factors Material Assets

		district's area <ul style="list-style-type: none"> Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial) 	
15. To ensure that the District is prepared for the impacts of coastal erosion and tidal flooding. (Coastal Erosion)	Will the approach have an impact on or be impacted by coastal erosion? Will the approach increase the risk of tidal flooding?	<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 and sustain economic growth in successful areas, and to revive the economies of the most deprived areas. (Economy)	Will the approach reduce retail vacancy rates? Will the amount of employment land increase? Will this approach create jobs?	<ul style="list-style-type: none"> Retail unit vacancy rates in town centres Net amount of floorspace developed for employment land Unemployment Rate Percentage of population who are long-term unemployed or who have never worked Number of business enterprises 	Population
17. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)	Will the approach increase the amount of jobs in the tourism sector? Will more people visit the district as a result of this approach?	<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 Strategic Objectives

Compliance with SEA Directive's Requirements

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

- 9.1 As part of the appraisal process, the Sustainability Appraisal objectives have been compared against the strategic objectives of the Core Strategy in order to see if any conflicts arise.
- 9.2 The Core Strategy strategic objectives were first developed for the Core Strategy Issues and Emerging Options Topic Papers (hereafter known as Topic Papers). Since then the objectives have undergone minor revisions and have been reordered⁴⁷ for both the Emerging Core Strategy and the Proposed Submission Core Strategy. Furthermore an additional objective has been added to ensure that the Core Strategy reflects the vision, and supports the district's town centres, retail centres and local centres. The list of objectives can be found in Appendix 2.
- 9.3 The matrix below shows how the respective objectives of both the sustainability appraisal and Emerging Core Strategy relate to each other. A plus (+) sign indicates a potential positive relationship while a minus (-) sign indicates a potential negative relationship. Where it has been appraised that there is no direct relationship between objectives a blank space has been left.

Table 15: Relationship between Core Strategy and Sustainability Appraisal Objectives

Sustainability Appraisal Objectives	1			+			+	-	+		-	
	2	+	+	+								
	3					+				+	+	
	4		+	+		+	+					+
	5					+						
	6	+			+	+				+		
	7	+	+	+	+		+	+	+			
	8			-	+			+	+			
	9			-			+	+	+			
	10			-							+	
	11			-							+	
	12			-						+	+	
	13									+	+	+
	14											+
	15											+
	16	+	+	+	+	+			+			
	17	+			+							
		1	2	3	4	5	6	7	8	9	10	11
		Proposed Submission Core Strategy Objectives										

+ = positive - = negative

⁴⁷ The reordering does not reflect importance but has been done so that objectives relate better to other objectives.

- 9.4 Generally speaking, the Sustainability Appraisal Objectives and the Core Strategy Strategic Objectives either complement each other or it has been appraised that there is no direct relationship between the respective objectives.
- 9.5 However, there are potential clashes between the Core Strategy Strategic Objective which relates to housing delivery (Objective 3) and some of the Sustainability Appraisal Objectives relating to the Environment. This is because it is likely that delivering the amount of housing that the District needs will increase resource use and may be located in areas which could impact on the existing natural environment, despite the stated desire of Core Strategy Objective 3 to accommodate housing need in the most sustainable way
- 9.6 Similarly, Sustainability Appraisal Objective 1 potentially clashes with objectives 7 and 10 of the Core Strategy as the desire to provide homes for all contrasts with the goal to reduce causes of climate change and the objective to conserve and enhance the natural environment and cultural heritage of the district.
- 9.7 Whilst it is noted that these negative relationships do exist, it is not thought they can be mitigated against as the objectives already include wording that seeks to encourage sustainable housebuilding.

10. Appraising Policy Options

Compliance with SEA Directive's Requirements

*The Environmental Report should provide (Art. 5 and 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.”*

10.1 An important part of the sustainability appraisal process is the appraisal of the policy options. This is to identify the most sustainable choice available for each policy area, helping in the identification of the preferred approach to be taken for policy areas.

10.2 In the SA that accompanied the Emerging Core Strategy, the policy areas of the Core Strategy appraised against the sustainability framework were those where more than one realistic option was identified. These same policy areas have been reassessed to reflect comments received during consultation, additional information and to clearly highlight short, medium and long term impacts of the potential policy options. As a result of the reappraisal, views on some of the options have changed. In addition, for some of the policy areas, additional options have been identified which required appraising.

10.3 The table and key below show how the policy approaches were appraised.

Table 16 : Example of Appraisal Table

Objectives	Option A			Explanation
	S	M	L	
1.Housing	-	+?	++	In this example, the approach would have a likely negative effect on the short-term, a possible positive effect in the medium term and would likely have a significant positive effect by the end of the plan period
2.Deprivation, etc.	0	0	0	The approach would be appraised for the remaining 16 objectives

Appraisal Key			
Symbol	Meaning	Symbol	Meaning
++	Likely Significant positive effect		Likely significant negative effect
+	Likely positive effect	S	Short term impact (approximately 2013 - 2018)
0	No effect likely	M	Medium term impact (approximately 2019 - 2024)
?	Uncertain effect	L	Long term impact (approximately 2025 - 2030)
-	Likely negative effect		

Compliance with SEA Directive's Requirements

The Environmental Report should provide (Art. 5 and 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”

Appraising the Spatial Strategy Options

Presumption in Favour of Sustainable Development

10.4 Since consultation on the Emerging Core Strategy, the National Planning Policy Framework (NPPF) was published. The NPPF explains that the key underlying principle of the planning system is the presumption in favour of sustainable development. In order to ensure that the Core Strategy helps to deliver this principle it was felt necessary to develop a policy that included the following:

- That, when considering proposals, the local planning authority will take a positive approach that reflects the presumption in favour of sustainable development
- That the local planning authority will work with applicants and to find solutions in order for development to be approved and to improve the economic, social and environmental conditions in the plan area.
- Where there are no policies relevant to an application it will grant applications unless adverse impacts would arise that would significantly outweigh the benefits when assessed against the NPPF or if the NPPF indicated that such development should be restricted.

10.5 No alternative approach for this policy area has been identified and therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Provision of Housing

10.6 In the Sustainability Appraisal that accompanied the Emerging Core Strategy, a number of different housing numbers were considered. These were the following:

A – To deliver 206 net additional dwellings per annum between 2010 and 2026 and, to deliver 220 net additional dwellings per annum for the remaining period until 2030.

- B – To deliver 300 net additional dwellings per annum over the course of the plan period (until 2030)
- C – To deliver 450 net additional dwellings per annum over the course of the plan period (until 2030)
- D – To deliver 4,150 net additional dwellings between 2010 and 2030 (208 dwellings per annum over the course of the plan period until 2030).

- 10.7 It was identified through consultation on the Emerging Core Strategy (both internal and public) that both A and D were very similar options and were ultimately based on the capacity of the district to provide housing, albeit A was based on the South East Plan and D was based upon the collective evidence used to influence the housing target. Since that time, further work has taken place looking at the capacity of the district to accommodate new housing.
- 10.8 Such work has identified that the district has the capacity to accommodate up to 4,500 additional new homes, which is considered a realistic option and consequently requires appraisal. The original options B and C are still considered necessary to appraise.
- 10.9 The following options were appraised through the Sustainability Appraisal:
 A – To deliver 4,500 net additional dwellings between 2010 and 2030
 B – To deliver 6,000 net additional dwellings between 2010 and 2030
 C – To deliver 9,000 net additional dwellings between 2010 and 2030

Table 17: Summary of Housing Provision Appraisal

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

- 10.10 All of the options were appraised against the sustainability framework (Appendix 3, SA Tables 1 and 2). Option A was seen as the most appropriate to take forward. Although Option A didn't provide as much housing as the other options, it was more of a realistic reflection of the district, taking into account environmental constraints and so isn't likely to have any significant negative effects. Options B and C both appraised well against the social and economic objectives as a large number of housing would be delivered per annum which would have a knock on effect on the local economy, albeit space for employment land uses would be reduced. However, they are both likely to have significant negative environmental impacts (Option C more so than Option B) of which mitigation may not be possible.
- 10.11 **The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan**

objectives has led to option A being included within the Proposed Submission document.

Provision of Employment Land

Industrial space

10.12 In the Sustainability Appraisal that accompanied the Emerging Core Strategy, three different options for the planned quantity of industrial space were considered. This was based on the 2010 version of the Employment and Economic Land Assessment (EELA).

10.13 These were the following:

A – To provide between 2010 and 2026, 30,000 to 40,000 sq. metres of industrial floorspace (this is the range the EELA suggests is the most appropriate).

B – To provide between 2010 and 2026, 12,500 sq. metres of industrial floorspace (the EELA developed this figure based on baseline growth estimates).

C – To provide between 2010 and 2026, 48,500 sq. metres of industrial floorspace (this is the figure the EELA has stated would be needed if past completions rates were to continue).

10.14 Since that time further work has been undertaken looking into employment space through an update to the EELA up to 2031 to reflect changes in the supply and demand balance, revised occupation densities for employment space, a change in the plan period and revised forecasts of future requirements (as provided by Experian in Spring 2012). As such the options considered were the following:

A – To provide between 2012 and 2031, around 1,000 sq. metres of industrial floorspace (based on job growth estimates)

B – To provide between 2012 and 2031, around 60,000 sq. metres of industrial floorspace (based on longer term trend forecasts)

C – To provide between 2012 and 2031, around 92,000 sq. metres of industrial floorspace (based on recent trends continuing)

Table 18: Summary of Industrial Space Options

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

10.15 The above 3 options were appraised against the sustainability framework (Appendix 3, SA Table 3 & 4). Overall, Option B was seen as the most sustainable option, performing well in terms of deprivation and local

economy indicators by increasing jobs (potentially in deprived areas). However, there is uncertainty as to the impact it may have on the environmental objectives. Option A was seen to be least harmful to the environment; however it didn't provide any significant benefits for the local economy, given that it proposed little in the way of employment floorspace provision. Option C could have a significant boost to the local economy; however, this would also likely lead to significant environmental impacts.

10.16 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option B being included within the Proposed Submission document.

Office space

10.17 In the Sustainability Appraisal that accompanied the Emerging Core Strategy, two different options for the distribution of office space were considered, based on the 2010 version of the EELA.

10.18 These were the following:

A – Between 2010 and 2026, provide between 20,000 and 24,000 sq. metres of office space (This is the range the EELA has indicated based on the baseline job growth estimates and enhanced demand for offices, rounded to the nearest 1,000 sq. metres)

B – Between 2010 and 2026, provide between 11,000 and 14,000 sq. metres of office space (This is the range the EELA has indicated based on the continuation of past completions and if completions were reduced).

10.19 As was the case for industrial floorspace, further work has been undertaken looking into employment space, through an update to the EELA up to 2031. As such the options considered were the following:

A – Between 2012 and 2031, provide around 14,000 sq. metres of office space (based on enhanced demand for offices)

B – Between 2010 and 2031, provide around 12,000 sq. metres of office space (based on job growth estimates and long term trends)

Table 19: Summary of Office Space Options

Option	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
A	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

10.20 The options were reappraised against the sustainability framework (Appendix 3, SA Table 5). Option A was considered the most sustainable as it was appraised to be the most beneficial in respect of the economic objectives, potentially for the most deprived parts of the district. Option B also appraised well and was not deemed to have any significant negative

impacts; however, it would not have as positive an impact on deprivation indicators and the local economy.

- 10.21 **The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Proposed Submission document.**

Distribution of Housing

10.22 It was considered appropriate to base the distribution of housing according to sustainability of the district's settlements as identified in the Rural Settlement Study. The distribution has also considered the findings of the SHLAA and the physical capacity of the settlements to accommodate additional dwellings as outlined in other evidence documents such as the Landscape Capacity Study and the Transport Statement.

10.23 In many cases, it is not considered that there are options for each settlement. However, in the case of some areas, there were a range of options considered which require appraisal.

Consideration of development at Ringmer and Broyleside

10.24 In the SA that accompanied the Emerging Core Strategy, two options were considered for development in Ringmer Parish. They were the following:
A – Ringmer and Broyle Side should have a planned level of housing growth that meets a wider District housing need (up to 601 homes).
B – Ringmer and Broyle Side should have a planned level of housing growth that meets local needs (130 homes).

10.25 Many comments were received on the subject of housing development in Ringmer and Broyle Side during consultation on the Core Strategy. Based on these comments, the objectives and vision for the plan and the findings of the appraisal of the two options identified above, it was decided to have a target towards the lower end of the range that was consulted upon (130 - 601 units).

10.26 Given the wide range of figures consulted upon for Ringmer, a number of different views were put forward concerning what the eventual housing target should be. Rather than assess each of the separate targets suggested, it has been decided to identify and appraise two other options based on where the majority of respondents suggested options within the consulted-upon range.

10.27 A number of comments favoured neither the lowest potential housing target (Option A) nor the highest potential housing target (Option B).

Thus, such comments helped introduce the following two additional options for consideration:

C – Ringmer and Broyle Side should have a planned level of growth towards the lower end of the range (200 – 230 homes)

D – Ringmer and Broyle Side should have a planned level of growth towards the higher end of the range (300 - 330 homes)

Table 20: Options for development at Ringmer

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

10.28 The 4 options for the distribution of residential development at Ringmer and Broyleside were appraised against the sustainability framework (Appendix 3, SA Tables 6 & 7). Overall, options B and C both scored well against the sustainability framework. In terms of housing and economic indicators, Option C was seen as having more significant benefits as a result of the higher housing delivery. Both of these indicators also scored relatively positively in terms of environmental indicators, with the only negative impact concerning education provision.

10.29 Options A and D had significant positive benefits in terms of housing and economic indicators, as a result of the high housing delivery these options put forward. However, this high level of housing had a negative impact when appraised against the environmental indicators. Also, Option A was deemed to potentially have a significant negative effect on travel indicators due to the impact it may have on the local transport infrastructure.

10.30 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option C being included within the Proposed Submission document.

Consideration of development at Newick

10.31 The Emerging Core Strategy considered a range of between 100 and 154 for Newick. It is considered appropriate to appraise the lower and upper figure of this range against the sustainability framework. Although there were a number of comments during consultation that indicated a number lower than 100, such an option is not considered realistic given the findings of the Rural Settlement Study and other evidence such as the SHLAA.

10.32 The two options appraised against the sustainability framework were the following:

A – Newick should have a planned level of growth that is to the lower end of the range consulted upon (approximately 100 homes)

B – Newick should have a planned level of growth that is towards the upper end of the range consulted upon (approximately 154 homes)

Table 21: Options for development at Newick

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

10.33 The two housing development options for Newick were appraised against the sustainability framework (Appendix 3, SA Table 8). The two options appraised fairly similarly, as there was only a small difference between the two. Option A appraised more positively than B with the only negative impact regarding land efficiency due to its greenfield status. Due to the larger number of units, Option B was appraised as having slightly more significant positive impacts in regards to housing, deprivation and the local economy. However, it was also seen as having more considerable negative consequences to the community, travel and land efficiency objectives. Therefore, Option A was considered on balance to be the more sustainable option.

10.34 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Proposed Submission document.

Consideration of development at Plumpton Green

10.35 The Emerging Core Strategy considered a range of between 30 and 100 for Plumpton Green. It is considered appropriate to appraise the lower and upper figure of this range against the sustainability framework. During consultation, a number of consultees indicated a preference towards a figure that fell mid-way within the range (around 45 – 60 dwellings), it has therefore been seen necessary to consider an option that relates to such comments.

10.36 The three options appraised against the sustainability framework were the following:

A – Plumpton Green should have a planned level of growth that is to the lower end of the range consulted upon (approximately 30 homes)

B – Plumpton Green should have a planned level of growth that is around the figure of approximately 45 - 60 homes

C – Plumpton Green should have a planned level of growth that is towards the upper end of the range consulted upon (approximately 100 homes)

Table 22: Options for development at Plumpton Green

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

10.37 The 3 options were appraised against the sustainability framework (Appendix 3, SA Tables 9 & 10). Option A set out the lowest level of development and as a result was appraised neutrally, with no benefits and only one negative impact regarding land efficiency. Option B appraised well, having a positive impact on the housing, deprivation and local economy objectives, although there were possible negative impacts in regards to the travel, communities and land efficiency objectives. Option C appraised similarly, with the impacts (both positive and negative) being more likely to occur as well as more pronounced. Overall, Option B was considered the most sustainable, and suitable, option for Plumpton Green.

10.38 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option B being included within the Proposed Submission document.

Consideration of development at Peacehaven/Telscombe and Newhaven

10.39 The Emerging Core Strategy considered ranges for Peacehaven/Telscombe and Newhaven in the emerging Core Strategy based primarily on capacity. Since that time work undertaken by East Sussex County Council looking at transport pressures⁴⁸, has revealed that there are constraints to development in both areas and that the ultimate housing capacity at both Peacehaven/Telscombe and Newhaven depend on a relationship between the two conurbations.

10.40 As a result of such a relationship, it was felt necessary to appraise options for development at the separate conurbations together.

10.41 The options for development in the area were appraised against the sustainability framework were the following:

A – Peacehaven/Telscombe should have a planned level of growth of 220 residential units and Newhaven should have a planned level of growth of 905 residential units (Overall 1,125)

⁴⁸ ESCC Highways Technical Background Note (Sept 2012)

B – A higher level of growth for Peacehaven/Telscombe than option A, that in turn reduces the level of growth for Newhaven. Overall this will reduce the level of growth in the whole area below 1,125.

C – A lower level of growth for Peacehaven/Telscombe than Option A, that will allow a higher level of growth for Newhaven. However, overall such an approach will reduce growth in the whole area below 1,125.

Table 23: Options for development at Peacehaven/Telscombe and Newhaven

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

10.42 The options were appraised against the sustainability framework (Appendix 3, SA Tables 11 & 12). Option A was seen as the most sustainable option as it would maximise the delivery of housing in an area in need of housing, whilst providing potential economic benefits to Newhaven and (to a lesser extent Peacehaven) whilst not impacting negatively on the transport network. As options B and C would not maximise development in the area, the positive effect is less that noted in option A, albeit it should have a positive impact on most social objectives.

10.43 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Proposed Submission document.

Consideration of development at Lewes Town

10.44 Lewes Town is considered a District Centre, owing to its importance to the district as a whole and has the highest need for housing in the district. As such it is expected that the Core Strategy will plan for an appropriate quantum of development in the town. Equally however, the site is in the South Downs National Park Authority and thus development is subject to the National Park’s purposes.

10.45 Considering the above, it was felt necessary to consider the following two options for the housing target for Lewes Town:
 A – To provide a level of housing in the existing built up area with modest expansion into less sensitive landscape areas (such an option is likely to yield a level of housing that falls short of meeting the needs of the town).
 B – To provide a level of housing that meets the needs of the town but recognising that in order for this need to be met, it would be at the expense of other land uses and would expand into sensitive landscape areas.

Table 24: Options for Development at Lewes Town

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

10.46 The options were appraised against the sustainability framework (Appendix 3, SA Table 13). Overall, Option A performed best in the appraisal, with positive effects noted in relation to some social, environmental and economic objectives. Although, Option B performed highly in respect to the housing and deprivation objectives, it is felt that such an option could have negative effects on the environmental objectives partly due to the fact that it would affect the National Park’s setting and thus would not be in accordance with its purposes. In addition, development at such a level could reduce the land available for other uses, such as employment land.

10.47 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Proposed Submission document.

Options for Strategic Development Sites/ Broad Locations for Growth

10.48 As the National Planning Policy Framework makes clear in paragraph 21 and 157, Local Plans, such as the Core Strategy, can identify strategic sites or locations for development. This related to the previous planning system, as expressed in Planning Policy Statement 12 which allowed for the identification of strategic sites “central to the achievement of the planning strategy.”

North Street Quarter and adjacent Eastgate Area, Lewes

10.49 Through all stages of the preparation of the Core Strategy, the North Street area of Lewes was considered a potential strategic development site. Thus, four potential options for development at North Street were appraised against the sustainability framework in the Sustainability Appraisal that accompanied the Emerging Core Strategy:

A – To retain the North Street area for employment use, upgrading and redeveloping the existing buildings for employment use as opportunities arise (This is our current policy in the Lewes District Local Plan). No upgraded hard flood defences would be provided.

B – Comprehensive redevelopment to create a new neighbourhood for the town, with a mix of housing, employment and other uses, which is able to generate sufficient value to provide all necessary supporting infrastructure, including upgraded hard flood defences.

C – Clearance of the existing buildings from the area and utilising it for flood storage and/or low key uses such as open space or surface car parking. In effect, this restores the flood plain in this location. No upgraded hard flood defences would be provided

D – Restore some of the flood plain, but allow an element of flood resistant and flood resilient development in selected, lower risk, locations within the site and integrate this with a wider package of flood risk management areas both on-site (e.g. open landscaped areas) and off-site (e.g. managing surface water drainage). No upgraded hard flood defences would be provided.

10.50 No reasonable alternatives to the four options have been identified since the publication of the Emerging Core Strategy, although the options have been reappraised against the sustainability framework. Furthermore, the appraisal now takes into account an exact location, as the boundaries for the site have now been identified based on what is considered a deliverable scheme and comments made during consultation that stated that the area should be extended. As a result the area is known as the North Street Quarter and adjacent Eastgate Area.

10.51 The appraisal tables can be found in Appendix 3 (Tables 14 - 17) and are summarised below:

Table 25: Summary of North Street Options

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

10.52 All of the options were appraised positively. Option B was seen as the most positive option as it enables the delivery of housing in an area of need, ensures that the site still performs an important economic role, would represent a good use of brownfield land and would also deliver flood improvements in a vulnerable area. Options D and C were appraised similarly to one another, having largely positive environmental benefits but having negative impacts on the social and economic objectives. Option A impacted on few objectives and thus was assessed to be the least favourable option although it scored well with respect to the land efficiency and economy objectives.

10.53 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option B being included within the Proposed Submission document.

Eastside, Newhaven

10.54 In the Emerging Core Strategy, the Eastside area of Newhaven was put forward as a potential strategic development site and a number of options for its development were considered.

10.55 Since the publication of the Emerging Core Strategy, two planning applications have been approved (subject to section 106 agreement) for a mix of uses including housing and a supermarket on the site. Thus, at the time of writing, it is no longer considered appropriate to consider different development options for the area in the Proposed Submission Core Strategy.

Appraising potential strategic housing sites/broad locations for housing growth

10.56 The Emerging Core Strategy, using the findings of the Strategic Housing Land Availability Assessment (SHLAA) at the time, identified 8 sites as potential allocations for either strategic housing sites or broad locations for housing growth (this was in addition to the two sites mentioned in the previous paragraphs). The sites/areas were considered strategic as they were capable of delivering over 100 housing units if fully developed and had been assessed to be either deliverable (suitable, achievable and available for development) or developable (suitable for development with a reasonable prospect of being available in the future).

10.57 All of the sites below were appraised against the sustainability framework (maximum site yield in brackets) in the Sustainability Appraisal that accompanied the Emerging Core Strategy:

- A – Old Mallong Farm, Lewes (up to 270 residential units)
- B – South of Lewes Road, Ringmer (up to 154 residential units)
- C – North of Bishops Lane, Ringmer (up to 286 residential units)
- D – Fingerpost Farm, Ringmer (up to 100 residential units)
- E – Valley Road, Peacehaven (up to 113 residential units)
- F – Lower Hoddern Farm, Peacehaven (up to 450 residential units)
- G – Land east of Valebridge Road, Burgess Hill, within Wivelsfield Parish (up to 150 residential units)
- H – Land at Greenhill Way/Ridge Way, Haywards Heath, within Wivelsfield Parish (up to 180 residential units)

10.58 Since the publication of the Emerging Core Strategy, more information has come to light on each site and for a number of sites the maximum yields have changed:

- For Site A, the maximum amount of residential units has been reduced to 225 based on an assessment of appropriate densities on the site.

- For Site E, discussions with the site proponents have indicated that a development yielding around 158 units was the only feasible options for this site.
- For site F, the amount of residential units considered has been lowered to 350 after a reassessment of densities took place.
- For site H, the amount of residential units has been lowered to 140 after a reassessment of appropriate densities took place.
- Furthermore, an additional site has been identified at Harbour Heights in Newhaven for up to 450 residential units, considered as Option I.
- A significant variation of Site C has also been identified, which comprises of just the western section of this site. It has been decided to treat this western section as a separate option in its own right as Option J.

10.59 Based on the new information, the following sites have been appraised against the sustainability framework (Appendix 3, SA Tables 18-27):

- A – Old Mallong Farm, Lewes (up to 225 residential units)
- B – South of Lewes Road, Ringmer (up to 154 residential units)
- C – North of Bishops Lane, Ringmer (up to 286 residential units)
- D – Fingerpost Farm, Ringmer (up to 100 residential units)
- E – Valley Road, Peacehaven (up to 158 residential units)
- F – Lower Hoddern Farm, Peacehaven (up to 350 residential units)
- G – Land east of Valebridge Road, Burgess Hill, within Wivelsfield Parish (up to 150 residential units)
- H – Land at Greenhill Way/Ridge Way, Haywards Heath, within Wivelsfield Parish (up to 140 residential units)
- I – Land at Harbour Heights, Newhaven (up to 450 residential units)
- J – North of Bishops Lane, Ringmer (western section), (up to 120 residential units).

Table 26: Summary of Strategic Housing Options

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

Site A

10.60 This site scores well in terms of the social and economic objectives, providing a significant amount of housing in a town with significant need (including affordable housing) and promoting local economic growth. However, it was appraised as having a significant negative impact in terms of land efficiency indicators due to its greenfield, grade 2 agricultural land and National Park location. Overall, the site was appraised fairly well, although there would be a significant negative impact when measured against the land efficiency objective as the site is located on a high agricultural value greenfield site.

Site B

10.61 Overall this site appraised well, however there were negative impacts in regards to land efficiency and environmental indicators as it is located on grade 3 agricultural land on a greenfield site. It appraised well in terms of providing a considerable number of dwellings, including affordable, to ease the housing register pressure in Ringmer and the wider housing market area. Also, it is likely that development of this scale would have a positive impact on the economy of the area, and could have the knock on effect of supporting the retention/creation of shops, services and jobs.

Site C

10.62 Overall the North of Bishops Lane site appraised well. The site has the potential to deliver a significant number of dwellings, including affordable, to ease the housing register pressure in Ringmer and the wider housing market area. The site scored well against travel indicators due to its proximity to local services and public transport. Also, it is likely that development of this scale would have a positive impact on the economy of the area, and could have the knock on effect of supporting the retention/creation of shops, services and jobs.

10.63 However, there are serious doubts as to the deliverability of the site and whether the land could be assembled to bring forward development. However, it is located on a greenfield site, impacting on the land efficiency objective. It is unknown if this is high quality agricultural land.

Site D

10.64 This site scored well against the housing and economy objectives of the sustainability appraisal in terms of the impact it would have in delivering a significant number of dwellings. Also, it is likely that development of this scale would have a positive impact on the economy of the area, and could have the knock on effect of supporting the retention/creation of shops, services and jobs.

10.65 However, it was also appraised as having a negative effect in regards to land efficiency as it is located on a grade 3 agricultural greenfield site (it is not clear whether this is high or low value agricultural land). Overall this site scored fairly well against the sustainability appraisal with one negative impact

Site E

10.66 This site scored negatively in regards to land use and environmental indicators due to its greenfield location and its low-medium capacity for change in landscape terms (meaning that development is likely to be damaging on a quite sensitive landscape). However, it appraised well against the deprivation and economy objectives as it was thought development at the site may have far-reaching benefits to the town which does contain some of the most deprived areas of the district. It may also have the knock on effect of supporting the retention/creation of shops, services and jobs. It also scored well in terms of the housing objective and its associated indicators.

Site F

10.67 Overall this site was appraised neutrally, as development would likely create significant positive effects and negative effects. For example it would have positive social benefits including: supplying a significant number of dwellings, including affordable houses; benefiting the town of Peacehaven, which contains a number of the district's most deprived areas; as well as having a positive impact on the economy of the area, and having the knock on effect of supporting the retention/creation of shops, services and jobs. However it is also likely to have a significant negative impact on the land efficiency objective, being located on a high grade agricultural greenfield site as well as having a possible negative environmental impact as the site is identified as having a low-medium capacity for change in landscape terms (meaning that development is likely to be damaging on a quite sensitive landscape if not mitigated against).

Site G

10.68 Site G scored positively in terms of the social objectives such as housing as it would provide significant number of dwellings (including affordable housing). Also, it is likely that development of this scale would have a positive impact on the economy of the area, and could have the knock on effect of supporting the retention/creation of shops, services and jobs. It was noted that higher order services were available relatively nearby, reducing the need to travel by private transport for long distances. However, development at the site may have negative environmental

consequences as it is located on a greenfield site, in the vicinity of a local SNCI and Ancient Woodland.

Site H

10.69 On the whole, Site H scored positively against the sustainability framework. It is believed that development would have positive social benefits in regards to housing delivery. Furthermore, it is thought development would have benefits to the economy of the area and could have the knock on effect of supporting the retention/creation of shops, services and jobs. It was noted that higher order services were available relatively nearby, reducing the need to travel by private transport for long distances. However, similar to the other sites, it doesn't score as positive on the environmental objectives as the site is located on a greenfield site.

Site I

10.70 Overall, this site performed averagely against the sustainability framework. Development would have positive social benefits due to the significant number of housing units it would provide and its location in one of the districts most deprived locations which could benefit from development in the area. On the other hand, there may be negative environmental impacts due to it being primarily located on greenfield land. The appraisal also noted that Newhaven is not considered a particularly buoyant housing market and therefore it was seen as very unlikely that the market could deliver the site alongside other planned development in Newhaven in the short-medium term. As such, in the short and medium term, development of the site had the potential to affect regeneration projects in Newhaven (a potential negative for the deprivation and economy objectives) and would likely mean that extra homes in Newhaven would not come forward.

Site J

10.71 Overall the western section of the North of Bishops Lane site appraised well. In some respects the site scores less favourably compared to the site as a whole (Site C), however, this section was seen as more of a contained and deliverable site. The site would provide a considerable number of affordable dwellings to ease the housing register pressure in Ringmer and the wider housing market area, as well as possibly having a positive impact on the parish's economy. It also scores positively against travel indicators due to its proximity to local services and public transport. However, it is located on a greenfield site, impacting on the land efficiency objective. It is unknown if this is high quality agricultural land.

10.72 **The outcomes of the site/area option appraisals and the option appraisals, along with the evidence base, has influenced the strategy**

for distributing new housing, as set out in the Core Strategy – Proposed Submission document. The following sites have been taken forward:

**Site H - Land at Greenhill Way/Ridge Way, Haywards Heath
Site I - Harbour Heights, Newhaven**

In addition to the above sites, Site J (below) was allocated as a strategic site contingent on the Ringmer Neighbourhood Plan not being made by June 2014, and/or that it does not allocate sufficient sites to deliver 120 net additional units by 2019.

Site J - North of Bishops Lane, Ringmer (Western Section)

10.73 In respect of Site J, Ringmer Parish Council are currently at an advanced stage in the production of their Neighbourhood Plan and so the preference is to allow Ringmer Parish Council to identify sites to provide the 220 net additional dwellings assigned to Ringmer and Broyle Side in Spatial Policy 2 through the Neighbourhood Plan.

10.74 Although some of the site/area options have not been taken forward in the strategy, it does not mean that they cannot come forward at a later date in the plan period. The Core Strategy has sought to allocate those sites that are deliverable at an early point in the plan period, are the most sustainable options and will help meet a number of the plan objectives.

Appraising potential strategic employment land sites

10.75 The Sustainability Appraisal for the Emerging Core Strategy appraised four sites for a mixture of office and industrial use:

A – North Street Strategic Development Site, Lewes (Office and Industrial)
B – Harvey’s Brewery Yard, Lewes (Office)
C – Land within South Downs College Site, Lewes (Office)
D – Land to the East of Caburn Enterprise Centre, Ringmer (Office and Industrial)

10.76 Since the Emerging Core Strategy was consulted upon, further evidence has been gathered on the sites A – D and a 2012 update to the Economic and Employment Land Assessment (EELA) has taken place. The 2012 EELA update identified a qualitative requirement for employment land in or near to Lewes town.

10.77 Land within the South Downs College is now known to be unavailable for such uses and therefore it is no longer considered appropriate to appraise the site for office use. Similarly, it is not thought realistic that the area east

of Caburn Enterprise Centre will come forward if allocated only for employment uses.

10.78 With regards to North Street, the site has already been appraised through the sustainability framework. The appraisal found that the most sustainable option for the site was for it to be redeveloped as part of a comprehensive scheme that delivers a number of uses. As such, the Core Strategy has allocated the site for such a scheme and it is no longer considered appropriate to appraise the site solely for employment use.

10.79 It is however anticipated that the redevelopment of the North Street site will meet the short-term need for quality office space, while relocating existing businesses from the site to more modern premises elsewhere will help meet the short-term qualitative need for industrial space in and around Lewes Town. As such it is not considered that there is an immediate need to allocate sites for employment use in the Core Strategy and thus there is no need to appraise the remaining site, Harvey's Brewery Yard.

10.80 As the fragile recovery from recession continues, it is unlikely that a quantitative need for employment land will become apparent in the short term. The South Downs National Park Authority will be producing the National Park Plan in the near future which will offer an opportunity to review the employment land need should conditions change.

Appraising the Core Policy Options

Core Policy 1 – Affordable Housing

10.81 Key Strategic Objective 1 in Topic Paper 4 set out the aim to deliver homes and accommodation needs for the district and this was carried through in Strategic Objective 1 of the Emerging Core Strategy (Strategic Objective 3 of the Proposed Submission Core Strategy). To achieve this, it was felt necessary to have an affordable housing policy and therefore not having a policy option was not considered to be a realistic approach.

10.82 In the Emerging Core Strategy, the following three options were considered for this policy area. These original options are listed below:

1. To continue with the existing district-wide policy, which sets the threshold at 15 dwellings with a 25% affordable housing requirement.
2. To replicate the South East Plan policy direction – the threshold will be 15 dwellings, with a 40% affordable housing requirement in the part of the district within the Sussex Coast sub-region and a 35% requirement in the remaining part of the district.
3. To follow the approach detailed in the SHMA – the threshold level and affordable housing requirement would differ across the district. In the rural

areas, there would be an affordable housing requirement of 40% and a threshold of 5 dwellings. In the urban areas the threshold would be 15 dwellings. In the coastal towns the requirement would be 30% affordable, whilst in Lewes Town the affordable requirement would be 35%.

10.83 At the time these options were developed it was made clear that the options may need to be refined, and indeed other options may come forward, as a result of the viability testing that was required. This testing would ensure that whatever requirement for affordable housing was taken forward, it would generally be viable and therefore could be met in the vast majority of developments expected to come forward.

10.84 An assessment of affordable housing viability has now been undertaken⁴⁹ that, along with the findings of the SHMA, infers that the current requirement is too low. As a result of the above, option 1 is no longer considered as a realistic option and thus has not been reappraised against the sustainability framework.

10.85 Option 2's threshold was based upon the standards of PPS 3 (now withdrawn) and the South East Plan (likely to be revoked). Notwithstanding its status it has been appraised as Option E.

10.86 Original option 3 remains a realistic option and thus has been appraised against the sustainability framework as option A. The Affordable Housing and CIL Viability Study (AHVA) recommended one option and offered another option for consideration. These options have been appraised against the sustainability framework as options B and C. Another option, based partly on the South East Plan and AHVA has also been appraised against the sustainability framework as option D.

10.87 The 5 options appraised against the sustainability framework were the following:

A - To follow the approach detailed in the SHMA – the threshold level and affordable housing requirement would differ across the district. In the rural areas, there would be an affordable housing requirement of 40% and a threshold of 5 dwellings. In the urban areas the threshold would be 15 dwellings. In the coastal towns the requirement would be 30% affordable, whilst in Lewes Town the affordable requirement would be 35%.

B – To follow the preferred approach detailed in the AHVA – the affordable housing requirement for the whole district would be 40% and the threshold would be 3, with a staggered approach up to 10 units.

C – To follow an alternative approach suggested in the AHVA – where the affordable requirement for the urban areas would be 40% and the requirement for the rural part would be 50%. The threshold would be 3.

⁴⁹ RS Drummond-Hay (2012), Affordable Housing and CIL Viability Study

D – To follow the South East Plan policy direction, with a 40% affordable housing requirement in the part of the district within the Sussex Coast sub-region and a 35% requirement in the remaining part of the district. The threshold, as considered in the AHVA would be 3.

E – To follow the South East Plan policy direction, with a 40% affordable housing requirement in the part of the district within the Sussex Coast sub-region and a 35% requirement in the remaining part of the district. The threshold would be 15 units.

Table 27: Summary of Affordable Housing Options

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

10.88 The appraisal of the options can be found in Appendix 3, SA Tables 28 – 30. As can be seen in the table, all of the options were seen as more positive than the existing situation, due to the fact they all would likely increase the amount of affordable housing being provided than is currently the case.

10.89 However, option B was seen as the most sustainable option as it was thought that it would maximise affordable housing delivery without affecting the viability of housing schemes, thus being of most benefit to the district that has a large amount of need for additional housing.

10.90 Options C and D were appraised to have similar positive benefits. However, the 50% requirement in the rural area (Option C) was thought likely to prevent some residential schemes from coming forward, while the 35 % requirement in the rural area (Option D) was not as high as could reasonably be asked for and therefore would not maximise affordable housing delivery in the area.

10.91 Option A, although would likely increase affordable housing delivery would do so at a lesser rate than could viably be delivered in the urban areas. Furthermore, the high threshold of 15 units would mean that a high proportion of developments would not deliver any affordable housing.

10.92 Option E appraised negatively as a result of the high threshold which would likely bring about reduced levels of affordable housing and act as a disincentive to larger developments. Also, the requirement of 35% set in the rural areas was not seen as high enough to maximise affordable housing delivery in those areas.

10.93 **The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option B being included within the Proposed Submission document.**

Core Policy 2 – Housing Type, Mix and Density

10.94 Continuing on from Core Policy 1, it was felt necessary to develop a policy on housing type, mix and density in order to deliver the right type of housing development in the district. The policy approach was, at the Emerging Core Strategy stage, made up of three different parts. For each part of the policy, different options were generated and have been assessed through the sustainability framework.

Housing Mix and Type

10.95 When considering options for this policy area, it was felt necessary to generate options for the mix and type of new housing. Three options were appraised in the Sustainability Appraisal that accompanied the Emerging Core Strategy, which were as follows:

- A - To have a flexible approach, to the mix and type of housing, based on up-to-date evidence and taking into account location, to provide a range of dwelling types and sizes.
- B – To set district-wide standards for the proportion of housing types and sizes.
- C – To set various standards for the proportion of housing types and sizes for different parts of the district.

10.96 Consultation on the Emerging Core Strategy did not reveal any additional options, for this part of the policy approach and not having a policy option was not considered to be a realistic approach. However, the options were re-appraised against the sustainability framework, as shown in SA Tables 31 and 32 in Appendix 3.

Table 28: Summary of Housing Mix and Type options

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

10.97 Option A came out positively against the sustainability framework. The flexibility of the approach would allow the policy to respond to the economic, environmental and social conditions and needs of the locality at the time of development. In addition, it would ensure development that is suitable for the different parts of the district. In general it was appraised

that the approach would have significant benefits to the objectives relating to housing, deprivation, communities and the environment.

10.98 Option C also performed well against the sustainability framework. Similar to Option A, it would have the flexibility to take into account the location when determining housing mix and type which would have environmental and social benefits in the short-term. However, it would not be able to respond to economic, housing market and socio-economic changes over the course of the plan period.

10.99 Option B performed negatively as it would not allow any flexibility and may not reflect particular parts of the district, which could result in development that is inappropriate to its location. Also, the district-wide standard, and the evidence upon which it is based, may be unresponsive to economic and socio-economic changes in the long-term. Proceeding with Option B was deemed to have a particular negative impact on the objectives relating to housing and communities, as well as well as less prominent negative impacts in regards to deprivation and the environment.

10.100 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Proposed Submission document.

Flexible and Adaptable Accommodation

10.101 Taking into account the expected rise in the elderly population during the plan period, two options were considered for the provision of flexible and adaptable accommodation. They were the following:

A – Support the provision of flexible and adaptable accommodation to help meet the diverse needs of the community and the changing needs of occupants over time and requires the Lifetime Homes standard to be met in all new residential developments.

B – As above, but not to require the Lifetime Homes standard to be met in all new residential developments.

10.102 No additional options for this policy approach have been introduced since the Emerging Core Strategy was consulted upon and not having a policy option was not considered to be a realistic approach. However, the options have been reappraised against the sustainability framework. The appraisal of the options can be found in SA Table 33 of Appendix 3.

Table 29: Summary of Flexible and Adaptable Accommodation options

Option	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
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
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10.103 Option A performed neutrally against the sustainability framework. Although the option would require housing that meets the needs of the whole population (whether they be able-bodied, disabled or elderly), this positive impact was deemed to be cancelled out by the potential for increased costs on schemes that have marginal viability, which could impact upon delivery rates, or result in developers negotiating a lower affordable housing requirement to make the scheme viable.

10.104 Option B performed positively compared to option A. Although the option is likely to bring forward some housing to lifetime homes standards, it would not impose additional costs on developers who are bringing forward schemes where viability is marginal. Hence, the option should not have an adverse impact on housing delivery.

10.105 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option B being included within the Proposed Submission document.

Housing Density

10.106 Following on from the housing type and mix part of this policy area, it was also felt that a policy area on housing densities was needed to successfully deliver Strategic Objective 3 of the Proposed Submission Core Strategy.

10.107 There were four options generated for this part of the policy area, all of which were appraised against the sustainability framework in the Sustainability Appraisal that accompanied the Emerging Core Strategy. The options can be summarised by the following:

A – Set a target average density range (between 47 and 57 dwellings per hectare for the towns and between 20 and 30 dwellings per hectare for the villages), allowing for actual densities on individual sites to be lower or higher than this. Expected densities to be achieved on allocated sites will be identified in the development principles that accompany a site allocation (either in the Core Strategy, subsequent Lewes District Site Allocations DPD or the National Parks Local Plan).

B – Set a minimum density requirement across the district, which all developments must meet or exceed.

C – To reflect the regional density target from the South East Plan.

D – Not to set density targets.

10.108 Consultation on the Emerging Core Strategy did not provide additional options. Thus, only the original options were reappraised against the sustainability framework (Appendix 3, SA Tables 34-35).

Table 30: Summary of Housing Density Options

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

10.109 Option A was appraised to be the most sustainable approach with regards to this policy area as it allows the District Council to maximise housing delivery, ensure a variety of housing is provided to meet demand and to make best use of the available land. Furthermore, the flexible nature of the option would ensure that development is appropriate to its location, both in social and environmental terms.

10.110 Option C performed similarly to Option A. The flexibility of the option allows new development to be in keeping with its location, in both environmental and social terms, and so is less likely to negatively impact on the community. However, whilst its relatively high target (40dph) would encourage good use to be made of available land, it does not go as far as other options in accurately reflecting the character of the district by differentiating between urban and rural locations. Therefore, it was not considered the most sustainable approach.

10.111 Option B was appraised negatively as it was considered that a minimum density may restrict development in rural locations and would not necessarily maximise housing delivery in other areas. In addition it was appraised that that this option may be inappropriate for rural areas where densities are low and consequently may have a negative impact on the character of the location. This could lead to negative feelings within the community.

10.112 Option D performed negatively as it would mean that the District Council would be unable to control densities and thus there would be uncertainty as to the intensity of housing development and its relationship with its location. Furthermore, this policy option is unlikely to ensure that the best use is made of available land. This is likely to hamper the ability to deliver our target level of new homes on the land available for housing in such a constrained district and put further pressure on sites that are not overly suitable for housing (for example sites with significant landscape value).

10.113 The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan

objectives has led to option A being included within the Proposed Submission document.

Identifying sites and Local Requirements for special need housing

10.114 Since consultation on the Emerging Core Strategy, it was felt necessary to add another part to the policy approach concerning the delivery of sites to meet specialised, local requirements, summarised by the following:

- Where appropriate, identify sites and local requirements for special needs housing (such as for nursing homes, retirement homes, people with special needs including physical and learning disabilities, specific requirements of minority groups, etc.) in a Site Allocations and Development Management Policies DPD and/or the SDNPA Local Plan.

10.115 No other realistic options for this area of the policy have emerged since consultation on the Emerging Core Strategy and not having a policy was not considered to be a realistic approach because of the need to meet the plan's objectives.

Core Policy 3 – Gypsy and Traveller Accommodation

10.116 Strategic Objective 1 of the Emerging Core Strategy (Strategic Objective 3 of the Proposed Submission Core Strategy) sets out the aim to deliver accommodation to meet the needs of the district. Providing appropriate accommodation for the needs of the district includes the needs of the Gypsy and Traveller community. Thus, it was felt necessary to develop options for the policy area.

10.117 Whilst a number of different options for this policy area were initially generated for the Emerging Core Strategy, only 1 suitable and realistic option emerged, which is summarised as the following:

- To provide 11 additional pitches for Gypsies and Travellers up until 2018 (This would equate to 26 overall pitches by 2018)
- *To review levels of need beyond 2018*
- To address additional need through subsequent Development Plan documents
- To develop a criteria-based policy for use in selecting Gypsy and Traveller Accommodation

10.118 Since the Emerging Core Strategy was published, no deliverable Gypsy and Traveller sites were found through the additional site assessment work to be allocated in the Core Strategy and consequently the option of allocating sites is no longer considered realistic. The planning authorities are committed to reviewing accommodation needs beyond 2018, but it is

felt that this is a procedural matter rather than a policy approach and has therefore been removed from the option above.

10.119 No other realistic options for this policy have emerged since consultation on the Emerging Core Strategy and not having a policy was not considered to be a realistic approach because of the need to have a clear strategy of Gypsy and Traveller accommodation. As there are no alternatives, no options appraisal has been carried out in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 4 – Encouraging Economic Development and Regeneration

10.120 Key Strategic Objective 9 in Topic Paper 4 sought to stimulate and maintain a balanced economy. This was carried through as Strategic Objective 10 of the Emerging Core Strategy (Objective 1 of the Proposed Submission Core Strategy). It was therefore felt necessary to include a policy in the Emerging Core Strategy to help deliver this.

10.121 In the Emerging Core Strategy, there was only 1 option considered for this policy area and thus no option appraisal was undertaken as it would not assist the decision making process.

10.122 The Employment and Economic Land Assessment (EELA) was used to help generate a number of parts for this policy area. The approach for the policy area that was developed is summarised below:

- To identify sufficient sites in sustainable locations to provide for a flexible range of employment space to meet current and future needs.
- Safeguard existing employment sites and unimplemented Local Plan employment site allocations from other competing uses unless there are demonstrated economic viability or environmental amenity reasons
- Support intensification, upgrading and redevelopment of existing employment sites, if appropriate
- Promote the delivery of new office space, particularly in Lewes town
- Promote small, flexible, start-up and serviced business units (including scope for accommodating business expansion)
- Promote development of sustainable tourism, including recreation, leisure, cultural and creative sectors, and having particular regard to the opportunities of the South Downs National Park.
- Support the use of Newhaven port for freight and passenger service, including plans for expansion and modernisation of the port as identified in the port authority's Port Masterplan.
- Promote modern and high speed e-communications and IT infrastructure
- Encourage sustainable working practices (such as homeworking and live/work)

- Increase the skills and education attainment level of the District's labour supply
- Identify Local Development Orders where necessary to support economic development and regeneration, particularly on existing employment sites.

10.123 No alternative approach for this policy area has been identified since the Emerging Core Strategy and not having a policy for this option is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 5 – The Visitor Economy

10.124 Strategic Objective 2 of the Emerging Core Strategy (Strategic Objective 4 of the Proposed Submission Core Strategy) stated that we should look to “take advantage of the richness and diversity of the District's natural and historical assets to promote and achieve a sustainable tourism industry in and around the District.” To achieve this, it was felt that a policy relating to tourism was needed.

10.125 In the Emerging Core Strategy, there was only 1 option considered for this policy area and thus, no appraisal was undertaken as it would not assist the decision making process.

10.126 A policy approach was developed which contained the following aspects to it. This is summarised by the following:

- Support for the provision of new and the upgrading/enhancement of existing sustainable visitor attractions and accommodation, supporting emerging and innovative visitor facilities and accommodation offers, and giving flexibility to adjust to changing trends
- A presumption in favour of the retention of existing visitor accommodation stock, including camping and caravan sites.
- Promote appropriate sustainable tourism in rural areas (both in and outside the National Park), including the promotion of opportunities for the understanding and enjoyment of the National Park while recognising the importance of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area as assets that form the basis of the tourist industry in the district.
- Support a year-round visitor economy and reduce seasonal restrictions where appropriate
- Support a sustainable tourist sector, use of public transport, local attractions, and local crafts, produce and appropriate tourism development that supports farm business/diversification
- Provide sufficient land for the provision of new hotel accommodation.

- *Retain saved Local Plan Policies E15, E16 and E17 until a Development Management DPD is adopted.*

10.127 Since the publication of the Emerging Core Strategy it has become apparent that saved Local Plan Policy E16 can no longer be used because it relates the Sussex Downs Area of Outstanding Natural Beauty, which no longer exists. As such the bulletpoint in italics has been removed from this approach. In its place, the following two points have been added to the approach:

- Retain saved Local Plan Policies E15 and E17 until a Development Management DPD is adopted.
- Ensure that any camping/caravan to be located in the South Downs National Park are appropriate for their surroundings

10.128 No alternative approach for this policy area has been identified since the Emerging Core Strategy. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 6 – Retail and Sustainable Town and Local Centres

Overall

10.129 In order for the Core Strategy to deliver sustainable development, it was felt necessary to generate an approach that supports the district's town and village centres for retail and other activities. An approach was developed for the Emerging Core Strategy taking into account regional and national policy and guidance, as well as local circumstances. This approach, summarised below, was developed that sought to:

- Set out the retail and functional hierarchy of our town and local centres (based on findings of an up-to-date retail study)
- Set out the amount of new retail floorspace (for comparison and/or convenience goods) to be accommodated in each town centre up to 2030 (if required by an up-to-date retail study)
- Promote and enhance the viability and vitality of the town and local centres, including encouraging high quality mixed use developments with active ground floor frontages, supporting appropriate enhancements to the evening economy, and supporting small and independent businesses.
- Protect local shops and facilities, but where unviable, take a flexible approach to the consideration of alternative uses, on their individual merits, that would be of benefit to the local community and the vitality and viability of the local centre.

- Reinforce and enhance the distinctive character and eclectic mix of specialist/niche retailers and service providers in Lewes town and support its role as the district's principal leisure, cultural and visitor destination town.
- Support the role of the Meridian Centre in the provision of shops and services in Peacehaven/Telscombe and to explore the potential for further improvements and development opportunity at the Meridian Centre and its immediate surroundings.
- Reinforce the Seaford town centre for retail provision, while encouraging more diverse uses in the peripheral area around the shopping core to help increase vitality beyond the central area, particularly uses that would help Seaford to exploit its potential as a visitor destination more fully (while having regard to its understated seaside character).

10.130 Since the publication of the Emerging Core Strategy, an up-to date retail study has been completed. Although this study has resulted in certain sections of the proposed policy approach (as set out above) being updated, it has not resulted in any distinct options being identified for this policy.

10.131 As no alternative approaches for the parts of the policy area above have been identified. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no options appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the whole policy.

Newhaven (town centre)

10.132 Part of the retail policy focuses on the role of the town centres of the district. The following two options were identified as realistic approaches for this policy area concerning Newhaven town centre and consequently were appraised in the Sustainability Appraisal that accompanied the Emerging Core Strategy:

A – Reclassify Newhaven town centre as a local centre and then reinforce its role as a local centre.

B – Maintain Newhaven town centre's classification.

Following consultation on the Emerging Core Strategy, no realistic additional options for the approach have been generated. The two options were reappraised (Appendix 3, SA Table 36).

Table 31: Summary of Newhaven Town Centre Options

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

- 10.137 The options were appraised against the sustainability framework Appendix 3, SA Table 37. Option A was assessed as the most sustainable approach as the flexibility that reclassifying the South Coast Road would give to the area was seen in a positive light. This would allow non-retail development (including housing, community facilities, cafes etc) to be built in what is currently a primary shopping area/town centre. These uses may bring people into the town centre area, generate income as well as helping to support the remaining retail units. Also, it was considered that there could be benefits to the community objective. Reducing vacant properties and allowing other community facilities along the South Coast road could improve community happiness and pride in the area. As a result, this is the preferred approach for the Core Strategy. However, it is recognised that this option would lead to a loss of shopping provision and related jobs which is contrary to SA objective 16.
- 10.138 Option B did score well with regards to the economic objective, by retaining retail provision and associated jobs. However, this approach would prevent development of non-commercial uses along the South Coast Road, meaning that other uses (such as housing, community facilities, cafes etc) would not be allowed to come forward in the area in place of any vacant properties. It was also felt that such an approach would increase the chances of long-term vacancies (although the vacancy rate is currently fairly low). This is likely to have a negative impact on the community objective as any vacant properties may affect community happiness and pride in their town, as well as prohibiting further community facilities from being brought forward in the town centre.
- 10.139 **Option A for Newhaven Town Centre and Option A for the South Coast Road at Peacehaven has been taken forward as part of the detailed policy in the Proposed Submission document for this policy area. A full appraisal of that proposed policy has been undertaken in the next stage of this report.**

Core Policy 7 – Infrastructure

- 10.140 Key Strategic Objective 3 in the Topic Papers makes mention that upgraded infrastructure is required for sustainable communities to exist in Lewes District. This was carried through in the Emerging Core Strategy as Strategic Objective 3 (Strategic Objective 5 of the Proposed Submission Core Strategy). For the objective to be achieved, it was felt that a policy was needed to be generated.
- 10.141 When generating options at the Emerging Core Strategy stage there was only one distinct option identified for this policy area identified. The approach consisted of the following aspects:

- To protect and where possible enhance existing physical and social infrastructure, including that which serves the elderly, unless it is evidently no longer required, occupies unsuitable land/premises and/or suitable alternative provision will be made.
- To prepare an Infrastructure Delivery Plan to identify key infrastructure requirements and shortfalls and how these can be met in a timely manner.
- To work with key delivery partners to identify the appropriate level of provision, priorities and associated financial costs.
- To establish a Community Infrastructure Levy (CIL Charging Schedule), setting out what contributions would be expected in association with different types and sizes of development.
- To require developer contributions towards infrastructure provision through the combination of S106 planning obligations and/or the CIL.

10.142 No alternative approach for this policy area has been identified since the Emerging Core Strategy. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 8 – Green Infrastructure

10.143 Strategic Objective 3 of the Emerging Core Strategy (Strategic Objective 5 of the Proposed Submission Core Strategy) states the ambition to improve the accessibility to key community services and facilities, which includes green infrastructure. To achieve this it was therefore felt necessary to develop an appropriate strategic policy, which is summarised below.

- To identify areas where existing green infrastructure could be enhanced or restored and areas where opportunities for new green space could be provided
- To ensure that development maintains and manages identified green infrastructure
- To require development to contribute to the creation of new green spaces and/or linkages between green infrastructure
- To support the creation of new green infrastructure and its linkages to improve the green infrastructure network
- To resist development that has a negative impact on green infrastructure, undermines its functional integrity, or results in a loss of green space (unless alternative provision of a greater standard was provided)

10.144 No alternative approach for this policy area has been identified since the Emerging Core Strategy and therefore no appraisal has been done in this

section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 9 – Air Quality

10.145 Whilst Topic Paper 1 did note that air quality was generally good in the district, it also recognised the Air Quality Management Area (AQMA) in Lewes Town and a possible designation in Newhaven at South Way. Therefore it was considered appropriate to develop a policy for this subject area.

10.146 Only 1 realistic option was generated for this policy area, which is summarised below:

- Seek improvements in air quality through implementation of the Air Quality Action Plan and having particular regard to the impacts of development on the air quality of the Lewes town centre AQMA (and any others subsequently declared).
- Ensure that development will have an acceptable impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.
- Promote opportunities for walking and cycling and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations.
- Require mitigation measures where development and/or associated traffic would adversely affect any declared AQMA.
- Seek best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development.

10.147 No alternative approach for this policy area has been identified since the Emerging Core Strategy. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 10 – Natural Environment and Landscape Character

10.148 Key Strategic Objective 10 of the Topic Papers set out, amongst other aspects, the need to conserve and enhance the natural beauty of the district. This was carried through as Strategic Objective 5 in the Emerging Core Strategy (Strategic Objective 7 of the Proposed Submission Core Strategy). To achieve the objective it was felt necessary to develop a policy on the natural environment and landscape character.

10.149 Only 1 realistic approach was developed for this policy area, which consisted of the following aspects:

- That the highest priority be given to the conservation and enhancement of the landscape qualities of the South Downs National Park by ensuring that all development complies with the National Park Purposes and the Management Plan (once prepared).
- That the integrity of the European designated sites in and around Lewes District (consisting of Special Areas of Conservation, Special Protection Areas and Ramsar sites) is maintained. This will be done by requiring those proposing development to ensure that development causes no significant adverse effects on the integrity of the sites both by itself and in combination with other plans, projects and proposals.

10.150 On a district wide basis, an approach was developed to conserve and enhance the natural environment and landscape characteristics and qualities by:

- Not permitting new development that would harm landscape character or nature conservation interests, unless the benefits outweigh the harm caused, in which case appropriate mitigation and compensation is provided.
- Seeking to conserve and enhance the landscape qualities of the district, as informed by the County Landscape Assessment and the Landscape Capacity Study
- Seeking the conservation, enhancement and net gain in local biodiversity resources.
- Seeking to maintain ecological corridors and avoiding habitat fragmentation
- *Working with neighbouring authorities to help deliver the Brighton and Lewes Downs Biosphere Project, the South Downs Way Ahead Nature Improvement Area and other plans and projects*
- *Ensuring that water quality is maintained and improved.*

10.151 Consultation on the Emerging Core Strategy added another two parts to the policy, shown in italics above. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 11 – Built and Historic Environment and High Quality Design

10.152 Core Policy 11 sought to meet Strategic Objectives 4 and 5 of the Emerging Core Strategy (Strategic Objectives 6 and 7 of the proposed Submission Core Strategy). Objective 6 looks to conserve and enhance the high quality of the towns and villages in the district while Objective 7 looks to conserve and enhance, amongst other things, the cultural heritage

of the area. For the Emerging Core Strategy three options were appraised for this policy area against the sustainability framework.

10.153 Option A consisted of the following:

- To prepare generic design and built environment policy to ensure a quality of design in all development because of the likely revocation of national and regional planning policy.
- To consider setting design standards with regard to matters such as crime reduction, private outdoor space, connectivity and local distinctiveness.
- Retain Local Plan Policy ST3 for development management purposes until a Development Management DPD is adopted.
- Protect, restore, conserve and enhance the historic environment and recognise the role that nationally and locally important historic assets play in the distinctive character of the District's diverse settlements.
- Propose the retention of saved Local Plan Policies H2, H3, H4, H5, H7, H12, H13 and H14 for Development Management purposes until such time as a Development Management DPSD is adopted.

10.154 Option B can be summarised by the following:

- Continue with existing saved Local Plan design related policies, particularly Policy ST3 but not prepare generic design and built environment policy.

10.155 Option C consisted of the following:

- Prepare generic design and built environment policy, but not to retain saved Local Plan policies relating to this policy area.

10.156 No reasonable alternative policy approaches have been identified since the publication of the Emerging Core Strategy for this policy area. The 3 original options were reappraised against the sustainability framework (Appendix 3, SA Table 39).

Table 33: Summary of Built and Historic Environment etc. options

Option	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
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	0	0

10.157 Option A was considered the most sustainable approach. It would have a long term positive impact on the historic and built environment which would be protected by the Core Strategy policy and the retained Local Plan policies. Also it would have similarly positive consequences for energy efficiency and community safety measures.

- 10.158 Option B was seen as a sustainable option, still achieving some protection for the historic and built environment – although not allowing the District Council to seek other standards or respond to design related opportunities that have emerged since the Local Plan was adopted. In addition, it was seen as having a positive impact on energy efficiency.
- 10.159 Option C did not perform as positively as the other options as it was thought that the lack of detailed policies of the Local Plan would leave uncertainty for Development Management decision making until a subsequent DPD is adopted.
- 10.160 **The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option A being included within the Proposed Submission document.**

Core Policy 12 – Flood Risk, Coastal Erosion and Sustainable Drainage

- 10.161 Topic Paper 2 acknowledged that flood risk and surface water run-off was an issue that should be resolved by new development. In addition, it is known that coastal erosion could present problems to parts of the district's coastline and thus it was necessary to consider an appropriate policy approach for this subject area.
- 10.162 Only 1 realistic option was generated for this policy area in Emerging Core Strategy which is summarised below:
- To direct development away from areas of flood risk
 - To ensure that there is no increase in surface water run-off from new developments
 - To avoid development at risk from coastal erosion
 - To help to deliver relevant flood/coastal protection plans
 - To work with partner organisations to help deliver the above goals.
- 10.163 No alternative approach for this policy area has been identified since the Emerging Core Strategy. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 13 – Sustainable Travel

- 10.164 Key Strategic Objective 7 of the Topic Papers identified the need to reduce travel in the district and to promote a sustainable transport network. This was carried through as Strategic Objective 7 in the Emerging Core Strategy (Strategic Objective 9 of the Proposed Submission Core

Strategy) and has since been taken forward into the Proposed Submission document. When exploring options to cover this policy area, only 1 realistic strategy was created. This is summarised below:

- To support development that encourages travel by public transport and other sustainable means
- To ensure development is located in sustainable locations with good access to key facilities, services and jobs, reducing car journeys
- To ensure that large developments minimise their impact on the road network and incorporate any mitigation measures
- Require development to contribute to transport infrastructure improvements
- To support the creation of additional public transport services
- To help with the implementation of Local Transport Plan 3 and subsequent plans
- To ensure that development has appropriate levels of parking for cycles and cars
- Support the design of development that prioritises the needs of non-car users ahead of motorists

10.165 No alternative approach for this policy area has been identified since the Emerging Core Strategy. Given the need to achieve the plan's objectives, not having a policy for this area is considered unrealistic. Therefore no appraisal has been done in this section of the Sustainability Appraisal. In the next section of the report, a full appraisal has been undertaken of the proposed policy.

Core Policy 14 – Renewable Energy and Low Carbon Energy and Sustainable Use of Resources

10.166 Key Strategic Objective 6 in the Topic Papers made clear that the Core Strategy should help reduce carbon emissions and promote renewable energy. This was carried through as Strategic Objective 8 of the Emerging Core Strategy (Strategic Objective 10 of the Proposed Submission Core Strategy). To achieve this it was felt necessary to develop a suitable strategic policy. In the Emerging Core Strategy, there was only 1 option considered for the majority of the policy area, and therefore no options appraisal was required. This option covered the following:

- In developing an option it became clear that a policy should cover the following:
- Renewable and low carbon energy will be encouraged in all development
- Locations/designs of development which take advantage of opportunities for decentralised renewable and low carbon energy will be encouraged
- Applications for low carbon/renewable energy installations will be supported, subject to resolving issues relating to national park purposes, landscape and visual impact, local amenity, cultural heritage and the

contribution an installation would make to meet national and local renewable energy targets.

- Developers of any strategic site allocations/broad locations for growth will need to undertake an Energy Strategy that will seek to incorporate decentralised and renewable or low carbon technologies into their proposals. If a site/location is to be developed in phases, the Energy Strategy will need to guide the development of infrastructure which supports renewable or low carbon technologies in a coordinated way.
- Set Code for Sustainable Homes and BREEAM minimum attainment requirements.

10.167 As there were considered no reasonable alternatives to the above parts of the policy they were not appraised against the sustainability framework. However, two options were developed for the final part of the policy, which were the following:

A – To rely on the Building Regulations to secure improvements in the sustainability of new developments

B – To require all new developments to meet full Code for Sustainable Homes Standards, of at least Code Level 3 from the point of adoption of this plan, and then at least Code Level 4 once further updates to Part L come into effect. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM ‘Very Good’ standard.

10.168 Consultation on the Emerging Core Strategy also revealed another option for this policy area. Thus, a third approach was developed that sought:

C – To require all developments to meet Code Level 6 standards Code for Sustainable Homes Standards, from the point of adoption.

10.169 All of the options were appraised against the sustainability framework. This is shown in SA Tables 40 and 41 of Appendix 3.

Table 34: Summary of Renewable Energy etc. options

Option	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
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
C		0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0

10.170 Option B was seen as the most sustainable approach, being positive in terms of waste, water, energy and flooding objectives, although it had an uncertain, neutral impact on the housing objective. Option A only had a positive impact on the Energy objective and no impact was recorded on the other objectives. Option C performed negatively, given that it would likely significantly impede housebuilding in the district by adding to development costs (it could also compromise the delivery of affordable housing as developers will be more likely to reduce their contribution on marginally viable schemes based on higher build costs).

10.171 **The outcome of this appraisal, alongside the input of stakeholders, the outputs from the evidence base and the need to achieve the plan objectives has led to option B being included within the Proposed Submission document.**

11. Appraising the Policies

- 11.1 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.
- 11.2 Following the identification of the preferred policy approaches (see section 10 of this report) work began on developing draft versions of the Core Strategy's policies. The policies were then appraised against the sustainability framework.
- 11.3 Throughout the drafting of the policies, consideration was given to the need to deliver sustainable development and of the sustainability appraisal process. As a result the appraisals that were carried out gave mostly positive results, reducing the need to make changes and to provide mitigation.

Appraising the Spatial Strategy

Presumption in Favour of Sustainable Development

- 11.4 As the previous section of the report has identified, there was only one option for the policy listed above. A draft of the policy was produced which was appraised against the sustainability framework.

Appraisal

Table 35: Presumption in Favour of Sustainable Development Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SD	++	+	+	++	+	+	+	+	+	+	+	+	+	+	+	++	+

- 11.5 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 1) and is summarised in the table above. Overall the policy was seen very positively, particularly in terms of the Housing, Communities and Economy objectives, but also in relation to the other objectives of the sustainability framework.

Mitigation

- 11.6 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Spatial Policy 1 - Provision of housing and employment land

11.7 The previous section of the report identified the preferred options for the provision of housing and employment land. The options were put into a draft of a policy that was then appraised against the sustainability framework.

Appraisal

Table 36: Provision of housing and employment land summary table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP1	+	++?	?	?	?	?	?	?	?	?	?	?	?	?	0	++	0

11.8 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 2) and is summarised in the table above. Overall the policy was seen positively in terms of a number of objectives. There were a number of objectives that the effect of the policy was seen as being uncertain.

Mitigation.

11.9 There are no significant negative effects that necessitate mitigation. Whilst the appraisal highlighted some uncertainties, it is not felt that such uncertainties are addressed through this policy but through other, more appropriate policies. As such no changes to the policy wording have been made.

Spatial Policy 2 – Distribution of Housing

11.10 The previous section of the report identified the preferred options for the distribution of housing at certain settlements but explained that for most settlements, the provision of housing would be based upon the findings of a number of evidence base documents. A draft of this policy was written, as seen below that was appraised against the sustainability framework.

Appraisal

Table 37: Distribution of housing summary table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP2	++	++	+	+	?	?	?	0	?	?	?	?	?	0	0	++	0

11.11 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 3) and is summarised in the table above. Overall, the policy was seen positively in relation to a number of objectives. There were a number of objectives that the effect of the policy was seen as being uncertain.

Mitigation

11.12 There are no significant negative effects that necessitate mitigation. Whilst the appraisal highlighted some uncertainties, it is not felt that such uncertainties are addressed through this policy but through other, more appropriate policies. As such no changes to the policy wording have been made.

Spatial Policy 3 – North Street Quarter and adjacent Eastgate area, Lewes

11.13 Following the identification of the preferred approach for the development of North Street in the previous section of the report, a policy was drafted that was appraised against the sustainability framework.

Appraisal

Table 38: North Street Quarter and adjacent Eastgate area, Lewes

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP3	++	+	+	+	?	?	++	0	+	?	+	?	?	++	0	+	+

11.14 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 4), the summary of which is shown above. Overall the policy was appraised highly positively, scoring well in a large number of the objectives. There were however a number of objectives where the effect of the policy was seen as being uncertain.

Mitigation

11.15 There are no significant negative effects that necessitate mitigation. Whilst the appraisal highlighted some uncertainties, the uncertainties can only be known following a detailed master plan being produced or, in some circumstances, once the development has been completed. As such, no changes to the policy wording have been made.

Spatial Policy 4 – Land at Greenhill Way/Ridge Way, Haywards Heath (within Wivelsfield Parish)

11.16 Following the identification of the above area as a sustainable option for housing development, a policy was drafted that was appraised against the sustainability framework.

Appraisal

Table 39: Land at Greenhill Way Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP4	+	0	+	?	?	?	-?	0	0	0	0	0	0	+	0	+	0

11.17 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 5), the summary of which is shown above. Overall, the policy was appraised positively although a negative consequence of the policy would be the loss of greenfield land, which may be of good quality. It was appraised to be unknown the effect the policies would have on certain objectives (Communities, Health and Education).

Mitigation

11.18 There are no significant negative effects that necessitate mitigation. Whilst the appraisal noted a negative impact relating to the loss of greenfield land, this cannot be mitigated against. Whilst uncertainties were noted, the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be improved to remove the uncertainties. As such no changes to the policy have been made.

North of Bishops Lane, Ringmer

11.19 Following the identification of the above area as a sustainable option for housing development, a policy was drafted that was appraised against the sustainability framework.

Appraisal

Table 40: Land north of Bishops Lane Summary Table

Option	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP5	+	0	+	?	?	?	-?	+?	0?	0	+	0	0	+	0	+	0

11.20 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 6), the summary of which is shown above. Overall the policy was viewed positively, having a positive effect on a number of different objectives, although a negative consequence of the policy would be the loss of greenfield land, which may be of good agricultural quality. It was appraised to be unknown the effect the policies would have on certain objectives (Communities, Health and Education), while it was not known the full impact on biodiversity (potentially positive) and the environment.

Mitigation

11.21 There are no significant negative effects that necessitate mitigation. Whilst the appraisal noted a negative impact relating to the loss of greenfield land, this cannot be mitigated against. Whilst uncertainties were noted, the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be improved to remove such certainties. The full impact on biodiversity and the environment cannot be known until work, highlighted in the policy, is completed in advance of development taking place and therefore there is no need to amend the policy in light of the appraisal.

Harbour Heights, Newhaven

11.22 Following the identification of the above area as a sustainable option for development, a policy was drafted that was appraised against the sustainability framework.

Appraisal

Table 41: Land at Harbour Heights Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP6	++?	+	+	?	?	?	-	0	0	0	0	0	0	+	0	+	0

11.23 The policy was appraised against the sustainability framework (Appendix 4, Appraisal Table 7), the summary of which is shown above. Overall, the policy was appraised positively in respect of a number of different objectives, albeit a negative consequence of the policy would be the loss of greenfield land. There was some uncertainty about the likely significant positive impact it would have on the housing objective as the number of homes and timescales are not listed in the policy. Furthermore, it was appraised to be unknown the effect the policies would have on certain objectives (Communities, Health and Education).

Mitigation

11.24 There are no significant negative effects that necessitate mitigation. The policy cannot remove the uncertainty surrounding the housing objective, but this will be detailed in a subsequent DPD or Neighbourhood Plan. Whilst uncertainties were noted around community and service provision, the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be improved to remove such certainties. As such no changes to the policy have been made.

Appraising the Policies

Core Policy 1 – Affordable Housing

11.25 Following the identification of the preferred approach in the previous section of the sustainability appraisal, a policy on Affordable Housing was drafted and was appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 42: Affordable Housing Summary Table

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

11.26 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 8 but is summarised in the table above. By increasing the amount of affordable housing being delivered without impacting on overall housing delivery in the district, the policy was appraised positively in respect of the housing objective. In addition, the maximising of affordable housing delivery should help those who are currently unable to access the housing market.

Mitigation

11.27 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

11.28 It should be noted however that earlier versions of the draft did not have mention to the need to take into account viability. As such the 40% target was essentially a requirement. It was felt that such an approach would perform less well against the sustainability framework as it would make some schemes unviable, particularly on brownfield sites, and thereby deliver less housing overall and consequently less affordable housing.

Core Policy 2 – Housing Type, Mix and Density

11.29 In the previous section of the sustainability appraisal, preferred options were identified for the 3 sub-areas of this policy; Housing Type, Housing Mix and Housing Density. Following this, a policy was drafted which was appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 43: Housing Type, Mix and Density Summary Table

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

11.30 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 9, but is summarised in the table above. As the appraisal demonstrates, the draft policy is likely to have a positive effect on various objectives set out in the sustainability framework. The policy will provide a range of different dwelling types at different densities, which relates well to the local environment and the needs of the community across the district. The flexible nature of the policy is positive as it enables decisions to be made appropriate to changes to the economy and needs of the community. However, there was appraised to be uncertainty regarding the health objective as it was unclear of the effect that the policy would have on delivering homes for elderly and disabled people.

Mitigation

11.31 There are no significant negative effects of the policy that necessitate mitigation. The only way of mitigating the uncertainty is to require developers to build homes to lifetime homes standards. However, such an option was appraised earlier in the sustainability appraisal process and was not seen as the most sustainable option. As a result, no changes to the policy have been made.

Core Policy 3 – Gypsy and Traveller Accommodation

11.32 Following the identification of the preferred approach in the previous section of the sustainability appraisal, a policy on Gypsy and Traveller Accommodation was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 44: Gypsy and Traveller Accommodation Summary Table

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

11.33 The full appraisal can be found in Appendix 4, Appraisal Table 10 and is summarised in the table above. Overall, the policy performed well against the sustainability framework as it was likely to bring benefits to a number of the social objectives. However, there is uncertainty about the impact on a number of objectives. This is because the update to the GTAA, which will include an identified need for pitches, is not yet available and so the impact cannot be fully gauged. Also, no specific sites have been identified

at present, although they will be identified in the Site Allocations DPD, which also leads to uncertainty.

Mitigation

11.34 There are no significant negative effects of the policy that necessitate mitigation. The uncertain effect cannot be avoided as it relies on both work which has not been completed and the identification of sites, the latter of which will be dealt by the Site Allocations DPD. As a result, no changes to the policy have been made.

Core Policy 4 – Encouraging Economic Development and Regeneration

11.35 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Economic Development and Regeneration was drafted and has been appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 45: Encouraging Economic Development and Regeneration Summary Table

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

11.36 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 11 but is summarised in the table above. Overall, the draft version of Core Policy 4 appraised well against the sustainability framework. The policy performs well in relation to a number of the economic and social objectives of the framework, such as by encouraging economic growth among a number of sectors and targeting deprived areas in need of regeneration for improved employment provision. In addition, the policy is positive in relation to environmental objectives by encouraging e-communication and homeworking which will reduce the need for travel, having a positive effect on air pollution.

Mitigation

11.37 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 5 – The Visitor Economy

11.38 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on The Visitor Economy

was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 46: The Visitor Economy Summary Table

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

11.39 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 12 but is summarised in the table above. Overall, the policy was appraised positively in relation to a number of objectives. The policy will most likely support the long-term growth of the sustainable tourism sector, and consequently the local economy, by promoting new visitor attractions, upgrading existing ones and providing new hotel accommodation. The wording of the policy ensures that tourism related development will be appropriate to the important local rural and urban environments in the district. There is uncertainty however of the effect of the policy on local communities.

Mitigation

11.40 There are no significant negative effects of the policy that necessitate mitigation. It is not thought that rewording the policy can avoid the unknown effect of the policy on the Communities objective and thus no change is proposed.

Core Policy 6 – Retail and Sustainable Town and Local Centres

11.41 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Retail and Sustainable Town and Local Centres, was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 47: Retail and Sustainable Town and Local Centres Summary Table

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

11.42 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 13 and is summarised in the table above. The draft policy for Retail and Sustainable Town and Local Centres has been appraised positively in respect to a number of different objectives. This is as it will have benefits for the vitality of the districts' centres as well as supporting the local

economy at a time of difficult economic conditions. The policy offers flexibility and support for areas such as Newhaven, which currently has an underperforming retail sector, which should increase the town centre's vitality and viability by bringing people and businesses back into the area despite the loss of retail units. It will also have a positive impact in terms of land efficiency, by bringing vacant properties back into use, while also supporting sustainable transport provision.

Mitigation

11.43 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 7 - Infrastructure

11.44 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Infrastructure was drafted and was appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 48: Infrastructure Summary Table

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

11.45 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 14 but is summarised in the table above. The draft policy for infrastructure is likely to have a positive impact on a number of the sustainability appraisal objectives. It is likely to improve accessibility to a number of services, resulting in a positive impact on objectives such as housing, travel and education. A coordinated approach to infrastructure in the form of the Infrastructure Delivery Plan may also benefit the local economy and housing delivery. There is however uncertainty on the effect that the policy would have on the environment and in deprived areas.

Mitigation

11.46 There are no significant negative effects of the policy that necessitate mitigation. It is not thought that modifying the policy could avoid the unknown effect of the policy on the Communities and Deprivation objectives as it is dependant on the location of infrastructure. As such no changes to the policy have been made.

Core Policy 8 – Green Infrastructure

11.47 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Green Infrastructure was drafted and appraised against the sustainability appraisal. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 49: Green Infrastructure Summary Table

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

11.48 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 15 and is summarised in the table above. This policy appraised well against the sustainability framework, having a positive impact on environmental objectives due to the protection and enhancement of existing greenspace and identification of new greenspace. It is also likely to have a positive impact on social objectives as the policies should provide more recreation space for local residents, therefore having community health benefits. It could also have a positive impact on the local tourism industry by boosting visitor numbers. No adverse effects to this policy were identified.

Mitigation

11.49 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 9 – Air Quality

11.50 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Air Quality was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 50: Air Quality Summary Table

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

11.51 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 16 but is summarised in the table above. The draft policy for air quality is likely to have a positive impact and help promote sustainable development within the District. The policy is likely to improve air quality

conditions within the district, especially in areas in and around designated AQMAs. It is also likely to have far reaching effects ranging from environmental and health benefits to encouraging the sustainable transport agenda. It is probable that these will be more apparent as the plan period progresses.

Mitigation

11.52 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 10 - Natural Environment and Landscape Character

11.53 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Natural Environment and Landscape Character was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 51: Natural Environment and Landscape Character Summary Table

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

11.54 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 17 but is summarised in the table above. Overall the policy was seen positive in a number of environmental objectives, whilst it was also felt that it could have a positive impact on tourism by preserving and enhancing the natural environment.

Mitigation

11.55 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 11 – Built and Historic Environment and High Quality Design

11.56 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Built and Historic Environment and High Quality Design, was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 52: Built and Historic Environment and High Quality Design Summary Table

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

11.57 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 18 and is summarised in the table above. Overall, the policy performed well against the objectives of the sustainability appraisal. In setting good design standards, the policy is likely to have a positive impact on environmental objectives such as waste, water, energy and flooding. Also, it is likely that this policy will have a positive effect on housing standards and on local communities.

Mitigation

11.58 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 12 – Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

11.59 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 53: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

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

11.60 The full appraisal of the policy can be found in Appendix 4, Table 19 and is summarised in the table above. This policy appraised well against the majority of objectives in the sustainability framework. It would have benefits in terms of reducing the risk of flooding and coastal erosion by directing development away from at risk areas, recreating the River Ouse corridor and requiring flood protection/mitigation/resistance measures. The implications of this policy shouldn't have an undue burden on the local economy or the realisation of development as it is not altogether prohibited in areas of flood risk.

Mitigation

11.61 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 13 – Sustainable Travel

11.62 Following the identification of a preferred approach for the above policy area in the previous section of the report, a policy on Sustainable Travel, which can be found below was drafted and was appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 54: Sustainable Travel Summary Table

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

11.63 The full appraisal of the policy can be found in Appendix 4, Appraisal Table 20 but is summarised in the table above. This policy is likely to encourage the uptake of sustainable modes of transport and so will impact positively on a number of objectives including travel, health and communities. It is also expected that the policy will improve accessibility within the district and so would have a desirable impact again on the travel objective and the deprivation objective. It is not thought that this policy would lead to any significant negative effects.

Mitigation

11.64 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Core Policy 14 – Renewable and Low Carbon Energy and Sustainable Use of Resources

11.65 Following the identification of the preferred approach in the previous section of the report, a policy on Renewable and Low Carbon Energy and Sustainable Use of Resources was drafted and appraised against the sustainability framework. The draft policy appraised can be found in Appendix 6.

Appraisal

Table 55: Renewable and Low Carbon Energy and Sustainable Use of Resources Summary Table

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

11.66 The full appraisal of the policy can be found in Appendix 4, Table 21 and is summarised in the table above. The draft policy is likely to have a positive impact on a number of the objectives set out in the sustainability appraisal table. It is likely to have a positive impact in terms of environmental improvements including waste generation, reductions in water consumption and flood risk. The policy would also lead to an increase in sustainably constructed homes without having too great an impact on housing developer costs and housing delivery. However, it is thought however the policy could prevent some conversions of existing buildings coming forward by requiring Code Level 4 standards in cases where it may not be either technically or financially viable.

Mitigation

11.67 There are no significant negative effects that necessitate mitigation. A change has been made to the policy to mitigate against the potential negative effect outlined above. This has been done by adding the wording, indicated in *italics* below to the first sentence of part 4 of the policy:

4. Unless it can be demonstrated that it would not be technically feasible or financially viable, all new dwellings will be required to meet the full Code for Sustainable Homes standard of at least Code Level 3 and then at least Code level 4 once further updates to Part L of the Building Regulations come into effect.

11.68 This change should allow for the re-use of buildings for residential use that would not have been able to be delivered in accordance with the draft version of the policy. No other changes to the policy wording have been made.

Secondary, Cumulative and Synergistic Effect

11.69 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 follows⁵⁰:

- 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’

⁵⁰ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive (Appendix 8).

- 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’

11.70 The summary tables for the individual policy appraisals have been brought together into a single table (Table 56). This allows an overview of the impact of the plan’s policies on the sustainability objectives. It is evident from the table that on the whole the policies set out in the Core Strategy have a neutral or positive impact on all of the sustainability objectives, with the one exception being the land use objective. This is predominantly as a result of allocating greenfield land and due to land use constraints within the district this impact cannot be mitigated as there is not a sufficient supply of brownfield land to meet the required housing need.

Table 56 - Summary of Core Strategy Policy Appraisals

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP1	+	++?	?	?	?	?	?	?	?	?	?	?	?	?	?	++	0
SP2	++	++	+	+	?	?	?	0	?	?	?	?	?	0	0	++	0
SP3	++	+	+	+	?	?	++	0	+	?	+	?	?	++	0	+	+
SP4	+	0	+	?	?	?	-?	0	0	0	0	0	0	+	0	+	0
SP5	+	0	+	?	?	?	-?	+	0?	0	+	0	0	+	0	+	0
SP6	++?	+	+	?	?	?	-	0	0	0	0	0	0	+	0	+	0
CP1	++	++	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0
CP2	+	+	0	+	?	0	++	0	++	0	0	0	0	0	0	0	0
CP3	+	+	+	0?	+	+	0?	0	0	0	0	0	0	0	0	0	0
CP4	0	++	+	0	0	+	+	0	0	0	0	++	+	0	0	++	+
CP5	0	0	+	?	0	0	0	0	+	0	0	0	0	0	0	++	++
CP6	+	+	+	+	0	0	++	0	0	0	0	0	0	0	0	++	0
CP7	+	?	+	+	+	+	0	0	?	0	0	0	0	0	0	++	0
CP8	0	0	+	+	+	0	+	+	++	0	0	0	0	0	0	0	+
CP9	0	0	+	+	+	0	0	+	+	0	0	0	++	0	0	0	0
CP10	0	0	0	0	0	0	0	++	++	0	++	0	0	0	0	0	+
CP11	+	0	0	+	0	0	+	0	++	+	+	+	0	+	0	0	0
CP12	0	0	0	0	+	0	0	+	+	0	+	0	0	++	++	+	0
CP13	0	+	++	+	+	0	0	0	0	0	0	0	+	0	0	0	0
CP14	+	0	0	0	0	0	-?	0	+	++	++	++	0	+	0	0	0

11.71 The table above has subsequently been used to inform the appraisal of the Core Strategy which appraises the policies of the plan, taken as a whole, against the sustainability framework.

Appraisal

Table 57: Secondary, Cumulative and Synergistic Effect Summary Table

Plan	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CS	++	++	++	+	+	+	0	+	++	+	++	++	+	++	++	++	+

11.72 The full appraisal of the Core Strategy can be found in Appendix 4, Appraisal Table 22 and is summarised in the table above. Overall, the plan performed very well against the sustainability framework having clear benefits for the vast majority of objectives. There were some uncertainties noted against a few social objectives (communities, health and education) and the air quality objective.

11.73 When compared against the likely effect of the district without the plan (Appendix 4, Appraisal Table 23), which is likely to have negative impacts on the period up until 2030, it is clear that the Core Strategy can be thought of as sustainable.

Mitigation

11.74 There are no significant negative effects that necessitate mitigation. The uncertainties cannot be resolved by rewriting the policies as they depend on a master plan coming forward for development at North Street, as well as the impact of strategic development on the communities and services in the vicinity to them. As such no changes to any policies have been made.

12. 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”

- 12.1 Monitoring is an important part of the plan process and helps in gauging the success of the Plan and its progress towards its objectives and its trend towards sustainable development. The Monitoring Framework for the Sustainability Appraisal, much like the monitoring framework for the Core Strategy, consists of a number of objectives (Sustainability Appraisal Objectives), indicators and targets. Monitoring is a requirement of EU regulations.
- 12.2 The Sustainability Appraisal is key to predicting the significant environmental, economic and social impacts, both positive and negative, resulting from the implementation of the plan. Sustainability Appraisal, 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 mitigation measures.
- 12.3 Monitoring is an ongoing process which is implemented through the Authority Monitoring Report. If any significant negative impacts resulting from the Core Strategy 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 relevant policies and make modifications to negate these effects.

Appendices

Appendix 1 – List of plans, policies and programmes

A1.1 The table below details the plans, policies and programmes (PPPs) that have had an influence on the formation of the Core Strategy.

Name of PPP	Broad aims/ relevant policies	Implications on Core Strategy/ Sustainability Appraisal
Overarching PPPs		
Johannesburg Declaration on Sustainable Development (2002)	Commitment to sustainability principles and the sustainable development agenda agreed at Rio de Janeiro Earth Summit in 1992.	Interpreted into national policy and guidance that has been used to inform the Core Strategy production process.
European Spatial Development Perspective, European Communities (1999)	Seeks to create the sustainable development of the EU, by balancing competitiveness with economic and social cohesion, conservation and management of natural resources and the cultural heritage.	
Localism Act (2011)	<p>The Act introduces major changes to Local Government. Changes of major relevance to planning include the following:</p> <ul style="list-style-type: none"> • Allows for the removal of Regional Spatial Strategies (RSS) by Secretary of State • Introduces the neighbourhood planning tier into the planning system that allows for communities to guide development locally 	<p>With the South East Plan likely to be revoked in the near future, the Core Strategy has considered options that differ from the South East Plan if there is more recent and locally derived evidence.</p> <p>Neighbourhood planning will be influenced by the Core Strategy as communities will have to produce documents that conform to its strategic policies.</p>
The National Planning Policy Framework (DCLG, 2012)	The NPPF guides the new planning system, replacing the set of Planning Policy Statements and Guidance Notes (see below) that governed the previous	The Core Strategy has to conform with the NPPF and its supporting documents in order to be adopted.

	system. It reaffirms previous guidance by stating that the planning system should contribute to the delivery of sustainable development and sets out the guiding principles for its achievement.	
Planning Policy Statements (PPSs) and Planning Policy Guidance Notes (PPGs)	PPSs and PPGs guided the previous planning system and were in existence for much of the production period for the Core Strategy. They covered a number of subjects relating to the management of land. Some of the best practice guidance documents that accompanied the PPSs and PPGs still remain current.	Previous versions of the Core Strategy have relied on PPGs and PPSs as their basis, so they have had an impact on the production of the document.
Planning and Compulsory Purchase Act 2004	Clause 38 places a duty on Local Authorities to the achievement of sustainable development.	Lewes District Council is required to produce a Sustainability Appraisal in conjunction with the Core Strategy.
Planning Act 2008	Paragraph 10 restates that the planning system must contribute to delivering sustainable development.	
'A Better Quality of Life' – A Strategy for Sustainable Development for the UK (DETR, 1999)	Set out the four key objectives to achieving sustainable development which have been used to influence some of the planning policy documents still in circulation: <ul style="list-style-type: none"> • Social progress which recognises the needs of everyone • Effective protection of the environment • Prudent use of natural resources 	Documents have been interpreted into national policy, guidance and objectives and will be used to inform the sustainability objectives and indicators used to appraise the Core Strategy.

	<ul style="list-style-type: none"> • Maintenance of high and stable levels of economic growth. 	
<p>'Securing the Future' - the UK Government Sustainable Development Strategy (HM Government, 2005)</p>	<p>Superseded and updated 'A Better Quality of Life' document, creating five sustainable development principles, which are used to guide policy documents:</p> <ul style="list-style-type: none"> • Living Within Environmental Limits • Ensuring a Strong, Healthy and Just Society • Building a strong, stable and sustainable economy • Promoting Good Governance • Using Sound Science Responsibly. 	
<p>Mainstreaming sustainable development (Defra, 2011)</p>	<p>Building on the 2005 Sustainable Development Strategy, this document stated 4 points for delivering sustainable development in government, which are:</p> <ul style="list-style-type: none"> • Ministerial leadership and oversight • Leading by example • Embedding sustainable development in Government policy • Transparency and independent scrutiny 	
<p>Regional Spatial Strategy for the South East – The South East Plan (GOSE, May 2009)</p>	<p>Sets out the planning framework and strategy for the South East until 2026, of which Lewes District is a part.</p>	<p>The South East Plan (SEP), as a statutory part of the planning system during much of the production period of the Core Strategy, has exerted a large influence over the content of the Core Strategy.</p> <p>Although at the time of writing it still exists, it has been made clear that it will soon be revoked. Given the</p>

		intention to get rid of the SEP, options for some of the policies of the Core Strategy were considered that differed from the SEP. Notwithstanding the above, information contained in the document which is up-to-date has been of use in the production of the Core Strategy.
East Sussex and Brighton & Hove Waste Local Plan 2006	<p>This document sets out the strategy for waste management and planning in the City of Brighton and Hove and East Sussex, of which Lewes District is a part.</p> <p>This plan will be replaced by the forthcoming Waste and Minerals Core Strategy and a Waste Sites Development Plan Document, being jointly prepared by East Sussex County Council and Brighton & Hove City Council.</p>	The Core Strategy complements this plan and has considered drafts of its replacement.
The South East Regional Sustainability Framework (SEERA, 2008)	<p>The document set out a vision and objectives to help guide the South East towards sustainable development. It set out four key priorities to achieve this aim:</p> <ul style="list-style-type: none"> • achieving sustainable levels of resource use • reducing greenhouse gas emissions associated with the region • ensuring that the South East is prepared for the inevitable impacts of climate change • ensuring that the most deprived people also 	While no longer current, the objectives and priorities were considered during the production process of the Core Strategy.

	have an equal opportunity to benefit from and contribute to a better quality of life.	
The South Downs AONB Management Plan 2008	The document sets out the area's (now incorporated into the South Downs National Park) important features and states how the features can be protected, restored and enhanced.	As the Core Strategy will be a joint document between LDC and the SDNPA, it should consider the management issues highlighted in the document.
Lewes District Council: The Council Plan 2012/13	<p>Sets out the Council's priorities, one of which is 'Planning in Partnership'.</p> <p>Amongst the sub-objectives of this priority is to work with the SDNPA on planning matters and to deliver an up-to-date planning framework to guide growth in the district.</p> <p>Another priority identified is for the regeneration of the coastal towns, particular Newhaven.</p>	The Core Strategy can help achieve some of the Council Plan's aims.
Lewes District Council & The South Downs National Park Authority Revised Statement for Community Involvement (SCI) (2011)	These documents set out how the community will be involved in the planning process in Lewes District and the South Downs National Park.	Consultation regarding the Core Strategy has been carried out in keeping with the SCIs.
South Downs National Park Authority, Statement for Community Involvement (2012)		

Lewes District Local Plan (2003)	Sets out the current planning policies for Lewes District that, along with national policy and the National Park purposes, continues to guide development in the district.	Some of the policies will continue to be used following the adoption of the Core Strategy. Thus, the Core Strategy should not contradict any of the policies that will be kept.
The Emerging Core Strategy (LDC & SDNPA, September 2011)	Both the Emerging Core Strategy and Topic Papers set out the proposed direction that the Core Strategy would take and were available for public consultation.	The Proposed Submission Core Strategy which this document accompanies, built upon these versions of the Core Strategy
Core Strategy: Issues and Emerging Options Topic Papers (LDC, May 2010)		
Summary of Consultation on the Emerging Core Strategy (2012)	Summarises the representations received on the Emerging Core Strategy, on a topic by topic basis,	Comments made by members of the public and organisations during consultations have been taken into account when producing the Core Strategy.
Summary of Consultation on the Core Strategy: Issues and Emerging Options Topic Papers (LDC, 2010)	Presents a summary of the comments that were received during the consultation on the Issues and Emerging Options Topic Papers and describes how the comments influenced the Emerging Core Strategy	
Core Strategy Preferred Options Development Plan Document 2006, summary of responses (LDC, 2010)	Summarises the responses that were received on the Preferred options of the Core Strategy in 2006. Whilst the production of the Core Strategy was halted and then restarted from scratch after this point, a lot of the comments are still relevant.	

Infrastructure Delivery Plan (LDC, 2012)	Sets out the necessary infrastructure to be delivered by service providers to cope with the additional pressures that the Proposed Submission Document may cause.	The District Council has worked with infrastructure providers to understand their needs, which are reflected in the Proposed Submission Core Strategy.
Housing		
East Sussex Traveller Strategy 2010 - 2013 (East Sussex County Council)	Sets out the countywide strategy for Gypsies and Travellers. It has the following three key objectives: <ul style="list-style-type: none"> • To work in partnership to strike a balance between the needs of the settled and Gypsy and Traveller communities. • To address the accommodation needs of Gypsies and Travellers. • To provide support to Gypsies and Travellers. 	The Core Strategy considers the need to accommodate Gypsies, Travellers and Travelling Showpeople – one of the key objectives of this strategy.
Planning Policy for Traveller Sites (DCLG, 2012)	Details national policy with regards to planning for traveller sites.	The Core Strategy policy on Gypsy and Traveller Accommodation has been informed by the document.
Affordable Housing and CIL Viability Study (RS Drummond-Hay, 2011)	Sets out the recommendations for the affordable housing policy, taking into account CIL contributions that will be collected from developments.	The findings of this report have influenced the policy approach on this subject area.
Lewes District Strategic Housing Land Availability Assessment (SHLAA) (LDC/NLP, 2012)	The SHLAA assesses whether sites submitted to us are suitable for housing development. It does this by putting sites into the following 3 categories: <ul style="list-style-type: none"> • Deliverable, meaning that a site is judged to be suitable, achievable and available at this present time) 	The document is a key piece of evidence that has informed and supported the housing policies of the Core Strategy. As an important piece of evidence it is kept regularly updated.

	<ul style="list-style-type: none"> • Developable, meaning that a site is deemed to be suitable with a reasonable prospect of being available at a specific point in time) • Not Suitable, meaning that a site is not considered to be suitable for housing development. <p>An update to the SHLAA is undertaken annually to take into account pieces of evidence that may affect the assessment, to assess any sites that have been submitted to us by the last update and to show our housing land supply</p>	
Lewes District Strategic Housing Market Assessment (SHMA) 2008	The aim of the SHMAA is to establish an understanding of the level of need and demand for housing within the District	The document is a key piece of evidence that will inform and support the housing policies of the Core Strategy.
Lewes District Assessment of the Local Need for Housing (NLP, 2011)	The assessment identifies the future housing needs for the District, taking into demand future population estimates, household projections and the current housing stock.	In response to the intention to revoke the South East Plan and its housing targets, the District Council looked to identify a locally derived housing target. This document has informed the housing Core Strategy's housing target
Lewes District Council Housing Strategy	Sets out that it is the aim of the Council to improve the quality, availability and affordability of homes for people in the District.	The Core Strategy will need to assist in meeting the aims of the strategy by providing affordable and open market housing.
Lewes District Council Older Persons Housing and Support Strategy for Older People	Sets out the strategy for providing housing and support to older persons within the district from 2011 to 2015, whilst also looking at long-term needs for the elderly population	The strategy will help inform and support policies of the Core Strategy.

(LDC, 2011)	in relation to demographic change.	
Health		
The Government's White Paper – Equity and Excellence: Liberating the NHS 2010	Set out the reforms to the National Health Service, in order to enable its modernisation.	The Core Strategy aims to help achieve the strategic aims of those who provide health services in the district. When progressing the Core Strategy, the District Council has sought to involve NHS Sussex in infrastructure planning and has kept up-to-date with reforms.
Strategic Commissioning Plan 2010-2015 The Integrated Plan for Health, Social Care and Wellbeing in East Sussex (ESCC, 2010)	Set out a number of aims for meeting the health needs of the County in the short-term and encouraged working with the PCT so that their views are integrated into plan making.	
East Sussex Downs and Wealds Primary Care Trust - Investing in Life	This document sets a strategic aim of reducing health inequalities in their area, of which Lewes District forms a part, by targeting geographical locations with the lowest life expectancy.	
Transport		
North Weald Towns & Lewes Accessibility Strategy Local Assessment 2008	This document assesses the levels of accessibility to key services, facilities, jobs and educational facilities in the Lewes area.	The assessment provides an indication of which potential development locations have good levels of access to key destinations without the requirement for major investment in new public transport services or other sustainable transport infrastructure.
Southern Coastal Towns Accessibility Strategy Local Assessment 2010	This document assesses the levels of accessibility to key services, facilities, jobs and educational facilities in Newhaven, Peacehaven, Seaford and Telscombe Cliffs	The assessment provides an indication of which potential development locations have good levels of access to key destinations without the requirement for major investment in new public transport services or other sustainable transport infrastructure.
Lewes Car Park Study 2010	This study examines off-street parking provision in	The aim of the study is to inform the preparation of new planning policies

	the town of Lewes and considers options for the future	in the Local Development Framework.
East Sussex Local Transport Plan 3 (LTP3) (ESCC, 2011)	<p>The overarching objectives of this plan are to:</p> <ul style="list-style-type: none"> • Improve economic competitiveness and growth • Tackle climate change • Improve safety, health and security • Provide sustainable transport opportunities to enhance social inclusion • Improve quality of life <p>In addition, the document considers the town of Newhaven a priority area for the planning and provision of transport infrastructure.</p>	As the statutory transport plan for East Sussex, of which Lewes District is a part, the Core Strategy should look to compliment the relevant aspects of the plan which should help to deliver the goals of the document.
Draft Bus Strategy (ESCC, 2009)	<p>The aims are:</p> <ul style="list-style-type: none"> • To increase the number of trips people make by bus each year • Make travelling by bus a more attractive option • Ensure buses are reliable, frequent and on time • Coordinate buses with other forms of transport • Make buses safer • Reduce the environmental impact of buses 	The Bus Strategy forms part of the Local Transport Plan.
Water		
EU Directive 2000/60/EC (The Water Framework Directive) and the South East River Basin	The aim of the Directive and Management Plan is to ensure that water bodies are improved and protected and that water resources are used sustainably.	The Core Strategy should promote the sustainable use of water resources and seek to improve water quality.

Management Plan 2009		
Asset Management Plans by Southern Water and South East Water	States what improvements will be made to water and sewerage infrastructure in a five year period.	Development proposals set out in the Core Strategy should complement the planned water and sewerage infrastructure improvements that are set out in this document.
The Adur and Ouse Catchment Abstraction Management Strategy (Environment Agency, March 2005)	In this document, the Environment Agency sets out how water abstraction should be managed in the Adur and Ouse Catchment Area, an area which covers a part of Lewes District	The content of these strategies has and will inform the plans and programmes prepared by water companies, which in turn inform the Core Strategy.
The Water Resources Management Plans produced by Southern Water and South East Water	Sets out in detail how each company proposes to ensure that there is sufficient security of water supplies to meet the anticipated demands of all its customers over the 25 year planning period from 2010 to 2035	The Core Strategy will take account of these Plans.
Flood and Coastal Defence		
Technical Guidance to the National Planning Policy Framework (CLG, 2012)	Sets out the way in which planning authorities should appraise, manage and reduce flood risk. Reaffirms previous government policy in steering development away from areas of low risk to flooding.	One of the core issues that the Proposed Submission Core Strategy aims to tackle is flooding and the proposed policy accords with the Technical Guidance.
Ouse to Seaford Head Coastal Defence Strategy (Environment Agency, 2011)	The document sets out plans to maintain current river embankments on the Ouse and build them higher as tidal river levels rise over time. The strategy also recommends that the shingle defences on the	As an authority where a significant proportion of its population resides in coastal areas, it is important that the Core Strategy takes into account documents which relate to plans for coastal management.

	coast are maintained.	
The Beachy Head to Selsey Bill Shoreline Management Plan 2 (South Downs Coastal Group, 2007)	<p>The plan splits the part of the south coast it covers into 27 policy units, 9 of which are located in the District.</p> <p>The plan proposes management of the policy units over three time periods – immediate (first 20 years), medium term (20-50 years) and long term (50-100 years). For each time period, the plan proposes whether to ‘Hold the Line’, allow ‘Managed Realignment’ or have a policy of ‘No Active Intervention’.</p>	
Lewes District Strategic Flood Risk Assessment (Faber Maunsell, 2009)	This document identified both the areas and the levels of flood risk in Lewes District and assessed the District’s current flood defences, helping to avoid development from occurring in unsuitable locations.	This is a key piece of evidence that has been used to support the Core Strategy’s.
Lewes Integrated Urban Drainage Pilot Study (Black and Veatch Ltd and Defra, 2008)	As part of a more holistic approach to flood risk management, urban flood risk and integrated drainage have been recognised as important issues. The study identifies key flooding problems and interactions between flooding problems in Lewes town, quantifies flood risks, prioritises actions, makes recommendations on remedial actions and develops a joint strategy	Informs the flood risk elements of the Core Strategy.

	on flood alleviation.	
River Ouse Catchment Flood Management Plan (CFMP) (EA, 2009)	The CFMP is produced by the Environment Agency and sets out policies for managing flood risk in the River Ouse Catchment, of which most of Lewes District is a part.	The Core Strategy's policy on the management of flood risk aligns with the policies of this strategy.
Environment		
Nottingham Declaration on Climate Change (2000)	Declaration stating signatories' intent to systematically address the causes of climate change and to prepare their community for its impacts.	As a signatory to the declaration, Lewes District Council has agreed to the aims and the Core Strategy will reflect this.
Rio Declaration on Environment and Development – Principle 15: Precautionary Principle (1992)	Stipulated that to ensure that the environment is protected, a precautionary approach should be taken, so that a lack of scientific knowledge should not be used as a reason for postponing appropriate action to be taken that would prevent serious or irreversible damage from occurring.	The Core Strategy will take into account the precautionary principle, ensuring that irreversible damage to the District's environment does not take place.
European Directive 2001/42/EC (SEA Directive) on the assessment of the effects of certain plans and programmes on the environment	Sets out detailed requirements of environmental assessment required for plans such as Development Plan Documents.	The SA incorporates the requirements of this Directive as has been followed to appraise the policies of the Core Strategy.
Kyoto Protocol (1997)	Sets out that the UK (and 37 other industrial countries) should cut the emissions of greenhouse gases between 2008 and 2012 to levels that are 5.2% below 1990 levels.	The agreements have influenced national policy and guidance that has, in turn, influenced the Core Strategy

European Union Sixth Environmental Action Plan (2001)	High level of protection of the environment and a general improvement in the environment and quality of life.	
European Directive 2009/147/EC	Preservation, maintenance or restoration of sufficient diversity and area of habitats in order to conserve all species of birds.	As a plan that manages land which could impact on protected European sites, the Core Strategy must have regard to the directive and accompanying regulations that seek the protection of such sites
European Directive 92/43/EEC (as amended by 97/62EC), known as the Habitats Directive	Set out two aims of relevance: <ul style="list-style-type: none"> • To conserve natural habitats and threatened species • To protect natural heritage. 	
Wildlife and Countryside Act 1981 (as amended)	Serves to protect the most important examples of habitats and species in Britain.	These Acts have been interpreted into national guidance which the Core Strategy must reflect.
Countryside and Rights of Way Act 2000	Tightens the provisions of the above mentioned Act by making it an offence to recklessly damage protected habitats and fauna.	
The Environmental Assessment of Plans and Programmes Regulations (2004)	National interpretation of the SEA Directive and Habitats Directive.	The Sustainability Appraisal of the Core Strategy will have to comply with the requirements.
Lewes District Core Strategy Habitats Regulations Assessment (2012)	Assesses the effect of the Core Strategy on protected European Sites and seeks to mitigate against significant adverse impacts.	The Core Strategy has been developed taking into account the findings of the Habitats Regulations Assessment
A Practical Guide to the Strategic	Provides guidance about how to comply with Directive 2001/42/EC	The SA must fully integrate the SEA requirements when appraising the Core Strategy and thus this

Environmental Assessment Directive (ODPM, 2005)	(SEA Directive).	guidance has been followed.
Environment Strategy for East Sussex (ESCC,2011)	<p>The outcomes which the strategy seeks to achieve, is to:</p> <ul style="list-style-type: none"> • create a better environment which allows for active lifestyles that improve people’s quality of life • increase the understanding of the role that the environment plays in the economy, by supporting jobs through environmentally sustainable economic growth • make the county more resource efficient • conserve and enhance the natural and historic environment • conserve the high nature quality and reverse the county-wide biodiversity loss • reduce greenhouse gas emissions and to make the county more adaptive to climate change • increase awareness of the environment and inspire greener behaviours • influence other strategies to help deliver these aims. 	The Core Strategy will try to help to achieve some of the aims of the strategy, particularly as some of the goals match with the vision of the document as well as the objectives of the sustainability appraisal.
Climate Change Strategy for East Sussex (ESCC, 2009)	The overarching aim of the strategy is to promote the prosperity of the community by reducing greenhouse gas	By helping to deliver sustainable development, the Core Strategy will support the aims of this document.

	emissions and adapting to climate change, and to enable individuals and organisations to tackle and adapt to climate change.	
Sussex Biodiversity Action Plan (Sussex Biodiversity Partnership)	The document sets out how the biological diversity of Sussex should be conserved and enhanced, taking into account local and national priorities.	The Core Strategy will aim to protect and enhance the biological diversity of Lewes District.
East Sussex Landscape Character Assessment (ESCC, 2004)	The document describes the area, of which Lewes District forms a part, and identifies problems and pressures that should be overcome.	The Core Strategy will reflect the findings of the documents and look to overcome the problems and pressures on the landscape and enhance it where possible.
Lewes District Landscape Capacity Study (LDC, 2011)	The assessment will look at the landscape of the District in a more comprehensive fashion than the above study and identifies landscapes that have capacity to change.	The Core Strategy will reflect the findings of the documents and look to overcome the problems and pressures on the landscape and enhance it where possible.
Lewes District Ancient Woodland Survey Report (2010)	The study identifies the extent and quality of the ancient woodland resource within Lewes District	The Core Strategy seeks to resist development that would result in any loss or deterioration to ancient woodland habitat, which is protected by national and regional planning policies.
Lewes District Council Climate Change Adaptation and Mitigation Plan 2009-2016	A series of aims and actions for reducing the District's carbon footprint.	These documents relate to the sustainable resource use and sustainable energy generation policies of the Core Strategy.
Lewes District Council Energy Policy	Based on the objectives to improve energy efficiency; help residents meet their energy needs; support sustainable energy supplies; share our knowledge; and lead by	

	example.	
Conservation Area Appraisals (LDC)	These appraisals give an overview of the history and development of each Conservation area within the District. They also describe what makes each area special, by identifying unique area features, such as historic buildings and trees as well as highlighting the problems, pressures and capacity for change of each area.	These appraisals will support and inform policies in the Core Strategy.
Extensive Urban Surveys (Roland B Harris, 2005)	These surveys aid the understanding, exploration and management of the historic qualities of 41 of the most significant towns in the historical county of Sussex, of which five are located in Lewes District (Ditchling, Lewes, Newhaven, Peacehaven and Seaford).	These documents will be support and inform policies in the Core Strategy.
Social		
East Sussex Sustainable Community Strategy – 'Pride of Place: Working Towards a Better Future for Local People and Local Communities' (ESCC, 2009)	The document sets out a long term vision for improving people's quality of life and creating strong communities within and across East Sussex. To achieve this, there are three main objectives to create and sustain; a vibrant, diverse and sustainable economy great places to live in, visit and enjoy, and safe, healthy and fulfilling lives.	The issues raised by this document will help to inform the production of the Core Strategy. The delivery of the objectives can be aided by the content of the Core Strategy.
Lewes District Sustainable Community Strategy –	Sets out policies under shared community themes and priorities that will help create Sustainable	The priorities set out in the Sustainable Community Strategy should aim to be achieved through the Core Strategy as far as possible

'Local Voices, Local Choices' (updated 2008)	communities in Lewes District. The shared community themes and priorities are: a valued environment decent, affordable housing for all safer, stronger communities access to good local facilities healthier communities a vibrant and sustainable local economy.	and thus will be taken on board when producing the Core Strategy.
Town and Parish Council Plans	These plans set out the aims and priorities for the each town/parish that have a plan and how they will achieve the aims.	The priorities and aims of each plan can be used to inform the Core Strategy so that certain aims and priorities of these communities are addressed.
Lewes District Council Rural Settlement Study (LDC, 2011)	The study will identify the major issues surrounding the District's rural settlements and sets a hierarchy of the rural settlements based on their services	This document is a key piece of evidence that will inform and support the Core Strategy policies on the rural settlements.
Energy		
Renewable Energy and Low Carbon Development Study (AECOM, 2010)	The document identifies the local potential for renewable and low carbon energy generation in Lewes District and highlights the opportunities for carbon footprint reduction through the LDF.	The document supports and informs the Proposed Submission Core Strategy's policy on renewable energy and low carbon development.
Economy		
Good Practice Guide on Planning for Tourism (DCLG, 2006)	States that tourism plays a valuable role in the economy and that planners should aim to encourage that the industry can sustain itself and grow.	Tourism is of vital importance to Lewes District and this is reflected in the Core Strategy.
Local Economic Assessment	A robust economic evidence base for East	The findings from the study inform the economic development and

(ESCC in association with Experian, 2011)	Sussex informed by policy and statistical evidence of economic performance.	regeneration policies in the Core Strategy.
Refreshing the East Sussex Economic Development Strategy (East Sussex Economic Partnership and ANCER SPA, 2007)	An assessment of the economic development potential of the County and complex issues that need tackling in that respect including, creating conditions for a higher value economy, encouraging stringer business performance and encouraging full and sustainable employment.	The findings from the study inform the economic development and regeneration policies in the Core Strategy.
Lewes District Economic and Employment Land Assessment & 2012 update (NLP, 2012)	The document assesses existing employment land and identifies sites that should be safeguarded and those that are no longer fit for purpose for employment land and therefore should be released for other uses. The document also considers the future employment land needs of the District.	The document is a key piece of evidence that will inform and support the economic strategy and policies that are to be contained within the Core Strategy.
Lewes District Touring Caravan & Camping Study (Hotel Solutions for LDC & Tourism South East, 2010)	The study looks at current provision of touring caravan and camping sites in and around Lewes District and examines the potential for growth, particularly in the light of the designation of the South Downs National Park.	The findings from the study inform the tourism policies in the Core Strategy.
Lewes District Hotel and Visitor Accommodation Futures Study (Hotel Solutions for LDC & Tourism South	An assessment of the potential for the future development of hotels, guesthouses and other forms of serviced accommodation in the District to inform the LDF.	The findings from the study inform the tourism policies in the Core Strategy.

East, 2009)		
Lewes District Shopping and Town Centre Study (GL Hearn, 2012) & Lewes District Council Retail Study (GVA Grimley, 2005)	The studies reviewed retailing within Lewes District, examining the current status of the sector in the district and any future needs.	The findings of the reports have been used to inform the retail policy in the Core Strategy.

Appendix 2 – List of Core Strategy 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 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 character 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 in urban areas 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 locally contributing causes of climate change, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments.
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.

Appendix 3 – Appraisal Tables (Options)

SA Table 1: Housing Target Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	0	0	0	This option is fairly near to the housing target set out in the South East Plan. Although it would not provide as many houses as the other two options, it would go some way to meeting housing need over the plan period.	+	+	+	This option was determined using figures from the Local Housing Needs Assessment (LHNA). Therefore it would provide fairly large number of housing which reflects needs.
2.Deprivation	-?	-?	-?	This option doesn't identify where housing will be distributed, and so it is not possible to foresee what impact it would have on deprived areas. High house prices throughout the district prevent those with low incomes accessing the housing market. The provision of such an amount of homes may increase this problem	+	+	+	This option doesn't identify where housing will be distributed, and so it is not possible to foresee what impact it would have on this objective. High house prices throughout the district prevent those with low incomes accessing the housing market. The provision of such an amount of homes may reduce the affordability problem, thus increasing social inclusion.
3.Travel	?	?	?	This option doesn't identify where housing will be distributed, and so it is not possible to foresee what impact it would have on this objective. Housing delivery on this scale would likely be contingent upon transport infrastructure improvements to offset any increase in congestion.	-?	-?	-?	This option doesn't identify where housing will be distributed, and so it is not possible to foresee what impact it would have on this objective. Housing consistent with this option would mean going against ESCC transport advice and/or delivering housing in unsustainable locations.
4.Communities	?	?	?	The affect of this option cannot be quantified. It may be that new housing development brings forward new community facilities, or it could be that it would put pressure on public open space to be developed. It is also uncertain as to whether housing on this scale would lead to improved or reduced community happiness.	-?	-?	-?	The affect of this option cannot be quantified. It may be that new housing development brings forward new community facilities, or it could be that it would put pressure on public open space to be developed. It is also uncertain as to whether housing on this scale would lead to improved or reduced community happiness. Development at this scale would likely increase pressure to develop open space and community facilities. Should this occur it could therefore have a negative effect.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
5.Health	?	?	?	It is not clear as to how much pressure an increase in 4,500 dwellings would have on the district's health facilities.	?	?	?	It is not clear as to how much pressure an increase in 6,000 dwellings would have on the district's health facilities.
6.Education	?	?	?	It is not clear as to how much pressure an increase in 4,500 dwellings would have on the district's educational facilities.	?	?	?	It is not clear as to how much pressure an increase in 6,000 dwellings would have on the district's educational facilities.
7.Land Efficiency	0	0	0	This option has taken environmental constraints into account and so it is unlikely that there would be a noticeable impact on this objective.	-?	-?	-	Brownfield land is extremely limited in the district. The housing target set out in this option is likely to put a large amount of pressure on greenfield land (even if brownfield land is intensively developed) to deliver housing, particularly towards the back end of the plan period.
8.Biodiversity	0	0	0	This objective will be more influenced by the distribution of housing rather than the overall housing delivery target. Also, this option has taken into account environmental constraints, including biodiversity designations, and so it is unlikely that there would be any negative effects on this objective.	?	-?	-?	This objective will be more influenced by the distribution of housing rather than the overall housing delivery target. Nonetheless, the target set by this option is likely to put pressure on biodiversity designations and so have a negative effect. This is particularly the case towards the back end of the plan period as brownfield sites are diminished.
9.Environment	0	0	0	This objective will be more influenced by the distribution of housing rather than the overall housing delivery target. Also, this option has taken into account environmental constraints, for example the South Downs National Park, and so it should ensure that the district's important natural environment is preserved.	?	-?	-?	This objective will be influenced by the distribution of housing rather than the overall housing delivery target. This option only takes into account housing need, ignoring environmental constraints, and so additional pressure is likely to be put on valued landscape as a result of the housing numbers proposed in this option. This may be more apparent towards the back end of the plan. Development at such a scale would also require high densities which may not be in keeping with the historic environments.
10.Waste	?	-?	-?	This option proposes a fairly large number of additional homes that would increase the generation of waste; although it is likely that new	?	-?	?	This option proposes a large number of additional homes that would increase the generation of waste; although it is likely that new development would promote more recycling. The significance of this

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				development would promote more recycling. The significance of this impact is likely to increase over the plan period in line with the accumulative addition of homes, but as it should not lead to an increase in population the effect should be small.				impact is likely to increase over the plan period in line with the accumulative addition of homes.
11.Water	?	?	?	It is likely that the net increase in additional homes, and the resultant increase in water consumption, would place further pressure on a region of water stress. However, new homes are required to be built at the Code for Sustainable Homes standards which does aim to improve water efficiency. This is therefore likely to reduce the water consumption per head, offsetting some of the previously mentioned negative effect.	?	-?	-?	It is likely that the large number of net additional homes, and the resultant increase in water consumption, would place a great deal of pressure on a region of water stress. However, new homes are required to be built at the Code for Sustainable Homes standards which does aim to improve water efficiency. This is therefore likely to reduce the water consumption per head, offsetting some of the previously mentioned negative effect.
12.Energy	?	-?	-?	This option is likely to have a negative impact by increasing energy consumption throughout the district due to the number of additional units. However, it is likely that new housing will be more energy efficient which would result in the offsetting of some of the previously mentioned negative effect.	?	-?	-?	This option is likely to have a negative impact by increasing energy consumption throughout the district due to the large number of additional units. However, it is likely that new housing will be more energy efficient which would result in the offsetting of some of the previously mentioned negative effect.
13.Air Quality	?	?	?	This objective is more influenced by housing distribution than overall housing numbers. However, due to the housing needs in Lewes town, it is possible that a number of additional homes will be located there, and so a rise in households may have a negative impact on the Lewes AQMA unless mitigated against.	?	?	?	This objective is more influenced by housing distribution than overall housing numbers. However, due to the housing needs in Lewes town, it is possible that a number of additional homes will be located there, and so a rise in households may have a negative impact on the Lewes AQMA, unless mitigated against.
14.Flooding	0	0	0	This objective is more influenced by housing distribution than overall	?	?	?	This objective is more influenced by housing distribution than overall housing numbers.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				housing numbers. However, this target has taken into account environmental constraints such as flooding and so it is unlikely that there would be any negative impacts.				Nonetheless, due to the large number of additional units, it is possible that development may be pushed into areas at a higher risk of flooding which would impact negatively on this objective unless mitigated against.
15.Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.	0	0	0	It is not thought that this option would impact on this objective.
16.Economy	++	++	++	The LHNA states that a housing target of this level would not necessarily constrain economic growth if out-commuting was reduced.	++	++	++	The target set out in this option is based on evidence from the LHNA which stated that a housing target close to this figure would maintain an indigenous labour force to support existing jobs while allowing growth. Therefore this option would provide significant benefits to the local economy. However, housing development at this level is likely to reduce the amount of space available for employment land uses and thus may have a less positive outcome as desired.
17.Tourism	0	0	0	It is not thought that this option would have an impact on this objective.	0	0	0	It is not thought that this option would have an impact on this objective.

SA Table 2: Housing Target Appraisal (Option C)

Option C				
Objectives	S	M	L	Explanation
1.Housing	++	++	++	This option was determined using figures from the Local Housing Needs Assessment (LHNA). Therefore it would provide large number of housing which reflects needs.
2.Deprivation	++ ?	++?	++?	This option doesn't identify where housing will be distributed, and so it is not possible to foresee what impact it would have on this objective. The provision of such an amount of homes may significantly reduce the affordability problem, thus increasing social inclusion.
3.Travel	?	?	?	This option doesn't identify where housing will be distributed, and so it is not possible to foresee what impact it would have on this objective. Housing consistent with this option would mean going significantly against ESCC transport advice and/or delivering housing in unsustainable locations.
4.Communities	-?	-?	-?	The affect of this option cannot be quantified. It may be that new housing development brings forward new community facilities, or it could be that it would put pressure on public open space to be developed. It is also uncertain as to whether housing on this scale would lead to improved or reduced community happiness. Development at this scale would likely put pressure to develop open space and community facilities. Should this occur it could therefore have a negative effect.
5.Health	?	?	?	It is not clear as to how much pressure an increase in 9,000 dwellings would have on the district's health facilities.

Option C				
Objectives	S	M	L	Explanation
6.Education	?	?	?	It is not clear as to how much pressure an increase in 9,000 dwellings would have on the district's educational facilities.
7.Land Efficiency	-	-	-	Brownfield land is extremely limited in the district. The housing target set out in this option is likely to put significant pressure on greenfield land (even if brownfield land is intensively developed) to deliver significant amounts of housing. This is particularly the case towards the back end of the plan period.
8.Biodiversity	-?	-?	?	This objective will be more influenced by the distribution of housing rather than the overall housing delivery target. Nonetheless, the high target set by this option is likely to put pressure on biodiversity designations and so have a negative effect. This is particularly the case towards the back end of the plan period as brownfield sites are diminished.
9.Environment	-?	-?	?	This objective will be influenced by the distribution of housing rather than the overall housing delivery target. This option only takes into account housing need, ignoring environmental constraints, and so additional pressure is likely to be put on valued landscape as a result of the high housing numbers proposed in this option. This may be more apparent towards the back end of the plan. Development at such a scale would also require high densities which may not be in keeping with the historic environments.
10.Waste	?	-?	-	This option proposes a large number of additional homes that would increase the generation of waste; although it is likely that new development would promote more recycling. The significance of this impact is likely to increase over the plan period in line with the accumulative addition of homes.
11.Water	?	-?	-?	It is likely that the significantly large number of net additional homes, and the resultant increase in water consumption, would place a great deal of pressure on a region of water stress. However, new homes are required to be built at the Code for Sustainable Homes standards which does aim to improve water efficiency. This is therefore likely to reduce the water consumption per head, offsetting some of the previously mentioned negative effect.
12.Energy	-?	-?	?	This option is likely to have a negative impact by increasing energy consumption throughout the district due to the significant number of additional units. However, it is likely that new housing will be more energy efficient which would result in the offsetting of some of the previously mentioned negative effect.
13.Air Quality	?	?	?	This objective is more influenced by housing distribution than overall housing numbers. However, due to the housing needs in Lewes town, it is possible that a number of additional homes will be located there, and so a rise in households may have a negative impact on the Lewes AQMA, unless mitigated against.
14.Flooding	?	?	?	This objective is more influenced by housing distribution than overall housing numbers. Nonetheless, due to the large number of additional units, it is possible that development may be pushed into areas at a higher risk of flooding, which would impact negatively on this objective, unless mitigated against.
15.Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.
16.Economy	+?	+?	+?	The target set out in this option is based on evidence from the LHNA which stated that a housing target close to this figure would maintain an indigenous labour force to support existing jobs while allowing growth. Therefore this option would provide significant benefits to the local economy. However, housing development at this level is likely to reduce the amount of space available for employment land uses and thus may have a less positive outcome as desired.
17.Tourism	0	0	0	It is not thought that this option would have an impact on this objective.

SA Table 3: Industrial floorspace Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
2.Deprivation	0	0	0	Given the small amount of industrial floorspace it proposes, this option would not have a large effect on employment and income in the district. As such, it is likely to have little impact on reducing deprivation.	+	+	+	This option is likely to have a noticeable impact on jobs and income in the district, a benefit for this objective. As the option does not stipulate the location of development, it is unknown if this would benefit the most deprived parts of the district.
3.Travel	-	-	-	Development at this nominal rate of employment land is likely to increase out-commuting and therefore the effect on this objective is negative.	?	?	?	Additional industrial development may add to traffic in the district. Alternatively, development may reduce out-commuting and thus journeys by non-sustainable means.
4.Communities	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	+	+	+	The low target proposed by this option is unlikely to exert strong pressure on greenfield land as employment space could likely come forward solely on brownfield land	0	0	0	This option reflects the constraints in the district, including on land, and thus should not put a large amount of pressure on valuable greenfield land.
8.Biodiversity	0	0	0	This option is unlikely to have an impact on biodiversity given the low amount of development that it proposes.	0	0	0	This option is unlikely to have an impact on biodiversity. However, there may be some site-specific impacts on biodiversity which cannot be known as the policy does not cover location.
9.Environment	0	0	0	The option is unlikely to have an impact on this objective given the low amount of development that it proposes.	0	0	0	This option is unlikely to have an impact on this objective. However, there may be some site-specific impacts on the environment which cannot be quantified as the policy does not cover location.
10.Waste	0	0	0	This option does not propose much employment and thus is unlikely to result in large amounts of waste being produced.	-?	-?	-?	Given the relatively large amount of industrial space it proposes, this option is likely to increase the production of waste. However, it is difficult to accurately determine the affect on this objective as waste generation is dependant on the type of industry.
11.Water	0	0	0	This option does not propose much	-?	-?	-?	Given the relatively large amount of industrial space

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				employment and thus is unlikely to result in large amounts of water consumption.				it proposes, this option is likely to increase water consumption. However, it is difficult to accurately determine the affect on this objective as water consumption is dependant on the type of industry.
12.Energy	0	0	0	This option does not propose much employment and thus is unlikely to result in large scale energy consumption.	-?	-?	-?	Given the relatively large amount of industrial space it proposes, this option is likely to increase the production of waste. However, it is difficult to accurately assess the impact on this objective as energy consumption would depend on the type of business, the design of buildings and renewable energy use.
13.Air Quality	?	?	?	New industrial development may have a negative impact on air quality, depending on the types of industries development would bring. It is however thought unlikely that such development would include heavy industry, based on the existing industrial uses in the district and what the needs are likely to be.	?	?	?	New industrial development may have a negative impact on air quality, depending on the types of industries development would bring. It is however thought unlikely that such development would include heavy industry, based on the existing industrial uses in the district what the needs are likely to be.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	-?	-?	-?	This option would only deliver small amounts of industrial land and jobs. As such, it is not thought that it would have a noticeable positive impact on this objective. Indeed it could have a negative impact on the economy by reducing the possibility for businesses to expand and by making the district less attractive for development.	+	+	+	This option is likely to have a positive impact on employment provision in the district over the whole plan period by providing an amount of land that should boost job creation.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 4: Industrial floorspace Appraisal (Option C)

Objectives	Option C			
	S	M	L	Explanation

Objectives	Option C			Explanation
	S	M	L	
1.Housing	0	0	0	This option does not have an impact on this objective.
2.Deprivation	++?	++?	++?	This option would have a large impact on this objective, particularly by the end of the plan period, by providing a high amount of jobs and income for the district. The EELA recognises that it would be difficult to accommodate this level of provision, due to environmental constraints and thus it is doubtful whether this level of provision can be delivered. Furthermore, as the option does not stipulate the location of development, it is unknown if this would benefit the most deprived parts of the district.
3.Travel	?	?	?	Additional industrial development may add to traffic in the district. Alternatively, development may reduce out-commuting and thus journeys by non-sustainable means.
4.Communities	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	-	-	-	This option would likely mean that some industrial sites would have to be provided on greenfield land, which would not be positive in relation to this objective.
8.Biodiversity	-?	-?	-?	Owing to environmental constraints, the EELA recognises that it would be difficult to deliver employment land to the extent proposed by this option. Thus providing industrial space at such a level may impact negatively on the aims of this objective. Furthermore, there may be some site-specific impacts on biodiversity which cannot be known as the policy does not cover location.
9.Environment	-?	-?	-?	The policy does not cover location and thus site specific impacts on the environment cannot be known. However, the EELA does recognise that it would be difficult to provide industrial space to the level specified in the option, due to environment constraints in the district. Thus, providing industrial space at this level may impact negatively on the aim to conserve and enhance the district's biodiversity.
10.Waste	?	?	?	Given the large amount of industrial space it proposes, this option is likely to increase the production of waste above that of the other options. However, it is difficult to accurately determine the affect on this objective as waste generation is dependant on the type of industry.
11.Water	?	?	?	Given the large amount of industrial space it proposes, this option is likely to increase water consumption above that of the other options. However, it is difficult to accurately determine the affect on this objective as water consumption is dependant on the type of industry.
12.Energy	?	?	?	Given the relatively large amount of industrial space it proposes, this option is likely to increase the production of waste above that of the other options. However, it is difficult to accurately assess the impact on this objective as energy consumption would depend on the type of business, the design of buildings and renewable energy use.
13.Air Quality	?	?	?	New industrial development may have a negative impact on air quality, depending on the types of industries development would bring. It is however thought unlikely to be heavy industry, based on the existing industrial uses in the district what the needs are likely to be.
14.Flooding	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	+	+	++?	Theoretically, this option would have the largest positive impact on this objective by the end of the plan period. This is as this is likely to create the highest amount of jobs, boosting the economic performance of the district,

Objectives	Option C			Explanation
	S	M	L	
				which is likely to trickle down into other sectors of the economy. However the EELA thought it unlikely that the district could accommodate the provision seen in this option, due to the district's constraints and such an approach may not actually achieve its intended results.
17.Tourism	0	0	0	This option does not have an impact on this objective.

SA Table 5: Office Target Appraisal

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
2.Deprivation	+	+	++	This option would have a large impact on this objective, particularly by the end of the plan period, by providing a high amount of jobs and income for the district. As the option does not stipulate the location of development, it is unknown if this option would benefit the most deprived parts of the district.	+	+	+	This option would impact positively on the objective, by providing jobs and income for the district. As the option does not stipulate the location of development, it is unknown if this option would benefit the most deprived parts of the district.
3.Travel	?	?	?	Additional office development may add to traffic in the district. Alternatively, development may reduce out-commuting and thus journeys by non-sustainable means.	?	?	?	Additional industrial development may add to traffic in the district. Alternatively, development may reduce out-commuting and thus journeys by non-sustainable means.
4.Communities	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on	0	0	0	This option does not have an impact on this

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				this objective.				objective.
12.Energy	?	?	?	It is difficult to accurately assess the impact on this objective as energy consumption would depend on the type of business, the design of buildings and renewable energy use.	?	?	?	It is difficult to accurately assess the impact on this objective as energy consumption would depend on the type of business, the design of buildings and renewable energy use.
13.Air Quality	?	?	?	The impact of office development cannot be known for this objective, as the options do not specify where office provision will be delivered.	?	?	?	The impact of office development cannot be known for this objective, as the options do not specify where office provision will be delivered.
14.Flooding	0	0	0	The impact of office development cannot be known for this objective, as the options do not specify where office provision will be delivered.	0	0	0	The impact of office development cannot be known for this objective, as the options do not specify where office provision will be delivered.
15.Coastal Erosion	0	0	0	The impact of office development cannot be known for this objective, as the options do not specify where office provision will be delivered.	0	0	0	The impact of office development cannot be known for this objective, as the options do not specify where office provision will be delivered.
16.Economy	+	+	++	The EELA recognises that there are “very few good existing office sites in the District”. This option would help to provide additional amounts of office space until 2031, above the rate currently provided and by creating additional jobs and income for the district, is a strong positive for this objective – particularly by the end of the plan period.	+	+	+	Although this option does bring in income and jobs to the district, it does so at a lesser rate than Option A and therefore does not score as well by the end of the plan period.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 6: Ringmer Options Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	++	++	++	Option A would help meet both the local need for market and affordable housing, as well as the wider need (district and housing market area) for housing.	+	+	+	Option B would meet the local need for housing, but would not meet the wider need for housing (district and housing market area). It is thought likely that the district would not be able to achieve its housing target with development at this level in Ringmer.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
2.Deprivation	?	?	?	Ringmer parish is not considered a particularly deprived area (both in relation to local and national scores). It may be that housing at such a scale in Ringmer reduces potential development in more deprived parts of the district (which could be seen negatively), equally it may reduce development in less deprived parts of the district.	?	?	?	Ringmer parish is not considered a particularly deprived area (both in relation to local and national scores). It may be that housing at such a scale in Ringmer would increase potential development in more deprived parts of the district (which could be seen positively), equally it may encourage development in less deprived parts of the district.
3.Travel	-	-	-	Ringmer is home to a number of services, although it does not have the same provision as the towns, and therefore residents travel out to access higher order services. Most local services can be accessed on foot from most of Ringmer, although it is not thought that all additional development at such a scale would be near to such services. Whilst it is likely that development at this scale would bring about improvements to certain parts of the transport network (including Earwig Corner) and improved bus services, such a level of development is likely to substantially increase congestion in the parish itself (particularly by the end of the plan period), making sustainable transport means (walking/cycling) less pleasant.	0	0	0	Ringmer is home to a number of services, although it does not have the same provision as the towns, and therefore residents travel out to access higher order services. Local services can be accessed on foot from most of Ringmer and it is thought likely that most additional development at such a scale would be near such services. Development at such a scale is unlikely to bring forward improvements to Earwig Corner or bus services nor a noticeable increase in congestion.
4.Communities	-	-	-	Whilst it is thought likely that development at this scale would deliver facilities for the community. From comments received during consultation on the Emerging Core Strategy, it seems that development at this scale would cause unhappiness in the community and	+	+	+	It is thought unlikely that development at such a scale would deliver community facilities. However, it would appear that development at such a scale would be welcomed by the community and would not negatively affect community cohesion.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				would negatively affect community cohesion.				
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	-?	-?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicate that development at this scale may result in a possible short-term and long-term shortfall in primary school educational provision which may need addressing. There is no such shortfall regarding secondary school facilities.	-?	-?	-?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicate that development at this scale may result in a possible short-term and long-term shortfall in primary school educational provision which may need addressing. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	-?	-?	-?	Ringmer has little in the way of brownfield sites and thus it can be assumed most development at this scale would occur on greenfield sites. It is unclear (although not thought likely) as to whether much of the land at Ringmer is of high agricultural land value and so development in the parish could protect land of higher quality elsewhere in the district.	0?	0?	0?	Ringmer has little in the way of brownfield sites and thus it can be assumed that some development at this scale would occur on greenfield sites. It is unclear (although not thought likely) as to whether much of the land at Ringmer is of high agricultural land value and so fewer houses delivered in the parish could make land of higher quality elsewhere in the district more vulnerable to development.
8.Biodiversity	0	0	0	Work for the Habitats Regulations Assessment has found that development in Ringmer, would not have a significant negative effect on the Lewes Downs SAC. Development of this nature is not thought likely to negatively affect any international, national or local biodiversity designations.	0	0	0	Work for the Habitats Regulations Assessment has found that development in Ringmer, would not have a significant negative effect on the Lewes Downs SAC. Development of this nature is not thought likely to negatively affect any international, national or local biodiversity designations.
9.Environment	-	-	-	Whilst part of the parish lies in the national park, the settlements are not and therefore it is not thought that development would impact upon it.	0	0	0	Whilst part of the parish lies in the national park, the settlements are not and therefore it is not thought that development would impact upon it. It is not thought that development at this scale would impact

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				Development at this scale in Ringmer is likely to include residential units being provided on sites that the Landscape Capacity study deem to have low/low-medium capacity to change, which is likely to have a negative impact on the landscape.				upon sensitive landscapes.
10.Waste	0	0	0	Development in Ringmer parish, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.	0	0	0	Development in Ringmer parish, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	The policy would not impact upon the objective.	0	0	0	The policy would not impact upon the objective.
14.Flooding	0	0	0	The SFRA does not identify Ringmer as a parish that is particularly prone to flooding. However, development at this scale is likely to mean that sites that are locally identified as at risk to flooding are brought forward for housing. It is likely that development here would mitigate such risks.	0	0	0	Development at this scale is unlikely to lead to development on sites locally identified as prone to flooding and thus unlikely to impact on this objective.
15.Coastal Erosion	0	0	0	The policy would not impact upon the	0	0	0	The policy would not impact upon the objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				objective.				
16.Economy	++	++	++	It is thought likely that development at this level in Ringmer parish, and the resulting increase in population, will increase the customer base for shops and services, which could help to support the retention/creation of such shops and services as well as jobs	+	+	+	Development at this level in Ringmer Parish, and the resulting increase in population, may increase the customer base for shops and services both in Ringmer and elsewhere in the district. However, as such an option is likely to lead to less housing in the district, the positive effect is likely to be less.
17.Tourism	0	0	0	The policy would not impact upon the objective.	0	0	0	The policy would not impact upon the objective.

SA Table 7: Ringmer Options Appraisal (Options C and D)

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	++	++	++	Option C would help meet both the local need for market and affordable housing, as well as some of the wider need (district and housing market area) for housing. It is seen as likely that the district would be able to achieve its housing target with development at this level in Ringmer.	++	++	++	Option D would help meet both the local need for market and affordable housing, as well as some of the wider need (district and housing market area) for housing. It is seen as likely that the district would be able to achieve its housing target with development at this level in Ringmer
2.Deprivation	?	?	?	Ringmer parish is not considered a particularly deprived area (both in relation to local and national scores). Housing at such a scale may affect development being brought forward in other more deprived areas of the district, but it is not clear what the affect would be.	?	?	?	Ringmer parish is not considered a particularly deprived area (both in relation to local and national scores). Housing at such a scale may affect development being brought forward in other more deprived areas of the district, but it is not clear what the affect would be.
3.Travel	+	+	+	Ringmer is home to a number of services, although it does not have the same provision as the towns, and therefore residents travel out to access higher order services. Local services can be accessed on foot from most of Ringmer, and it is thought that most additional development at such a scale would	0	0	-?	Ringmer is home to a number of services, although it does not have the same provision as the towns, and therefore residents travel out to access higher order services. Local services can be accessed on foot from most of Ringmer, and it is thought that some additional development at such a scale would be near to such services. Development at this scale is likely to bring forward improvements at Earwig Corner and may also bring about improved bus

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
				be near to such services. Development at this scale is likely to bring forward improvements at Earwig Corner but it is not thought likely that it would lead to improved bus services. It is unlikely that development at this level would have a significant affect on congestion.				services. Development at this level could bring about increased congestion (particularly by the end of the plan period).
4.Communities	+	+	+	It is thought unlikely that development at such a scale would deliver community facilities. However, it would appear that development at such a scale would be welcomed by the community and would not negatively affect community cohesion.	-?	-?	-?	Development at this scale could deliver facilities for the community. From comments received during consultation on the Emerging Core Strategy, it seems that development at this scale would cause unhappiness in the community and would negatively affect community cohesion.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	-?	-?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicate that development at this scale may result in a possible short-term and long-term shortfall in primary school educational provision which may need addressing. There is no such shortfall regarding secondary school facilities.	-?	-?	-?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicate that development at this scale may result in a possible short-term and long-term shortfall in primary school educational provision which may need addressing. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	0?	0?	0?	Ringmer has little in the way of brownfield sites and thus it can be assumed that some development at this scale would occur on greenfield sites. It is unclear (although not thought likely) as to whether much of the land at Ringmer is of high agricultural land value and so fewer houses delivered in the parish could	-?	-?	-?	Ringmer has little in the way of brownfield sites and thus it can be assumed most development at this scale would occur on greenfield sites. It is unclear (although not thought likely) as to whether much of the land at Ringmer is of high agricultural land value and so development in the parish could protect land of higher quality elsewhere in the district.

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
				make land of higher quality elsewhere in the district more vulnerable to development.				
8.Biodiversity	0	0	0	Work for the Habitats Regulations Assessment has found that development in Ringmer, would not have a significant negative effect on the Lewes Downs SAC. Development of this nature is not thought likely to negatively affect any international, national or local biodiversity designations.	0	0	0	Work for the Habitats Regulations Assessment has found that development in Ringmer, would not have a significant negative effect on the Lewes Downs SAC. Development of this nature is not thought likely to negatively affect any international, national or local biodiversity designations.
9.Environment	0	0	0	Whilst part of the parish lies in the national park, the settlements are not, and therefore it is not thought that development would impact upon it. It is not thought that development at this scale would impact upon sensitive landscapes.	-?	-?	-?	Whilst part of the parish lies in the national park, the settlements are not, and therefore it is not thought that development would impact upon it. Development at this scale in Ringmer could include residential units being provided on sites that the Landscape Capacity study deem to have low/low-medium capacity to change, which is likely to have a negative impact on the landscape
10.Waste	0	0	0	Development in Ringmer parish, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.	0	0	0	Development in Ringmer parish, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase energy generation. However, as new homes will likely be more energy efficient than existing	0	0	0	Development in Ringmer parish, as would be the case in other locations, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
				housing this negative impact would be offset.				
13.Air Quality	0	0	0	The policy would not impact upon the objective.	0	0	0	The policy would not impact upon the objective.
14.Flooding	+	+	+	The SFRA does not identify Ringmer as a parish that is particularly prone to flooding. However, development at this scale could mean that sites that are locally identified as at risk to flooding are brought forward for housing. Development here would be likely to mitigate such risks.	+	+	+	The SFRA does not identify Ringmer as a parish that is particularly prone to flooding. However, development at this scale could mean that sites that are locally identified as at risk to flooding are brought forward for housing. Development here would be likely to mitigate such risks.
15.Coastal Erosion	0	0	0	The policy would not impact upon the objective.	0	0	0	The policy would not impact upon the objective.
16.Economy	++	++	++	Development at this level in Ringmer Parish and the resulting increase in population may increase the customer base for shops and services both in Ringmer and elsewhere in the district.	++	++	++	Development at this level in Ringmer Parish and the resulting increase in population may increase the customer base for shops and services both in Ringmer and elsewhere in the district.
17.Tourism	0	0	0	The policy would not impact upon the objective	0	0	0	The policy would not impact upon the objective

SA Table 8: Newick Options Appraisal

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	+	+	+	Option A would provide a fairly large number of new homes, which would include affordable housing. Relative to the district's towns, Newick does not have a significant housing need and so this would be helping to meet district needs.	+	+	+	Option B would provide more homes (including affordable housing) than Option A. Relative to the district's towns, Newick does not have a particularly notable housing need and so this would be helping to meet district needs.
2.Deprivation	+	+	+	Newick is not a deprived area in terms of access to housing, however, the provision of affordable housing would still benefit low income families in Newick and the wider district area.	+	+	+	Newick is not a deprived area in terms of access to housing, however, the provision of affordable housing would still benefit low income families in Newick and the wider district area.
3.Travel	0?	0?	0?	The village of Newick does contain a	-?	-?	-?	The village of Newick does contain a number of

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				number of services, including key services such as primary schools, Doctors Surgery etc and is serviced by regular bus provision. However, it is likely that new residents of the village would need to out-commute to employment centres. This is likely to encourage private transportation as there is no train service in the village. It is also likely that development at this scale would increase congestion in the village unless mitigated against.				services, including key services such as primary schools, Doctors Surgery etc and is serviced by regular bus provision. However, it is likely that new residents of the village would need to out-commute to employment centres. This is likely to encourage private transportation as there is no train service in the village. As this option would provide more housing, it is likely to have a more negative impact than Option A. It is also likely that development at this scale would increase congestion in the village unless mitigated against.
4.Communities	0?	0?	0?	It is not known whether development at this scale would have any impact on community happiness within the village or whether any community facilities would be provided.	-?	-?	-?	It is not known whether development at this scale would have any impact on this objective or whether any community facilities would be provided. However, it is possible that a significant level of housing may alter the character of the village, which may have a negative effect on community happiness.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	Newick does contain a primary school. East Sussex County Council (The education authority) have indicated that a shortfall in primary school provision over the course of the plan period is possible, although the impact at Newick is not known.	0?	0?	0?	Newick does contain a primary school. East Sussex County Council (The education authority) have indicated that a shortfall in primary school provision over the course of the plan period is possible, although the impact at Newick is not known.
7.Land Efficiency	-?	-?	-?	The specific location of development is not detailed in this option, although it is likely that development would be on greenfield land. The land surrounding Newick is mainly Grade 3 Agricultural Land, although it is not known whether this is high quality (3a) or not (3b). There is a patch of	-	-	-	The specific location of development is not detailed in this option, although it is likely that development would be on greenfield land. The land surrounding Newick is mainly Grade 3 Agricultural Land, although it is not known whether this is high quality (3a) or not (3b). There is a patch of Grade 1 Agricultural Land to the east of Newick. Any potential negative impacts are likely to be more

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				Grade 1 Agricultural Land to the east of Newick.				extensive than Option A due to the larger number of units.
8.Biodiversity	0	0	0	Although the specific location of development is not detailed, there are no biodiversity designations immediately surrounding Newick.	0	0	0	Although the specific location of development is not detailed, there are no biodiversity designations immediately surrounding Newick.
9.Environment	0?	0?	0?	Newick does contain conservation areas and listed buildings, although the specific location of development is not known. Development would be expected to respect the distinct character of these areas and so should not impact on this objective.	0?	0?	0?	Newick, and the land surrounding, is not located within the National Park. The village does contain conservation areas and listed buildings, although the specific location of development is not known. Development would be expected to respect the distinct character of these areas and so should not impact on this objective.
10.Waste	0	0	0	Development at Newick, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.	0	0	0	It is likely that more additional waste would be generated as a result of this option. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development at Newick, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.	0	0	0	This option is likely to increase water use (to a greater extent than Option A). However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at Newick, as would be the case in other locations, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.	0	0	0	Development set out in this option will probably increase energy generation to a greater extent than Option A. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	The policy would not impact upon the objective.	0	0	0	The policy would not impact upon the objective.
14.Flooding	0	0	0	There are no flood risk areas immediately surrounding Newick	0	0	0	There are no flood risk areas immediately surrounding Newick
15.Coastal Erosion	0	0	0	The policy would not impact upon the	0	0	0	The policy would not impact upon the objective

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				objective				
16.Economy	+	+	+	Development at this level at Newick and the resulting increase in population may increase the customer base for shops and services both in the village and elsewhere in the district.	+	+	+	Development at this level at Newick would increase the customer base for shops and services both in the village and elsewhere in the district. A more significant impact would be expected than Option A.
17.Tourism	0	0	0	The policy would not impact upon the objective	0	0	0	The policy would not impact upon the objective

SA Table 9: Plumpton Green options Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	0?	0?	0?	Option A would provide a small number of dwellings, which would include affordable housing provision. Relative to the district's towns, there isn't a significant housing need in the village, although it would help to ease pressure on district housing needs.	+	+	+	This option would provide slightly more dwellings and so is appraised better. It would also include affordable housing provision. Relative to the district's towns there isn't a significant housing need in the village, although it would help to ease pressure on district housing needs.
2.Deprivation	0?	0?	0?	Plumpton Green is not a deprived area, generally or in terms of access to housing; however, the provision of affordable housing would still benefit low income families in the village and the wider district area.	+	+	+	Plumpton Green is not a deprived area, generally or in terms of access to housing; however, the provision of affordable housing would still benefit low income families in the village and the wider district area.
3.Travel	0?	0?	0?	The village of Plumpton Green does contain some key services, including a primary school and a Post Office. It is likely that new residents of the village would need to out-commute to employment centres. However, there is good public transport provision in the village, and due to the scale of development the impact would be minimal. It is unlikely that development at this scale would impact on congestion in the village.	-	-	-	The village of Plumpton Green does contain some key services, including a primary school and a Post Office. It is likely that new residents of the village would need to out-commute to employment centres. However, there is good public transport provision in the village, which may offset some of the negative impact. Development at this scale may add to congestion in the village, although it would not be significant.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
4.Communities	0?	0?	0?	It is not known whether development at this scale would have any impact on community happiness within the village, although it is unlikely that the character of the villages would be affected by development at this scale.	-?	-?	-?	It is not known whether development at this scale would have any impact on this objective or whether any community facilities would be provided. It is possible that housing at this scale may alter the character of the village, which may have a negative effect on community happiness.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	Plumpton Green does contain a primary school. East Sussex County Council (the education authority) have indicated that a shortfall in primary school provision over the course of the plan period is possible, although the impact at the village is not known.	0?	0?	0?	Plumpton Green does contain a primary school. East Sussex County Council (the education authority) have indicated that a shortfall in primary school provision over the course of the plan period is possible, although the impact at the village is not known.
7.Land Efficiency	-?	-?	-?	The specific location of development is not detailed in this option, although it is likely that development would be on greenfield land. The land surrounding Plumpton Green is Grade 3 Agricultural Land, although it is not known whether this is high quality (3a) or not (3b). Due to the scale of development, any negative impact would be minimal.	-?	-?	-?	The specific location of development is not detailed in this option, although it is likely that development would be on greenfield land. The land surrounding Plumpton Green is Grade 3 Agricultural Land, although it is not known whether this is high quality (3a) or not (3b).
8.Biodiversity	0	0	0	Although the specific location of development is not detailed, there are no biodiversity designations immediately surrounding Plumpton Green. There is a patch of ancient woodland to the west of the village; however, any development in the vicinity would be required to mitigate any harmful impacts. .	0	0	0	Although the specific location of development is not detailed, there are no biodiversity designations immediately surrounding Plumpton Green. There is a patch of ancient woodland to the west of the village; however, any development in the vicinity would be required to mitigate any harmful impacts.
9.Environment	0	0	0	The specific locations of sites are not detailed in these options. Plumpton Green is located just to north of the National Park. However, it is not	0?	0?	0?	The specific locations of sites are not detailed in these options. Plumpton Green is located just to north of the National Park. It is possible that development at this scale would impinge on views

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
				thought that development at this scale would impinge on views from the park. There aren't a significant amount of listed buildings at Plumpton Green or any conservation areas.				from the park. There aren't a significant amount of listed buildings at Plumpton Green or any conservation areas.
10.Waste	0	0	0	Development at Plumpton Green, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.	0	0	0	Development at Plumpton Green, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development at Plumpton Green, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.	0	0	0	Development at Plumpton Green, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this scale may increase energy generation slightly. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.	0	0	0	Development may lead to an increase in energy generation, however, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	The policy would not impact upon the objective.	0	0	0	The policy would not impact upon the objective.
14.Flooding	0	0	0	Specific site locations are not detailed in these options and so this objective cannot be accurately appraised. However, It must be noted that there is an area of flood risk to the south of the village.	0	0	0	Specific site locations are not detailed in these options and so this objective cannot be accurately appraised. However, it must be noted that there is an area of flood risk to the south of the village.
15.Coastal Erosion	0	0	0	The policy would not impact upon the objective	0	0	0	The policy would not impact upon the objective
16.Economy	0?	0?	0?	Development at this scale will result in a slight rise in the village's population, which may increase the customer base for shops and services in the village.	+	+	+	Development at this scale will result in a rise in the village's population, which may increase the customer base for shops and services both in the village and the wider district.
17.Tourism	0	0	0	The policy would not impact upon the	0	0	0	The policy would not impact upon the objective

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
				objective				

SA Table 10: Plumpton Green options Appraisal (Option C)

Objectives	Option C			Explanation
	S	M	L	
1.Housing	+	+	+	Option C would provide a relatively large number of dwellings, including affordable housing provision. Relative to the district's towns, there isn't a significant housing need in the village, although it would help to ease pressure on district housing needs.
2.Deprivation	+	+	+	Plumpton Green is not a deprived area in general or in terms of access to housing; however, the provision of affordable housing would still benefit low income families in the village and the wider district area. This option appraised better as a result of higher affordable housing provision.
3.Travel	-	-	-	The village of Plumpton Green does contain some key services; including a primary school and a Post Office. It is likely that new residents of the village would need to out-commute to employment centres. However, there is good public transport provision in the village, which may offset some of the negative impact. Development at this scale is likely to add to congestion in the village.
4.Communities	-	-	-	It is not known whether development at this scale would have any impact on this objective, or whether any community facilities would be provided. It is possible that housing at this scale may alter the character of the village, which may have a negative effect on community happiness.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	Plumpton Green does contain a primary school. East Sussex County Council (the education authority) have indicated that a shortfall in primary school provision over the course of the plan period is possible, although the impact at the village is not known.
7.Land Efficiency	-	-	-	The specific location of development is not detailed in this option, although it is likely that development would be on greenfield land. The land surrounding Plumpton Green is Grade 3 Agricultural Land, although it is not known whether this is high quality (3a) or not (3b). Due to the scale of development, it is likely that this option would have more of a negative impact than the other two options.
8.Biodiversity	0	0	0	Although the specific location of development is not detailed, there are no biodiversity designations immediately surrounding Plumpton Green. There is a patch of ancient woodland to the west of the village; however, any development in the vicinity would be required to mitigate any harmful impacts. .
9.Environment	-?	-?	-?	The specific locations of sites are not detailed in these options. Plumpton Green is located just to north of the National Park. It is possible that development at this scale would impinge on views from the park. There aren't a significant amount of listed buildings at Plumpton Green or any conservation areas.
10.Waste	0	0	0	Development at Plumpton Green, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development at Plumpton Green, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative

Objectives	Option C			Explanation
	S	M	L	
				impact of development at this site would be offset.
12.Energy	0	0	0	Development may lead to an increase in energy generation, however, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	The policy would not impact upon the objective.
14.Flooding	0	0	0	Specific site locations are not detailed in these options and so this objective cannot be accurately appraised. However, it must be noted that there is an area of flood risk to the south of the village.
15.Coastal Erosion	0	0	0	The policy would not impact upon the objective
16.Economy	+	+	+	Development at this scale will result in a fairly significant rise in the village's population, which will increase the customer base for shops and services both in the village and the wider district.
17.Tourism	0	0	0	The policy would not impact upon the objective

SA Table 11: Peacehaven/Telscombe and Newhaven Appraisal (Options A and B)

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
1.Housing	++	++	++	This option would maximise housebuilding in the area, including affordable homes (where there is a large identified need).	+	+	+	Although this area promotes housing in an area of need, it does not do so at the maximum rate and therefore is not seen very positively.
2.Deprivation	++	++	++	This area is seen as being the most deprived part of the district. Development at this scale could act as a boost to the area.	+	+	+	Development at this scale should have a positive impact on this objective, boosting the area but not at the same rate as Option A identifies as it does not deliver the same amount of construction.
3.Travel	++	++	++	ESCC advise that development at this scale would involve upgrades to transport infrastructure and public transport routes, funded by new development. Development in the area is likely to be close to services, encouraging sustainable transport usage more so than for the other options.	+?	+?	+?	ESCC advise that development at this scale would involve upgrades to transport infrastructure and public transport routes, funded by new development. Development in the area would be expected to rely on public transport. However, by not maximising development in such an area, it could push development to other parts of the district not as well served by public transport.
4.Communities	0?	0?	0?	The effect of development at such a rate in the area is unknown.	0?	0?	0?	The effect of development at such a rate in the area is unknown.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	?	?	ESCC indicate that it is possible that	-?	?	?	ESCC indicate that it is possible that development at

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
				development at the level would have a short-term negative impact on primary school provision in Peacehaven if not mitigated against. The long-term impact of the option is unknown.				the level would have a short-term negative impact on primary school provision in Peacehaven if not mitigated against. The long-term impact of the option is unknown.
7.Land Efficiency	+	+	+	The effect on this objective ultimately depends on the location of new development. Despite this, the maximisation of development in the urban area is likely to more positive to the other options, protecting more vulnerable, rural and greenfield locations.	0?	0?	0?	The effect on this objective ultimately depends on the location of new development. The option does not maximise development in the urban area which could result in other areas, potentially to the detriment of more vulnerable, rural and greenfield locations.
8.Biodiversity	0	0	0	It is not thought that development at this scale would impact on this objective.	0	0	0	It is not thought that development at this scale would impact on this objective.
9.Environment	0	0	0	It is not thought that the option would have an impact on the objective, such an impact is dependant on the location of new development.	0	0	0	It is not thought that the option would have an impact on the object, such an impact is dependant on the location of new development.
10.Waste	0	0	0	Development in this area, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.	0	0	0	Development in this area, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development in this area, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.	0	0	0	Development in this area, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development may lead to an increase in energy generation, however, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.	0	0	0	Development may lead to an increase in energy generation, however, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	The option would not impact upon the objective.	0	0	0	The option would not impact upon the objective.
14.Flooding	0	0	0	Specific site locations are not detailed in	0	0	0	Specific site locations are not detailed in these

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				these options and so this objective cannot be accurately appraised.				options and so this objective cannot be accurately appraised.
15.Coastal Erosion	0	0	0	The option would not impact upon the objective	0	0	0	The option would not impact upon the objective
16.Economy	++	++	++	This option would have the most positive impact on the area's economy, increasing the customer base in the part of the district which is the most economically deprived.	+	+	+	This option should have a positive impact upon this objective by adding to the customer base in the area, albeit not at the maximum level.
17.Tourism	0	0	0	The option would not impact upon the objective	0	0	0	The option would not impact upon the objective

SA Table 12: Peacehaven/Telscombe and Newhaven Appraisal (Option C)

Objectives	Option C			
	S	M	L	Explanation
1.Housing	+	+	+	Although this area promotes housing in an area of need, it does not do so at the maximum rate and therefore is not seen very positively.
2.Deprivation	+	+	+	Development at this scale should have a positive impact on this objective, boosting the area but not at the same rate as Option A identifies as it does not deliver the same amount of construction.
3.Travel	+?	+?	+?	ESCC advise that development at this scale would involve upgrades to transport infrastructure and public transport routes, funded by new development. Development in the area would be expected to rely on public transport. However, by not maximising development in such an area, it could push development to other parts of the district not as well served by public transport.
4.Communities	0?	0?	0?	The effect of development at such a rate in the area is unknown.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	?	?	ESCC indicate that it is possible that development at the level would have a short-term negative impact on primary school provision in Peacehaven if not mitigated against. The long-term impact of the option is unknown.
7.Land Efficiency	0?	0?	0?	The effect on this objective ultimately depends on the location of new development. The option does not maximise development in the urban area which could result in other areas, potentially to the detriment of more vulnerable, rural and greenfield locations.
8.Biodiversity	0	0	0	It is not thought that development at this scale would impact on this objective.
9.Environment	0	0	0	It is not thought that the option would have an impact on the objective, such an impact is dependant on the location of new development.
10.Waste	0	0	0	Development in this area, as would be the case in other locations, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development in this area, as would be the case in other locations, will increase water use. However, as new homes are likely be built to high water conservation standards and have water meters installed, the negative

Objectives	Option C			Explanation
	S	M	L	
				impact of development at this site would be offset.
12.Energy	0	0	0	Development may lead to an increase in energy generation, however, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	The policy would not impact upon the objective.
14.Flooding	0	0	0	Specific site locations are not detailed in these options and so this objective cannot be accurately appraised.
15.Coastal Erosion	0	0	0	The policy would not impact upon the objective
16.Economy	+	+	+	This option should have a positive impact upon this objective by adding to the customer base in the area, albeit not at the maximum level.
17.Tourism	0	0	0	The policy would not impact upon the objective

SA Table 13: Consideration of Development at Lewes Town

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
1.Housing	+	+	+	Whilst such an option would increase housing provision in Lewes Town, it would not deliver enough to meet the housing needs of the town.	++	++	++	This option would increase housing provision in Lewes Town and would deliver housing at a rate suitable to meet the identified housing needs of the town.
2.Deprivation	+	+	+	High house prices prevent those with low incomes accessing the housing market in Lewes Town. The option is unlikely to address the issue as it is not meeting the housing needs of the town. Development could however be brought forward in some of the deprived areas of the town, helping to close the gap between other areas of the district.	++	++	++	High house prices prevent those with low incomes accessing the housing market in Lewes Town. This option should bring forward a level of housing that should help address the issue. Furthermore, Lewes is home to some deprived areas and development could help close the gap between the other areas of the district.
3.Travel	0	0	0	It is not thought that this option would impact on this objective	0	0	0	It is not thought that this option would impact on this objective
4.Communities	?	?	?	It is not known the impact on this objective as this quantum of development may or may not bring forward additional community services. The option would likely bring forward development in keeping with the town and therefore is less likely to negatively impact on this objective.	-?	-?	-?	It is not known the impact on this objective as this quantum of development may or may not bring forward additional community services. The option would likely deliver some development that would not be in keeping with the town which may impact on the happiness of the local community. Development at this rate may lead to homes coming forward on areas of open space, given the lack of space within the town.
5.Health	0	0	0	It is not thought that this option would	0	0	0	It is not thought that this option would impact on

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				impact on this objective				this objective
6.Education	0	0	0	It is not thought that this option would impact on this objective	0	0	0	It is not thought that this option would impact on this objective
7.Land Efficiency	+	+	+	Such an option promotes development in the existing footprint of the town, and thus development should generally come forward on brownfield land.	-	-	-	Development at a high rate will mean that a large portion of development would likely come forward on greenfield land, some of which may be good quality agricultural land.
8.Biodiversity	0	0	0	This option is unlikely to impact on this objective.	-	-	-	This option could mean development coming forward at a rate that would impact the Lewes Downs SAC negatively, if not mitigated against.
9.Environment	0	0	0	This option should not impact on this objective, as it would accord with the National Park purposes and not impact on highly sensitive landscapes.	-	-	-	This option is likely to significantly impact on this objective by permitting development on sensitive landscapes and bringing forward development that would go against National Park purposes.
10.Waste	0	0	0	It is not thought that this option would impact on this objective	0	0	0	It is not thought that this option would impact on this objective
11.Water	0	0	0	It is not thought that this option would impact on this objective	0	0	0	It is not thought that this option would impact on this objective
12.Energy	0	0	0	It is not thought that this option would impact on this objective	0	0	0	It is not thought that this option would impact on this objective
13.Air Quality	0	0	0	Development at this level may impact on the AQMA, if not mitigated against.	0	0	0	Development at this level may impact on the AQMA, if not mitigated against.
14.Flooding	+	+	+	Development in flood risk zones would have to bring forward mitigation/defences and thus the option is seen positively.	+	+	+	Development in flood risk zones would have to bring forward mitigation/defences and thus the option is seen positively.
15.Coastal Erosion	0	0	0	The option would not impact on this objective.	0	0	0	The option would not impact on this objective.
16.Economy	+	+	+	This option should add to the customer base for shops and services, a positive for this objective.	-	-	-	While this option would substantially add to the customer base for shops and services, development at this level would likely mean that housing comes forward on employment land and constrains land available for additional employment uses. Therefore the option is seen negatively.
17.Tourism	0	0	0	It is not thought that the option would impact on this objective.	-	-	-	Development on sensitive landscape areas is likely to make Lewes less attractive for tourists and could negatively affect the tourism industry.

SA Table 14: North Street Options Appraisal – Option A

Objectives	Option A			Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought that this option would impact on this objective.
2.Deprivation	0?	0?	0?	It is not thought that that this option would have a direct impact on this objective. However, the North Street site is located within Lewes Castle Ward, which does contain one of the most deprived lower super output areas in the district. Therefore, development at this location may have a positive impact as an indirect consequence, for example creating jobs for local residents.
3.Travel	0	0	0	Continuing with the current policy is unlikely to have an effect on the indicators linked to this objective.
4.Communities	0	0	0	It is not thought that this option would impact on this objective.
5.Health	0	0	0	It is not thought that this option would impact on this objective.
6.Education	0	0	0	It is not thought that this option would impact on this objective.
7.Land Efficiency	++	++	++	The North Street area is currently developed and so this option would ensure that large development is located on brownfield land. Vacant properties may also be brought back into use as existing properties are upgraded and redeveloped.
8.Biodiversity	0	0	0	It is not thought that this option would impact on this objective.
9.Environment	0	0	0	It is not thought that this option would impact on this objective, although any new development would need to consider the nearby Lewes conservation area.
10.Waste	0	0	0	It is not thought that retaining the current policy would have an effect on this objective, either positively or negatively.
11.Water	0	0	0	It is not thought that retaining the current policy would have an effect on this objective, either positively or negatively.
12.Energy	0	0	0	It is not thought that retaining the current policy would have an effect on this objective, either positively or negatively.
13.Air Quality	0	0	0	Although the site is site is not located in an AQMA, most traffic to the site will pass through the AQMA In Lewes town. Keeping the current Local Plan policy, therefore, is likely to maintain the current levels of traffic and thus the high levels of nitrogen dioxide emissions.
14.Flooding	-	-	-	The North Street site is located in a grade 3a flood zone. No upgraded hard flood defences are included in this option and so maintaining the current Local Plan policy would likely put existing premises (mainly businesses) at risk of flooding. Also, with the climate change likely to increase the frequency of flood events, this option is likely to have a negative impact on this objective.
15.Coastal Erosion	0	0	0	This option would impact on this objective.
16.Economy	+	+	+	The Employment and Economic Land Assessment identified that Lewes town has a qualitative shortfall in employment space, particularly office accommodation. This option seeks to upgrade and redevelop current employment units, therefore meeting the qualitative shortfall and promoting economic growth. Having employments premises suitable for modern business use should also help to attract businesses in emerging markets, which should help sustain growth into the future.
17.Tourism	0	0	0	It is not thought that this option would impact on this objective.

SA Table 15: North Street Options Appraisal – Option B

Objectives	Option B			Explanation
	S	M	L	
1.Housing	++	++	++	This option is likely to provide a significant amount of housing, including affordable housing, in a location where a significant housing need exists. Development at this site would be deliverable in the short term.
2.Deprivation	+?	+?	+?	The Indices of Multiple Deprivation (IMD) is a tool used to measure the most disadvantaged areas in England. The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation. Therefore, it is not thought that this option would have a direct impact on this objective. However, the North Street site is located in Lewes Castle Ward, which does contain some of the most deprived lower super output areas in the district, and therefore it is possible that this option could have an indirect positive impact in terms of improving access to affordable housing, as well as associated infrastructure and jobs that could improve the area.
3.Travel	+?	+?	+?	<ul style="list-style-type: none"> - The site benefits from good public transport access being located within 700m of both the bus and train stations in Lewes town. - Also, a number of local services, facilities and employment centres are located nearby; reducing the need for motorised transportation. - Development at the site would include sustainable transport infrastructure. - The site has decent access to the trunk road network (A26/A27), although this is via town centre streets that are prone to congestion, especially at peak times.
4.Communities	?	?	?	It is not thought that this option would have a direct impact on this objective, although new community facilities may be provided alongside the redevelopment of the site. In addition, this option offers the opportunity to improve the townscape, including public realm, of this part of the town. This could result in improving people's satisfaction in the place in which they live.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	-?	-?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that development at the site may result in a possible short-term and long-term shortfall in primary school educational provision which may need addressing. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	++	++	++	The North Street site is currently developed, as well as including a number of vacant and derelict units, and so this option would be making good use of brownfield land.
8.Biodiversity	0	0	0	The site is not located within, or adjacent to, any international, national or local biodiversity designations
9.Environment	+?	+?	+?	Opportunities to improve the townscape of this part of Lewes are presented through this option. In turn, this has the potential to improve the setting for listed buildings that are either on, or within the vicinity of the site, as well as the Lewes Conservation Area. The improved riverside access, as proposed with this option, may have a positive effect by increasing access to parts of the National Park by sustainable means.
10.Waste	?	?	?	It is not possible to know the effects on this objective. It is likely that the additional homes would lead to an increase in domestic waste being produced on site, although industrial waste is likely to be reduced as employment land is lost. It may also be the case that the current recycling centre on site is relocated as part of the redevelopment of the area, and so the effects are uncertain.

Objectives	Option B			Explanation
	S	M	L	
11. Water	?	?	?	It is not known whether there would be a net increase in water usage should the site be developed in line with this option. Also, any redevelopment of the site offers the opportunity to remediate known contaminated sites. Contaminated sites run the risk of polluting both ground and surface waters, hence remediating the sites could have a positive impact upon water quality.
12. Energy	?	?	?	It is not possible to specify whether development at this site will increase/decrease energy consumption. Any increase in energy generation is likely to be offset as new homes and employment units will be built to high energy efficiency standards. Also, it possible that a significant amount of energy will be sourced from renewables.
13. Air Quality	?	?	?	Although not in an AQMA, most private travel to the site will pass through the AQMA in Lewes Town. As the designation of the AQMA is largely as a result of traffic emissions, the impact of this option could impact upon this objective. Any negative impacts would be expected to be mitigated through the Action Plan. It will only be possible to determine the full impact upon this objective at a more detailed planning stage..
14. Flooding	++	++	++	This option would include upgraded flood defences within a flood zone 3A area, as such it would reduce this part of the towns susceptibility to flood risk.
15. Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.
16. Economy	0	0	0	The Employment and Economic Land Assessment identified that Lewes town has a qualitative shortfall in employment space, particularly office accommodation. This option will provide some new employment space (particularly office units) that is likely to be of a higher quality and more suited to modern business needs than existing units, thereby helping to address the aforementioned shortfall. However overall, the quantity of employment space could be reduced, maybe causing some existing businesses to be relocated.
17. Tourism	0	0	0	It is not thought that this option would impact on this objective.

SA Table 16: North Street Options Appraisal – Option C

Objectives	Option C			Explanation
	S	M	L	
1. Housing	0	0	0	This option would not bring forward any new housing and thus does not impact on this objective.
2. Deprivation	0	0	0	It is not thought that this option would impact on this objective.
3. Travel	-?	-?	-?	This option would reduce the need to travel to and from the North Street area by all means of transport and so would reduce congestion. However, there is a possibility that existing businesses will be relocated to sites that are less accessible by public transport, and so impacting negatively on this objective.
4. Communities	0?	0?	0?	This option may result in the creation of public open space.
5. Health	0	0	0	It is not thought that this option would impact on this objective.
6. Education	0	0	0	It is not thought that this option would impact on this objective.
7. Land Efficiency	■	■	■	Clearing the site would have a negative impact on this objective as it would place more pressure on greenfield land, which may be of a high agricultural quality, to accommodate new development within the district.
8. Biodiversity	+	+	+	Restoring the flood plain may create habitats that would enhance the biodiversity of the area.
9. Environment	+	+	+	The improved riverside access, as proposed with this option, may have a positive effect by increasing access to

Objectives	Option C			Explanation
	S	M	L	
				parts of the National Park by sustainable means. It will also improve the aesthetic value of the area.
10.Waste	+	+	+	This option would reduce the amount of waste being generated on the site. However, it would also mean that the recycling centre would need to be relocated.
11.Water	+	+	+	This option would lead to a reduction in water use as existing businesses are relocated. It is not thought that this option would harm or improve water quality.
12.Energy	++	++	++	Clearing the North Street area would reduce the energy consumed on site and so would score positively.
13.Air Quality	++	++	++	Implementing this option would likely reduce the number of journeys that travel to the site and through the AQMA area and so may result in improved air quality.
14.Flooding	++	++	++	Effectively restoring the flood plain would allow flooding to occur at the site, thus reducing the risk in other areas.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy				This option is likely to have a negative effect on the local economy as employment space is lost in an area where there is a specified need.
17.Tourism	+	+	+	This option would improve the appearance of the site and the riverside area; consequently making it a more attractive area for tourist visits. Also, adding to parking provision would increase the amount of visitors the town could accommodate, helping to facilitate any growth within the local tourism sector.

SA Table 17: North Street Options Appraisal – Option D

Objectives	Option D			Explanation
	S	M	L	
1.Housing	0?	0?	0?	It is not clear what type development this site would bring forward, but it is unlikely to bring about a significant amount of housing.
2.Deprivation	0	0	0	It is not thought that the flood resilient development brought forward would have any impact on this objective.
3.Travel	-?	-?	-?	This option would reduce the need to travel to and from the North Street area by all means of transport and so would reduce congestion. However, there is a possibility that existing businesses will be relocated to sites that are less accessible by public transport, and so impacting negatively on this objective.
4.Communities	0	0	0	It is not thought that this option would have an impact on this objective.
5.Health	0	0	0	It is not thought that this option would have an impact on this objective.
6.Education	0	0	0	It is not thought that this option would have an impact on this objective.
7.Land Efficiency				Clearing the site may have a negative impact on this objective as it would place more pressure on greenfield land, which may be of a high agricultural quality, to accommodate new development within the district.
8.Biodiversity	+	+	+	Restoring the flood plain may create habitats that would enhance the biodiversity of the area.
9.Environment	+	+	+	The improved riverside access, as proposed with this option, may have a positive effect by increasing access to parts of the National Park by sustainable means. It will also improve the aesthetic value of the area.
10.Waste	+	+	+	This option would reduce the amount of waste being generated, although not entirely. It may also mean that the recycling centre would need to be relocated.
11.Water	0	0	0	Although water consuming businesses will be cleared of the site, this option may possibly lead to some small-scale housing, which is likely to result in an increase in water usage. However, this is thought to be minimal

Objectives	Option D			Explanation
	S	M	L	
				given the insignificant number of housing units likely to be delivered and improvements to water conservation standards as a result of meeting the Code for Sustainable Homes. Also, it is not thought that this option would harm or improve water quality.
12.Energy	+	+	+	Clearing the North Street area would reduce the energy consumed on site and so would score positively, although to a lesser scale than Option C as some businesses would remain and there would be the possibility of small-scale housing.
13.Air Quality	++	++	++	Implementing this option would likely reduce the number of journeys that travel to the site and through the AQMA area and so may result in improved air quality.
14.Flooding	++	++	++	The collection of measures instigated by Option D would reduce the likelihood of flooding, not only on the site, but also in the wider area.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	-?	-?	-?	This option would bring about partial clearing of the site, resulting in a loss of employment land in an area of specified need, although some units would be kept.
17.Tourism	+	+	+	This option would improve the appearance of the site and the riverside area; consequently making it a more attractive area for tourist visits.

SA Table 18: Site A Appraisal - Old Malling Farm

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	This site has the potential to deliver approximately 225 dwellings in an area of need as Lewes Town has a relatively large proportion of households on the housing register in comparison to other towns within the district. Any development on this site would also help meet affordable housing needs.
2.Deprivation	0	0	0	The Indices of Multiple Deprivation (IMD) is a tool used to measure the most disadvantaged areas in England. The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation.
3.Travel	+?	+?	+?	Access to the site would be achieved from Old Malling Way and/or Monks Way and therefore improved access point(s) would need to be created. <ul style="list-style-type: none"> - The nearest train and bus stations in the town centre are over 800m away which may encourage private transport. - There are a number of bus routes which run down Malling Way - There are a number of local services within 800m of the site. - However, it is likely that a residential development here would include an increase in sustainable transport options. - It is possible to travel to and from the site without entering the often congested streets of the town centre.
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and facility provision.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is a possible

Objectives				Explanation
	S	M	L	
				short-term shortfall in primary school educational provision in Lewes town, however, they believe this could be mitigated by existing spaces at certain schools and by considering expansion. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	■	■	■	The site is a greenfield site that is home to high quality (grade 2) agricultural land. This is seen as significant negative in terms of this objective.
8.Biodiversity	-	-	-	This site is located next to a Site of Nature Conservation Importance (SNCI). In addition the Offham Marshes SSSI is located on the opposite side of the River Ouse. An ecological report has been carried out on behalf of the land owner, that notes that badgers are established in the area.
9.Environment	-?	-?	-?	This site is located in the South Downs National Park. The sensitivity of the site to development is uncertain although a Landscape and Visual Assessment of the Old Malling Farm site was recently carried out by the SDNPA. The report suggested that the site (particularly the north field) is visible from significant parts of the National Park, and that it is unlikely that significant mitigation measures could be achieved. The Landscape Capacity Study also identified the most northern part of the site to be the most sensitive in landscape terms but found the site overall to have a medium capacity for change, being less sensitive than other sites around Lewes.
10.Waste	0	0	0	Development at Old Malling Farm, as at other sites, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.
11.Water	0	0	0	Development at Old Malling Farm, as at other sites, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at Old Malling Farm, as at other sites, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	?	?	?	It is not thought that development at this site would impact significantly on the Lewes town AQMA. Due to it's location, traffic from the site would likely use the Cuilfail tunnel access point as opposed to driving through the town centre (where the AQMA lies).
14.Flooding	0	0	0	A small section of this site lies within an area of flood risk, although it is considered possible that this site could be developed for residential uses whilst avoiding the area at risk.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	Development at this site does not have an impact on this objective.

SA Table 19: Site B Appraisal - South of Lewes Road

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The site, if fully developed, could bring about up to 154 homes, a large portion of which would be affordable. Ringmer, and the wider housing market area, has a significant need for housing and has a relatively large number on the Housing Register, and so delivering this site could ease this pressure.
2.Deprivation	0	0	0	In terms of barriers to housing and services (an IMD indicator), the lower super output area (LSOA) in which this site lies is not located in an area of relative deprivation. In regards to overall deprivation levels, this site is also not considered to be located in an area of relative deprivation.

Objectives				Explanation
	S	M	L	
3.Travel	0?	0?	0?	<ul style="list-style-type: none"> - Ringmer does not benefit from access to a railway station - There is access to regular bus services (within 800m). - The site is located approximately 800m from local services, and so there is a possibility that residents would use sustainable transport modes (i.e. walking/cycling). - Also, a development of this size at this location would be expected to make improvements to sustainable transport provision and specifically in this case help facilitate the completion of the Ringmer to Lewes cycleway. - Development is likely to add to the congestion at the A26/B2192 junction, however mitigation measures to congestion hotspots such as Earwig Corner would be provided.
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and satisfaction but it may cause an opposite, negative effect, by adding strain to community services.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is a short-term shortfall in primary school provision in Ringmer. However, they believe this could be mitigated by mobile classroom provision and consideration of school enlargement. Therefore, a shortfall in the medium to long-term is unlikely. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	-?	-?	-?	The site is located on greenfield and so must be appraised negatively. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land.
8.Biodiversity	0	0	0	Work for the Habitats Regulations Assessment has found that development at this site, in combination with development elsewhere, would not have a significant negative effect the Lewes Downs SAC. The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	0	0	0	This site is categorised as having a medium capacity for change in the Landscape Capacity Study, meaning that the principle of development would be acceptable in landscape terms and would not have a noticeable negative affect on this objective. Two Grade 2 listed buildings located adjacent to north west part of site. Development will need to consider impact on setting of buildings. Site is not within a national or international environmental designation. East boundary of site lies adjacent to a site of archaeological interest.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact on this objective.
14.Flooding	+	+	+	The Strategic Flood Risk Assessment does not identify the site as an area at risk from flooding, although following consultation on the Emerging Core Strategy, it was noted that surface flooding has occurred there in the past and so improvements to the drainage of the site would need to be included if developed. This could be viewed as a positive impact of development.
15.Coastal	0	0	0	Development at this site does not have an impact on this objective

Objectives	S	M	L	Explanation
	Erosion			
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 20: Site C Appraisal - North of Bishops Lane

Objectives	S	M	L	Explanation
	1.Housing	++?	++?	
2.Deprivation	?	?	?	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation. This option has no clear impact on this objective.
3.Travel	+?	+?	+?	<ul style="list-style-type: none"> - Ringmer does not benefit from access to a railway station - There is access to regular bus services (within 800m). - Local services are located within walking distance, which would help to support sustainable transport (i.e. walking/cycling) and reduce the need to travel. - A development of this size would be expected to make improvements to sustainable transport provision, which in this case could help facilitate the completion of the Ringmer to Lewes cycleway. - Development at this location will add to the congestion at A26/B2192 junction, however, this impact would expect to be mitigated
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development, in comparison to the western section of the North of Bishops Lane site, could help retain/increase community service and satisfaction but it may cause an opposite, negative effect, by adding strain to community services.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is a short-term shortfall in primary school provision in Ringmer. However, they believe this could be mitigated by mobile classroom provision and consideration of school enlargement. Therefore, a shortfall in the medium to long-term is unlikely. There is no such shortfall regarding secondary school facilities.

Objectives				Explanation
	S	M	L	
7.Land Efficiency	-?	-?	-?	The North of Bishops Lane site is mainly located on greenfield land and thus development on it is seen negatively in respect of this objective. However, there is a possibility that the site will also include a section of brownfield land (Diplocks Industrial Estate). As for the greenfield land, the site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land.
8.Biodiversity	+	+	+	Work for the Habitats Regulations Assessment has found that development at this site, in combination with development elsewhere, would not have a significant negative effect on the Lewes Downs SAC. The site is in the vicinity of the Lewes Downs Biodiversity Opportunity Area and there is a partly culverted ditch on the site that development may facilitate the opening up of, creating an improved biodiversity corridor. The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	0	0	0	This site is categorised as having a medium capacity for change in the Landscape Capacity Study meaning that the principle of development should be acceptable in landscape terms. There are grade II listed buildings within the vicinity of the site but it is thought that any adverse impact on these could be landscape/signed out.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact on this objective.
14.Flooding	+	+	+	This site is not located within an area at risk of flooding, as identified in the District Council's Strategic Flood Risk Assessment, and so does not impact on this objective. There have been incidences of surface water flooding recorded on and within the vicinity of the site, although a formalised drainage system is likely to aid in rectifying these problems.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services within Ringmer; which could have the knock on effect of supporting these facilities and the jobs they support. However, there is also the possibility that employment land and jobs at the Diplock Industrial Estate will be lost.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 21: Site D Appraisal - Fingerpost Farm

Objectives

	S	M	L	Explanation
1.Housing	+	+	+	The Fingerpost Farm site is being considered for approximately 100 dwellings, within which affordable housing would be provided. Ringmer, and the wider housing market area, has a significant need for housing and has a relatively large number on the Housing Register and so delivering this site could ease this pressure.
2.Deprivation	?	?	?	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels. The lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation.
3.Travel	0?	0?	0?	<ul style="list-style-type: none"> - Ringmer does not benefit from access to a railway station. - There is access to regular bus services (within 800m). - Local services are not quite within 800 metres of the site, although it is likely that these services are close enough to encourage sustainable transport (i.e. walking/cycling) to these services. - A development of this size would be expected to make improvements to sustainable transport provision, and specifically in this case would help facilitate the completion of the Ringmer to Lewes cycleway. - Development at this location is likely to add to the congestion at A26/B2192 junction; however this would be expected to be mitigated.
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and satisfaction but it may cause an opposite, negative effect, by adding strain to community services.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is a short-term shortfall in primary school provision in Ringmer. However, they believe this could be mitigated by mobile classroom provision and consideration of school enlargement. Therefore, a shortfall in the medium to long-term is unlikely. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	-?	-?	-?	The Fingerpost Farm site is located on greenfield land and thus development on it is seen negatively in respect of this objective. The site is classified as Grade 3 Agricultural Land, although it is not considered high quality agricultural land.
8.Biodiversity	0?	0?	0?	Work for the Habitats Regulations Assessment has found that development at this site, in combination with development elsewhere, would not have a significant negative effect on the Lewes Downs SAC. The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	0	0	0	The site is categorised as having a medium capacity to change in the Landscape Capacity Study, meaning that the principle of development should be acceptable in landscape terms. There is a Grade 2 listed building along south east boundary of site, which development should not impact on. The site is not within, or adjacent to, a national or international designation.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact this objective.
14.Flooding	+	+	+	The Fingerpost Farm site is located on the border of a Flood Zone 3 designated area which follows Norlington Stream. Although

Objectives	S	M	L	Explanation
				the SFRA suggests that the flood zone does not extend into the site, local opinion suggests that recurrent flooding does take place. Thus, if development would occur here it would have to rectify the existing issues.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 22: Site E Appraisal - Valley Road

Objectives	S	M	L	Explanation
1.Housing	+	+	+	The Valley Road site can deliver up to 158 homes. If developed the site would also bring about affordable housing provision which could help to reduce the number on the housing needs register which currently stands at 255 households in Peacehaven.
2.Deprivation	+	+	+	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation. However, the town of Peacehaven does contain a number of the District's most deprived Super Output Areas and so development within the town may have wider benefits in relation to this objective.
3.Travel	0?	0?	0?	<ul style="list-style-type: none"> - Peacehaven does not have a train station (the nearest being approximately 5 miles away at Newhaven). - There are bus services which run along Telscombe Road (within 800m). - There is a local shop relatively close, however, the Meridian Centre is approximately 1.5 miles away, which although just within 30 minutes walking time, is likely to be far enough away to encourage private transport. - A development of this size would be expected to make improvements to sustainable transport provision as well as road upgrading.
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and satisfaction but it may cause an opposite, negative effect, by adding strain to community services.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicated that there should be no such shortfall in primary school provision (although places may be tight). The long-term situation is unknown. A possible medium-term shortfall in secondary school provision is possible.
7.Land Efficiency	-	-	-	The site is located on greenfield land and so must be appraised negatively, although it is low quality agricultural land.
8.Biodiversity	0?	0?	0?	It is not thought that development at this site would have an impact on this objective. There is a SNCI at Halcombe Farm which is in the vicinity but this is unlikely to be affected by development. There are no national or international designations within the site.
9.Environment	-?	-?	-?	This site was categorised as having a low/medium capacity for change in the Landscape Capacity Study, meaning that certain parts of the area may be unsuitable for development in landscape terms, or would need to be brought forward at a relatively low density. There are also half a dozen Tree Preservation Order (TPO) group designations within the Valley Road area that may be affected by development at the site.

Objectives				Explanation
	S	M	L	
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. The District Council's waste and recycling services will help mitigate against this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact on this objective.
14.Flooding	0	0	0	It is not thought that this policy would impact on this objective.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 23: Site F Appraisal - Lower Hoddern Farm

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	The Lower Hoddern site has the potential to deliver 350 dwellings, which would include a proportion of affordable housing units, thus helping to reduce the number on the housing needs register in Peacehaven (currently 255 households).
2.Deprivation	+	+	+	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as the overall deprivation score, the lower super output area (LSOA) in which this site lies is located in an area of relative deprivation. Development at this location could therefore have a positive impact on this objective and allow access to the housing market. In addition, in relation to overall deprivation levels, this site is situated in the District's most deprived LSOA, and so locating development at this site may have wider benefits.
3.Travel	0?	0?	0?	<ul style="list-style-type: none"> - Development at this location of 350 units would, as outlined by the County Council, have a negative impact on the local transport network (A259). - This site is not located near to rail services (the nearest approximately 3 miles away at Newhaven). - There are frequent bus services to Brighton and Newhaven within 800m of the site - The site does benefit from close proximity to the Meridian Centre, where residents of any development would be able to access local services - A development of this size would be expected to make improvements to sustainable transport provision. - Vehicular access to the site is good, with the nearby A259 allowing for access to the trunk road network; although this route does suffer from congestion at peak times.
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and facility provision.
5.Health	0	0	0	The affect housing growth would have on this objective is not known. It is possible that new development would support the

Objectives				Explanation
	S	M	L	
				creation/retention of health services or, conversely, it could add further strain to such services.
6.Education	0?	0?	0?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicated that there should be no such shortfall in primary school provision (although places may be tight). The long-term situation is unknown. A medium-term shortfall in secondary school provision is possible.
7.Land Efficiency	■	■	■	This site is located on high quality agricultural land that would be lost, as well as on a greenfield site, and so is appraised negatively.
8.Biodiversity	0	0	0	It is not thought that development at this site would impact on this objective.
9.Environment	-?	-?	-?	The Landscape Capacity Study characterises this site as having a low-medium capacity for change, and thus development here could have a noticeable negative impact on this objective if the design/site layout doesn't respect the landscape qualities of the area. Mitigation is possible without compromising the character of the area.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact this objective.
14.Flooding	0	0	0	This site is not located within an area at risk of flood and so does not impact on this objective.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	++	++	++	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs. It is possible that development could have significant benefits to Peacehaven in this respect and could help to promote growth in the local economy.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 24: Site G Appraisal - Land East of Valebridge Road

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The site off Valebridge Road has the potential to deliver up to 150 dwellings which could ease the housing needs register within the district (meeting the district need, not necessarily the local).
2.Deprivation	?	?	?	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation.
3.Travel	+?	+?	+?	In terms of public transport, the site is reasonably well provided for. - The site is located within 800m of bus and train provision (Wivelsfield train station) - The nearest local amenities are approximately 0.9 miles away (above the recommended distance of 800m) from the site and Burgess Hill town centre is approximately 1.5 miles away. However, Burgess Hill is home to higher order services and thus long,

Objectives				Explanation
	S	M	L	
				private journeys are less likely. - Development at this scale and location would likely impact on the road network and a transport assessment would be required. The completion of the Haywards Heath Relief Road (scheduled for 2017) would be necessary prior to development on this site. - A development of this size would be expected to make improvements to sustainable transport provision.
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and facility provision.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is no short-term shortfall in primary school educational provision at Wivelsfield Primary, and so mitigation measures were not considered. However, it was accepted that in the long-term development at this location may put pressure on educational provision at Wivelsfield Primary which is close to capacity. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	-?	-?	-?	The site is located on greenfield land and thus development on it is seen negatively in respect of this objective. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land.
8.Biodiversity	-?	-?	-?	The site does contain patches of ancient woodland that would need to be buffered from development. The site should not have a significant impact on the Bedelands SNCI which is on the opposite side of Valebridge Road and across the railway line.
9.Environment	0	0	0	This site was categorised as having a medium-high capacity for change in the Landscape Capacity Study, meaning that the principle for development should be acceptable in landscape terms.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact this objective.
14.Flooding	0	0	0	This site is not located within an area at risk of flood and so does not impact on this objective.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 25: Site H Appraisal - Land at Greenhill Way/Ridge Way

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The area of land at Greenhill Way has the potential of delivering up to 140 dwellings. This would include affordable housing which could ease the housing needs register within the district (meeting the district need, not necessarily the local). Development would

Objectives				Explanation
	S	M	L	
				be deliverable in the short-medium term and is dependent on the Haywards Heath Relief Road which is scheduled for completion in 2017.
2.Deprivation	0	0	0	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation.
3.Travel	+?	+?	+?	<ul style="list-style-type: none"> - The site at Greenhill/Ridge Way is located approximately 2 miles from Haywards Heath train station (in excess of the recommended 800m), but is just within 800m from the nearest bus stop on the A272. However, the train station does have excellent links to other areas (London, Gatwick Airport etc) which is likely to minimise the need to travel large distances by unsustainable means. - The nearest local services are approximately 1 mile from the site and the town centre is 1.2 miles away (in excess of the recommended 800m). However, although this optimum distance is exceeded, this is somewhat balanced by the wider variety of services, retail provision, employment opportunities etc available at Haywards Heath. - A development of this size would be expected to make improvements to sustainable transport provision. - Development at this scale and location would likely impact on the road network and a Transport Assessment would be required. <p>The completion of the Haywards Heath Relief Road (scheduled for 2017) would be necessary prior to development on this site.</p>
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and facility provision.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	0?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is no short-term shortfall in primary school educational provision at Wivelsfield Primary, and so mitigation measures were not considered. However, it was accepted that in the long-term development at this location may put pressure on educational provision at Wivelsfield Primary which is close to capacity. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	-	-	-	The site is located on greenfield land and thus development on it is seen negatively in respect of this objective. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land.
8.Biodiversity	0?	0?	0?	It is not thought that development at this site would have an impact on this objective. There are no national or international designations within the site. There is a patch of ancient woodland nearby, although it is believed that any potential impacts could be mitigated.
9.Environment	0	0	0	The site is identified as having a medium-high capacity for change in the Landscape Capacity Study, meaning that the principle of development should be acceptable in landscape terms.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact this objective.

Objectives	S	M	L	Explanation
	14.Flooding	0	0	
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective.
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 26: Site I Appraisal - Land at Harbour Heights

Objectives	S	M	L	Explanation
	1.Housing	0?	0?	
2.Deprivation	-?	-?	+	When considering affordability and the ability to access owner-occupation, the IMD does not identify the LSOA in which the site lies (Newhaven Denton and Meeching) to be located in an area of relative deprivation - although when considering overall deprivation levels, the site is located in the second most deprived LSOA in the district and within the 30% most deprived in the UK. In theory developing this site may have wide benefits, such as attracting people to the area, increasing the tax base and encouraging further development and investment in Newhaven. However, it seems unlikely that the housing market could deliver this site in the short or potentially medium term alongside other planned developments and thus allocating the site in the short term could prevent some regeneration projects from coming forward.
3.Travel	0	0	0?	<ul style="list-style-type: none"> - The main access to the site would likely be via Court Farm Road. There is also a possibility that a thoroughfare may run from this access point to the school access road/ onto Gibbon Road. - The site is approximately 1.2 miles of Newhaven Train Station (in excess of the recommended 800m) - The site is well served by bus transport provision, with links on either side of the site. - The nearest local services at Newhaven town centre are over 800m from the site. - Due to existing transport infrastructure constraints at Newhaven, it is likely that development of this scale and nature would lead to further congestion on the A259; however improvements to the transport infrastructure are likely to mitigate any potential negative impacts. - This option would likely include improvements to sustainable transport provision.
4.Communities	+?	+?	+?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and facility provision. Also, development is likely to require additional open space/recreation as part of proposals as there is currently a shortage in the town.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	0?	0?	East Sussex County Council (the local education authority), in their School Organisation Plan, indicated that there is a short-term shortfall in primary school provision in Newhaven. However, ESCC believe this could be mitigated in the medium to long-term by existing spaces at certain schools and the use of mobile classrooms. There is no such shortfall regarding secondary school

Objectives	S	M	L	Explanation
7.Land Efficiency	-	-	-	The majority of the site is located on greenfield land; however the eastern section is currently employment land. No high value agricultural land would be lost.
8.Biodiversity	0?	0?	0?	The site is located nearby to a number of SNCI's, a Local Nature Reserve and the Brighton to Newhaven Cliffs SSSI although it is not thought they would be impacted on by development at the site. It is likely that development would include a buffer zone from the cliff edge, near to the SSSI. There are no designations on the site itself.
9.Environment	-?	-?	-?	The section of the site that has already been allocated in the Local Plan is the area which may impact most upon the valued landscape (including the National Park) surrounding the site. The site was assessed as having a low to medium capacity for change in the Landscape Capacity Study, meaning that development will need to be sensitive to its location and landscape qualities (in terms of type, design and density etc). Mitigation measures would be required to reduce the visual impact from vantage points such as Newhaven Fort.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.
11.Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact on this objective.
14.Flooding	0	0	0	It is not thought that development at this location would impact on this objective.
15.Coastal Erosion	0?	0?	0?	The south western corner of the site lies just outside the indicative erosion zone up to 2105 outlined in the 2006 Beachy Head to Selsey Bill Shoreline Management Plan. Therefore, there is a possibility this section of the site could be impacted on by coastal erosion. Development is however likely to include a buffer zone from the cliff edge.
16.Economy	-	-	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs. However in the short and potentially medium term this development could potentially impact on other, regenerative schemes in Newhaven coming forward.
17.Tourism	0	0	0	It is not thought that development at this location would impact this objective.

SA Table 27: Site J Appraisal - North of Bishops Lane (Western Section)

Objectives	S	M	L	Explanation
1.Housing	+	+	+	Development at this location would deliver up to 120 units. Ringmer, and the wider housing market area, has a significant need for housing and has a relatively large number on the Housing Register and so delivering this site could ease this pressure. Any development here would help meet affordable housing need. The smaller western section of the North of Bishops Lane site is seen as more of a distinct site that has a higher delivery potential than the North of Bishops Lane site as a whole.

Objectives				Explanation
	S	M	L	
2.Deprivation	?	?	?	The IMD measures the barriers to housing and services when determining deprivation levels. In terms of the wider barriers sub-domain (which considers affordability and ability to access owner-occupation), as well as overall deprivation levels, the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation. This option has no clear impact on this objective.
3.Travel	+	+	+	<ul style="list-style-type: none"> - Ringmer does not benefit from access to a railway station - There is access to regular bus services (within 800m). - Local services are located within walking distance, which would help to support sustainable transport (i.e. walking/cycling) and reduce the need to travel. - A development of this size would be expected to make improvements to sustainable transport provision, which in this case could help facilitate the completion of the Ringmer to Lewes cycleway. - Development at this location will add to the congestion at A26/B2192 junction, however, this impact would expect to be mitigated
4.Communities	?	?	?	The impact on this objective cannot be fully established at this stage (this is likely to be determined once the development is operational). However, increased residential development could help retain/increase community service and satisfaction but it may cause an opposite, negative effect, by adding strain to community services.
5.Health	0	0	0	The NHS does not believe that development at this location, and of this scale, would impact on health services in the area.
6.Education	-?	0?	0?	East Sussex County Council (the local education authority), in their School Observation Plan, indicated that there is a short-term shortfall in primary school provision in Ringmer. However, they believe this could be mitigated by mobile classroom provision and consideration of school enlargement. Therefore, a shortfall in the medium to long-term is unlikely. There is no such shortfall regarding secondary school facilities.
7.Land Efficiency	-?	-?	-?	The western section of the North of Bishops Lane site is located on greenfield land and thus development on it is seen negatively in respect of this objective. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land.
8.Biodiversity	+	+	+	Work for the Habitats Regulations Assessment has found that development at this site, in combination with development elsewhere, would not have a significant negative effect on the Lewes Downs SAC. The site is in the vicinity of the Lewes Downs Biodiversity Opportunity Area and there is a partly culverted ditch on the site that development may facilitate the opening up of, creating an improved biodiversity corridor. The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	0	0	0	This site is categorised as having a medium capacity for change in the Landscape Capacity Study meaning that the principle of development should be acceptable in landscape terms. There are grade II listed buildings within the vicinity of the site but it is thought that any adverse impact on these could be landscape/managed out.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact.

Objectives				Explanation
	S	M	L	
11. Water	0	0	0	Development at this site, as with the other sites appraised, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12. Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13. Air Quality	0	0	0	It is not thought that development at this location would impact on this objective.
14. Flooding	+	+	+	This site is not located within an area at risk of flooding, as identified in the District Council's Strategic Flood Risk Assessment, and so does not impact on this objective. There have been incidences of surface water flooding recorded on and within the vicinity of the site, although a formalised drainage system is likely to aid in rectifying these problems.
15. Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16. Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services within Ringmer; which could have the knock on effect of supporting these facilities and the jobs they support.
17. Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

SA Table 28: Affordable Housing Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1. Housing	+	+?	+?	By lowering the threshold of developments that would be required to deliver affordable housing in rural areas to 5, the option would likely increase the numbers of affordable homes delivered in the rural areas above the current level – a positive for this indicator. Whilst the policy is likely to increase affordable housing provision in the towns too with a higher requirement, viability studies indicate that a greater percentage could be asked for. In addition, the high threshold of 15 units means that a large number of potential affordable homes would not come forward in urban areas. Given that the economic conditions are likely to change over the period of the plan, there is some uncertainty over the medium and long-term impact of the approach.	++	++?	++?	By lowering the threshold of developments that would be required to deliver affordable housing in the district to 3, this option would maximise the number of developments that would bring forward affordable housing. Furthermore, the relatively high requirement (40%) is both viable and likely to deliver a significant amount of affordable housing – above that currently supplied. Given that the economic conditions are likely to change over the period of the plan, there is some uncertainty over the medium and long-term impact of the approach.

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
2.Deprivation	+	+	+	As evidenced by the Indices of Deprivation, the towns are generally seen as the most deprived parts of the district, all of which lie in the Sussex Coast Sub-Region. The towns score particularly poorly with regard to housing ⁵¹ . As explained for the other options, the towns are considered the most deprived parts of the district – particularly in relation to housing. This policy is likely to increase the amount of affordable housing delivered in the urban areas and can thus be viewed positively, but not to the extent that the AHVA believes could be delivered.	++	++	++	This approach is likely to maximise the amount of affordable housing delivered in the towns of the district, the areas which are recognised as most deprived. As such, the policy is seen as highly positive in respect of this objective. The approach is also likely to increase affordable housing delivery in the rural areas of the district that the SHMA recognises is home to high prices and high home ownership which prevents those from lower incomes accessing these parts of the district.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	?	?	?	It is unknown whether this option would have an impact on the indicators for this objective. Some comments received during consultation on the Emerging Core Strategy suggested residents wanted more affordable housing and so an increase in delivery would be seen as having a positive impact on community satisfaction. However, some residents were not as receptive to the idea of affordable housing in their areas and so the expected increase in delivery may have a negative impact.	?	?	?	It is unknown whether this option would have an impact on the indicators for this objective. Some comments received during consultation on the Emerging Core Strategy suggested residents wanted more affordable housing and so an increase in delivery would be seen as having a positive impact on community satisfaction. However, some residents were not as receptive to the idea of affordable housing in their areas and so the expected increase in delivery may have a negative impact.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	This option does not have an impact on this	0	0	0	This option does not have an impact on this

⁵¹ See English Indices of Deprivation 2010, Wider Barriers Sub-Domain (Barriers to Housing and Services Domain)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				objective.				objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	+	+	+	It is possible that an increase in affordable housing may help to support the local economy as people on lower incomes can afford to live and work in the district. This would provide a customer base for certain businesses which would also have less of a difficulty in recruiting and retaining staff.	+	+	+	It is possible that an increase in affordable housing may help to support the local economy as people on lower incomes can afford to live and work in the district. This would provide a customer base for certain businesses which would also have less of a difficulty in recruiting and retaining staff.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 29: Affordable Housing Appraisal (Options C and D)

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	+	+	+	It is envisaged that the approach would have a similarly positive impact in the urban areas as option B. However, it is felt that the 50% requirement in the rural areas would mean that some developments would become unviable and would reduce both market housing and, consequently, affordable housing in rural areas. Given that the economic conditions are likely to change over the period of the plan, there is some uncertainty over the medium and long-term impact of the approach.	+	+	+	By lowering the threshold of developments that would be required to deliver affordable housing in the district to 3, this option would maximise the number of developments that would bring forward affordable housing. Furthermore, the relatively high requirement (40%) is both viable and likely to deliver a significant amount of affordable housing – above that currently supplied. In addition, the requirement for the Sussex Coast Sub-Region of 40% is viable and likely to increase affordable housing provision over current levels. However, the Affordable Housing and CIL Viability Study (AHVA) indicates that a higher affordable housing requirement would be viable in the rural areas. As such, if this option was brought forward it is likely

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
								that it would bring forward a lower number of affordable homes in the rural area than could otherwise be achieved. Given that the economic conditions are likely to change over the period of the plan, there is some uncertainty over the medium and long-term impact of the approach.
2.Deprivation	++	++	++	This policy is likely to maximise the amount of affordable housing delivered in the towns of the district, the areas which are recognised as most deprived. As such, the policy is seen as highly positive in respect of this objective.	++	++	++	As explained for the other options, the towns are considered the most deprived parts of the district – particularly in relation to housing. As this approach is likely to maximise housing delivered in the Sussex Coast Sub-Region (where the towns are located), the approach is seen as highly positive in respect of this objective.
3.Travel	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	?	?	?	It is unknown whether this option would have an impact on the indicators for this objective. Some comments received during consultation on the Emerging Core Strategy suggested residents wanted more affordable housing and so an increase in delivery would be seen as having a positive impact on community satisfaction. However, some residents were not as receptive to the idea of affordable housing in their areas and so the expected increase in delivery may have a negative impact.	?	?	?	It is unknown whether this option would have an impact on the indicators for this objective. Some comments received during consultation on the Emerging Core Strategy suggested residents wanted more affordable housing and so an increase in delivery would be seen as having a positive impact on community satisfaction. However, some residents were not as receptive to the idea of affordable housing in their areas and so the expected increase in delivery may have a negative impact.
5.Health	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This approach will not impact on this objective.	0	0	0	This approach will not impact on this objective.
10.Waste	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
								objective.
12.Energy	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	+?	+?	+?	It is possible that an increase in affordable housing may help to support the local economy as people on lower incomes can afford to live and work in the district. This would provide a customer base for certain businesses which would also have less of a difficulty in recruiting and retaining staff. However, it is possible that there would be less of a benefit than for other options as there would likely be a reduction in affordable units in rural areas.	+?	+?	?	It is possible that an increase in affordable housing may help to support the local economy as people on lower incomes can afford to live and work in the district. This would provide a customer base for certain businesses which would also have less of a difficulty in recruiting and retaining staff.
17.Tourism	0	0	0	This approach will not impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 30: Affordable Housing Appraisal (Option E)

Objectives				Explanation
	S	M	L	
1.Housing	-	-?	-?	<p>This policy option sets a high affordable housing requirement of 40% for the Sussex Coast Sub-Region which is viable. However, the Affordable Housing and CIL Viability Study (AHVA) indicates that it could be achievable to set a requirement in excess of 35% in the rural areas and still ensure viability and so this may result in a reduced number of affordable homes being brought forward in these areas. However, on the contrary it may lead to more market housing being delivered.</p> <p>In terms of the threshold, by setting the threshold at 15 dwellings, this option may act as a disincentive to larger developments (15+) coming forward as it would reduce profits from housebuilding as more affordable dwellings would need to be provided. Therefore, this may lead to reduced levels of affordable housing being delivered. This option may not have a noticeable affect on the total amount of housing being provided in Lewes Town; however in the coastal towns where there are already known viability issues, it is likely to hinder larger developments. In the rural areas, it must also be mentioned that development tends to be less than 15 units which again may lead to few affordable units being developed. Viability is not as much of an issue in these areas (as a result of high house prices), however, this then hinders the ability of those on lower incomes from accessing the housing market.</p>

Objectives				Explanation
	S	M	L	
				Given that the economic conditions are likely to change over the period of the plan, there is some uncertainty over the medium and long-term impact of the approach.
2.Deprivation	-	-?	-?	Setting a high threshold of 15 units and a high affordable housing requirement in the rural areas is likely to result in fewer affordable units in these areas. Barriers to housing are considered an issue in the rural areas of the district due to high home ownership and house prices, therefore, this option could have a negative impact in these areas. In regards to the Sussex Coast Sub-Region, these are typically the areas where lower income families are based due to being more affordable areas. These areas are also considered the most deprived in terms of overall deprivation statistics (IMD data) and so as this approach may hinder larger developments, and as a result bring about less affordable housing, it is considered that this option may have a negative impact.
3.Travel	0	0	0	This approach will not impact on this objective.
4.Communities	?	?	?	It is unknown whether this option would have an impact on the indicators for this objective. Some residents were not particularly receptive to the idea of affordable housing in their areas and so the reduced delivery may be viewed positively. However, some comments received during consultation on the Emerging Core Strategy suggested residents wanted more affordable housing and so a reduced delivery would be viewed more negatively.
5.Health	0	0	0	This approach will not impact on this objective.
6.Education	0	0	0	This approach will not impact on this objective.
7.Land Efficiency	0	0	0	This approach will not impact on this objective.
8.Biodiversity	0	0	0	This approach will not impact on this objective.
9.Environment	0	0	0	This approach will not impact on this objective.
10.Waste	0	0	0	This approach will not impact on this objective.
11.Water	0	0	0	This approach will not impact on this objective.
12.Energy	0	0	0	This approach will not impact on this objective.
13.Air Quality	0	0	0	This approach will not impact on this objective.
14.Flooding	0	0	0	This approach will not impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	0?	0?	0?	It is likely that this option would result in a reduced number of affordable units being delivered, making it more difficult for families on lower incomes to afford to live in the area. Therefore, the benefits to the local economy, such as an increased customer base and less of a difficulty in recruiting and retaining staff for certain businesses, are reduced.
17.Tourism	0	0	0	This approach will not impact on this objective.

SA Table 31: Housing Type and Mix Appraisal (Options A and B)

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
1.Housing	++	++	++	With the current economic housing market conditions, this policy approach would allow the flexibility to respond to market driven forces and local housing needs throughout the plan period, as economic and housing market conditions	-	-	?	Rigid district-wide standards for the proportion of housing types and sizes would not allow flexibility required in order to respond to local housing needs and in the housing market which is likely to change over the plan period. As such, the negative impacts of this approach may amplify

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
				improve. This would ensure developments reflect market conditions at the time an application is made.				by the end of the period. This policy could lead to a reduction in housebuilding by making some schemes unviable or could deliver a mix of homes that would be inappropriate at a certain time or location.
2.Deprivation	++	++	++	As the SHMA points out, it is important for the District Council to avoid creating concentrations of disadvantage by allowing a certain type of home to dominate an area, which in turn encourages a particular socio-economic group to the area. This approach would ensure that a range of housing mix and types were provided throughout the District, providing for a cross-section of the community in a sustainable manner. Due to its flexibility, the approach would be able to react to changing socio-economic conditions over the plan period.	-	-	-	This option would ensure that a range of accommodation would be provided in the district, avoiding the creation concentrations of disadvantage dominating parts of the district. The lack of flexibility in the approach means that it would only reflect the situation in the district at the time of adoption, and so would be unable to react to changing levels of deprivation. In addition, given that the policy does not look at particular areas the approach may not be suitable for different parts of the district dealing with deprivation.
3.Travel	0	0	0	The effect of this objective depends on the location of new housing development rather than the effect of the policy options.	0	0	0	The effect of this objective depends on the location of new housing development rather than the effect of the policy options.
4.Communities	++	++	++	This approach would ensure that new large developments would provide a mix of housing types that relate well to its locale and is able to respond to changing needs of the local community. From this mix it would be reasonable to assume that development would bring about a mixed community with a variety of different households (families, single-person households, low income etc) rather than being home to one particular group. It would also give the flexibility required to ensure that new development across the District fits in with the local character of the area which would have a positive impact on the community and their perception of new development. It would also provide a hook for Neighbourhood Plans, created with community support, to have locally set policies.	-	?	?	This approach does not consider differences in different parts of the district and is not flexible. As a result, the approach may lead to development which may not be appropriate for particular locations or for the whole period of the plan. Such outcomes are likely to have a negative impact on community cohesion/happiness in some areas, which is likely to increase over the plan period.
5.Health	0	0	0	It is not thought that the options would have a noticeable impact on this objective.	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
6.Education	0	0	0	It is not thought that the options would have a	0	0	0	It is not thought that the options would have a noticeable

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				noticeable impact on this objective.				impact on this objective.
7.Land Efficiency	0	0	0	The affect of these policy options on this objective cannot be fully quantified as it depends on the ultimate location of housing and not on the mix of housing in new developments.	0	0	0	The affect of these policy options on this objective cannot be fully quantified as it depends on the ultimate location of housing and not on the mix of housing in new developments.
8.Biodiversity	0	0	0	The affect of this objective depends on the location of new housing development rather than the types of homes being delivered.	0	0	0	The affect of this objective depends on the location of new housing development rather than the types of homes being delivered.
9.Environment	++	++	++	This approach would be sensitive to the environment as its flexible nature would take into account location, therefore protecting the District's most valuable natural landscape and historic environments from inappropriate development.	-?	-?	-?	The approach may not have a positive impact in regards to the environment as a district-wide policy would not take into account the location of development and so this approach would not in itself prevent housing mix and types being inappropriate to its surroundings.
10.Waste	0	0	0	It is not thought that the options would have a noticeable impact on this objective.	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
11.Water	0	0	0	It is not thought that the options would have a noticeable impact on this objective.	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
12.Energy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
13.Air Quality	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
14.Flooding	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
15.Coastal Erosion	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
16.Economy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
17.Tourism	0	0	0	It is not thought that the options would have a noticeable impact on this objective.	0	0	0	It is not thought that the options would have a noticeable impact on this objective.

SA Table 32: Housing Type and Mix Appraisal (Option C)

Objectives	Option C			
	S	M	L	Explanation
1.Housing	++	+?	+?	This flexible approach would provide the correct housing type and mix in the short term in response to market-driven

Objectives	Option C			Explanation
	S	M	L	
				forces and local housing needs. However, it would not be able to react to changes in such forces and needs in the medium and long term, which may change.
2.Deprivation	++	+?	+?	This approach would have a positive impact for this objective in the short-term, by ensuring a mix of housing development and so avoiding a single housing type which could create new pockets of deprivation and socio-economic problems in deprived areas. This approach would relate to particular areas too. However, with economic and local housing needs likely to change over the course of the plan period, the lack of flexibility may mean that the policy is not as effective in the medium and long term as it would be unable to react to changes in circumstances.
3.Travel	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy options.
4.Communities	++	+?	+?	This would provide the correct mix and type of development which relates well to its locale. This would help bring about a mix community with a variety of different households, rather than being home to one particular group. However, Option C is unable to react to local community needs in the long-term.
5.Health	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
6.Education	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
7.Land Efficiency	0	0	0	The affect of these policy options on this objective cannot be fully quantified as it depends on the ultimate location of housing and not on the mix of housing in new developments.
8.Biodiversity	0	0	0	The effect on this objective depends on the location of new housing development rather than the types of homes being delivered.
9.Environment	++	++	++	This approach would be sensitive to the environment protecting the District's most valuable natural landscape and historic environments from inappropriate development as it takes into account particular locations.
10.Waste	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
11.Water	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
12.Energy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
13.Air Quality	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
14.Flooding	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
15.Coastal Erosion	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
16.Economy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
17.Tourism	0	0	0	It is not thought that the options would have a noticeable impact on this objective.

SA Table 33: Options for Flexible and Adaptable Accommodation Appraisal

Objectives	Option A			Explanation	Option B			Explanation
	S	M	L		S	M	L	
1.Housing	0?	0?	0?	This option would bring forward housing that meets the needs of the whole population (whether they be able bodied,	++	++	++	Although the option encourages Lifetime Homes it does not require, and thus it would not ensure, that homes are built to be suitable for the whole cross section of residents

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				disabled or elderly). However, this option would increase housebuilding costs and would likely make some schemes unviable. In turn, this may reduce the housing build rate (including affordable housing) where housing need exists.				in the district, although some may come forward. However, this option would not impose costs on housebuilding and thus would not impact negatively on building rates (including affordable housing).
2.Deprivation	0?	0?	0?	This option would mean that new homes are built to reflect the diverse needs of the district's population, as it would not exclude anyone from the housing market based on physical capabilities. However, the option would increase housebuilding costs and thus would likely impact on housing delivery (including affordable housing), particularly in deprived parts of the district where developers' margins are tighter.	+?	+?	+?	Although they would be encouraged to do so, the option does not force developers to bring forward Lifetime Homes. As such, it may exclude some sectors of the community from accessing the housing market based on physical capabilities. Importantly however, this option would not add to the cost of developing housing (including affordable housing), which could become a barrier to new development, particularly in deprived parts of the district where developers' margins are tighter.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	0?	0?	0?	It is difficult to quantify the affect of the option on this objective. This option could lead to improved community happiness as those who don't have full physical capabilities, would be able to gain access to new housing built to lifetime home standards and would presumably be more content with their housing provision. However, it may reduce the provision of overall housing, which is desired by some members of the existing communities.	0?	0?	0?	It is difficult to quantify the affect of the option on this objective. As the option would not force developers to provide new homes to a lifetime homes standard, it would not satisfy parts of the community who require such properties. However, this approach would not reduce housing delivery and some members of the community require housing.
5.Health	+	+	+	This option would provide housing suitable for all the district's residents, including the elderly and those of ill-health.	0?	0?	0?	This option would not reflect the health needs of the district, although some homes may be built to lifetime home standards regardless.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on	0	0	0	This option does not have an impact on this objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				this objective.				
9.Environment	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 34: Housing Density Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	++	++	++	Having a flexible approach allows for housing to be maximised whilst still allowing new development to be appropriate for its location.	-	-	-	Having an inflexible minimum density may restrict development coming forward, particularly in locations where its character would not lend itself to the minimum density being met.
2.Deprivation	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	++	++	++	With the flexibility that such an approach allows, new development is likely to be in keeping with its location and is less likely to impact negatively on the community.	-?	-?	-?	A defined minimum may be inappropriate for rural areas where densities are low, as development could change the character of a location – affecting happiness of the population and community cohesion.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	++	++	++	Having a flexible density range that maximises housing delivery would allow the Council to make good use of available land while still respecting the character of locations.	0?	0?	0?	Whilst ensuring that new development would be built to at least a minimum density, the approach would not necessarily maximise housing development and thus, available land.
8.Biodiversity	0	0	0	The affect of development on biodiversity is dependant on location not density.	0	0	0	The affect of development on biodiversity is dependant on location not density.
9.Environment	++	++	++	The flexibility that this approach advocates allows the Council to ensure that development comes forward at a density appropriate to a site's environment.	-?	-?	-?	The setting of a minimum target for all developments in the district would prevent housing from coming forward for less than 20dph. As a result, this may mean that housing adjacent to historic environments and outstanding landscapes are built at densities above that of current settlements.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 35: Housing Density Appraisal (Options C and D)

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	+	+	+	Having a flexible approach is seen as positive in relation to this objective but	?	?	?	The option would not allow the Council to manage densities of new development. Thus, while some development may

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
				does not go as far Option A in reflecting the needs of the district.				maximise housing delivery, it is equally possible that some may not which would reduce housing completions.
2.Deprivation	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	++	++	++	With the flexibility that such an approach allows, new development is likely to be in keeping with its location and is less likely to impact negatively on the community.	?	?	?	The option would not allow the Council to control densities of new development. Therefore, while some developments could be in keeping with the locality – some may not. This would likely affect community happiness.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	++	++	++	The option targets a reasonably high district-wide density range and, in doing so, would enable to Council to make good use of available land.	-?	?	?	The approach would not allow the Council to control densities of new development. This could mean that large sites may deliver low numbers thereby putting pressure on additional sites (likely greenfield) to deliver housing, particularly towards the end of the plan period as available brownfield sites diminish.
8.Biodiversity	0	0	0	The affect of development on biodiversity is dependant on location not density.	0	0	0	The affect of development on biodiversity is dependant on location not density.
9.Environment	++	++	++	The flexibility that this approach advocates allows the Council to ensure that development comes forward at a density appropriate to a site's environment.	?	?	?	The lack of any target or requirement increases the chance of development coming forward whose densities do not reflect the environment in which it sits, which would be a large negative in respect of this objective.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on	0	0	0	This option does not have an impact on this objective.

Objectives	Option C				Option D			
	S	M	L	Explanation	S	M	L	Explanation
				this objective.				
16.Economy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 36: Retail Options Newhaven

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	+?	+?	+?	This option would allow development in the Town Centre for uses other than retail, including residential, and thus may positively impact on the aims of the objective (although the impact is not likely to be significant).	0	0	0	This option is unlikely to impact on this objective.
2.Deprivation	+	+	+	The town is seen as the most deprived settlement in the district and it may be that the policy option would help regenerate the town centre by reducing vacancy rates. This is seen as a positive in respect of this objective.	?	?	?	This option is not thought to help regenerate the town centre, thus is unlikely to positively impact this objective although its impact cannot be accurately quantified.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	+	+	+	This approach may have a positive impact on this objective. Bringing vacant properties into use should improve the happiness of the local community and reinforce their sense of pride in the town. Also, the approach would allow for other community services/facilities into the town centre.	-	-	-	This approach would not allow vacant premises to be brought forward for other uses. Therefore, it is possible that they may remain vacant for the foreseeable future, possibly impacting on community happiness and pride in their town. It would also prohibit vacant properties being brought forward for other community services/facilities.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	+	+	+	The option would allow vacant retail units to be changed to other uses. As such it would make good use of available	-	-	-	The option would not allow vacant retail premises to be brought forward for other uses and as a result may put additional pressure on greenfield land (although this is

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				brownfield land and may reduce pressure on greenfield land to provide new development (although this is unlikely to have a significant impact).				unlikely to have a significant impact). As it is considered unlikely that the vacant premises will become occupied within the plan period, this is seen negatively with respect to this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	+	+	+	The option would likely result in the loss of retail units. This represents a negative in respect of this objective, although it is thought unlikely that all vacant premises would ever become occupied over the plan period. It may be that this option would help to support the local economy by allowing other uses in the town centre, which would generate income as well as helping to maintain/enhance the vitality of the area by providing a larger customer base to support shops and services.	+	+	+	The option would maintain the level of retail premises. In theory, the protection of premises for retail use is a benefit for this objective. However, as it is thought likely that vacancy rates would continue to be high in the town centre - impacting on the vibrancy of the area - it may not actually have a positive impact. It may be the case that prohibiting non-commercial uses (such as cafes, restaurants and community facilities) which could bring in revenue to the area and occupy vacant properties would be harmful to the local economy.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 37: Retail Options - South Coast Road

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	+	+	+	Option A would allow development along the South Coast Road for uses other than shops, which would allow residential units to be developed in the area (although the impact is not likely to be significant).	0	0	0	This option would not impact upon this objective.
2.Deprivation	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	+	+	+	This approach may have a positive impact on this objective. Bringing vacant properties out of vacancy may improve the happiness of the local community and reinforce their sense of pride in the area. Also, the approach would allow for other community services/facilities along the South Coast Road. However, it must be mentioned that the vacancy rate is currently fairly low.	-	-	-	This approach would not allow vacant premises to be brought forward for other uses (although vacancy rate is currently fairly low). Therefore, it is possible that they may remain vacant for the foreseeable future, possibly impacting on community happiness and pride in the area. It would also prohibit vacant properties being brought forward for other community services/facilities.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	+	+	+	As the option would allow vacant units to be changed to other uses, it is likely to make good use of available brownfield land and reduce pressure on greenfield land to provide development (although this is unlikely to have a significant impact).	-	-	-	The option would not allow vacant units to come forward for other uses and thus would put additional pressure on greenfield land to provide development (although this is unlikely to have a significant impact). In addition, such an approach would increase the chance of long-term vacancies (although the vacancy rate is currently quite low).
8.Biodiversity	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on	0	0	0	This option does not have an impact on this objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				this objective.				
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	+?	+?	+?	The option would likely result in the loss of retail units on the South Coast Road. Depending on the rate and amount of change (which cannot be known), this is likely to negatively impact this objective. However, it may be the case that this option would help to support the local economy by allowing other uses, which would generate income as well as helping to maintain/enhance the vitality of the area by providing a larger customer base to support shops and services.	+?	+?	+?	The option would retain the area for commercial use, helping to ensure that retail premises and associated jobs would remain in the area – which performs positively in respect of parts of this objective. However, as non-commercial uses would be prohibited, it would prevent other uses such as cafes, restaurants and community facilities which could bring in revenue to the area and occupy vacant properties (although the vacancy rate is currently fairly low).
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 38: Built and Historic Environment Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
2.Deprivation	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	+?	+?	+?	If the policy includes a policy that promotes crime resistant developments, it would have a positive impact on the objective.	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on	0	0	0	This option does not have an impact on this objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				this objective.				
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	++	++	++	This approach would have a positive impact on this objective throughout the plan period as the historic and built environment would be protected by the Core Strategy policy as well as the retained Local Plan policies.	+	++?	++?	By keeping the detailed local plan policies (at least until replaced by policies in a subsequent DPD) the built and historic environment would remain protected, but would not allow to seek other standards or respond to design related opportunities that have emerged since the Local Plan was adopted in the short term.
10.Waste	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
12.Energy	+	+	+	Part of Policy ST3, which would be retained with this option, aims to maximise energy efficiency which would have a positive impact on this objective.	+	+	+	Part of Policy ST3, which would be retained with this option, aims to maximise energy efficiency which would have a positive impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 39: Built and Historic Environment Appraisal (Option C)

Objectives	Option C			
	S	M	L	Explanation
1.Housing	0	0	0	This option does not have an impact on this objective.
2.Deprivation	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.
4.Communities	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.

Objectives	Option C			Explanation
	S	M	L	
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.
9.Environment	-	++?	++?	In the short term, the approach would likely have a negative impact on the built environment as there would be no measures in place to support development management decision making and it is therefore seen as likely that there will be undesirable consequences. In the medium-long term, policies would be created in a subsequent DPD to help close this vacuum.
10.Waste	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option would not retain Policy ST3, and so would appraise negatively in respect of this objective. However, it is likely that the Core Strategy (see Core Policy 14) would include a policy that promotes energy efficiency, thus negating the negative impact.
13.Air Quality	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.

SA Table 40: Renewable Energy Appraisal (Options A and B)

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
1.Housing	0	0	0	The option is unlikely to impact on housebuilding throughout the plan, however it is not as likely (as option A) to deliver sustainably constructed homes. Therefore there will be no noticeable effect on this objective.	0?	+	+	It may be that this approach would have slight impact on housing delivery with a small increase to house build costs. This potential negative is offset by the likelihood that this policy would create more sustainably constructed homes, part of this objective. In addition, as expertise in delivering such homes increases, costs attributable to the provision of highly sustainable homes are likely to drop.
2.Deprivation	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
4.Communities	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	This option does not have an impact on this objective.	+	++ ?	++ ?	As part of achieving a Code Level, developers, as a minimum, would have to ensure that a waste management plan was in operation that sets targets to promote resource efficiency and provides adequate space for waste storage. Thus, the approach will impact on this objective positively. In addition, to collect points to achieve higher code levels, developers may choose to add other measures relating to waste (e.g. compost facilities). As the code level requirement rises throughout the plan period, this is likely to mean a greater positive impact on this objective in the long-term.
11.Water	0	0	0	This option does not have an impact on this objective.	+	++	++	To achieve code level 3, developers would have to ensure that estimated water level would be a maximum of 105 litres per person per day. This is a much lower level than is achieved currently in the region and would reduce further over the period of the Core Strategy as the code requirements become more stringent. As a result the approach is seen positively.
12.Energy	+	++	++	The option would have a positive impact on the objective and would reduce energy consumption from current levels. As the requirements would increase throughout the plan period, this approach would have larger long-term benefits.	+	++	++	The option would have a positive impact on the objective and would reduce energy consumption from current levels. As the requirements would increase throughout the plan period, this approach would have larger long-term benefits.
13.Air Quality	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.	+?	+?	+?	As part of achieving a Code level developers, as a minimum, would have to ensure that peak and annual surface water run-off rates would not increase in comparison to the site pre-development. In addition, to collect additional credits to achieve higher code levels, developers may choose to add other measures relating to the reduction of surface water run-off.
15.Coastal Erosion	0	0	0	This option does not have an impact on	0	0	0	This option does not have an impact on this objective.

Objectives	Option A				Option B			
	S	M	L	Explanation	S	M	L	Explanation
				this objective.				
16.Economy	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.	0	0	0	This option does not have an impact on this objective.

SA Table 41: Renewable Energy Appraisal (Option C)

Objectives	Option C			
	S	M	L	Explanation
1.Housing	■	■	■	If Code Level 6 was mandatory for all homes, housebuilding in the district would essentially stop in the short-term due to the high costs that such a policy would impose. Whilst it is thought that some homes might be built further into the plan period as building homes to this standard would reduce in price, the likely long-term impact would be to raise house prices substantially, whilst under-delivering housing. As such the policy approach can be seen highly negatively to the aims of this objective.
2.Deprivation	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.
4.Communities	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	This option does not have an impact on this objective.
10.Waste	0	0	0	Theoretically, the approach should reduce waste generation from new developments substantially. However, it is thought likely that the approach would significantly reduce housebuilding and thus the reduction in waste generation would not occur. As a result, the approach would not impact on this objective.
11.Water	0	0	0	Theoretically, the approach should reduce water consumption from new developments substantially. However, it is thought likely that the approach would significantly reduce housebuilding and thus the reduction in water consumption would not occur. As a result, the approach would not impact on this objective.
12.Energy	0	0	0	Theoretically, the approach should reduce energy consumption from new developments substantially. However, it is thought likely that the approach would significantly reduce housebuilding and thus the reduction in energy consumption would not occur. As a result, the approach would not impact on this objective.
13.Air Quality	0	0	0	This policy approach will not have a direct impact on this objective.
14.Flooding	0	0	0	Theoretically, the approach should increase the flood resilience of new developments. However, it is thought likely that the approach would significantly reduce housebuilding and thus the reduction in flood resilience would not occur. As a result, the approach would not impact on this objective.
15.Coastal Erosion	0	0	0	This policy approach will not have a direct impact on this objective.
16.Economy	0	0	0	This policy approach will not have a direct impact on this objective.
17.Tourism	0	0	0	This policy approach will not have a direct impact on this objective.

Appendix 4 – Appraisal Tables (policies)

Appraisal Table 1: Presumption in Favour of Sustainable Development

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	The policy will mean that development (such as housing development) will come forward without delay at the application stage, helping to deliver homes (including affordable homes) throughout the plan period – a positive for this objective.
2.Deprivation	+	+	+	The policy calls on development that delivers improvement in social and environmental conditions, which will positively impact deprived areas.
3.Travel	+	+	+	The policy commits the planning authorities to work with applicants to find solutions to improve conditions in an area. The improvement of sustainable transport options is thus supported by this policy, a positive for this objective.
4.Communities	++	++	++	The policy commits the planning authorities to work to secure development that improves the economic, social and environmental conditions of an area, impacting positively on this objective.
5.Health	+	+	+	The policy commits the planning authorities to work with applicants to find solutions to improve conditions in an area. The improvement of health in the district is thus supported by this policy, a positive for this objective
6.Education	+	+	+	The policy commits the planning authorities to work with applicants to find solutions to improve conditions in an area. The improvement of education in the district is thus supported by this policy, a positive for this objective
7.Land Efficiency	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as those included within the land efficiency objective, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
8.Biodiversity	+	+	+	The policy adds clarity where applications that could have significant adverse impact on issues, such as biodiversity, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
9.Environment	+	+	+	The policy adds clarity where applications that could have significant adverse impact on issues, such as those included within the environment objective, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
10.Waste	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as waste, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
11.Water	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as water, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
12.Energy		+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as energy, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
13.Air Quality	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as air quality, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).

Objectives				Explanation
	S	M	L	
14.Flooding	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as flooding, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
15.Coastal Erosion	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as coastal erosion, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
16.Economy	++	++	++	The policy will mean that development (such as economic development) will come forward without delay at the application stage, helping to deliver development that improves economic conditions throughout the district, impacting positively on this objective.
17.Tourism	+	+	+	This policy encourages the planning authorities to help secure development that improves economic conditions, including in the tourism sector.

Appraisal Table 2: Provision of Housing and Employment Land

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The policy commits the local planning authorities into adding to the housing stock (including affordable) throughout the plan period at a rate that exceeds current levels.
2.Deprivation	+?	+?	++?	Whilst the policy does not specify if development would be directed to the most deprived parts, it is likely that development at this scale would come forward in deprived areas. It is hoped that development, by the end of the plan period would therefore have a strong positive impact on this objective.
3.Travel	?	?	?	It is possible that the provision of housing and employment at this scale could increase congestion and place strain on transport infrastructure. However, development proposals are likely to include mitigation measures to offset these impacts.
4.Communities	?	?	?	The policy does not indicate where development would take place and so this objective cannot be fully appraised. It is not known if development at this level could bring forward community facilities or not, nor is it possible to know the affect on the local communities.
5.Health	?	?	?	It is not clear from the policy what the impact on health services would be, it could strain services but equally development at this level could bring forward new facilities.
6.Education	?	?	?	It is not clear from the policy what the impact on education services would be, it could strain services but equally development at this level could bring forward new facilities and extensions to schools.
7.Land Efficiency	?	?	?	The policy has been developed by considering constraints to development, including on land. However, development on this scale would require development on greenfield land. This policy does not identify the location of development and so this objective cannot be fully appraised.
8.Biodiversity	?	?	?	The policy has been developed by considering constraints to development, including on biodiversity, and therefore should not have an impact on this objective. Also, the policy does not identify the location of

Objectives				Explanation
	S	M	L	
				development and so this objective cannot be fully appraised.
9.Environment	?	?	?	The policy has been developed taking into consideration environmental constraints, thereby the policy should not impact negatively on this objective. Also, the policy does not identify the location of development and so this objective cannot be fully appraised.
10.Waste	?	?	?	Although it is considered that this policy would result in a level of development that would lead to an increased generation of waste, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
11.Water	?	?	?	Although it is considered that this policy would result in a level of development that would lead to an increase in water usage, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
12.Energy	?	?	?	Although it is considered that this policy would result in a level of development that would lead to increased energy consumption, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
13.Air Quality	?	?	?	Although it is considered that this policy would result in a level of development that would lead to an increase in air pollution, the effect on this objective depends largely on the types and specification of new development, as well as the location of new development rather than the wording of the policy. Such issues are considered by other policies. Therefore, this policy cannot be fully appraised.
14.Flooding	?	?	?	Development at this scale could bring forward development in areas of flood risk. However, such risks would be required to be mitigated against and thus there should be no adverse impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought that the policy would impact on this objective.
16.Economy	++	++	++	The policy proposes development that will both add to the customer base and provide jobs for the district throughout the plan period.
17.Tourism	0	0	0	This policy does not impact on this objective.

Appraisal Table 3: Distribution of Housing

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	This policy generally looks to distribute housing in the area with the highest housing demands and needs over

Objectives	S	M	L	Explanation
2.Deprivation	++	++	++	The policy focuses a large amount of development in the most deprived communities in the district, which is likely to have a positive impact on these areas – a benefit for this objective.
3.Travel	+	+	+	The policy focuses most development in the district's towns and therefore new residents will be more likely to use sustainable transport modes. The policy has taken into account transport constraints such as those in Peacehaven and Newhaven.
4.Communities	+	+	+	The policy focuses most development in the district's towns, the communities who are most able to accommodate additional homes and residents.
5.Health	?	?	?	It is not clear from the policy what the impact on health services would be, it could strain services but equally development at this level could bring forward new facilities.
6.Education	?	?	?	It is not clear from the policy what the impact on education services would be, it could strain services but equally development at this level could bring forward new facilities and extensions to schools.
7.Land Efficiency	-	-	-	The policy has been developed by considering constraints to development, including on land. However, this policy would include some development on greenfield land, although this is a necessity in order to provide the housing to help meet the district's need.
8.Biodiversity	0	0	0	The findings of the HRA indicate that there is no significant effect as a result of the levels of development indicated in the policy.
9.Environment	?	?	?	The policy has been developed taking into consideration environmental constraints, thereby the policy should not impact negatively on this objective, although it is possible that development on this scale may impact upon areas of valued landscape.
10.Waste	?	?	?	Although it is considered that this policy would result in a level of development that would lead to an increased generation of waste, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
11.Water	?	?	?	Although it is considered that this policy would result in a level of development that would lead to an increase in water usage, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
12.Energy	?	?	?	Although it is considered that this policy would result in a level of development that would lead to increased energy consumption, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be

Objectives				Explanation
	S	M	L	
				fully appraised.
13.Air Quality	?	?	?	Development at this scale in Lewes could impact on the AQMA and could also cause an AQMA in Newhaven to be declared unless mitigated against by other policies.
14.Flooding	0	0	0	The policy does not impact on this objective.
15.Coastal Erosion	0	0	0	The policy does not impact on this objective.
16.Economy	++	++	++	The policy will likely increase the customer base throughout the district, including in the economies of the most deprived areas, and is seen positively.
17.Tourism	0	0	0	The policy does not impact on this objective.

Appraisal Table 4: North Street Quarter and adjacent Eastgate area

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	This option is likely to provide a significant amount of housing, including affordable housing, in a location where a significant housing need exists. Development at this site would be deliverable in the short term and therefore have a significant positive impact throughout the period of the plan.
2.Deprivation	+	+	+	The North Street site is located in Lewes Castle Ward, which does contain some of the most deprived lower super output areas in the district, and therefore it is probable that this option would have a positive impact in terms of improving access to affordable housing, as well as providing associated infrastructure and jobs that could reduce deprivation.
3.Travel	+	+	+	The policy seeks to improve pedestrian and cycling links and would result in highway improvements, benefitting this objective. The policy would either retain the bus station or relocate it, so there are no negative impacts. The policy also proposes on and off-site highway/access improvements.
4.Communities	++?	++?	++?	The reaction of the local community to development on the site is not known at this point, although new community facilities may be provided alongside the redevelopment of the site. In addition, this option offers the opportunity to improve the townscape, including public realm, of this part of the town. This could result in improving people's satisfaction in the place in which they live.
5.Health	?	?	?	With measures to encourage sustainable transport (walking/cycling), in addition to the possibility of recreational land being included as part of the development, there may be health benefits felt by the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made. Redevelopment of the site could result in new or refurbished health premises being provided and new leisure floorspace.
6.Education	?	?	?	Site proponents would be required to make contributions to off-site infrastructure improvements, in particular primary school provision, mitigating the potential impact of the policy. Any negative/positive impacts would

Objectives				Explanation
	S	M	L	
				only be apparent some years after contributions have been made
7.Land Efficiency	++	++	++	The North Street site is currently developed, as well as including a number of vacant and derelict units, and so this option would be making good use of brownfield land.
8.Biodiversity	0	0	0	The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	+?	+?	+?	The policy presents opportunities to improve the townscape of this part of Lewes. In turn, this has the potential to improve the setting for listed buildings that are either on, or within the vicinity of the site, as well as the Lewes Conservation Area. The improved riverside access, as proposed with this option, may have a positive effect by increasing access to parts of the National Park by sustainable means.
10.Waste	?	?	?	It is not possible to know the effects on this objective. It is likely that the additional homes would lead to an increase in domestic waste being produced on site, although industrial waste is likely to be reduced as employment land is lost. It may also be the case that the current recycling centre on site is relocated as part of the redevelopment of the area, and so the effects are uncertain.
11.Water	+?	+?	+?	It is not known whether there would be a net increase in water usage should the site be developed in line with this option. Also, any redevelopment of the site offers the opportunity to remediate known contaminated sites. Contaminated sites run the risk of polluting both ground and surface waters, hence remediating the sites could have a positive impact upon water quality.
12.Energy	?	?	?	It is not possible to specify whether development at this site will increase/decrease energy consumption. Any increase in energy generation is likely to be offset as new homes and employment units will be built to high energy efficiency standards.
13.Air Quality	?	?	?	Although not in an AQMA, most private travel to the site will pass through the AQMA in Lewes Town. As the designation of the AQMA is largely as a result of traffic emissions, the impact of this option could impact upon this objective. Any negative impacts would be expected to be mitigated through the AQMA's Action Plan. It will only be possible to determine the full impact upon this objective at the masterplanning stage.
14.Flooding	++	++	++	This option would include upgraded flood defences within a flood zone 3A area, as such it would reduce this part of the towns susceptibility to flood risk.
15.Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.
16.Economy	+	+	+	The Employment and Economic Land Assessment identified that Lewes town has a qualitative shortfall in employment space, particularly office accommodation. This option will provide some new employment space (particularly office units) that is likely to be of a higher quality and more suited to modern business needs than existing units, thereby helping to address the aforementioned shortfall. However overall, the quantity of employment space could be reduced, maybe causing some existing businesses to be relocated. The option is also likely to deliver other uses such as retail and cafes, restaurants etc, as well as increasing the customer base for these shops and services.
17.Tourism	+	+	+	This option would propose a new hotel that could help to accommodate any growth of the district's tourism

Objectives				Explanation
	S	M	L	
				industry which was identified in the Hotel and Visitor Accommodation Futures Study.

Appraisal Table 5: Land at Greenhill Way

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	Development at this site would provide 140 dwellings, which would include affordable housing. This would be delivered in the early part of the plan period and so offers the possibility of reducing the Housing Needs Register in the short term.
2.Deprivation	0	0	0	This policy does not have an impact on this objective.
3.Travel	+	+	+	Development at the site would be contingent on the completion of the Haywards Heath Relief Road and so increased car numbers could be accommodated by the local transport network and would not lead to extra congestion. A travel Plan would be required for any development at the site. This would be required to improve linkages and provide sustainable transport provision to the town centre and the nearest railway station (approx 2 miles away). Therefore it would have a positive effect on this objective.
4.Communities	?	?	?	The policy sets out requirements to include open space/sports fields and/or play areas which will be of benefit to the local community. All effort will be made to integrate the development into the existing dwellings which adjoin the site, but ultimately it is unknown what effect it would have on the community until it becomes operational.
5.Health	?	?	?	With measures to encourage sustainable transport (walking/cycling), in addition to the possibility of recreational land being included as part of the development, there may be health benefits felt by the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	?	?	?	Site proponents would be required to make contributions to off-site infrastructure improvements, such as schools, although any negative/positive impacts would only be apparent some years after contributions have been made. It is likely that residents of development at Greenhill Way would use the educational facilities in the Mid/West Sussex area.
7.Land Efficiency	-?	-?	-?	The site is located on greenfield land and thus development on it is seen negatively in respect of this objective. Due to land constraints within the district, greenfield strategic sites will be required to meet local housing need and it is this, along with the economic benefits, which balance the loss of greenfield land. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land. However, it must be mentioned that agricultural land is of a lower quality than other options for strategic sites, assessed in the earlier stages of the sustainability appraisal process.
8.Biodiversity	0	0	0	Mitigation measures would be integrated into development proposals regarding the nearby ancient woodland in the form of buffer zones and it is not thought that there would be any significant negative impacts on the ecological potential of the area.

Objectives				Explanation
	S	M	L	
9.Environment	0	0	0	Development on the site would be in keeping with the nearby Lewes Road conservation area. The site is designated as having a med-high capacity for change in the Landscape Capacity Study and is well contained by woodland and existing development and so should not cause any adverse effects.
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective.
11.Water	0	0	0	This policy does not have an impact on this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	This policy does not have an impact on this objective.
14.Flooding	+	+	+	Although the site is not within a designated Flood Zone 2 or 3, any application would need to include a Site Specific Flood Risk Assessment and a surface water drainage strategy agreed with the Environment Agency which would mitigate any risk of surface water flooding which has been apparent at the site in the past. Therefore, it is likely that these mitigations, for example incorporating SUDS, will have a positive impact on this objective.
15.Coastal Erosion	0	0	0	This policy does not have an impact on this objective.
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	This policy does not have an impact on this objective.

Appraisal Table 6: Land North of Bishops Lane

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	Development at this site would deliver approximately 120 dwellings, which would include affordable housing provision. Ringmer does contain a relatively large number of households on the housing needs register and so development at the site would help to ease this pressure, as well as at the district level.
2.Deprivation	0	0	0	This policy does not have an impact on this objective.
3.Travel	+	+	+	Development is contingent upon infrastructure improvements to key junctions, such as Earwig Corner. Congestion is already an issue at this junction and so any development that would increase this burden would need to be mitigated. Also, improvements would be made in the vicinity of the site (along Bishops Lane). Measures to encourage sustainable transport provision, including footpaths and cycle paths, will be incorporated into the development to improve linkages to Ringmer village.
4.Communities	?	?	?	Any development at the site would be required to respect the existing adjacent dwellings and so the impact on the existing community would be kept to a minimum. However, the reaction of the local community to development on the site is not known at this point. It is likely that development at the site would incorporate play spaces and sports pitches, which Ringmer has a shortage of.
5.Health	?	?	?	With measures to encourage sustainable transport (walking/cycling), in addition to the possibility of recreational

Objectives				Explanation
	S	M	L	
				land being included as part of the development, there may be health benefits felt by the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	?	?	?	This policy requires developers to make contributions to off-site infrastructure improvements, in particular primary school provision, hence mitigating the shortfall in primary education facilities that currently exists in Ringmer.
7.Land Efficiency	-?	-?	-?	The North of Bishops Lane site is located on greenfield land and thus development on it is seen negatively in respect of this objective. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land. Due to land constraints within the district, greenfield strategic sites will be required to meet local housing need and it is this, along with the economic benefits, which balance the loss of greenfield land.
8.Biodiversity	+?	+?	+?	It is thought that the removal of the culverted ditches may have a positive impact on this objective by creating a biodiversity corridor. The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	0?	0?	0?	Any development would be required to carry out a geological and a trial trench survey at the site due to the archaeological potential in the area. Mitigation measures would be implemented as required. This site is categorised as having a medium capacity for change in the Landscape Capacity Study meaning that the principle of development should be acceptable in landscape terms.
10.Waste	0	0	0	It is not thought that this policy would have a direct effect on this objective.
11.Water	+	+	+	Development would be contingent upon increased capacity at the Neaves Lane Waste Water Treatment Works which should bring about improvements in regards to this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	This policy does not have an impact on this objective.
14.Flooding	+	+	+	This site is not located within an area at risk of flooding, as identified in the District Council's Strategic Flood Risk Assessment. The policy does however ensure that an appropriate Surface Water Drainage Strategy is implemented with the Environment Agency to mitigate any instances of surface water flooding.
15.Coastal Erosion	0	0	0	This policy does not have an impact on this objective.
16.Economy	+	+	+	It is likely that the village of Ringmer (which would be the local service centre for the site) would benefit from an increased customer base. This could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that this policy would have a direct effect on this objective.

Appraisal Table 7: Land at Harbour Heights Table

Objectives

	S	M	L	Explanation
1.Housing	0	++?	++?	Whilst the policy does not set exact timescales nor housing numbers, it is likely that a significant amount of housing development (including affordable housing) would take place on the site in the medium-long term. Such development would aid in meeting the identified housing needs in Newhaven and the district.
2.Deprivation	0	+	+	When considering overall deprivation levels, the site is located in the second most deprived LSOA in the district and so developing this site may have wider benefits, such as attracting people to the area, increasing the tax base and encouraging further development and investment.
3.Travel	0	+	+	The policy requires development to mitigate any adverse impacts on the highway network and improve sustainable transport options. Therefore this policy is seen positively with respect to this objective.
4.Communities	0	?	?	The reaction of the local community to development on the site is not known at this point, although any development would be required to respect neighbouring dwellings. Any development at the site would also include, or make a contribution to community facilities as required.
5.Health	0	?	?	With measures to encourage sustainable transport (walking/cycling), in addition to the possibility of recreational land being included as part of the development, there may be health benefits felt by the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	0	?	?	It is likely that site proponents would be required to make contributions to off-site infrastructure improvements, such as schools, although any negative/positive impacts would only be apparent some years after contributions have been made.
7.Land Efficiency	0	-	-	The site is predominantly located on greenfield land of a low agricultural value, although there is a section of brownfield land as well. Due to land constraints within the district, greenfield strategic sites will be required to meet local housing need and it is this, along with the economic benefits, which balance out the loss of greenfield land.
8.Biodiversity	0	0	0	There are no biodiversity designations within the site and so this objective should not be impacted.
9.Environment	0	0	0	The site is designated as having a low/medium capacity for change, although the policy would mitigate these sensitivities as far as possible by directing the development layout, design, gradient and landscaping to protect valued vantage points from the South Downs.
10.Waste	0	0	0	This policy does not have an impact on this objective.
11.Water	0	0	0	This policy does not have an impact on this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	This policy does not have an impact on this objective.
14.Flooding	0	0	0	The site is located in a Flood Zone 1 area which is the lowest level of risk and thus development should not impact upon this objective.
15.Coastal Erosion	0	0	0	The policy prevents development on areas at risk to coastal erosion and therefore does not impact on this objective.

Objectives				Explanation
	S	M	L	
16.Economy	0	+	+	Employment land at the Meeching Quarry Industrial Estate (B2 and B8) would be lost, however new business start up units (which are considered more suitable uses adjacent to residential areas) would be provided and there would be no net loss of employment floorspace. The employment units are not considered market attractive due to their age and their poor quality. It is likely that providing modern business premises would be more beneficial to the local economy. Also it is probable that the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	This policy does not have an impact on this objective.

Appraisal Table 8: Core Policy 1 – Affordable Housing

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	The draft policy sets out a flexible district-wide target of 40% on schemes of 10 or more units, which was recommended by the Affordable Housing Viability Assessment. It also allows for affordable housing to be delivered on smaller schemes. This approach is therefore likely to maximise affordable housing delivery, increasing the amount of affordable housing currently delivered, without impacting on overall housing delivery. The flexibility that this policy affords means that it will be able to respond to changes in the economy, resulting in a positive impact over the course of the plan period.
2.Deprivation	++	++	++	This approach is likely to maximise the amount of affordable housing delivered in the towns of the district, the areas which are recognised as most deprived. As such, the policy is seen as highly positive in respect of this objective. The approach is also likely to increase affordable housing delivery in the rural areas of the district that the SHMA recognises is home to high prices and high home ownership which prevents those from lower incomes accessing these parts of the district.
3.Travel	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the option
4.Communities	?	?	?	It is unknown whether the draft policy would have an impact on the indicators for this objective. Some comments received during consultation on the Emerging Core Strategy suggested residents wanted more affordable housing and so an increase in delivery would be seen as having a positive impact on community satisfaction. However, some residents were not as receptive to the idea of affordable housing in their areas and so the expected increase in delivery may have a negative impact.
5.Health	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
6.Education	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
7.Land Efficiency	0	0	0	The affect of this policy on this objective cannot be fully quantified as it depends on the ultimate location of affordable housing delivery and not directly on different threshold and/or target levels.

Objectives				Explanation
	S	M	L	
8.Biodiversity	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy.
9.Environment	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy.
10.Waste	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
11.Water	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
12.Energy	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
13.Air Quality	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy.
14.Flooding	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy.
15.Coastal Erosion	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy.
16.Economy	+	+	+	It is possible that an increase in affordable housing may help to support the local economy as people on lower incomes can afford to live and work in the district. This would provide a customer base for certain businesses which would also have less of a difficulty in recruiting and retaining staff.
17.Tourism	0	0	0	It is not thought that that this policy would have a direct impact on this objective.

Appraisal Table 9: Core Policy 2 - Housing Type, Mix and Density

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The policy will have a positive impact as it would allow the flexibility to respond to market driven forces as well as the needs of the local community as they change throughout the plan period. This should ensure that development comes forward that is appropriate for the different parts of the district. The policy does not require developments to be built to Lifetime Homes standards and thus may deliver homes that are not appropriate for the whole community even though such standards are encouraged. However, such an approach imposes few barriers to development (for example added requirements/costs for developers) meaning that build rate should not be negatively impacted.
2.Deprivation	+	+	+	As the SHMA details, it is important to avoid creating concentrations of disadvantage by allowing a certain type of home to dominate an area that encourages a singular socio-economic group to locate. Thus the flexible policy is seen positively as it encourages a range of homes to be provided over the plan period. However, as the policy only encourages new homes to be built to Lifetime Homes standards, it may exclude some sectors of the community from accessing the housing market based on physical capabilities. However, this approach would not add to the cost of developing housing (including affordable housing), which could become a barrier to new

Objectives				Explanation
	S	M	L	
				development, particularly in deprived parts of the district where developers' margins may be tighter.
3.Travel	0	0	0	The effect of this objective depends on the location of new housing development rather than the effect of the policy.
4.Communities	+	+	+	The policy is likely to meet the needs of the community by providing a range of dwelling type and size, that fits in with the local character of the area, therefore improving community satisfaction. The flexibility of the policy will enable local communities, should they choose to produce a neighbourhood plan, to have locally set policies on this issue if desired. As the option would not force developers to provide new homes to a lifetime homes standard, it would not satisfy parts of the community who require such properties.
5.Health	?	?	?	The approach encourages development which meets the Lifetime Homes standard, therefore does not require developers to meet the standard. It is likely that this policy will lead to an increase in homes meeting this standard (which would reflect the needs of older people and those with physical impairment), however it is uncertain.
6.Education	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
7.Land Efficiency	++	++	++	The flexible approach set out in the policy will allow for the land to be developed efficiently while still respecting the local environment
8.Biodiversity	0	0	0	The affect of this objective depends on the location of new housing development rather than the types of homes being delivered.
9.Environment	++	++	++	The flexibility of the policy ensures that development will come forward at a density appropriate to a site's environment.
10.Waste	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
11.Water	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
12.Energy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
13.Air Quality	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
14.Flooding	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
15.Coastal Erosion	0	0	0	The affect on this objective depends on the location of new housing development rather than the effect of the policy options.
16.Economy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
17.Tourism	0	0	0	It is not thought that the options would have a noticeable impact on this objective.

Appraisal Table 10: Core Policy 3 - Gypsy and Traveller Accommodation

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The policy, although not allocating specific sites, sets out provision for 11 additional Gypsy Traveller pitches

Objectives				Explanation
	S	M	L	
				between 2011 and 2018. This figure meets the identified need for the district up until 2018. Therefore, this helps to meet a key consideration of this objective: meeting the needs of all members of the community. Until an update to the GTAA is done, the need for pitches will be calculated by repeating the compound growth rate (see policy wording) and so there is some uncertainty into the long term impact on this objective.
2. Deprivation	+?	+?	+?	Allocating Gypsy Traveller sites in the Site Allocations DPD, and as a result meeting the identified need as outlined above, would help to support social inclusion. As mentioned above, the identified long term need, and consequently the impact on this objective, is uncertain
3. Travel	+?	+?	+?	The policy stresses the need for sufficient access by sustainable modes of transport as well as locating development near to local services, which would encourage sustainable modes of transport. The policy also states the requirement to provide sufficient accessibility for residents, emergency vehicles and services. This policy is unlikely to impact on congestion within the district. As mentioned above, the identified long term need, and consequently the impact on this objective, is uncertain.
4. Communities	0?	0?	0?	Specific sites have not yet been allocated; it may be the case that as sites are identified in the Site Allocations DPD some communities raise concerns, although this is uncertain. On the contrary, allocating specific accommodation for travellers should reduce conflict with the settled community and reduce instances of unauthorised encampments. Community and play facilities are a requirement for Gypsy and Traveller sites and so would be included in development proposals which would have a positive impact on this objective. Even though the policy does set a clear direction for Gypsy & Traveller sites, the identified need post 2018 is not yet known and so the long term impact is uncertain.
5. Health	+	+	+	Identifying the provision needs and allocation of specific permanent sites in the Site Allocations DPD will help to improve access to health facilities, tackling known issues such as life expectancy, currently 10 years below the national average, and long term illnesses.
6. Education	+	+	+	Provision of permanent accommodation will improve the opportunities of Gypsy and Traveller children, and adults, to attend school/ further education.
7. Land Efficiency	0?	0?	0?	The specific location of sites will not be known until the Site Allocations DPD stage and so this objective cannot be assessed yet.
8. Biodiversity	0	0	0	This policy approach does offer protection for biodiversity designations when determining Gypsy Traveller site applications. As a result it is not considered that the policy will impact on the objective.
9. Environment	0	0	0	This policy approach does offer protection for areas of valuable landscape, such as the National Park, when determining Gypsy Traveller site applications. As a result, it is not considered that the policy will impact on this objective.
10. Waste	0	0	0	It is not thought that the policy would have an effect on this objective.
11. Water	0	0	0	It is not thought that the policy would have an effect on this objective.
12. Energy	0	0	0	It is not thought that the policy would have an effect on this objective.

Objectives				Explanation
	S	M	L	
13.Air Quality	0	0	0	It is not thought that the policy would have an effect on this objective.
14.Flooding	0	0	0	Although the specific location of sites is not identified in the policy wording, the policy aims to direct development away from areas at risk of flooding.
15.Coastal Erosion	0	0	0	It is not thought that the policy would have an effect on this objective.
16.Economy	0	0	0	It is not thought that the policy would have an effect on this objective.
17.Tourism	0	0	0	It is not thought that the policy would have an effect on this objective.

Appraisal Table 11: Core Policy 4 – Encouraging Economic Development and Regeneration

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought this policy would have an impact on this objective.
2.Deprivation	+	++	++	Many parts of the policy (such as parts 2, 7 and 10) are designed to have a positive impact on the most deprived areas of the district. Over time, the benefit for the deprived areas should increase.
3.Travel	+	+	+	This policy should have a positive impact on this objective by promoting e-communications and homeworking which will likely reduce the need for travel for business.
4.Communities	0	0	0	It is not thought this policy would have an impact on this objective.
5.Health	0	0	0	It is not thought this policy would have an impact on this objective.
6.Education	0	+	+	Part 10 of the policy aims to support the up-skilling of the District's labour supply which should, by the end of the plan period, have a positive impact on the employability of the population, levels of educational attainment and access to educational services.
7.Land Efficiency	+	+	+	By safeguarding against the loss of employment sites in most circumstances (part 2) and by encouraging the intensification of existing employment sites (part 3), the policy should be positive in terms of this objective, directing development to brownfield land. However, development to support the rural economy is likely to be on greenfield sites. In addition, the promotion of good IT infrastructure and homeworking (parts 8 and 9) should further ensure that land is used efficiently.
8.Biodiversity	0	0	0	It is not thought this policy would have an impact on this objective.
9.Environment	0	0	0	It is not thought this policy would have an impact on this objective.
10.Waste	0	0	0	It is not thought this policy would have an impact on this objective.
11.Water	0	0	0	It is not thought this policy would have an impact on this objective.
12.Energy	++	++	++	Modern employment units are likely to be more energy efficient than older, existing units. Thus, the approach to provide new employment accommodation and to upgrade existing space is likely to be positive in terms of this objective.
13.Air Quality	+	+	+	The promotion of homeworking and improved e-communications should help reduce air pollution, by decreasing the need to travel for business.

Objectives				Explanation
	S	M	L	
14.Flooding	0	0	0	It is not thought this policy would have an impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought this policy would have an impact on this objective.
16.Economy	++	++	++	The measures set out in the policy would benefit the District's economy by providing employment space to meet current and future needs. Economic growth would be encouraged by supporting a number of areas which have been identified as areas of underperformance for the District. For example, by encouraging new business start-ups and supporting growth in rural areas (including farm diversification).
17.Tourism	+	+	+	The policy promotes the sustainable tourism economy, which has been identified as having potential for modest growth.

Appraisal Table 12: Core Policy 5 - The Visitor Economy

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought that this policy would have an impact on this objective.
2.Deprivation	0	0	0	It is not thought that this policy would have an impact on this objective.
3.Travel	++	++	++	The policy encourages sustainable modes of transport which should negate any harmful effects caused by an increase in visitor numbers and reduce the impact of current visitors, such as increased pressure on the highway network.
4.Communities	?	?	?	Developing the tourism sector and providing the infrastructure such as new hotel accommodation may well lead to increased visitor numbers which may have an impact on local communities. However, whether this is a positive or negative impact is unknown.
5.Health	0	0	0	It is not thought that this policy would have an impact on this objective.
6.Education	0	0	0	It is not thought that this policy would have an impact on this objective.
7.Land Efficiency	0	0	0	It is not thought that this policy would have an impact on this objective.
8.Biodiversity	0	0	0	The policy does stress the need to conserve and enhance the natural beauty and the wildlife of the District and so would protect against development that may impact on biodiversity.
9.Environment	+	+	+	In order to develop the tourism sector, new development such as accommodation facilities and visitor attractions, may be provided in areas of valued landscape. Also, growth of the tourism sector would lead to increased visitor numbers. This could put pressure on the natural environment in the long term in terms of tranquillity, appearance and by physical erosion if not properly managed. However, the policy stresses the need to conserve and enhance the natural beauty of the area which meets the twin purposes that govern the National Park as set out in the Environment Act 1995, which will ensure that development only comes forward that will relate well to the National Park. Furthermore, the approach will aid in making the National Park more accessible.
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective.
11.Water	0	0	0	It is not thought that this policy would have an impact on this objective.

Objectives				Explanation
	S	M	L	
12.Energy	0	0	0	It is not thought that this policy would have an impact on this objective.
13.Air Quality	0	0	0	It is not thought that this policy would have an impact on this objective.
14.Flooding	0	0	0	It is not thought that this policy would have an impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an impact on this objective.
16.Economy	+	++	++	The policy is likely to have a positive impact on the local economy, importantly on a year-wide basis, whereas current seasonal restrictions exist that reduce the sector's economic benefits. Providing facilities for tourists, such as hotel accommodation, may lead to longer stays which would retain visitor spend within the local economy. The Hotel and Visitor Accommodation Futures Study suggested a shortfall in accommodation and so the policy will satisfy such needs, benefitting the local economy. The policy is also likely to create jobs in the local vicinity through new visitor attractions and facilities. These are benefits which would be more apparent in the medium to long-term. Supporting local businesses and farm diversification would also benefit the local economy.
17.Tourism	+	++	++	Providing new and upgraded visitor attractions, conserving the natural beauty of the District as well as identifying restraints to growth such as meeting the need for accommodation and sustainable transport provision should encourage a buoyant and sustainable tourism sector and an increase in visitor numbers, particularly over the medium to long-term. Promoting a year-wide tourism industry and supporting the provision of new and upgraded visitor attractions should increase the amount of jobs in the tourism sector. The flexibility of the policy should ensure it is able to respond to changes to visitor trends over the course of the plan period.

Appraisal Table 13: Core Policy 6 - Retail and Sustainable Town and Local Centres

Objectives				Explanation
	S	M	L	
1.Housing	+?	+?	+?	A flexible approach to local centres such as Newhaven Town Centre, that will allow non-retail uses, may lead to some housing coming forward in such areas.
2.Deprivation	+	+	+	It is likely that revitalising and diversifying retail centres, encouraging investment and improving pedestrian linkages will be of benefit to the deprived areas of the district.
3.Travel	+	+	+	The sequential approach outlined within the draft policy will direct development to central locations, and where this is not possible, to areas well served by public transport. This will have the benefit of reducing congestion as well as encouraging sustainable modes of transport.
4.Communities	+	+	+	The policy should have a positive impact on this objective by encouraging growth in town and local centres which should benefit local communities with additional shops, jobs and services. Additionally, the policy should reduce vacancy rates in areas where they are high, which should reinforce community pride.
5.Health	0	0	0	It is not thought that this policy would have an impact on this objective
6.Education	0	0	0	It is not thought that this policy would have an impact on this objective
7.Land Efficiency	++	++	++	The policy aims to improve the vitality and viability of retail centres which would include a flexible approach to the

Objectives				Explanation
	S	M	L	
				consideration of alternative uses in areas which are found to be unviable. This approach is likely to bring vacant properties back into use and promote the development of brownfield land. This should reduce pressures to develop on greenfield land.
8.Biodiversity	0	0	0	It is not thought that this policy would have an impact on this objective
9.Environment	0	0	0	It is not thought that this policy would have an impact on this objective
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective
11.Water	0	0	0	It is not thought that this policy would have an impact on this objective
12.Energy	0	0	0	It is not thought that this policy would have an impact on this objective
13.Air Quality	0	0	0	It is not thought that this policy would have an impact on this objective
14.Flooding	0	0	0	It is not thought that this policy would have an impact on this objective
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an impact on this objective
16.Economy	++	+	+	The flexible approach to non-retail use in unviable areas would result in retail premises being lost which may be difficult to regain for this use in the long term. In theory this would be a negative aspect to this policy. However, it is unlikely that all vacant retail premises would be filled for retail use, particularly in the short-term with the economic conditions withstanding. However, it is also possible that this approach could benefit the vitality and the local economy by encouraging people into the area, thus supporting local shops and facilities.
17.Tourism	0	0	0	It is not thought that this policy would have an impact on this objective

Appraisal Table 14: Core Policy 7 - Infrastructure

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	It is likely that this policy would have a positive impact on housing delivery, as large residential developments in particular are often delayed pending infrastructure improvements and so if the infrastructure is already provided this should help unblock such developments.
2.Deprivation	?	?	?	This policy does attempt to provide the infrastructure necessary for a high quality of life, and so this policy may help to bridge the gap between the district's most deprived and affluent communities.
3.Travel	+	+	+	Investment in new and existing travel infrastructure should lead to improved accessibility to services and facilities.
4.Communities	+	+	+	The policy aims to safeguard and enhance existing community facilities as well as providing new facilities in the most appropriate areas to benefit the local community. This should also lead to positive outcomes in terms of community satisfaction and happiness. Also, the introduction of CIL charging should bring about investment in community facilities.
5.Health	+	+	+	This policy should safeguard and provide the facilities required by the district's elderly population, while also ensuring that adequate health services are available in the district.
6.Education	+	+	+	The Infrastructure Delivery Plan should identify where further provision is needed to improve accessibility to

Objectives				Explanation
	S	M	L	
				services such as educational establishments throughout the plan period.
7.Land Efficiency	0	0	0	The policy does not have an impact on this objective.
8.Biodiversity	0	0	0	The policy does not have an impact on this objective.
9.Environment	?	?	?	There is a possibility that new infrastructure in certain areas may have a negative impact on the natural environment, although this factor is more concerned with the location of development. Conversely, access to the countryside may be improved.
10.Waste	0	0	0	The policy does not have an impact on this objective.
11.Water	0	0	0	The policy does not have an impact on this objective.
12.Energy	0	0	0	The policy does not have an impact on this objective.
13.Air Quality	0	0	0	The policy does not have an impact on this objective.
14.Flooding	0	0	0	The policy does not have an impact on this objective.
15.Coastal Erosion	0	0	0	The policy does not have an impact on this objective.
16.Economy	+	+	++	Providing the necessary infrastructure for the district, as set out in the Infrastructure Delivery Plan, should benefit the local economy and attract new investment. This should benefit this objective positively, particularly by the end of the plan period.
17.Tourism	0	0	0	The policy does not have an impact on this objective.

Appraisal Table 15: Core Policy 8 - Green Infrastructure

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	The policy does not have an impact on this objective.
2.Deprivation	0	0	0	The policy does not have an impact on this objective.
3.Travel	+	+	+	It is likely that this policy would lead to increased sustainable transport provision, a positive for this objective.
4.Communities	+	+	+	This policy would protect and enhance existing greenspace as well as identify opportunities for the provision of new greenspace/community facilities, which could lead to improvements in community happiness.
5.Health	+	+	+	Protecting and enhancing existing greenspace, as well as identifying new greenspace, would provide more opportunities for recreation, exercise and relaxation and consequently benefit the district's health.
6.Education	0	0	0	The policy does not have an impact on this objective.
7.Land Efficiency	+	+	+	The policy looks to protect undeveloped land and thus is seen positively in respect of this objective.
8.Biodiversity	+	+	+	The protection and enhancement of existing greenspace, as well as the creation of new greenspace, will have a positive impact on this objective.
9.Environment	++	++	++	This policy aims to protect and enhance valued landscape, as well as improve accessibility, and so would impact positively on this objective.
10.Waste	0	0	0	The policy does not have an impact on this objective.

Objectives				Explanation
	S	M	L	
11. Water	0	0	0	The policy does not have an impact on this objective.
12. Energy	0	0	0	The policy does not have an impact on this objective.
13. Air Quality	0	0	0	The policy does not have an impact on this objective.
14. Flooding	0	0	0	The policy does not have an impact on this objective.
15. Coastal Erosion	0	0	0	The policy does not have an impact on this objective.
16. Economy	0	0	0	The policy does not have an impact on this objective.
17. Tourism	+	+	+	Conserving, enhancing and providing new greenspace could result in an even more desirable natural environment and consequently an increase in visitor numbers.

Appraisal Table 16: Core Policy 9 – Air Quality

Objectives				Explanation
	S	M	L	
1. Housing	0	0	0	It is not thought that this policy will impact on this objective.
2. Deprivation	0	0	0	It is not thought that this policy will impact on this objective.
3. Travel	+	+	+	It is likely that the policy would have a positive impact on travel by promoting sustainable transport methods such as walking and cycling. This would help to realise the aim of reducing congestion in areas of low air quality.
4. Communities	+	+	+	Although the intention of the policy is to improve air quality, the traffic reducing aim of the policy would likely improve community safety as a secondary benefit by the end of the plan period.
5. Health	0	+	+	The policy seeks to reduce air quality from reaching unsafe levels, which would have a positive impact by the end of the plan period to community health.
6. Education	0	0	0	It is not thought that this policy will impact on this objective.
7. Land Efficiency	0	0	0	It is not thought that this policy will impact on this objective.
8. Biodiversity	0	+	+	The measures to improve the air quality set out in the draft policy are likely to have a positive impact in terms of conserving the district's biodiversity. Point 2 in particular highlights the importance of limiting the impact of development on the natural environment. The benefits are likely to be noticed towards the end of the plan period as the policy takes effect.
9. Environment	0	+	+	The measures to improve the air quality set out in the draft policy are likely to have a positive impact in terms of conserving the district's natural environment. Point 2 in particular highlights the importance of limiting the impact of development on the natural environment. The benefits are likely to be noticed towards the end of the plan period as the policy takes effect.
10. Waste	0	0	0	It is not thought that this policy will impact on this objective.
11. Water	0	0	0	It is not thought that this policy will impact on this objective.
12. Energy	0	0	0	It is not thought that this policy will impact on this objective.
13. Air Quality	+	++	++	The policy sets out a number of measures to manage development, to mitigate against the negative impacts of

Objectives				Explanation
	S	M	L	
				development and reduce traffic levels. These measures would improve air quality within the District, which is likely to improve and be more apparent in the long term.
14.Flooding	0	0	0	It is not thought that this policy will impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought that this policy will impact on this objective.
16.Economy	0	0	0	It is not thought that this policy will impact on this objective.
17.Tourism	0	0	0	It is not thought that this policy will impact on this objective.

Appraisal Table 17: Core Policy 10 - Natural Environment and Landscape Character

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	This option does not have an impact on this objective.
2.Deprivation	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.
4.Communities	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	++	++	++	The policy gives the highest priority to conserving and enhancing international biodiversity designations within and surrounding the district. The policy also aims to conserve, enhance and contribute to the net gain of national and local biodiversity designations. Overall the policy is seen very positive in respect to this objective.
9.Environment	++	++	++	The policy ensures that all development will comply with the National Park purposes. It aims to conserve and enhance the Park's landscape character while also protecting other parts of the district's landscape that would be sensitive to the impacts of new development.
10.Waste	0	0	0	This option does not have an impact on this objective.
11.Water	++	++	++	The policy has a positive impact on this objective by seeking to maintain and improve water quality in the district.
12.Energy	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.
17.Tourism	+	+	+	The conservation and enhancement of the district's natural environment is likely to ensure that the district remains attractive to visitors, a positive for the tourism sector. Furthermore the creation of SANGs is likely to ensure that the tourist destination that is the Ashdown Forest is suitably managed and able to cope with additional residential development in the district.

Appraisal Table 18: Core Policy 11 - Built and Historic Environment and High Quality Design

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	This policy encourages housing of a high quality design that complements the locality, and also should result in more sustainably constructed homes due to the high sustainable construction standards. There is the possibility that setting high quality design standards may result in housing development viability issues, however, buildings regulations and national policy do require such standards.
2.Deprivation	0	0	0	It is not thought that this policy would have an effect on this objective.
3.Travel	0	0	0	It is not thought that this policy would have an effect on this objective.
4.Communities	+	+	+	The policy promotes housing and street design that incorporates crime reduction measures and so should impact positively on this objective. Also, well designed housing that complements the district's heritage is also likely to have a positive impact on community happiness.
5.Health	0	0	0	It is not thought that this policy would have an effect on this objective.
6.Education	0	0	0	It is not thought that this policy would have an effect on this objective.
7.Land Efficiency	+	+	+	The policy proposes efficient and effective use of land and so may impact positively on this objective.
8.Biodiversity	0	0	0	It is not thought that this policy would have an effect on this objective.
9.Environment	++	++	++	This policy will both ensure that the heritage assets are protected and that new development responds well to its environment through high quality design.
10.Waste	+	+	+	The policy encourages development that incorporates measures to reduce resource use and so should deliver housing that contributes positively to this objective.
11.Water	+	+	+	The policy encourages development that incorporates measures to reduce resource use and so should deliver housing that contributes positively to this objective.
12.Energy	+	+	+	The policy encourages development that incorporates measures to reduce energy consumption and so should deliver housing that contributes positively to this objective.
13.Air Quality	0	0	0	It is not thought that this policy would have an effect on this objective.
14.Flooding	+	+	+	This policy, in aiming to minimize flood risk, does reference Core Policy 12 (Flood Risk, Coastal Erosion and Sustainable Drainage) and so recognizes the need to develop in sustainable locations
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an effect on this objective.
16.Economy	0	0	0	It is not thought that this policy would have an effect on this objective.
17.Tourism	0	0	0	It is not thought that this policy would have an effect on this objective.

Appraisal Table 19: Core Policy 12 - Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought that this policy will have a direct impact on this objective.

Objectives				Explanation
	S	M	L	
2.Deprivation	0	0	0	It is not thought that this policy will have a direct impact on this objective.
3.Travel	0	0	0	It is not thought that this policy will have a direct impact on this objective.
4.Communities	0	0	0	It is not thought that this policy will have a direct impact on this objective.
5.Health	+	+	+	Indirectly, this policy is likely to have a positive impact on this objective. Large-scale flood events can impact on human health by negatively affecting water quality. Therefore, an approach which reduces the likelihood of such events can be seen as positive.
6.Education	0	0	0	It is not thought that this policy will have a direct impact on this objective.
7.Land Efficiency	0	0	0	It is not thought that this policy will have a direct impact on this objective.
8.Biodiversity	0	0	+	Protecting and re-creating the River Ouse Corridor would certainly help support the biodiversity of the area, especially in the long-term. Also, the policy stresses the importance of protecting biodiversity assets from flood mitigation measures and so should not negatively impact on this objective.
9.Environment	+	+	+	The policy does mention that due weight should be given to the natural environment of the site and its surroundings when considering flood mitigation measures. Furthermore, flood events can have a negative impact on both the natural and historic environments in the district. Thus, having an approach that reduces the likelihood of such events can be seen as positive.
10.Waste	0	0	0	It is not thought that this policy will have a direct impact on this objective.
11.Water	+	+	+	The combined parts of the approach seek to reduce flooding and water run-off and thus is unlikely to have a negative impact on this objective. Indeed, as large scale flood events can have a negative impact on water quality, an approach that reduces the likelihood of such events can be seen as positive.
12.Energy	0	0	0	It is not thought that this policy will have a direct impact on this objective.
13.Air Quality	0	0	0	It is not thought that this policy will have a direct impact on this objective.
14.Flooding	++	++	++	The policy approach would certainly reduce the risk of flooding by directing development away from at-risk areas, promoting the use of flood protection measures as well as reducing the surface run-off from new developments. Also, working towards the protection and re-creation of the River Ouse corridor would have a positive impact in respect to this objective, one that is likely to increase over the plan period.
15.Coastal Erosion	++	++	++	The policy would certainly have a positive impact as development (where possible) is directed away from areas at risk from erosion as well as seeking to enhance coastal defences in line with other plans and projects.
16.Economy	+	+	+	The policy would seek to increase flood protection, which is likely to have a positive impact on this objective by protecting businesses from flooding and promoting confidence in vulnerable areas.
17.Tourism	0	0	0	It is not thought that this policy will have a direct impact on this objective.

Appraisal Table 20: Core Policy 13 - Sustainable Travel

Objectives				Explanation
	S	M	L	

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	This option does not have an impact on this objective.
2.Deprivation	+	+	+	The policy proposes to improve public transport provision and improve accessibility within the district which could support social inclusion and benefit the most deprived communities.
3.Travel	++	++	++	The overriding aim of the policy is to encourage sustainable modes of travel and reduce the proportion of journeys made by car. Therefore, by making sustainable travel options safer and more accessible (for example by influencing design and layout standards and providing cycle parking) it would encourage the uptake of such modes of transport and impact positively on this objective.
4.Communities	+	+	+	A number of the measures set out in the policy are likely to improve community safety by reducing car use and creating safer roads.
5.Health	+	+	+	It is likely that this policy will benefit the district's health and encourage healthier lifestyles by promoting active modes of transport such as walking and cycling. Also, the policy proposes design and layout measures that would make it safer and easier to carry out walking and cycling, which in turn may encourage the uptake of such travel.
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	Although the policy is unlikely to bring about improvements to this objective; whereas previously large scale developments might have had significant negative effects, this policy now aims to ensure the environmental impacts are reduced.
10.Waste	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	+	+	In the long term the district should see air quality improvements as a result of a reduction in car journeys.
14.Flooding	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.

Appraisal Table 21: Core Policy 14 - Renewable and Low Carbon Energy and Sustainable Use of Resources

Objectives				Explanation
	S	M	L	
1.Housing	0?	+?	+?	The implementation of this policy may lead to a slight negative impact on the delivery of housing as developer costs are likely to rise. This may then impact on affordable housing delivery. However, this policy is likely to bring about more energy efficient and sustainably constructed homes and so would offset this negative. In addition, as expertise in delivering such development increases, the costs attributed are likely to drop. It may not be possible

Objectives				Explanation
	S	M	L	
				to incorporate such standards in conversions to residential from other uses either.
2.Deprivation	0	0	0	It is not thought that this policy would have an impact on this objective.
3.Travel	0	0	0	It is not thought that this policy would have an impact on this objective.
4.Communities	0	0	0	It is not thought that this policy would have an impact on this objective.
5.Health	0	0	0	It is not thought that this policy would have an impact on this objective.
6.Education	0	0	0	It is not thought that this policy would have an impact on this objective.
7.Land Efficiency	-?	-?	-?	The wording of the policy (part 4) may prevent conversions of existing buildings into residential units as in some cases it may not be financially viable or even technically feasible to build to Code Level 3/4
8.Biodiversity	0	0	0	It is not thought that this policy would have an impact on this objective.
9.Environment	+	+	+	There may well be a negative visual impact of renewable energy sources i.e. wind turbines, however, the policy also mentions that issues such as this will be fully taken into account when determining applications. The wider environmental impact of the measures set out in the policy would certainly have a positive impact on this objective.
10.Waste	+	++	++	The Code for Sustainable Homes standard would require waste generation, disposal and management to be taken into account to meet the full Code Level 3/4. Therefore this would have a positive impact on this objective. Although a Site Waste Management Plan is no longer mandatory for the Code, to collect points to achieve higher code levels, developers may choose to add other measures relating to waste (e.g. compost facilities). As the code level requirement rises throughout the plan period, this is likely to have a greater positive impact on this objective in the long-term.
11.Water	+	++	++	To meet Code for Sustainable Homes level 3/4, developers would have to ensure that estimated water level would be a maximum of 105 litres per person per day. This is a much lower level than is achieved currently in the region and would reduce further over the period of the Core Strategy as the code requirements become more stringent.
12.Energy	+	++	++	The policy is likely to have a positive effect on energy use and incorporating low carbon and renewable sources into new developments. This impact is likely to improve over the course of the plan period as requirements are set to increase.
13.Air Quality	0	0	0	It is not thought that this policy would have an impact on this objective.
14.Flooding	+	+	+	Meeting the requirements of Code Level 3/4 would ensure that peak and annual surface water run-off rates would not increase in comparison to the site pre-development. In addition, to collect additional credits to achieve higher code levels, developers may choose to add other measures relating to the reduction of surface water run-off, for example a Sustainable Drainage System (SuDS).
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an impact on this objective.
16.Economy	0	0	0	It is not thought that this policy would have an impact on this objective.
17.Tourism	0	0	0	It is not thought that this policy would have an impact on this objective.

Appraisal Table 22: Cumulative and Synergistic Impacts

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	Overall, the plan is seen highly positively with respect to this objective by substantially adding to the housing stock and by delivering an increase in affordable housing over the course of the plan period. The plan directs housing to areas in need and identifies a target for the Gypsy and Traveller Community. The plan promotes sustainably constructed homes another positive for this objective.
2.Deprivation	+	+	++	Overall, the plan should have a positive effect on this objective by directing development to deprived areas of the district. In addition the plan promotes social inclusion, for example, by looking to increase sustainable transport options. The greatest effect on this objective should be noted by the end of the plan period
3.Travel	++	++	++	Generally, the plan directs development to sustainable locations that will reduce the need for new residents to travel by private means and in certain locations (such as Earwig Corner), the plan looks to resolve known issues. In addition the Sustainable Travel policy looks to encourage the increased usage of sustainable modes of transport. As a result the effect of the plan on the policy is highly positive.
4.Communities	+?	+?	+?	The plan, as a whole, should have a positive impact on this objective by both safeguarding or enhancing community facilities and services. Whilst the plan aims to ensure that new development will relate well to the existing communities, it cannot be known what the reaction of a community will be to strategic development. It is likely that low crime rates will continue.
5.Health	+?	+?	+?	The plan as a whole should have a positive impact on this objective by, for example, promoting healthier transport choices and reducing the risk of flooding and associated risk to life. The plan should help to deliver health infrastructure suitable for the needs of the population although at this stage it is not known if development at the rate proposed in the Core Strategy, particularly in areas of strategic development, will strain existing services or support new or enhanced services.
6.Education	+?	+?	+?	The plan as a whole should have a positive impact on this objective by, for example, promoting the up-skilling of the district's labour supply. The plan should help to deliver the infrastructure suitable for the educational needs of the district, although at this stage it is not known if development at the rate proposed in the Core Strategy, particularly in areas of strategic development, will strain existing schools or support the building of new schools or extensions to schools.
7.Land Efficiency	0	0	0	While the plan generally seeks to prevent development on greenfield land and promote the use of brownfield sites this positive is negated because a number of greenfield sites will be developed as a result of the plan.
8.Biodiversity	+	+	+	As a whole, the plan should have a positive impact on this objective by protecting and enhancing biodiversity of value in the district, including designated sites.
9.Environment	++	++	++	The plan should have a positive impact on this objective by protecting and enhancing the district's natural and historic environment and bringing forward development in keeping with the purposes of the park.
10.Waste	+	+	+	The plan should minimise, on a per capita basis, the amount of waste generated in the district. Recycling rates are also likely to rise.
11.Water	++	++	++	The plan as a whole should have a positive impact on this objective by minimising water use on a per capita basis and ensuring that water quality is not adversely affected and improved where possible,
12.Energy	+	++	++	The plan as a whole looks to reduce energy use throughout the district, particularly towards by the later stages of the plan, by bringing forward modern employment units and by requiring developments to be of high standards in terms of energy efficiency. Furthermore, development would be more likely to incorporate low carbon and renewable sources of energy.
13.Air Quality	+?	+?	+?	The plan should have a positive impact on this objective, requiring development to consider its impact on air quality (including in AQMAS) and to mitigate against its effect. It is not clear what impact that strategic development in the North Street Area will have

Objectives	S	M	L	Explanation
				on the AQMA however.
14.Flooding	++	++	++	As a whole, the plan directs development away from areas of flood risk or ensures that development brings about adequate flood defences and should deliver SuDS to reduce any surface water problem
15.Coastal Erosion	++	++	++	The plan directs development away from undefended areas of the district's coastline and seeks to enhance coastal defences where possible.
16.Economy	+	++	++	The plan should, particularly by the end of the period, increase job opportunities within the district (including in areas needing economic revival)) and provide adequate accommodation for business. Development should increase the customer base for shops and services and add to the attractiveness of the retail sector.
17.Tourism	+	+	+	The plan should have a positive impact on this objective by supporting the development of the tourism sector. Efforts to protect, enhance and increase the accessibility of the South Downs National Park, should enable the district to continue to attract tourists.

Appraisal Table 23: Predicted future without Core Strategy

Objectives	S	M	L	Explanation
1.Housing	-	-	-	The current district-wide policy sets the threshold at 15 dwellings with a 25% affordable housing requirement. This policy has helped the District to (at times) exceed the South East Plan housing requirements; however this has not provided enough affordable housing. Since the Local Plan was adopted in 2003, the number of households on the register has increased and affordable housing targets set in the Sustainable Community Strategy have not been met. Therefore, maintaining the current policy would have detrimental impacts. Average house price and the house prices to earning ratio are relatively high within the district.
2.Deprivation	-?	-?	-?	Overall, levels of deprivation across the district are low, although there are disparities with pockets of deprivation (mainly in the coastal towns) that fall within the worst 30% nationally. Between 2007 and 2010, Lewes District's IMD ranking worsened and the number of Super Output Areas (SOAs) in the district considered to be in the worst 30% nationally increased from 5 to 8. It is possible that this trend will continue without a Core Strategy.
3.Travel	-?	-?	-?	The district has access to a good trunk road network, although congestion is an issue on key A roads at peak times. Access to services is considered to be relatively good. Without the plan, it is considered unlikely that traffic improvements to Earwig Corner would come about. In addition, large amounts of development may come forward in unsustainable locations away from public transport.
4.Communities	0	0	0	Without a plan in place, there is no guarantee that community services will be enhanced or safeguarded. The planning authorities would not be as able to ensure that development would relate well to existing communities. Crime has reduced in recent years and access to recreational facilities is good in comparison to the national average. It is considered that the trends will likely persist.
5.Health	0	0	0	Compared to national and county averages, health is good and this is likely to remain without a plan. However, without a plan healthier transport choices wouldn't be encouraged.
6.Education	0	0	0	Attainment at schools has been steadily improving, although a high proportion of residents in the coastal towns have

Objectives				Explanation
	S	M	L	
				no skill qualifications. It is likely that such trends would continue without a plan.
7.Land Efficiency	-	-	-	To meet the housing target, it is inevitable that greenfield land will be developed. Without a plan in place, it could mean the loss of more valuable greenfield sites than under a planned approach.
8.Biodiversity	0	0	0	Even without a plan in place, there is enough protection afforded to sites designated due to their biodiversity status.
9.Environment	+	+	+	The National Park Purposes should ensure that the area in the Park is preserved and enhanced even without the Core Strategy and similar protected will exist for listed buildings. Without a plan however, proposals that may affect landscape would be more likely to be approved – a negative for this objective.
10.Waste	0	0	0	Recycling rates should rise, regardless of the Core Strategy, as the Newhaven Incinerator is operational. Without a plan, there is likely to be little change in waste generation
11.Water	-	0	0	Water consumption is likely to remain high, particularly in the short term. Over time, changes to building regulations may begin to rectify the situation. Without the Core Strategy there is unlikely to be efforts to improve water quality.
12.Energy	+	+	+	Trends indicate that energy consumption is decreasing and thus, without the plan, it is likely that improvements will continue. Albeit, Lewes won't benefit from the encouragement of renewable energy that is a feature of the Core Strategy.
13.Air Quality	0?	0?	0?	It is likely that air quality will remain as existing and thus the AQMAs will remain. It is unknown what effect new development will have on AQMAs as without a plan in place – locations will be unknown.
14.Flooding	-?	-?	-?	The district is prone to flooding and will be in further risk as climate change increases flood risk. Without a plan in place, the district would be unable to ask for and thus less likely to get development that reduces such risk (flood defences/ SuDS etc.), which is likely to make the current situation worse.
15.Coastal Erosion	+	+	+	Even without a plan in place, it is seen as unlikely that development will come forward in areas prone to coastal erosion.
16.Economy	-	-	-	Without a plan in place, it is unlikely that there will be much encouragement for the economy, which will be particularly detrimental to the most deprived areas of the district.
17.Tourism	0?	0?	0?	The designation of the National Park may increase tourism in the district, albeit there would be no explicit encouragement of tourism without the plan.

Appendix 5 – Monitoring Framework

Note: **GREEN** = Positive Change, **RED** = Negative Change

Table 58: Monitoring Framework

Objective	Indicator(s)	Source	Current Level	Trend	Target
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home. (Housing)	Net housing completions per annum	LDC, Annual Monitoring Report	2010/11: 161	2006/07: 296 2007/08: 426 2008/09: 257 2009/10: 175	In line with trajectory
	Net affordable housing completions per annum	LDC, Annual Monitoring Report	2010/11: 30	2006/07: 13 2007/08: 14 2008/09: 66 2009/10: 52	Increase from current level
	Percentage of applications of 10 units or more meeting 40% affordable housing target	Not monitored yet – to be monitored	N/A	Not available	District wide target of 40% affordable housing provision (on developments exceeding
	Lower quarter house prices	DCLG, Live Housing Tables, Table 587	201: £180,000	2006: £162,988 2007: £179,000 2008: £172,900 2009: £165,000	Reduce from current level
	House prices to earning ratio	House prices: HM Land Registry, Earnings: ONS/NOMIS	201: 8.56:1	2007: 7.22:1 2008: 9.32:1 2009: 7.39:1 2010: 7.31:1	Reduce from current level
	Households on housing needs register	Self collected	2012: 2,154	2008: 2,207 2009: 1,724 2010: 2,142 2011: 2,227	Reduce from current level
	Percentage of unfit dwellings	DCLG, Housing Strategy Statistical Appendix, section A	2006: 2.3%	2002: 6.5% 2003: 6.3% 2004: 5.4%]	Reduce from current level

Objective	Indicator(s)	Source	Current Level	Trend	Target
				2005: 2.4%	
	Net additional Gypsy and Traveller pitches	LDC, Annual Monitoring Report	2011: 4	2007/08: 0 2008/09: 0 2009/10: 0	To increase the number of pitches
	Estimated population of the district	CACI PayCheck Data	2011: 97,653	2007: 95,100 2008: 95,740 2009: 96,429 2010: 97,466	No target
	Number of homeless households in temporary accommodation	DCLG Housing Live Table, June 2011	2011: 61	2009: 57 2010: 52	Reduce from current level
	Social Housing Stock	DCLG Housing Live tables 115 & 116	2011: 4,640	2007:4,565 2008:4,548 2009: 4,591 2010: 4,622	Increase from current level
2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the district. (Deprivation)	Rank and change in rank of Lewes District in the Index of Multiple Deprivation	Index of Multiple Deprivation (IMD), 2010	2010: 179 out of 326 Local authorities	2007 - 211 out of 354 local authorities	Improve ranking (where 1 = least desirable ranking)
	Number and location of Super Output Areas (SOA) in the District considered to be in the most deprived 30% in the country	Index of Multiple Deprivation (IMD), 2010	2010 : 8, 1 SOA in the following wards: Lewes Castle, Newhaven Denton and Meeching, Newhaven Valley, Ouse Valley and Ringmer, Peacehaven East, Peacehaven North, Seaford Central and Seaford North.	2007 - 5, 1 SOA in the following wards: Lewes Castle, Newhaven Denton and Meeching, Newhaven Valley, Peacehaven North and Seaford North.	Selective improvement in worst performing wards. Reduce the number from current level.
3. To increase travel choice and accessibility to all services and facilities. (Travel)	Number of large development completions estimated to be within 30 minutes of public transport and walking	LDC, Annual Monitoring Report, 2011	2010/11 : 100%	2006/07: 54% 2007/08: 45% 2008/09: 85% 2009/10: 85%	Maintain current level

Objective	Indicator(s)	Source	Current Level	Trend	Target
	and cycling journey time of services				
	Mode of travel to work	ONS, Census 2001	2001 : Private motor vehicle – 64% Public transport – 11.7% On foot or cycle – 12.5% People who work mainly at or from home – 11.4% Other - 0.4%	Census data – reported every decade	Increase in number of people travelling to work by sustainable modes
	Commuting rate	ONS, Census 2001	2001: Live and work in district – 23,567 2001 - Out-commuters - 17,874		Increase from current level Reduce from current level
	Percentage of the district connected to the internet	CACI, July 2011	2011: 73.7%	2010: 73.6%	Increase from current level
	Average minimum travel Time to the nearest service by public transport/walk (minutes)	Department for Transport, Accessibility Indicators, July 2012	2011: Employment: 10 Food Stores (FS): 9 FE Colleges (FE Cols): 222 GPs: 11 Hospitals (Hosp): 43 Primary Schools (Pri Schl): 9 Secondary Schools (Sec Schl): 15 Town Centres (TCs): 15	(2009) Emp: 10, FS: 10, FE Cols: 24, GPs: 11, Hosp: 36, PriSch: 9, Sec Schl: 15, TCs: 17 (2010) Emp: 11, FS: 10, FE Cols: 24, GPs: 10, Hosp: 45, PriSch: 5, Sec Schl: 14, TC's: 16.	Reduce travel time to nearest services
4. To create and sustain vibrant, safe and distinctive communities. (Communities)	Percentage of people satisfied with their local area as a place to live	Place Survey, 2008 - 2009	2008/09: 84.2%	BVPI General User Survey 2006/07: 69.5%	Increase from current level
	Change in number of community meeting facilities	Not currently measured – To be measured	N/A	Not available	To maintain/ increase number of community meeting facilities

Objective	Indicator(s)	Source	Current Level	Trend	Target
	Change in public open space	Not currently measured – to be measured	N/A	Not available	Increase/ maintain area of public open space
	Crime rate per 1000 of the population	Home Office recorded Crime Statistics, November 2010	2009/10: 49.17	2006/07: 67.5 2007/08: 63.1 2008/09: 55.7	Reduce crime rate
5. To improve the health of the District's population. (Health)	Life expectancy at birth	ONS, life expectancy at birth statistics, October 2011	2011 - Males: 81.0	2005-07: 79.9 2006-08: 80.5 2007-09: 80.9	Increase life expectancy
			2011 - Females: 85.1	2005-07: 84.1 2006-08: 84.3 2007-09: 84.8	Increase life expectancy
	Percentage of population not in good health	ONS, 2001 Census, Table UV20	2001 - 8.5%	Will be compared against 2011 Census when data released	Reduce from current level
	Percentage of population within 30 minutes of a GP surgery either by walking or public transport	Department of Transport, Core Accessibility Indicators	2011 - 100%	2007: 99.3% 2008: 99.2% 2009: 99.6% 2010 – 100%	Maintain current percentage
6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services. (Education)	Students achieving 5 or more A*-C GCSEs grades (including Maths and English)	East Sussex County Council, June 2012	2010/11 - 62.9%	2008/2009: 52.7% 2009/10: 54.9%	Increase percentage
	Numbers of adult learners	East Sussex County Council, February 2011	2008/09 - 2,638	2007/08: 2,867	Increase from current level
	Percentage of adults without any qualifications	Annual Population Survey, Nomis/ONS, August 2010	2011: 11.6%	2008: 12.7% 2009: 5.2% 2010: 7.1%	Reduce current percentage
	Percentage of adults with degree level (or equivalent) qualification	Annual Population Survey, Nomis/ONS, August 2010	2011 - 37.3%	2008: 27.6% 2009: 31.9% 2010: 31.6%	Increase from current level

Objective	Indicator(s)	Source	Current Level	Trend	Target
	Percentage of population within 15 minutes of a primary school either by walking or public transport	Department of Transport, Accessibility Indicators, June 2011	2011 – 95.3%	2007: 96.2% 2008: 95.7% 2009: 96.6% 2010: 99.8%	All district residents within 15 minutes of a primary school either by walking or public transport
	Percentage of population within 20 minutes of a secondary school either by walking or public transport	Department for Transport Accessibility Indicators, June 2011	2011 – 83.9%	2007: 82.8% 2008: 84.4% 2009: 83.5 2010: 83.1%	Increase percentage
7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and minimising the loss of valuable greenfield land. (Land efficiency)	Percentage of new homes built on previously developed land	LDC, Annual Monitoring Report, 2011	2010/11: 67%	2006/07: 79% 2007/08: 72% 2008/09: 57% 2009/10: 74%	Increase current percentage
	Number of empty homes	Empty Homes Agency, 2011	2011: 1,131 (332 long term empty homes)	2007: 1,071 (469 long term empty homes) 2008: 1080 (438) 2009: 1,066 (398) 2010: 1,066 (328)	Reduce number of empty homes and long-term empty homes

Objective	Indicator(s)	Source	Current Level	Trend	Target
	Average density of new residential developments over 6 units for i) towns and ii) villages (planning applications received not completions)	LDC	Not monitored yet – to be monitored	Not available	To achieve residential densities in the region of 47 – 57 dwellings/ha for towns and 20-30 for villages
8. To conserve and enhance the District's biodiversity. (Biodiversity)	Number and condition of internationally and nationally important wildlife and geological sites (SSSIs and SACs)	Natural England, December 2011. Natural England, December 2010.	2011: SSSIs – 16 (2,437 hectares of land): 99.5% of SSSI land favourable or unfavourable but recovering, 0.4% unfavourable and stable, 0.2% unfavourable and declining. 2009: SACs – 2: Castle Hill – 114.52 hectares (both in Lewes District and Brighton & Hove). 100% of SAC land favourable. Lewes Downs – 161.29 hectares. 97.12% of SAC land favourable or unfavourable but recovering. 2.88% of SAC land unfavourable but	April 2010: SSSIs – 16 (2,437 hectares of land): 93.8% of SSSI land favourable or unfavourable but recovering, 1% unfavourable and stable, 5.3% unfavourable and declining. Not available	Maintain/ improve number and improve condition of SSSI's and SAC's

Objective	Indicator(s)	Source	Current Level	Trend	Target
			declining.		
	Number and extent of SNCIs and LNRs	Annual Monitoring Report, 2011	2011: SNCIs – 98, 1,236 hectares (4.2% of District) 5 LNRs – 354 hectares (1.2% of District)	Not available	Maintain or increase current number and extent
	Area of ancient woodland	Weald and Downs Ancient Woodland Survey, 2010	2010: 1156 hectares	Not available	No loss
9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park. (Environment)	Number of listed buildings on the Buildings at Risk Register	Lewes District Council, 2005	2005: Grade I: 1 Grade II*: 3 Grade II: 11	Not available	Reduce from current level
	Net change of Rights of Way	East Sussex County Council, 2010	2010: Footpaths – 234 miles Bridleways - 112 miles Byways – 6 miles Restricted bridleways – 9 miles	Not available	Maintain or increase provision
10. To reduce waste generation and disposal, and achieve the sustainable management of waste. (Waste)	Domestic waste produced per head of population.	East Sussex County Council, 2011	2010/11: 311kg per head	2006/07: 352 kg 2007/08: 347 kg 2008/09: 331 kg 2009/10: 314 kg	Reduce from current level
	Percentage of waste that is recycled or reused.	East Sussex County Council, 2011	2010/11: 27.3%	2006/07: 22.2% 2007/08: 25.3% 2008/09: 25.3% 2009/10: 24.5%	Increase current percentage
11. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management. (Water)	Biological quality of water	Environment Agency, 2009	2009: Good – 36.1% Poor – 63.9%	First year of new method of measurement – not comparable with old method	Increase percentage of 'Good' quality water
	Ecological quality of water	Environment Agency, 2009	2009: Moderate – 48.7% Poor – 51.3%	First year of new method of measurement – not comparable with old method	Increase percentage of 'Moderate' quality water

Objective	Indicator(s)	Source	Current Level	Trend	Target
				method	
	Physico-chemical quality of water	Environment Agency, 2009	2009: Moderate – 100%	First year of new method of measurement – not comparable with old method	100%
	Bathing water quality	Environment Agency, 2010	Seaford 2011: 1 (Best)	Seaford 2006: 1 2007: 1 2008: 1 2009: 1 2010: 1	Maintain current level
	Water consumption per capita (regional level only)	Water Services Regulation Authority (OFWAT), 2010	2009/10: Measured household water consumption – 138 litres per head per day	2006/07: 136 2007/08: 137 2008/09: 137	Reduce water consumption per head per day
			2009/10: Unmeasured household water consumption – 157 litres per head per day.	2006/07: 149 2007/08: 159 2008/09: 149	Reduce unmeasured water consumption per head per day
12. To reduce the emissions of greenhouse gases, to reduce energy consumption and increase the proportion of energy generated from renewable sources. (Energy)	Average Annual Consumption of Energy per user	Department of Energy and Climate Change, March 2012	2010: Electricity: Industry and commercial – 38,962 Kilowatt hours (kWh). Domestic – 4,427 kWh.	Industry and Commercial - 2005: 44,564 kWh 2006: 46,333 kWh 2007: 39,430 kWh 2008: 39,525 kWh 2009: 38,432 kWh Domestic – 2005: 4,819 kWh 2006: 4,767 kWh 2007: 4,694 kWh 2008: 4,503 kWh 2009: 4,405 kWh	Reduce from current level
		Department of Energy and Climate Change, March 2012	2010: Gas: Industry and Commercial – 314,354 kWh.	Industry and Commercial – 2005: 303,131 kWh 2006: 322,379 kWh	Reduce from current level

Objective	Indicator(s)	Source	Current Level	Trend	Target
			Domestic – 14,637 kWh	2007: 312,293 kWh 2008: 326,412 kWh 2009: 293,574 kWh Domestic – 2005: 18,238 kWh 2006: 17,508 kWh 2007: 16,708 kWh 2008: 15,948 kWh 2009: 14,643 kWh	
	Percentage of waste converted to energy	East Sussex County Council, 2011	2010/11: 4.1%	2006/07: 0% 2007/08: 0.6% 2008/09: 0.1% 2009/10: 0.1%	Increase from current level
	Number of grants for renewable energy installations approved	LDC, Annual Monitoring Report 2011	2010/11: 60	2008/09: 67 2009/10: 41	Increase number of grants
	Number of planning applications received relating to renewable energy	LDC, Annual Monitoring Report 2011	2010/11: 24	2006/07: 9 2007/08: 12 2008/09: 10 2009/10: 9	Increase from current level
	Proportion of journeys to work by private motor vehicle public transport, on foot or cycle	ONS, Census 2001	2001: Private motor vehicle – 64% Public transport – 11.7% On foot or cycle – 12.5% People who work mainly at or from home – 11.4% Other - 0.4%	Census data – reported every decade	Increase in number of people travelling to work by sustainable modes
	Carbon dioxide emissions per capita per sector	Department of Energy and Climate Change, 2011	2009: Industry and Commercial and Agriculture – 1.5 tonnes per capita.	Industry and Commercial and Agriculture – 2005: 2.0 tonnes per capita 2006: 1.9 2007: 1.7 2008: 1.6	Reduce figure to help meet UK target to reduce greenhouse gas emissions by 80% by 2050
			2009: Domestic – 2.1	Domestic –	Reduce figure to help

Objective	Indicator(s)	Source	Current Level	Trend	Target
			tonnes per capita.	2005: 2.4 2006: 2.4 2007: 2.3 2008: 2.1	meet UK target to reduce greenhouse gas emissions by 80% by 2050
			2009: Road Transport – 2.0 tonnes per capita.	Road Transport – 2005: 2.2 2006: 2.2 2007: 2.1 2008: 2.1	Reduce figure to help meet UK target to reduce greenhouse gas emissions by 80% by 2050
13. To improve the District's air quality. (Air quality)	Number of Air Quality Management Areas (AQMAs)	Lewes District Council	1, Lewes Town (Fisher Street, West Street, Station Road)	Not available	To reduce or maintain number of AQMA's
	Annual Mean Nitrogen Dioxide Levels in AQMAs	Sussex Air, 2012	2012: Lewes AQMA: 21 ug/m3 (Note: This was recorded in mid-2012, full figure available at end of year)	No trend available: recording began in mid-2011	Improve annual mean nitrogen dioxide levels in AQMA's
	Carbon Dioxide emissions by sector	Department of Energy & Climate Change, November 2011	2009: Total: 531 kt	2005: 620 kt 2006: 612 kt 2007: 586 kt 2008: 580 kt	Reduce figure to help meet UK target to reduce greenhouse gas emissions by 80% by 2050
			2009: Industry & Commercial: 142 kt	2005: 190 kt 2006: 186 kt 2007: 165 kt 2008: 162 kt	Reduce figure to help meet UK target to reduce greenhouse gas emissions by 80% by 2050
			2009: Domestic: 199 kt	2005: 228 kt 2006: 228 kt 2007: 222 kt 2008: 221 kt	Reduce figure to help meet UK target to reduce greenhouse gas emissions by 80% by 2050

Objective	Indicator(s)	Source	Current Level	Trend	Target
			2009: Road Transport: 192 kt	2005: 206 kt 2006: 201 kt 2007: 201 kt 2008: 199 kt	Reduce figure to help meet UK target to reduce greenhouse gas emissions by 80% by 2050
14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. (Flooding)	Number of residential properties at risk of flooding	GIS Data	2528 properties in Flood Zone 2 2075 residential properties in Flood Zone 3	Not currently measured annually.	Reduce from current level
	Amount of land in Flood risk zones 2 and 3 as a percentage of the District's area	GIS	- 11.1% Flood Risk Zone 2 - 9.9% Flood Risk Zone 3	Not available	Reduce from current level
	Percentage of appropriate developments incorporating sustainable urban drainage systems	Lewes District Council (self-collected)	Not monitored yet – to be monitored by LDC	Not available	Increase percentage of development incorporating SUDS year on year
	Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial)	Annual Monitoring Report, 2011	2010/11: 0	2006/07: 1 2007/08: 0 2008/09: 4 2009/10: 0	No applications approved contrary to advice
	Number of planning applications granted contrary to the advice on the Environmental Agency flood defence grounds (tidal)	Annual Monitoring Report, 2011	2010/11: 0	2006/07: 0 2007/08: 0 2008/09: 0 2009/10: 3 (applications granted with conditions)	No applications approved contrary to advice
16. To promote and sustain economic growth in successful	Retail unit vacancy rate in town centres	Retail Vacancy Survey, LDC	2009: Lewes Town Centre – 9%	2008: 10.5%	Reduce vacancy rate
			2009: Newhaven Town	2008: 22.2%	Reduce vacancy rate

Objective	Indicator(s)	Source	Current Level	Trend	Target
areas, and to revive the economies of the most deprived areas. (Economy)			Centre – 25.3%		
			2009: Peacehaven Meridian Centre – 0%	2008: 0%	Maintain vacancy rate
			2009: Seaford Town - Centre 8.9%	2008: 10.3%	Reduce vacancy rate
	Net amount of floorspace developed for employment land	LDC, Annual Monitoring Report, 2011	2010/11: 1254.17m ²	2007/08: 7939m ² 2008/09: 3966m ² 2009/10: -221.3m ²	Increase from current level
	Loss of employment land in local authority area by use class (ha)	LDC, Annual Monitoring Report, 2011	2011: No loss of employment land	2009: 0 2010: B1 – 0.076 (ha)	No loss
	Unemployment Rate Estimate	ONS/Nomis, January 2012	Apr 2011- Mar 2012: 5.5%	Apr 2011- Mar 2012: 4.7% Apr 2009- Mar 2010: 6.0% Apr 2010- Mar 2011: 5.5%	Reduce from current level
	Percentage of population who are long-term unemployed or who have never worked	ONS, 2001 Census, Table KS09.	2001: 1.2%	Census data – reported every decade	Reduce from current level
	Number of business enterprises	ONS/ Inter Departmental Business Register, September 2010	2010: 3,800	2009: 3,880	Increase from current level
Average household income	CACI PayCheck data, July 2011	2011: £36,643	2008: £34,879 2009: £35,671 2010: £35,887	No target	
17. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)	Number of jobs in the tourism sector	Tourism South East, 2010	2010: 3,231	2009: 2,300 2008 figure did not use same methodology	Increase from current level
	Contribution to the District's economy made by visitors – turnover of local businesses	Tourism South East, 2010	2010: £155,080,000	2009: £155,958,000 2008: £149,310,000	Increase from current level

Objective	Indicator(s)	Source	Current Level	Trend	Target
	Number of Day Visitors to the District	Tourism South East: <i>The Economic Impact Of Tourism Lewes 2010</i>	2010: 2,855,000	2009: 2,771,000	Increase in number year on year

Appendix 6 – Appraised Core Policies

Core Policy 1 - Affordable Housing

1. A district wide target of 40% affordable housing, including affordable rented and intermediate (shared ownership) housing, will be sought for developments of 10 or more dwelling units. For developments of less than 10 units, affordable housing will be sought according to the stepped target and threshold below:

Affordable Housing Target/Threshold	
Scheme size (Units)	Affordable housing (Units)
1 - 2	0
3 - 4	1
5 - 7	2
8 - 9	3
10+	40%

2. The affordable housing requirement may exceptionally be determined on a site by site basis where justified by market and/or site conditions. The target levels will be expected to be provided by all developments of 3 or more (net) dwelling units (including conversions and subdivisions) unless the local planning authority is satisfied by robust financial viability evidence that development would not be financially viable at the relevant target level. Such evidence will be required to be submitted with the planning application to justify any reduced levels of affordable housing provision proposed for assessment using an open-book approach and may be subject to independent assessment (e.g. by the Valuation Office Agency or equivalent).
3. The guideline affordable housing tenure split will be 75% affordable rented and 25% intermediate (shared ownership). The local planning authority will negotiate the appropriate tenure split on a site by site basis based upon the latest evidence of needs in the site locality.
4. Affordable housing units will be integrated throughout the development site, be indistinguishable in design and materials from the market housing on the site and remain affordable in perpetuity.

The strong presumption is that affordable housing will be provided on the development site. In exceptional circumstances, the local planning authority may, at its discretion, consider accepting in lieu an off site contribution on another suitable serviced site provided by the developer in the first instance or a financial

contribution of broadly equivalent value. In such circumstances the local planning authority will have particular regard to the need to develop mixed and balanced communities and will need to be persuaded that the affordable housing cannot satisfactorily be provided on the development site itself. In the National Park the focus will be on the provision of affordable housing to ensure that the needs of local communities in the National Park are met.

Where sites are allocated in a Development Plan Document a different affordable housing requirement may be specified (either higher or lower), taking into consideration any site specific factors that may affect financial viability and/or the wider planning benefits of the development of that site.

The local planning authority will monitor the delivery of affordable housing through the Authority Monitoring Report. In the event of persistent under delivery against this policy target and the Housing Strategy annual target the Council will review the targets and thresholds of this policy. In the event of a fall of 10% or more in East Sussex average house prices (Land Registry House Price Index June 2011 baseline) the local planning authority will review the thresholds and targets of this policy.

Due to the largely rural nature of the district, Rural Exception Sites for local needs affordable housing outside the planning boundary of rural settlements will continue to be considered according to the requirements of Policy RES10 carried forward from the Lewes District Local Plan 2003.

Core Policy 2 – Housing Type, Mix and Density

In order to deliver sustainable, mixed and balanced communities, the local planning authority will expect housing developments (both market and affordable) to:

1. Provide a range of dwelling types and sizes to meet the identified local need, based on the best available evidence. This need will generally include accommodation appropriate for the ageing population, and 1 and 2 bedroom homes for single person households and couples with no dependents. Account will also need to be given to the existing character and housing mix of the vicinity and, where appropriate, the setting of the National Park and its Purposes and Duty.
2. Provide flexible, socially inclusive and adaptable accommodation to help meet the diverse needs of the community and the changing needs of occupants over time. Lifetime Homes standards will be encouraged in new residential developments.
3. Achieve residential densities in the region of 47 to 57 dwellings per hectare for the towns and 20 to 30 dwellings per hectare for the villages. Exceptions will be made where individual sites merit lower or higher densities when taking

into consideration the site context including the character of the surrounding area, site accessibility, and the size/type of dwellings needed in the locality. Densities to be achieved on allocated sites will be identified in the development principles that accompany the site allocation in the relevant DPD.

4. Where appropriate, identify sites and local requirements for special needs housing (such as for nursing homes, retirement homes, people with special needs including physical and learning disabilities, specific requirements of minority groups etc) in a Site Allocations and Development Management Policies DPD and/or the SDNPA Local Plan.

Core Policy 3 – Gypsy and Traveller Accommodation

Provision will be made for a net total of 11 additional permanent pitches for Gypsies and Travellers in Lewes District for the period 2011 to 2018. The local planning authority will allocate specific, deliverable sites through a Site Allocations and Development Management DPD and the SDNPA Local Plan. These plans will be informed by appropriate Site Assessment work and taking into account any planning permissions granted permanent use in the interim.

In guiding the allocation of permanent Gypsy and Traveller sites and/or considering planning applications for sites for Gypsies and Travellers and Travelling Showpeople, proposals will be supported where the following criteria have been met and they are in conformity with other relevant district wide policies:

1. Avoid locating sites in areas at high risk of flooding or significantly contaminated land, or adjacent to existing uses incompatible with residential uses, such as waste tips;
2. The site is well related to, or has reasonable access by foot, cycle or public transport, to settlements with existing services and facilities such as schools, health services and shops;
3. The proposal does not compromise the special features of national historical, environmental or landscape designations such as the South Downs National Park, Lewes Downs and Castle Hill Special Areas of Conservation (SAC) and Sites of Special Scientific Interest (SSSI);
4. Safe and convenient access is provided for residents, emergency vehicles and services, such as waste collection, and the site is suitable in terms of size and topography to provide facilities such as parking, storage, play space and residential amenity;

5. Basic services, such as water and power are available, or can be reasonably provided; and
6. Adequate levels of privacy for residents on and adjacent to the site and provided through considerations such as site layout and landscaping.

Proposals for sites for Travelling Showpeople should also include adequate space for storage and/or keeping and exercising any animals associated with Travelling Showpeople's needs.

Core Policy 4 – Encouraging Economic Development and Regeneration

In order to stimulate and maintain a buoyant and balanced local economy through regeneration of the coastal towns, support for local and key strategic businesses and the rural economy and ensuring that the district's economy does not become reliant on one or two sectors, the local planning authority will take a flexible and supportive approach to economic development through the following measures:

1. When and where appropriate, identify sufficient sites in sustainable locations to provide for a flexible range of employment space to meet current and future needs. Within the South Downs National Park the pursuit of National Park Purposes will be paramount.
2. Safeguard existing employment sites from other competing uses unless there are demonstrable economic viability or environmental amenity reasons for not doing so. This will include:
 - i. A demonstrated lack of developer interest.
 - ii. Persistently high vacancy rates.
 - iii. Serious adverse environmental impacts from existing operations.
 - iv. Where the site is otherwise unlikely to perform an employment role in the future.
 - v. Where the loss of some space would facilitate further/improved employment floorspace provision.

In such circumstances, there will be a strong preference for a mixed use alternative development in order to facilitate the retention or delivery of an appropriate element of employment use on the site.

There is a presumption in favour of retaining the unimplemented employment site allocations from the Local Plan (2003) towards meeting the District's employment land requirements over the plan period. However, if there are clear economic viability or environmental amenity reasons for not doing so then such sites will be de-allocated or considered for alternative uses through

the Site Allocations and Development Management Policies DPD or the SDNPA Local Plan.

3. Support the appropriate intensification, upgrading and redevelopment of existing employment sites for employment uses. Where appropriate, mechanisms such as Local Development Orders and 'value added' mixed use schemes will be used.
4. Support the delivery of new office space to meet modern requirements.
5. Encourage and support small, flexible, start-up and serviced business units (including scope for accommodating business expansion). This would include support for economic growth in rural areas through the conversion of existing buildings and appropriate, well designed new buildings for suitable business uses and for sustainable tourism developments. In addition, support will be given for farm diversification schemes and enterprises that help maintain the viability of farm businesses engaged in sustainable land management.
6. Promote the development of sustainable tourism, including recreation, leisure, cultural and creative sectors, and having particular regard to the opportunities provided by the South Downs National Park, both within and outside the National Park boundary.
7. Support the continued use of Newhaven port for freight and passengers including plans for expansion and modernisation of the port as identified in the port authority's Port Masterplan. Support will also be provided to the delivery of onshore infrastructure and support services for the Rampion offshore windfarm.
8. Promote modern and high speed e-communications and IT infrastructure.
9. Encourage sustainable working practices (eg. homeworking and live/work).
10. Support opportunities for the improvement of the skills and educational attainment levels of the district's labour supply, including new education and training facilities.

Core Policy 5 – The Visitor Economy

Opportunities for the sustainable development of the visitor economy will be supported where they are of a scale, type and appearance appropriate to the locality and provide local employment, through the following measures:

1. Support for the high quality provision of new, and the upgrading/enhancement of existing sustainable, visitor attractions; a wide range of accommodation types; encouraging emerging and innovative visitor facilities

and accommodation offers; and giving flexibility to adjust to changing market trends.

2. Presumption in favour of the retention and improvement of existing visitor accommodation stock, including camping and caravan sites and existing visitor attractions/facilities.
3. Encourage sustainable tourism in rural areas, both within and outside the National Park boundary. This will include better linkages between the towns and rural surroundings; and the promotion of opportunities for the understanding and enjoyment of the National Park while recognising the importance of conserving and enhancing the natural beauty, wildlife and cultural heritage of the area, as assets that form the basis of the tourist industry here.
4. Support a year-round visitor economy, including the relaxation or removal of seasonal planning restrictions wherever appropriate, while ensuring the facility remains for visitor use.
5. Support the improvement of sustainable transport opportunities for visitors and encourage the use of sustainable transport modes to reduce the impact of visitors on the highway network.
6. Encourage local crafts, food and produce and appropriate tourism development that supports rural business and farm diversification.
7. Continue to use saved Lewes District Local Plan policies E15 and E17 for Development Management purposes until such time as the Lewes District Council Development Management DPD and/or the South Downs National Park Local Plan is adopted.
8. Ensure that any new camping and touring caravan sites proposed in the South Downs National Park require a location within the National Park; respond sensitively to the National Park Purposes, including in design, location and scale; and meet the requirements of Local Plan Policy E17.

Core Policy 6 – Retail and town centres

In order to promote and enhance the vitality and viability of retail and town centres in the district the local planning authority will:

1. Support development that reinforces or enhances the identified role of the centre in the retail hierarchy:

Main Town Centres

The district's primary focus for retail activity, particularly within the defined Primary Shopping Areas and Primary Shopping Frontages where a predominance of retail units will be retained. Other appropriate uses within Main Town Centres will include appropriate leisure facilities; restaurants; offices; arts, culture and tourism facilities. A diversity of such uses will be particularly encouraged in the Secondary Shopping Frontages and more peripheral areas of the town centres where they support the wider function, vitality and viability of the town.

District Centres

A predominance of retail units will be retained within the defined Primary Shopping Areas and Primary Shopping Frontages in order to maintain a range of convenience and comparison retail goods to serve the local area. A range of other supporting uses and services such as cafes, financial and professional services and offices will be encouraged in the more peripheral areas of the town centres where they support the wider function, vitality and viability of the town centre.

Local Centres

In order to ensure local shopping centres remain a vibrant focus for the local community a range of retail, employment, leisure, cultural and community uses will be encouraged. Local shops and community facilities (such as meeting places, sports facilities, public houses, places of worship and cultural assets) will be retained unless it can be demonstrated that they are financially or otherwise unviable.

In Newhaven town centre a diverse range of retail and other uses such as cafes, restaurants, financial and professional services, employment, arts, cultural and community facilities will be encouraged in order to support the retail function. Such uses will also be permitted in vacant retail units within the Newhaven Primary Shopping Area. Changes of use to residential will be supported in Newhaven town centre, except at street level in the Primary Shopping Area, where other appropriate alternative uses such as retail, cafés, restaurants, financial and professional services, arts, cultural or community facilities cannot be identified.

2. Apply the Sequential Test for edge of centre or out of centre retail development proposals and require Retail Impact Assessments where the following thresholds are exceeded:

<i>Retail Impact Assessment – Trigger Thresholds (gross)</i>	
<i>Main Town Centre</i>	<i>750sqm</i>
<i>District Centre</i>	<i>500sqm</i>
<i>Local Service Centre</i>	<i>250sqm</i>

The Retail Impact Assessment will need to comply with paragraph 26 of the National Planning Policy Framework (NPPF) and applications and their associated assessments will be determined against paragraph 27 of the NPPF.

3. Require developments in edge of centre or out of centre locations to provide, enhance, or make contributions to, improved pedestrian and cycle linkages to the town centre.
4. Support and retain local and rural shops and community facilities in locations not identified in the retail hierarchy. Where such uses become redundant or are demonstrated to be unviable alternative community uses will be sought. Proposals for new small scale rural retail and community facilities will be encouraged where they provide for local needs.

Core Policy 7 - Infrastructure

The creation of sustainable communities in the district where residents enjoy a high quality of life will be achieved by:

1. Protecting, retaining and enhancing existing community facilities and services, including facilities which serve older people. New community facilities should be located within the defined settlement boundaries where they will be most accessible. In exceptional circumstances, such facilities may be located outside of these areas where it can be demonstrated that this is the only practicable option and the site is well related to an existing settlement.
2. Resisting proposals involving the loss of sites or premises currently, or last, used for the provision of community facilities or services unless:
 - i) a viability appraisal, including a marketing exercise where appropriate, demonstrates that continued use as a community facility or service is no longer feasible; or
 - ii) an alternative facility of equivalent or better quality to meet community needs is available or will be provided in an accessible location within the same locality; or
 - iii) a significant enhancement to the nature and quality of an existing facility will result from the redevelopment of part of the site or premises for alternative uses.
3. Preparing, regularly updating and facilitating the implementation of an Infrastructure Delivery Plan that will set out how necessary physical and social infrastructure provision for the district will be achieved with key delivery partners in a timely manner to support growth.
4. Ensuring that land is only released for development where there is

sufficient capacity in the existing local infrastructure to meet the additional requirements arising from the proposed development. Where development would create the need to provide additional or improved community facilities, services or infrastructure, a programme of delivery will be agreed with the relevant infrastructure providers to ensure that these improvements are provided at the time they are needed.

The local planning authorities will implement a Community Infrastructure Levy (CIL) to provide for wider infrastructure and community needs. Arrangements for the provision or improvement of infrastructure, that is not intended to be wholly or partly funded by CIL and is required to make the development acceptable in planning terms, will be secured by means of planning obligations via a legal agreement, or by conditions attached to the planning consent or by any other appropriate mechanism.

Core Policy 8 – Green Infrastructure

The local planning authority will promote a connected network of multi-functional green infrastructure by protecting and enhancing the quantity, quality and accessibility of open spaces throughout the district. This will be achieved by:

1. Identifying in the Site Allocations and Development Management Policies DPD or SDNPA Local Plan areas where there is potential for the enhancement or restoration of existing green infrastructure and opportunities for the provision of new green space.
2. Ensuring that development maintains and/or manages identified green infrastructure, where appropriate.
3. Requiring development to contribute to the green infrastructure network and make provision for new green infrastructure and/or linkages to existing green infrastructure, where appropriate.
4. Resisting development that would undermine the functional integrity of the green infrastructure network or would result in the loss of existing green spaces, unless either mitigation measures are incorporated within the development or alternative and suitable provision is made elsewhere in the locality.
5. Working in partnership with other organisations to increase walking, cycling and public transport access to the countryside.

Core Policy 9 – Air Quality

The local planning authority will seek to improve air quality throughout the district, having particular regard to any Air Quality Management Area (AQMA)

designations. Applications for development that by virtue of their location, nature or scale could impact on an AQMA will be required to:

1. Have regard to any relevant Air Quality Action Plans (AQAP) and to seek improvements in air quality through implementation of measures in the AQAP.
2. Provide mitigation measures where the development and/or associated traffic would adversely affect any declared AQMA.

All applications for development will be required to:

3. Provide mitigation measures where the development and/or its associated traffic could lead to a declaration of a new or extended AQMA.
4. Ensure that the development will not have a negative impact on the surrounding area in terms of its effect on health, the natural environment or general amenity, taking into account cumulative impacts.
5. Promote opportunities for walking, cycling and public transport and congestion management to reduce traffic levels in areas of reduced air quality, particularly in town centre locations, and promote the opportunity for cycling through the provision of cycleways.
6. Secure best practice methods to reduce levels of dust and other pollutants arising from the construction of development and/or from the use of the completed development.

Core Policy 10 – Natural environment and Landscape Character

1. The natural environment of the district, including landscape assets, biodiversity, geodiversity, priority habitats and species and statutory and locally designated sites, will be conserved and enhanced by:
 - i. Seeking to conserve and enhance the natural, locally distinctive and heritage landscape qualities and characteristics of the district including hedgerows, ancient woodland and shaws, as informed by the East Sussex County Landscape Assessment and the Lewes District Landscape Capacity Study;
 - ii. Ensuring that new development will not harm nature conservation interests, unless the benefits of the development clearly outweigh the harm caused. In such cases appropriate mitigation and compensation will be required;
 - iii. Seeking the conservation, enhancement and net gain in local biodiversity resources including through maintaining and improving wildlife corridors, ecological networks and avoiding habitat fragmentation in both rural and urban areas;

- iv. Working with neighbouring local authorities to contribute to the delivery of biodiversity improvements within the South Downs Way Ahead Nature Improvement Area and the Brighton and Lewes Downs Biosphere Project, as well as other projects and partnerships that are established during the plan period.
2. The highest priority will be given to the conservation and enhancement of the landscape qualities of the South Downs National Park, and the integrity of European designated sites (SACs and SPAs) in and around Lewes District.
 3. To ensure that the Ashdown Forest (SAC and SPA) is protected from recreational pressure, residential development that results in a net increase of one or more dwellings within 7km of the Ashdown Forest will be required to contribute to:
 - i. The provision of Suitable Alternative Natural Greenspaces (SANGs) at the ratio of 8 hectares per additional 1,000 residents;
 - ii. The implementation of an Ashdown Forest Management Strategy;
 - iii. A programme of monitoring and research at Ashdown Forest.

Until such a time that appropriate SANGs provision is delivered, development that results in a net increase of one or more dwellings within 7km of Ashdown Forest, will be resisted.

4. Ensure that water quality is maintained or improved (including during any construction process) and that watercourses (including groundwater flows) are protected from encroachment and adverse impacts in line with the objectives of the South East River Basin Management Plan. Where appropriate, the local planning authority will seek the enhancement and restoration of modified watercourses.

Core Policy 11 – Built and Historic Environment and High Quality Design

The local planning authority will seek to secure high quality design in all new development in order to assist in creating sustainable places and communities. This will be achieved by ensuring that the design of development:

- i. Respects and, where appropriate, positively contributes to the character and distinctiveness of the district's unique built and natural heritage;
- ii. Within the South Downs National Park shall be in accordance with the Park purposes and outside the SDNP that regard is had to the setting of the National Park and its purposes;
- iii. Incorporates sustainable construction standards and techniques and adequately addresses the need to reduce resource and energy consumption;

- iv. Responds sympathetically to the site and its local context and is well-integrated in terms of access and functionality with the surrounding area;
- v. Is adaptable, safe and accessible to all and, in relation to housing development, is capable of adapting to changing lifestyles and needs;
- vi. Incorporates measures to reduce opportunities for crime or anti-social behaviour, including the provision of active ground floor frontages in town, district and local centres to assist with the informal surveillance of the public realm;
- vii. Makes efficient and effective use of land, avoiding the creation of public space which has no identified use or function;
- viii. Provides a satisfactory environment for existing and future occupants including, in relation to housing development, adequate provision for daylight, sunlight, privacy, private outdoor space and/or communal amenity areas;
- ix. Minimises flood risk in accordance with Core Policy 12.

The local planning authority will safeguard historic assets, including scheduled ancient monuments, listed buildings (both statutory and locally listed), registered parks and gardens, the Lewes Battlefield (1264), and archaeological remains. Proposals which conserve or enhance the historic environment, including the sensitive use of historic assets through regeneration, will be encouraged and supported.

The local planning authority will seek opportunities to enhance the character and appearance of designated Conservation Areas, in accordance with the Conservation Area character appraisals.

Core Policy 12 – Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

The local planning authority will seek to reduce the impact and extent of flooding. This will be achieved by:

1. Steering development away from areas of flood risk (as identified in the latest Environment Agency and SFRA flood risk and climate change maps) where possible. Development in areas of flood risk will be required to meet the national Sequential and Exception tests, where relevant.
2. Where site specific flood risk assessments are required, directing applicants to demonstrate that the development and its means of access will be safe from flooding without increasing the risk of flooding elsewhere. Development should seek to reduce overall flood risk where possible.
3. Requiring flood protection, resilience, resistance and mitigation measures appropriate to the specific requirements of the site. Such measures will be expected to have regard to the character of the natural and built environment

of the site and surroundings, to climate change implications and to biodiversity.

4. Liaising closely with the Environment Agency and East Sussex County Council on development and flood risk.
5. Seeking the appropriate management of surface water run-off and ensuring there is no increase in surface water run-off from new developments. This will include requiring new development to incorporate Sustainable Drainage Systems (SuDS), unless it is demonstrated that SuDS are not technically appropriate. The local planning authority will liaise with East Sussex County Council, the lead local flood authority, on the whole life management and maintenance of SuDS.
6. Ensuring development avoids areas of undeveloped coastline unless it specifically requires a rural coastal location, meets the sequential test and does not have other adverse impacts.
7. Preventing development on unstable areas of coastline and areas at risk of erosion, such as those identified in the South Downs Shoreline Management Plan.

The local planning authority will work with partners and applicants to implement the current Shoreline Management Plan, Catchment Flood Management Plan and other relevant flood/coastal protection strategies and plans.

Core Policy 13 – Sustainable Travel

The local planning authority will promote and support development that encourages travel by walking, cycling and public transport, and reduces the proportion of journeys made by car, in order to help achieve a rebalancing of transport in favour of sustainable modes by:

1. Ensuring that new development is located in sustainable locations with good access to schools, shops, jobs and other key services by walking, cycling and public transport in order to reduce the need to travel by car (unless there is an overriding need for the development in a less accessible location).
2. Ensuring that the design and layout of new development prioritises the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist.
3. Ensuring that new residential developments are designed to achieve speeds of 20 mph or less.

4. Ensuring that new development minimises the need to travel and incorporates appropriate measures to mitigate for any transport impacts which may arise from that development.
5. Expecting new development to contribute to delivering the priorities of the East Sussex Local Transport Plan.
6. Requiring new development to provide for an appropriate level of cycle and car parking (standards will be set out in a Supplementary Planning Document).
7. Requiring development which generates a significant demand for travel, and/or is likely to have other transport implications to:
 - i. Be supported by a Transport Assessment/Transport Statement and sustainable Travel Plan, where appropriate;
 - ii. Contribute to improved sustainable transport infrastructure, including the provision of safe and reliable sustainable transport modes; and
 - iii. Provide facilities and measures to support sustainable travel modes.

The local planning authority will work with East Sussex County Council and other relevant agencies to encourage and support measures that promote improved accessibility, create safer roads, reduce the environmental impact of traffic movements, enhance the pedestrian environment, or facilitate highway improvements. In particular, the local planning authority will:

- i. Support the expansion and improvement of public transport services, particularly those providing links between the rural and urban areas;
- ii. Encourage improvements to existing rail services, new or enhanced connections or interchanges between bus and rail services, and improvements to the quality and quantity of car and cycle parking at railway stations; and
- iii. Support the development of a network of high quality walking and cycling routes throughout the district.

Core Policy 14 - Renewable and Low Carbon Energy and Sustainable Use of Resources

In order to reduce locally contributing causes of climate change, including through the implementation of the highest feasible standards of sustainable construction techniques in new developments, the local planning authority will:

1. Encourage renewable and low carbon energy in all development, with proposals responding to the potential identified in the Energy Opportunities Map. Development location and design that takes advantage of opportunities for decentralised, renewable and low carbon energy will be encouraged.

2. Support applications for low carbon and renewable energy installations, subject to the following matters being satisfactorily assessed and addressed:
 - i. Appropriate contribution to meeting national and local renewable heat and energy targets
 - ii. Meeting the National Park Purposes where proposals lie within the South Downs National Park boundary
 - iii. Landscape and visual impact
 - iv. Local amenity impact
 - v. Ecology impact
 - vi. Cultural heritage impact, including the need to preserve and enhance heritage assets.
3. Require planning applications relating to Core Strategy strategic site allocations and broad locations for growth to be accompanied by an Energy Strategy. The Energy Strategy will seek to incorporate decentralised and renewable or low carbon technologies into the development proposal. Where a strategic site or broad location is developed in phases, the Energy Strategy will guide the development of infrastructure for renewable and/or low carbon technologies in a coordinated way.
4. All new dwellings will be required to meet the full Code for Sustainable Homes standard of at least Code Level 3 and then at least Code level 4 once further updates to Part L of the Building Regulations come into effect. All new non-residential developments over 1,000 square metres (gross floorspace) will be expected to achieve the BREEAM 'Very Good' standard. Developers will be expected to provide certification evidence of the levels achieved in the relevant codes/standards at the planning application stage.