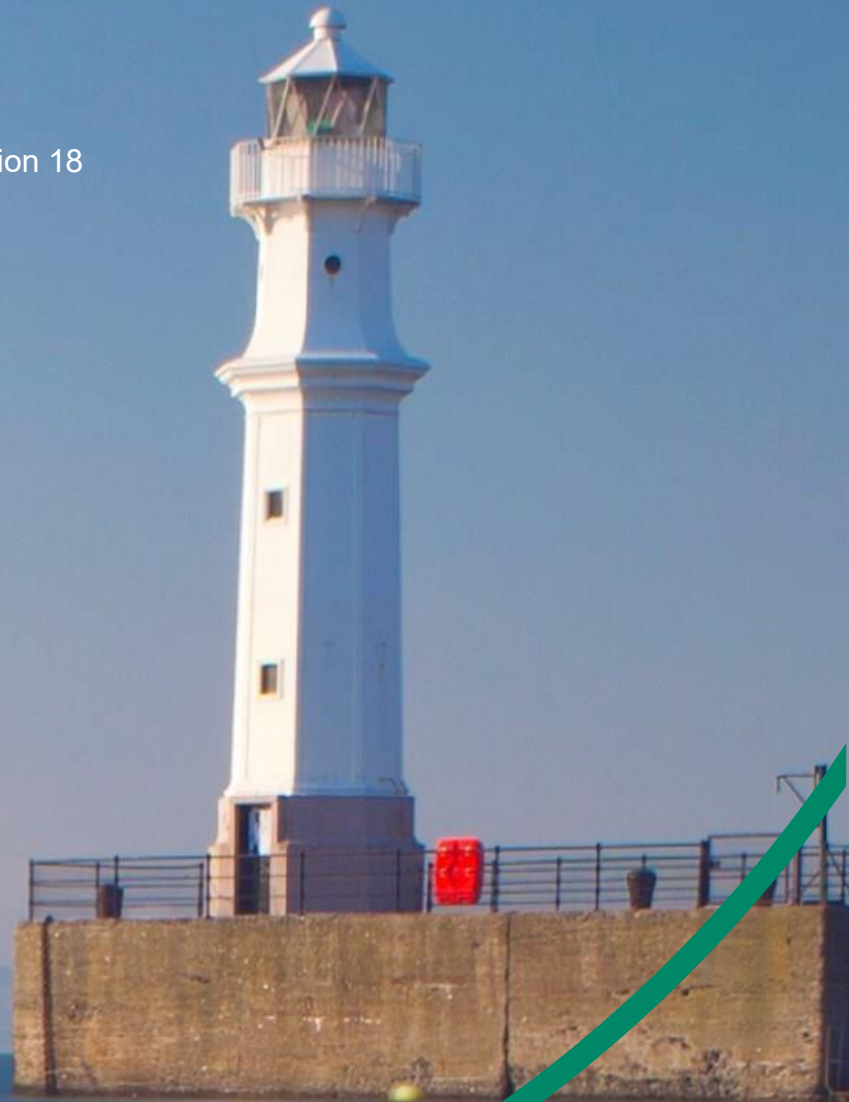


Sustainability Appraisal (SA) for the Lewes Local Plan

Interim SA Report to accompany Regulation 18
consultation (November 2023)

November 2023



Quality information

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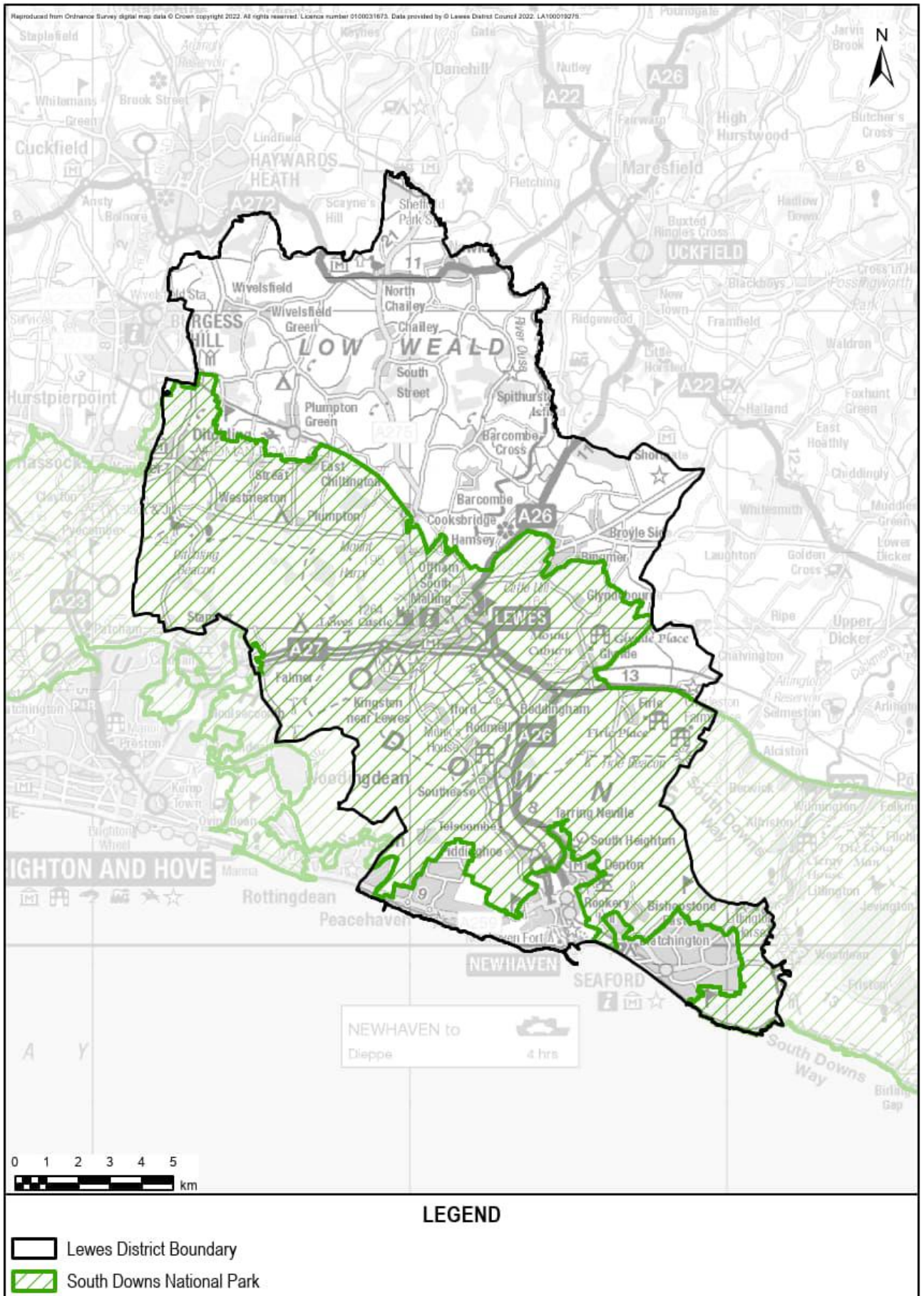


Figure 1.1: Map of Lewes District (with boundary of the South Downs National Park)

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake an independent Sustainability Appraisal (incorporating Strategic Environmental Assessment) in support of the emerging Lewes Local Plan. This is being undertaken on behalf of Lewes District Council (LDC).
- 1.2 Two local plans are currently in place in Lewes District – the Lewes District Local Plan 2010-2030 and the South Downs Local Plan.
- 1.3 The Lewes District Local Plan comprises two documents:
 - Part 1 Joint Core Strategy 2010-2030, which sets out the Council’s vision, aims and overarching (strategic) planning policies (adopted May 2016).
 - Part 2: Site Allocations and Development Management Policies, which sets out more detailed (non-strategic) planning policies for different types of development (adopted February 2020).
- 1.4 In addition, the South Downs Local Plan (2014-2033), adopted in 2019, covers the parts of the District within the South Downs National Park. Within the National Park, the South Downs National Park Authority is the local planning authority.
- 1.5 LDC is currently revisiting the Lewes District Local Plan. In 2018 the Government introduced a requirement for all councils to review their local plans every five years, and then update them where necessary.
- 1.6 This review has been undertaken, and it concluded that several strategic policies need updating as a result of changes in national planning policy requirements and a considerable increase in the District’s local housing need as assessed by a new government algorithm introduced in 2016. The Council also needs to look ahead to the period beyond 2030 and strengthen the Local Plan in a number of key areas in order to help meet the Council’s new ambitions and aspirations, such as addressing climate change.
- 1.7 The new Lewes Local Plan will cover the area of the District which is outside of the South Downs National Park. This area is separated by the South Downs National Park and has distinct characteristics:
 - the coastal strip including the towns of Seaford, Newhaven, Peacehaven and Telscombe, which are located to the south of the National Park, and
 - the countryside and villages of the Low Weald, to the north of the South Downs National Park within Lewes District’s boundary.
- 1.8 The Local Plan, which will cover the period to 2040, will be the key planning policy document for the District and will guide decisions on the use and development of land. It is currently anticipated that the Local will be submitted the Secretary of State and then undergo an independent Examination in Public by the end of 2025.
- 1.9 Key information relating to the Local Plan is presented in **Table 1.1** below.

Table 1.1: Key facts relating to the Lewes Local Plan

Name of Responsible Authority	Lewes District Council
Title of Plan	Lewes Local Plan
Subject	Development plan
Purpose	<p>The Local Plan will guide future development and land use within Lewes District over the period up to 2040.</p> <p>Replacing the current Lewes District Local Plan 2010-2030, the Local Plan will, alongside Neighbourhood Plans, comprise the development plan for the District outside of the South Downs National Park and will be the primary basis against which planning applications are assessed.</p>
Timescale	To 2040
Area covered by the plan	<p>Lewes District, excluding the area covered by the South Downs National Park.</p> <p>(Figure 1.1)</p>
Summary of content	<p>The Local Plan will set out the vision, strategy and policies to manage growth and development in Lewes District in the period to 2040.</p> <p>The new Local Plan will set out where and how new development will take place over the period to 2040. It will include site allocations for different land uses, such as housing and employment, and policies to help tackle the climate emergency, safeguard the environment and secure high quality design. When it is adopted by the Council, the new Local Plan will be used to help determine planning applications.</p>
Plan contact point	<p>Nadeem Dim, Lewes District Council</p> <p>Email address: nadeem.din@lewes-eastbourne.gov.uk</p>

Current stage of plan making

- 1.10 This Interim SA Report accompanies the current consultation on the Local Plan.
- 1.11 At the current stage of plan-making LDC is not consulting on a full draft plan. Rather, the Council is consulting on an initial document, “*Towards a Local Plan spatial strategy and policies directions*”.
- 1.12 The aim of this consultation is to gain stakeholders’ views on the approach Local Plan policies can take on various key planning issues, including alternative development strategies for the District. The document is an initial stage in developing the Local Plan and has been prepared under Regulation 18 of the Town and Country Planning (England) Regulations 2012).
- 1.13 The current consultation precedes the release of the draft Local Plan for further Regulation 18 consultation in spring 2024. Drawing on consultation responses received at the current stage of plan-making and new evidence base studies undertaken to inform the Local Plan, this document will set out the proposed policies for the Local Plan, including a preferred development strategy.

Sustainability appraisal explained

- 1.14 SA considers and communicates the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process, in terms of key sustainability issues. The aim of SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, the SA seeks to maximise the emerging Local Plan's contribution to sustainable development.
- 1.15 An SA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations). SA also widens the scope of the assessment from focusing generally on environmental issues to also explicitly include social and economic issues.
- 1.16 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.17 The 'likely significant effects on the environment', are those defined in the SEA Regulations as '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'. Reasonable alternatives to the plan need to take into consideration the objectives for the plan and its geographic scope. The choice of 'reasonable alternatives' is determined by means of a case-by-case assessment and a decision.¹

This Interim SA Report

- 1.18 At the current stage of plan-making, LDC is not consulting on a full draft plan. Rather, the Council is consulting on an initial document setting out proposed approaches for the Local Plan.
- 1.19 This Interim SA Report has therefore been produced voluntarily with the intention of informing this stage of preparation of the Local Plan. Specifically, this report presents an appraisal of a series of approaches and alternatives which are currently being evaluated as part of plan development. This is for the benefit of those who might wish to make representations through the consultation and for the benefit of the plan-makers tasked with selecting preferred approaches for the Local Plan.
- 1.20 Subsequent stages of the SA process will consider more detailed Local Plan options. This will include a detailed consideration of growth strategy options for the Local Plan, which will consider alternative spatial strategies for the district, reflecting land availability and different levels of growth. The findings of these assessments will be presented in SA Reports accompanying Regulation 18 consultation on the draft Local Plan (spring 2024) and Regulation 19 consultation on the Pre-Submission version of the Local Plan (winter 2024).
- 1.21 The next steps for the Local Plan's development and accompanying SA process are discussed in more detail in **Chapter 5**.

¹ Commission of the European Communities (2009) Report from the Commission to the Council, The European Parliament, The European Economic and Social Committee and the Committee of the Regions on the application and effectiveness of the Directive on Strategic Environmental Assessment (Directive 2001/42/EC). (COMM 2009 469 final).

2. Scope of the appraisal

What is the scope of the SA?

- 2.1 The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. These authorities were consulted on the scope of the Local Plan SA in March 2021 for the statutory period of 5 weeks.
- 2.2 The baseline information (including baseline data and context review) initially included in the SA Scoping Report has been updated in the period since and provides the basis for the SA process.

SA Framework

- 2.3 Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of sustainability issues that should be a particular focus of SA, ensuring it remains targeted on the most important issues. These issues were then translated into an SA ‘framework’ of objectives and appraisal questions.
- 2.4 The SA Framework provides a way in which the sustainability effects of the Local Plan and alternatives can be identified and subsequently analysed based on a structured and consistent approach.
- 2.5 The SA Framework and the appraisal findings in this Interim SA Report have been presented under ten SA Themes, reflecting the range of information being considered through the SA process. These are:
 1. Energy and Waste
 2. Flooding, Erosion, Drought
 3. Quality Environment
 4. Biodiversity
 5. Green Infrastructure
 6. Landscape and Historic Environment
 7. Housing
 8. Resilient Communities
 9. Economy and Tourism
 10. Travel and Transport
- 2.6 The SA Framework is presented in **Table 2.1** below.

Table 2.1: SA Framework for the Lewes Local Plan

SA Theme	SA Objectives	Assessment questions
Energy and Waste	To address the causes of Climate Change by promoting and supporting the zero carbon objective.	<ul style="list-style-type: none"> • Will the approach reduce greenhouse gas emissions? • Does the approach support reductions in energy consumption? • Will the approach increase the amount of carbon captured by plants and trees? • Will the approach increase the proportion of energy from renewable sources? • Will the approach increase recycling rates? Will appropriate recycling and storage facilities be provided? • Will the approach affect amounts of construction and demolition waste?
Flooding, Erosion, Drought	To reduce the risk to people, properties, and the environment of flooding from all sources, and of coastal erosion.	<ul style="list-style-type: none"> • Will the approach impact on flooding – tidal, coastal, fluvial, groundwater, and surface water? • Does the approach reduce the risk of flooding? • Does the approach reduce the risk of erosion? Does the approach put people or property at risk of erosion?
	To reduce heat stress, drought and water scarcity in dry seasons.	<ul style="list-style-type: none"> • Does the approach impact on heat stress in warm summers? • Does the approach impact on the quantity of available drinking water?
Quality Environment	To improve the quality of the environment by reducing air, water, and soil pollution.	<ul style="list-style-type: none"> • Does the approach decrease air pollution? • Does the approach decrease the need to travel into AQMAs in the (entire) District? • Does the approach reduce surface or ground water pollution? (Does the approach affect a Source Protection Zone?) • Does the approach improve chemical and biological water quality of our waterways? • Does the approach reduce soil pollution or improve the conditions of the soil and the ability to capture carbon?
Biodiversity	To protect and enhance biodiversity and the networks of biodiversity, and achieve net gains for biodiversity.	<ul style="list-style-type: none"> • Does the approach protect the areas of SSSI and ancient woodland? • Does the approach protect and enhance natural and semi-natural terrestrials, coastal, river, and marine habitats and species? • Does the approach optimise opportunities to create a Nature Recovery Network? • Does the approach contribute to the achievement of net gains for biodiversity? • Does the approach protect nationally important wildlife? • Does the approach impact on the Ashdown Forest?
Green Infrastructure	To protect and enhance green infrastructure, and improve outdoor	<ul style="list-style-type: none"> • Does the approach avoid negative impact on Green and Blue Infrastructure?

SA Theme	SA Objectives	Assessment questions
	recreation and the access to nature.	<ul style="list-style-type: none"> • Will the approach avoid impact on parks and gardens, children's play areas, sport pitches or amenity areas? • Does the approach optimise opportunities to create a network of linked green and blue spaces / a Nature Recovery Network? • Does the approach optimise access to the Plan Area's green and blue infrastructure and to the countryside?
Landscape and Historic Environment	To protect, and enhance the intrinsic character and visual amenity of landscapes / townscapes and to protect and enhance archaeological, historical and cultural heritage and their settings.	<ul style="list-style-type: none"> • Will the approach minimise negative impact on valued landscapes? • Will the approach protect the intrinsic character and visual amenity of landscapes / townscapes? This includes characteristics such as tranquillity, dark night skies and ecosystem services. • Will the approach protect character, Special Qualities and views from the National Park? • Will the approach minimise negative impact on greenfield land? • Does the approach avoid a negative impact on listed buildings and conservation areas? Sites of archaeological interest?
Housing	To provide affordable, environmentally sound and good quality housing of types and sizes that meets the needs of the community.	<ul style="list-style-type: none"> • Does the approach help meet affordable housing needs? • Does the approach meet the needs of all members of the community (ageing population, new families)? • Does the approach encourage a mix of types and tenures to be achieved? • Will the condition and diversity of stock be improved? • Does the approach lead to more sustainably constructed homes?
	To improve efficiency in land use through the re-use of previously developed land.	<ul style="list-style-type: none"> • Does the approach lead to houses of good design? • Does the approach encourage the development of brownfield land?
Resilient Communities	To improve community health, safety and wellbeing and promote inclusive and vibrant communities.	<ul style="list-style-type: none"> • Will a sense of cultural identity, belonging and well-being be achieved? • Does the approach support a healthy lifestyle and outdoor playing space? Does the approach encourage active transport modes?
	To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the district.	<ul style="list-style-type: none"> • Does the approach consider the needs of people with disabilities, and / or the needs of the ageing population and / or the needs of the deprived population? • Does this approach benefit the most deprived areas of the district?
	To ensure the appropriate provision of infrastructure to meet needs arising from new and existing development.	<ul style="list-style-type: none"> • Is new development located in proximity to a range of services and facilities? <ul style="list-style-type: none"> – School – GP surgery – Shops

SA Theme	SA Objectives	Assessment questions
		<ul style="list-style-type: none"> – Employment locations – Public transport • Is the capacity of existing infrastructure sufficient? With special attention to services for the older people. • Does the approach provide for sufficient infrastructure to sustain accessible services? • Is the infrastructure easily accessible? • Does the approach improve access to a range of facilities? • Will there be sufficient capacity of the highway and public transport network? • Will there be sufficient capacity of utilities networks? • Will the approach enable the funding and timely delivery of infrastructure to support development?
Economy and Tourism	To promote and sustain economic development in resource-efficient areas, to increase the local employment rate and community wealth.	<ul style="list-style-type: none"> • Does the approach improve access to a range of facilities and employment opportunities? • Does the approach increase possibilities for resource efficient businesses? • Will the approach reduce retail vacancy rates? • Will the amount of local employment land increase?
	To narrow the gap between the most deprived and the more affluent areas in the Plan Area.	<ul style="list-style-type: none"> • Will this approach create jobs for people from most deprived areas?
	To encourage the growth of a buoyant and sustainable tourism sector.	<ul style="list-style-type: none"> • Will the approach increase the number of jobs in the tourism sector? • Will more people visit the district as a result of this approach?
Travel and Transport	To increase travel choice and accessibility to all services and facilities. To reduce the need to travel particularly by the private car and enabling more sustainable travel, including walking, cycling and public transport.	<ul style="list-style-type: none"> • Will the approach lead to more sustainable travel including walking, cycling and public transport? • Will the approach enable a shift away from the private car towards public transport and cycling and walking? • Will the approach encourage the use of Ultra Low Emission Vehicles (ULEVs)? • Will the approach ensure sufficient capacity of the highway and public transport network? • Will the approach minimise the need to travel particularly by private car by efficient land use patterns? • Will the approach minimise the need to travel by car through the location and design of new development and places which provide opportunities for active travel and with link to public transport infrastructure?

3. Options appraised as reasonable alternatives

Reasonable alternatives in SA

3.1 A key element of the SA process is the appraisal of 'reasonable alternatives' for the Local Plan. The SEA Regulations² are not prescriptive as to what constitutes a reasonable alternative, stating only that the SA Report should present an appraisal of the "*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*".

Options appraised

3.2 In response to this, a number of options have been considered for the Local Plan at this stage through the SA process. These relate to the following:

- Rural diversification
- Town centre uses
- Former Lewes to Uckfield railway line
- Affordable homes provision
- Renewable energy
- Energy performance of new development
- Carbon sequestration
- Biodiversity Net Gain
- Urban greening

3.3 Further detail on these options is presented in **Chapter 4**.

Note on the assessment of growth scenarios for the Local Plan

3.4 A central aspect of the SA process will be the consideration of growth scenarios for the Local Plan. This will comprise a detailed consideration of alternative spatial strategies for the District, reflecting land availability and different levels of growth.

3.5 The development and assessment of growth scenarios will draw on the following:

- different potential levels of growth in the District;
- land availability in the District, drawing on the findings of the Land Availability Assessment being undertaken to support the Local Plan; and
- information from the evidence base studies being prepared for the Local Plan. These studies include a climate change study, biodiversity assessment, strategic flood risk assessment, water cycle study and landscape study.

3.6 The growth scenario options appraisal will be presented in the forthcoming SA Reports accompanying Regulation 18 and Regulation 19 consultations on the draft Local Plan (discussed further in **Chapter 5**).

² Environmental Assessment of Plans and Programmes Regulations 2004

Approach to the appraisal

- 3.7 The options considered as 'reasonable alternatives' have been appraised against the SA Framework (**Table 2.1**).
- 3.8 In undertaking the appraisal, the proposed options were reviewed to determine the likelihood of positive or negative effects under each SA theme.
- 3.9 Where a causal link between the options and SA themes was established, impacts were identified on the basis of professional judgment with reference to the evidence base. The appraisal was undertaken with reference to the criteria in Schedule 1 of the SEA Regulations, that is:
- the probability, duration, frequency and reversibility of the effects;
 - the cumulative nature of the effects;
 - the transboundary nature of the effects;
 - the risks to human health or the environment (for example, due to accidents);
 - the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
 - the value and vulnerability of the area likely to be affected due to-
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values; or
 - intensive land-use; and
 - the effects on areas or landscapes which have a recognised national, community or international protection status.
- 3.10 The following chapters therefore:
- Provide more detail on the options considered as reasonable alternatives through the SA process; and
 - Present the appraisal findings relating to these options.

4. Appraisal of options for key policy areas

Key policy areas

- 4.1 The aim of the current Local Plan consultation is to gain stakeholders' views on the approach Local Plan policies can take on various key planning issues. It reflects LDC's understanding of the main issues for the new Local Plan and the possible approaches to address these through planning policy.
- 4.2 Reflecting this, LDC have considered alternative approaches for the key policy areas for the Local Plan.

Approach to the appraisal

- 4.3 To inform this process, the SA process has appraised a series of options for a range of policy areas, with a view to informing the current consultation. This appraisal seeks to explore the options with particular potential for significant environmental effects. These appraisals are designed to inform plan makers and stakeholders on the relative sustainability merits of alternative approaches the Local Plan could take on different policy areas, and the likely implications of these.
- 4.4 The following pages present details of the options assessed. This is accompanied by an appraisal of these options against the SA Framework developed during scoping (**Table 2.1**), presented by SA theme.
- 4.5 For each SA theme, a commentary on the likely effects is presented. Options are also ranked numerically reflecting their relative sustainability performance, with '1' the most favourable ranking and '2' or '3' the less favourable ranking.
- 4.6 Infographics are also presented in relation to the SA themes and show the relative performance of each option against each other. Where there are two options, a green shading with an 'outer ring' is used to highlight the best performing option (ranking 1st), whilst a red shading covering an 'inner ring' represents the option which performs less well (ranking 2nd). Where there are three options, an orange 'middle ring' represents the option which performs less well (ranking 2nd), whilst a red shading covering an 'inner ring' represents the option which performs least favourably (ranking 3rd). Where options are ranked equally, or it is not possible to differentiate between the options, an equals sign is used within the diagrams.

Appraisal of options relating to rural diversification

- 4.7 The rural economy is an important component of the District's economy.
- 4.8 It is anticipated that the Local Plan will support proposals for diversification schemes which enable farming operations to continue.
- 4.9 A first approach would be to support proposals for diversification schemes which enable farming operations to continue, particularly where they are engaged in sustainable land management or renewable / low carbon energy, where they are appropriate in scale to their location and, where possible, reuse existing buildings.
- 4.10 A second approach would be to allowing greater flexibility for the residential use of rural buildings.
- 4.11 As such, the SA process has considered two options, as follows:
- **Option RD1:** Support proposals for diversification schemes which enable farming operations to continue.
 - **Option RD2:** Allow greater flexibility for residential uses of rural buildings.
- 4.12 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Option RD1: Support proposals for diversification schemes which enable farming operations to continue.

Option RD2: Allow greater flexibility for residential uses of rural buildings.

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		RD1	RD2
Energy and Waste	<p>Option RD1, through supporting diversification schemes, has the potential to support climate change mitigation by increasing opportunities to deliver land-based schemes which support carbon sequestration. This includes tree planting and other nature-based solutions which directly contribute to carbon sequestration and enhancing natural carbon sinks. In addition, diversification may facilitate opportunities for other activities that support climate change mitigation, such as renewable energy provision.</p> <p>Option RD2, through allowing for greater flexibility for residential uses of rural buildings, may lead to housing provision in locations which are less accessible. This may increase emissions through necessitating the use of the private vehicle to access services and facilities.</p>	1	2
Flooding, Erosion, Drought	<p>Option RD1 may help facilitate activities which would enable changes in land use like wetlands and floodplain restoration that, if appropriately designed, increase resilience to the impacts of extreme weather events such as floods and droughts. This would support the development of landscape-scale resilience to the impacts of climate change. Option RD2 would not directly support climate change adaptation in this regard.</p>	1	2
Quality Environment	<p>Given the largely rural locations affected by Option RD2, facilitating the delivery of limited housing in rural areas is unlikely to affect air quality in the locations in the District with the most significant air quality issues. Similarly, diversification of farming activities is unlikely to have significant effects on air quality.</p> <p>Soil and water quality may though be supported through Option RD1 by enabling regenerative land-based practices which support regulating ecosystem services. This depends though on the nature of diversification activities.</p>	1	2

Option RD1: Support proposals for diversification schemes which enable farming operations to continue.

Option RD2: Allow greater flexibility for residential uses of rural buildings.

Biodiversity	Option RD1, by facilitating activities such as habitat restoration, tree planting and other nature-based solutions, has the potential to provide benefits for enhancing priority habitats and species, improving ecological connectivity, supporting recovery of declining species, and restoring degraded areas. RD2, through facilitating residential uses, may do less to support biodiversity and geodiversity in this regard. Some types of diversification schemes taken forward through Option RD2 may however have impacts on habitats and species. As such, it is not possible to differentiate between the options at this level of detail	?	?
Green Infrastructure	Option RD1, through supporting diversification, has the potential to support the delivery of multifunctional green infrastructure provision alongside land-based schemes. RD2, through facilitating limited residential conversions, may do less to support a significant expansion and improvement of multifunctional green infrastructure provision.	1	2
Landscape and Historic Environment	Option RD2, through delivering limited additional housing provision, may have the potential to lead to impacts on landscape character through visual impacts and the loss of key landscape features. The approach may also have impacts on the fabric and setting of the historic environment. This depends though on the design and layout of development; sensitive conversions for example may support the rejuvenation of heritage assets, and better reveal their significance, or support landscape character. With regards to RD1, the impact of diversification activities on landscape character and the historic environment similarly depends on the type and design of the diversification scheme. It is not possible to differentiate between the options therefore.	?	?
Housing	Option RD2 has the potential to do more than Option RD1 to deliver additional homes in rural parts of the District. This may help meet localised rural housing needs. The extent to which this takes place depends however on the type and tenure of housing delivered, and the number of homes in which the option would facilitate. In this respect, whilst the option will do more to support housing delivery, when considered in the overall context of housing delivery in the District, the option is unlikely to have significant effects on the delivery of affordable homes or housing of a range of types and tenures.	2	1
Resilient Communities	Option RD1, through supporting economic diversification, has the potential to support the vitality of rural communities by increasing employment opportunities and facilitating the delivery of new rural amenities. Whilst Option RD2 will support the delivery of additional housing, which will support localised housing needs, the option is unlikely to have significant effects on the delivery of affordable homes or housing of a range of types and tenures. The option therefore may do less than otherwise to support the diversity of rural communities.	1	2
Economy and Tourism	Through taking more of a residential focus, potential opportunities relating to a change of use for economic activities (including tourism) may not be as effectively realised through Option RD2. In this respect a farming-led diversification focus of Option RD1 has additional potential to support the vitality of the rural economy.	1	2

Option RD1: Support proposals for diversification schemes which enable farming operations to continue.

Option RD2: Allow greater flexibility for residential uses of rural buildings.

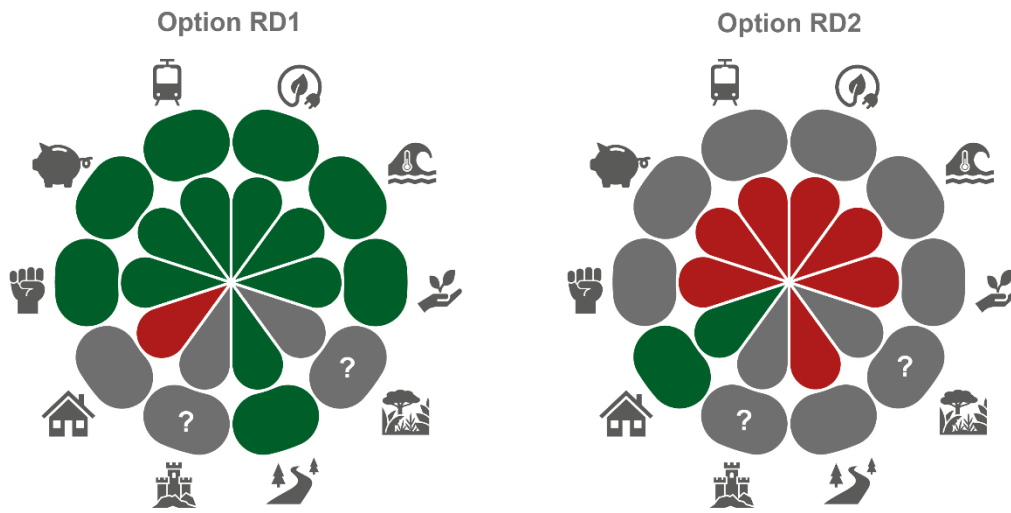
Travel and Transport	Impacts on traffic and accessibility depend on the type and location of diversification schemes, or the location of new residential uses. However, the delivery of residential uses in rural areas through Option RD2 is less likely to support the use of sustainable modes of transport or accessibility given the likely need to access these uses via private car.	1	2
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Appraisal of options relating to rural diversification



Option RD1 - Support proposals for diversification schemes which enable farming operations to continue

Option RD2- Allow greater flexibility for residential uses of rural buildings



- 
energy and waste
- 
flooding, erosion & drought
- 
quality environment
- 
biodiversity
- 
green infrastructure
- 
landscape and historic environment
- 
housing
- 
resilient communities
- 
economy and tourism
- 
travel and transport

Appraisal of options relating to town centre uses

4.13 The Local Plan seeks to support the economic vitality and viability of town and village centres in the District.

4.14 Given ongoing pressures on the vitality of the District’s town and village centres, support and diversification is needed to encourage different and innovative uses, particularly in underused properties and floorspace. In light of this, there is the potential to take a flexible approach to town centres which facilitates changes of use where these are compatible with other town centre uses.

4.15 In response to this, the SA process has considered two options, as follows:

- **Option TC1:** Seek to facilitate the retention of uses typically found within high streets and resist the loss of town centre uses.
- **Option TC2:** Apply a more flexible approach with regards to change of use in town centres (taking into account changes to the Use Classes Order).

4.16 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Option TC1: Seek to facilitate the retention of uses typically found within high streets and resist the loss of town and village centre uses.

Option TC2: Apply a more flexible approach with regards to change of use in town and village centres (taking into account changes to the Use Classes Order).

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		TC1	TC2
Energy and Waste	<p>The application of a more flexible approach with regards to change of use in town centres through Option TC2 has the potential to deliver residential uses in locations accessible to services and facilities. This will help reduce the need to travel, and support access to public transport networks with associated benefits for limiting greenhouse gas emissions from transport.</p> <p>However, the approach may lead to the loss of retail and other community uses and amenities in these centres. Given town and village centres are the most accessible locations in the District by sustainable modes of transport, the loss or relocation of amenities from these locations may increase the need to travel, and do less to limit greenhouse gas emissions from transport.</p> <p>Overall, it is uncertain as to which option will perform most favourably in relation to this SA theme.</p>	?	?
Flooding, Erosion, Drought	<p>It is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example, sustainable drainage systems and the provision of green and blue infrastructure are an effective means of minimising surface water runoff. In this regard it is not possible to differentiate between the options in relation to climate change adaptation.</p>	?	?
Quality Environment	<p>In relation to the options’ impact on air quality, this depends on the location and type of development, and the likelihood of the proposal stimulating traffic movements which will affect air quality. However, the application of a more flexible approach relating to change of use through Option TC2 may support a greater diversity of uses in town centres, including residential uses. This may reduce the need to travel by the private car. As such it is considered that localised air quality improvements may be delivered through Option TC2, including through a reduced need to travel and subsequent modal shift. However, this is not likely to be significant. Furthermore, given town and village centres</p>	?	?

Option TC1: Seek to facilitate the retention of uses typically found within high streets and resist the loss of town and village centre uses.

Option TC2: Apply a more flexible approach with regards to change of use in town and village centres (taking into account changes to the Use Classes Order).

	<p>are the most accessible locations in the District by sustainable modes of transport, the loss or relocation of amenities from these locations may increase the need to travel by the private car, with implications for air quality.</p> <p>In terms of the potential impacts on soil and water quality, both options will support the remediation of contaminated land by facilitating the redevelopment of employment land where appropriate. In terms of water quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution.</p> <p>Overall therefore, it is not possible to differentiate between the options in relation to this SA theme.</p>		
Biodiversity	It is recognised that the effects from each option on features and areas of biodiversity interest largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures. As such it is not possible to differentiate between the options.	?	?
Green Infrastructure	Whilst the redevelopment of employment land for residential or other uses may facilitate enhancements to multifunctional green and blue infrastructure networks, both options have the potential to lead to enhancements in this regard. As such it is not possible to differentiate between the options in terms of green and blue infrastructure provision.	?	?
Landscape and Historic Environment	Whilst the redevelopment of employment land for residential or other uses may support enhancements to the built environment (or have negative impacts), both options have the potential to lead to enhancements to the setting of the public realm, the historic environment and landscape/townscape character if high quality design and layout is incorporated within new provision. As such, it is not possible to differentiate between the options in terms of potential effects on townscape and landscape character.	?	?
Housing	Option TC2 has additional potential to lead to the delivery of housing in town centres. This will support the delivery of homes in accessible locations, in good proximity to services, facilities and amenities.	2	1
Resilient Communities	Option TC2 has additional potential to lead to the delivery of housing in town centres. This will support the delivery of homes in accessible locations, in good proximity to services, facilities and amenities. However, the option has the potential to undermine the role of town and village centres. Town and village centres play an important role in local communities, it is therefore important to take a positive approach to their growth, management and adaptation. In this respect local amenities not only help create local employment opportunities and provide opportunities for social interaction among residents, but they also reduce the need for local people to have to travel to access these services. Option TC1 therefore does more to recognise the importance of retaining these local amenities which are of such importance to local communities.	1	2
Economy and Tourism	Option TC2 has additional potential to lead to the delivery of housing in town centres. This will support the delivery of homes in accessible	1	2

Option TC1: Seek to facilitate the retention of uses typically found within high streets and resist the loss of town and village centre uses.

Option TC2: Apply a more flexible approach with regards to change of use in town and village centres (taking into account changes to the Use Classes Order).

locations, in good proximity to economic and employment opportunities. Increased residential uses in town centres will also support the vitality of town centres, including through supporting the evening economy.

However, the option has the potential to undermine the economic role of town and village centres. Town and village centres play an important role in the economy of the District, it is therefore important to take a positive approach to their growth, management and adaptation. In this respect local amenities not only help create local employment opportunities, but they also reduce the need for local people to travel to access these opportunities. In this respect Option TC1 recognises the importance of retaining these local economic activities which are of such importance to local communities.

As such, whilst elements of both options will have positive effects in relation to this SA theme, Option TC1, through recognising the important economic role of town and village centres, has the potential to do more to support the District's economy than Option TC2.

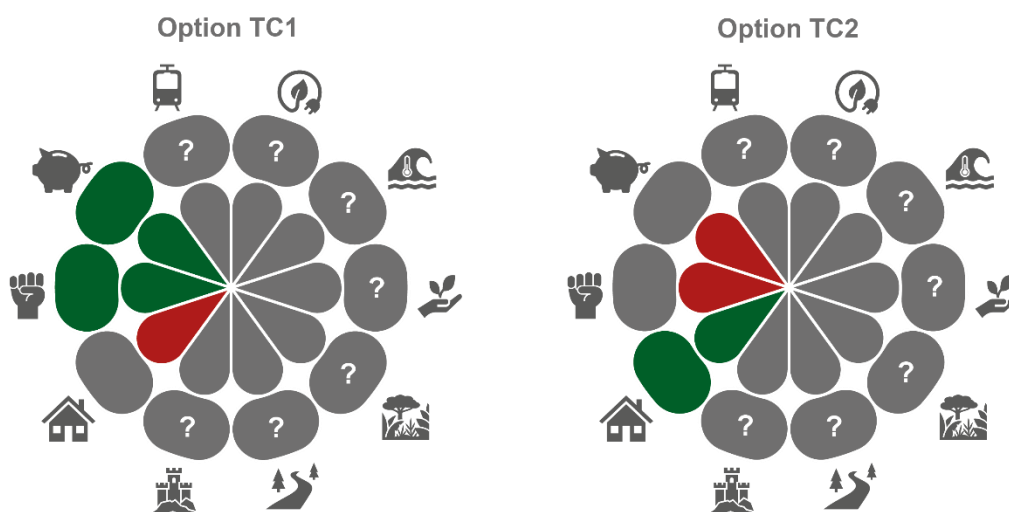
Travel and Transport	<p>The application of a more flexible approach with regards to change of use in town centres has the potential to deliver residential uses in locations accessible to services and facilities. This will help reduce the need to travel, and support access to public transport networks. However, the approach may lead to the loss of retail and other community uses and amenities in these centres.</p> <p>Given town and village centres are the most accessible locations in the District by sustainable modes of transport, the loss or relocation of amenities from these locations may increase the need to travel by the private car. As such, it is not possible to rank the options in this regard.</p>	?	?
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Appraisal of options relating to town centre uses



Option TC1 - Seek to facilitate the retention of uses typically found within high streets and resist the loss of town centre uses

Option TC2 - Apply a more flexible approach with regards to change of use in town centres (taking into account changes to the Use Classes Order)



Appraisal of options relating to the former Lewes to Uckfield railway line

- 4.17 The Lewes to Uckfield railway line closed in 1969. Comprising part of the Wealden Line, it enabled rail services to run from Tunbridge Wells to Lewes and the south coast via Uckfield.
- 4.18 A range of recent studies have indicated that there is a significant case for reopening the line to passenger services.
- 4.19 The London and South Coast Rail Corridor Study, published by the Department for Transport in 2017, concluded that a transport case could be made for such a scheme subject to additional economic growth. The Transport for the South East Strategic Investment Plan (2023) identifies an aspiration to reinstate the railway between Lewes and Uckfield to increase resilience of rail connectivity between the South Coast and London.
- 4.20 East Sussex County Council and Lewes District Council support the reinstatement of the line in order to provide additional rail capacity in the county. This is in line with the objectives of the Local Transport Plan 2011-2026 and the East Sussex Rail Strategy.
- 4.21 As such, it is anticipated that the re-opening of the Lewes to Uckfield line would provide a new link that would not only ease pressure on the existing network and provide an additional rail route between Brighton and London, but also make more sustainable travel options available to more people across the region.
- 4.22 Given these opportunities, there is the potential for the Local Plan to introduce policies which support (within its parameters) the reopening of the Lewes to Uckfield railway line to passenger services.
- 4.23 In light of this, the SA process has considered two options for this issue, as follows:
- **Option RL1:** Safeguard the former Lewes to Uckfield railway line for future use, including the potential reopening of the line.
 - **Option RL2:** Do not include a policy to protect the route of the former railway line.
- 4.24 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Option RL1: Safeguard the former Lewes to Uckfield railway line for future use, including the potential reopening of the line

Option RL2: Do not include a policy to protect the route of the former railway line

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		RL1	RL2
Energy and Waste	<p>As highlighted by the Lewes Climate Change & Sustainability Strategy Framework 2020, transport is a significant contributor to greenhouse gas emissions in the District and across the wider region.</p> <p>In this respect, the reinstatement of rail services between Uckfield and Lewes will support a limitation of emissions from transport through facilitating and encouraging rail use. By improving the availability of sustainable travel options for people across the region, the reopening of the line has the potential to encourage lower carbon modes of travel. This includes through improving sustainable transport links from London, the Weald and the south coast, the facilitation of improved links to Brighton, and the potential delivery of new direct rail services to and from Seaford and Newhaven. Option RL1 therefore would facilitate these longer-term benefits.</p> <p>In contrast, Option RL2, through potentially facilitating the loss of the former railway line, and precluding a reinstatement of services, has the potential to neutralise one of the main opportunities available for promoting lower carbon modes of transport across the region.</p>	1	2

Option RL1: Safeguard the former Lewes to Uckfield railway line for future use, including the potential reopening of the line

Option RL2: Do not include a policy to protect the route of the former railway line

<p>Flooding, Erosion, Drought</p>	<p>The route of the former railway line is in close proximity to a number of watercourses, including those associated with the River Uck and the River Ouse and the route alignment follows these watercourses' floodplains in many places. As such flood risk along the route would need to be addressed through a reinstatement of rail services through Option RL1, and any new structures (such as station buildings or bridges) would be likely to require a sequential test to ensure flood risk is appropriately addressed. There would also need to be consideration of impacts on erosion and linked effects.</p> <p>Whilst Option RL2 may preclude these effects through impacting on the reopening of the railway, the option also has the potential to lead to impacts on flood risk through facilitating other types of development along the route.</p> <p>As such it is not possible to differentiate between the options in relation to climate change adaptation.</p>	<p>?</p>	<p>?</p>
<p>Quality Environment</p>	<p>The potential impact of the options on emissions from transport has been discussed under the Energy and Waste SA theme. In this respect, Option RL1, through facilitating a key regional opportunity for increasing sustainable transport use, has the potential to support an improvement of air quality at key air quality hotspots in the District. This includes associated with the AQMAs in Lewes town centre and Newhaven.</p> <p>Railway land is generally regarded as contaminated and so development of the former track alignment and associated structures would require assessment. In addition, the route of the former railway line is in close proximity to a number of watercourses, including associated with the River Ouse and River Uck. However, in terms of water and soil quality no significant impacts are anticipated from a reinstatement of rail services if the required embedded mitigation measures are incorporated within the construction and operations stage.</p>	<p>1</p>	<p>2</p>
<p>Biodiversity</p>	<p>No internationally or nationally designated biodiversity sites are present along or close to the potentially reinstated part of the route. The nearest is the Offham Marshes SSSI, which is located in the area adjacent to the existing railway line between Cooksbridge and Lewes.</p> <p>A number of biodiversity action plan priority habitats are present alongside the route. This includes large areas of coastal and floodplain grazing marsh (associated with the River Ouse), a number of areas of deciduous woodland and good quality semi improved grassland, and small pockets of lowland fens habitat.</p> <p>There are also two areas of ancient woodland adjacent to the route, including an outlier of the Owlsbury Wood (located south west of Uckfield) and the River Uck Shaw (located north east of Isfield).</p> <p>In this respect the reinstatement of the railway line facilitated by Option RL1 has the potential to lead to impacts on habitats, species and ecological networks along the route. This is given the disused railway route acts as an important biodiversity corridor, linking key habitats and supporting a significant number of protected species.</p> <p>As such, the clearance of the route for a reinstatement of rail services of has the potential to have significant effects on biodiversity through impacts on habitats and species from landtake and fragmentation, including associated with strengthening of earthworks, as well as disturbance from noise, light pollution or trampling from enhanced access.</p>	<p>?</p>	<p>?</p>

Option RL1: Safeguard the former Lewes to Uckfield railway line for future use, including the potential reopening of the line

Option RL2: Do not include a policy to protect the route of the former railway line

	<p>It should be noted however that through in effect safeguarding the route, any potential effects will be longer term, rather than short and medium term, and indirect.</p> <p>Option RL2, through not including a policy to protect the route, also may also lead to indirect impacts on habitats, species and ecological networks. In this respect other uses for the route facilitated through Option RL2 (including through the loss of land through development, or the reconfiguration of the route as an active travel corridor) also have the potential to have significant effects on biodiversity.</p> <p>In this respect it is not possible to differentiate between the options at this level of detail in relation to potential impacts on biodiversity.</p>		
Green Infrastructure	<p>Option RL2 has the potential to facilitate the use of route (or parts of the route) as an active travel corridor. For example, part of the route (including near Barcombe Mills) already is a permissive bridleway. The option therefore has the potential to facilitate the route as a key linkage in the District's green infrastructure network, incorporating multiple ecological, social and economic functions.</p> <p>However, it should be noted that the reinstatement of rail services through Option RL1 does not preclude the development of new multifunctional green infrastructure provision.</p>	?	?
Landscape and Historic Environment	<p>Both of the options have the potential to lead to indirect impacts on landscape character and the historic environment.</p> <p>Like many railway corridors, the former Lewes to Uckfield line is of historic interest, with a number of features of heritage interest present along the route. This includes the Grade II listed Signal Box and Railway Level Crossing Gates at Isfield.</p> <p>Reopening of the line would likely require the replacement of existing cast-iron and steel bridges on brick/stone abutments with modern concrete structures, including culverts. This may have impacts on landscape character and designated and undesignated features of heritage interest.</p> <p>Reinstatement of the line is also likely to create landscape and visual impacts due to clearance of vegetation along the route and the creation of a new transport corridor. For example, level crossings at Isfield, Anchor Lane and Barcombe Mills would not be reopened but substituted with bridges, though not necessarily at the same location. As such, whilst it is not proposed to reopen any intermediate stations, landscape character impacts would be likely to take place from the reintroduction of rail services. There would also be impacts on tranquillity from noise and visual impacts.</p> <p>Whilst impacts on the historic environment and landscape character arising from Option RL1 would be indirect and long term, and result from facilitating the reopening of the line, impacts from Option RL2 have the potential to be indirect and shorter term. This is given the option may lead to development taking place along the corridor which impacts on heritage features and their settings.</p> <p>Whilst the options have the potential to have negative impacts, it should also be noted that both options offer the scope for positive effects, such as through the rejuvenation of key heritage assets along the corridor.</p>	?	?
Housing	<p>Neither option is likely to facilitate the delivery of significant new housing along the corridor.</p>	N/A	N/A
Resilient Communities	<p>By improving the availability of sustainable travel options for people across the region, the reopening of the Lewes to Uckfield line has the potential to improve access to services, facilities and employment opportunities. This includes through improving sustainable transport</p>	1	2

Option RL1: Safeguard the former Lewes to Uckfield railway line for future use, including the potential reopening of the line

Option RL2: Do not include a policy to protect the route of the former railway line

links from London, the Weald and the south coast, the facilitation of improved links to Brighton, and the potential delivery of new direct rail services to and from Seaford and Newhaven. This will support the quality of life and vitality of communities. The option, through encouraging modal shift from the private car, will also provide benefits through reducing the impacts of traffic and congestion, including on the quality of neighbourhoods and on health and wellbeing. Option RL1 would therefore facilitate these longer-term opportunities and benefits. In contrast, Option RL2, through potentially facilitating the loss of the former railway line, and precluding a reinstatement of services, has the potential to neutralise one of the main opportunities available for improving accessibility by sustainable transport modes across the region, and the associated benefits for the quality of life and health and wellbeing of residents.

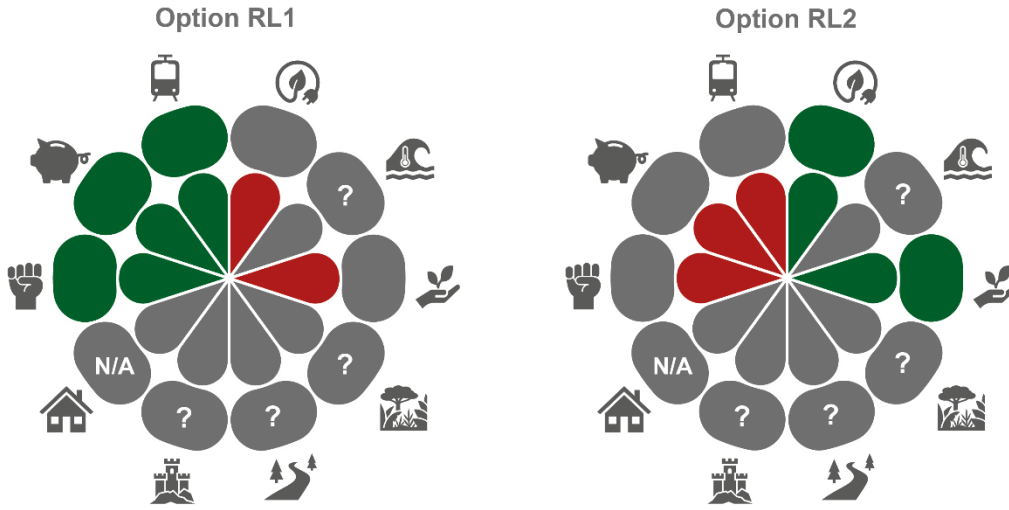
Economy and Tourism	<p>A reinstatement of passenger rail services on the Lewes to Uckfield route has the potential to have a negative impact on an important local tourism asset – the Lavender Line. This is a heritage railway based at Isfield Station and would be unlikely to continue as a tourism asset with the reinstatement of passenger services. However the impacts on tourism associated with the loss of the steam railway would be likely to outweighed by the overall benefits for sustainable tourism supported by the reponing of the line to passenger services. This includes through providing quicker, higher-capacity and more convenient access between London, the Weald, the South Downs National Park, and south coast seaside resorts. In this respect, improved access to key tourism assets by rail will have significant positive effects for the visitor economy.</p> <p>More broadly in relation to economic vitality, a reinstatement of passenger services on the line will provide new direct links to Seaford and Newhaven via Lewes, supporting regeneration in these towns through improved linkages the provision of more reliable journeys. The reopening of the line will also enhance access to economic and employment opportunities regionally, including in Brighton, Eastbourne and further afield.</p> <p>In this respect Option RL1 will indirectly support a range of long term significant positive effects for the economy and employment through helping to ensure that the Lewes and Uckfield route is safeguarded for future use. In contrast, Option RL2 has the potential to preclude these opportunities.</p>	1	2
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Appraisal of options relating to the former Lewes to Uckfield railway line



Option RL1 - Safeguard the former Lewes to Uckfield railway line for future use, including the potential reopening of the line

Option RL2 - Do not include a policy to protect the route of the former railway line



- energy and waste
- flooding, erosion & drought
- quality environment
- biodiversity
- green infrastructure
- landscape and historic environment
- housing
- resilient communities
- economy and tourism
- travel and transport

Appraisal of options relating to affordable homes provision

- 4.25 The Local Housing Needs Assessment suggests that there is a substantial need for affordable homes to buy in the District alongside the need for affordable homes to rent. The headline need is for 290 affordable homes per year for the plan area, which consists of a need for 125 homes additional rented affordable homes per year and 165 for affordable home ownership. As such, the delivery of affordable homes will be a central facet of the Local Plan’s housing policies.
- 4.26 Two approaches can be taken. A first approach could be to set out an overarching affordable housing requirement for the District. This would take a broad-brush approach which would set out, in general terms, levels and types of affordable housing provision required. A second approach would be to specifically set out the number of homes that are expected to be delivered on different types of site. This would set out the proportion of homes that are expected on sites that already have planning permission, sites allocated to be developed by the plan and development that LDC expect to come forward from sites that have not been allocated (windfall development).
- 4.27 In this respect two options have been appraised, as follows:
- **Option AH1:** Set out specific requirements as to the number of affordable homes that are expected to be delivered on different types of site.
 - **Option AH2:** Do not set out specific affordable housing targets for sites, relying on a more general policy relating to the level and type of affordable housing provision required.
- 4.28 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Table 4.5: Appraisal of options relating to affordable housing

Option AH1: Set out specific requirements as to the number of affordable homes that are expected to be delivered on different types of site.

Option AH2: Do not set out specific affordable housing targets for sites, relying on a more general policy relating to the level and type of affordable housing provision required.

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		AH1	AH2
Energy and Waste	The provision of specific requirements relating to affordable housing through Option AH1 is unlikely to lead to significant effects on greenhouse gas emissions if energy efficiency measures are integrated within all types of housing provision. This will depend on the application of other policies relating to energy efficiency in the Local Plan.	N/A	N/A
Flooding, Erosion, Drought	In relation to flood risk, it is not possible to differentiate between the options given this depends on the location of development and the incorporation of mitigation measures such as sustainable urban drainage systems (SuDS). It is also considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented. In terms of the wider elements relating to climate change, including relating to the impacts of extreme weather events, this also depends on the provision of appropriate infrastructure alongside new housing, such as green infrastructure provision, and appropriate design and layout.	N/A	N/A
Quality Environment	Air quality is a key issue for parts of the District, including Lewes and Newhaven. However, the options will not differ in terms of impacts on air quality if it is assumed that affordable housing is considered in a similar manner as market housing in terms of location and design.	N/A	N/A

Option AH1: Set out specific requirements as to the number of affordable homes that are expected to be delivered on different types of site.

Option AH2: Do not set out specific affordable housing targets for sites, relying on a more general policy relating to the level and type of affordable housing provision required.

	In terms of water and soil quality, it is difficult to come to a conclusion regarding the potential for development at any given location to result in negative effects without an understanding of the design measures that will be put in place. For example sustainable drainage systems – SuDS – are an effective means of minimising surface water runoff and hence pollution.		
Biodiversity	The significance of effects depends on the design and layout of new development and the integration of infrastructure which supports ecological networks in the area. As such, if all housing provision- including affordable housing seeks to integrate these elements, then there should be no difference between the options in terms of impacts on biodiversity and ecological networks.	N/A	N/A
Green Infrastructure	Given affordable housing provision should be considered in the same way as market housing in terms of infrastructure provision and design and layout, there should be no difference between the options in terms of the delivery	N/A	N/A
Landscape and Historic Environment	If all housing provision- including affordable housing- is appropriately located, and design and layout is sensitive to landscape character, then there should be no difference between the options in terms of landscape impacts and the impacts on the significance of the District's historic environment resource. As such, it is not possible to differentiate the options in terms of potential effects on the historic environment or landscape/townscape character. Effects depend on the design and layout of new development, the retention of distinct features contributing to local character, the location of development in relation to key viewpoints in the area, and the integration of high-quality green infrastructure provision.	N/A	N/A
Housing	<p>The Local Housing Needs Assessment found that there is a substantial need for affordable homes to buy in the District alongside the need for affordable homes to rent. The headline need is for 290 affordable homes per year for the plan area, which consists of a need for 125 homes additional rented affordable homes per year and 165 for affordable home ownership. Analysis of the ability of households to afford different home ownership products confirms that households with median incomes would only be able to access lower quartile First Homes with a 50% discount on market prices or a 10% share of lower quartile shared ownership homes. For First Homes, these households would also need to have saved for a deposit.</p> <p>In this respect the setting out specific requirements as to the number of homes that are expected to be delivered on different types of site through Option AH1 will perform more favourably than the broader approach proposed through Option AH2. Option AH1 will help ensure that the type, size and tenure of affordable housing will better match localised demand, including associated with urban and rural areas and locations within the District with further specific needs.</p>	1	2
Resilient Communities	<p>Option AH1, through setting out specific requirements as to the number of homes that are expected to be delivered on different types of sites, will help residents access a wider range of housing types, sizes and tenures. This will support the quality of life of residents and support the vitality and cohesiveness of communities.</p> <p>Given the challenge of delivering affordable housing in smaller settlements on sites of a limited size, initiating a more specific requirement through Option AH1 has the potential to have particular benefits for affordable housing provision in smaller settlements, where</p>	1	2

Option AH1: Set out specific requirements as to the number of affordable homes that are expected to be delivered on different types of site.

Option AH2: Do not set out specific affordable housing targets for sites, relying on a more general policy relating to the level and type of affordable housing provision required.

available sites tend to be of a more limited size. This will enable an increased number of existing residents to find affordable housing and remain living locally, supporting accessibility to current employment and social networks. It also has increased potential to support the vitality of these settlements by facilitating the provision of housing for a broader range of groups and ages.

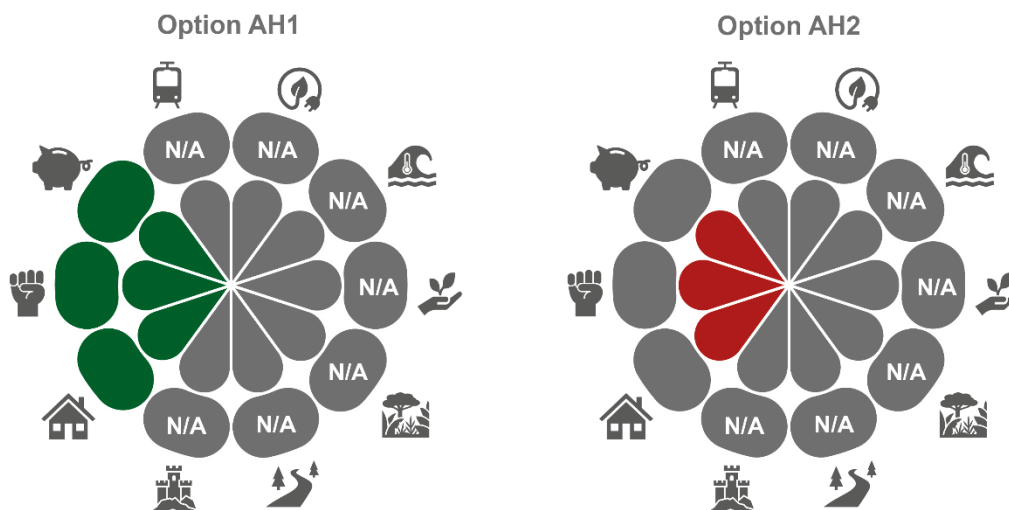
Economy and Tourism	The implementation a more proactive approach to affordable housing provision through Option AH1 has the potential to have particular impacts on affordable housing provision in smaller settlements, where available sites tend to be of a more limited size. This will support the vitality of these settlements by facilitating the provision of housing for a broader range of groups and ages, with benefits for the rural economy. Through potentially encouraging an increased provision of affordable housing in smaller settlements, Option AH1 will also support the availability of the rural workforce in key sectors such as agriculture, forestry and leisure/recreation.	1	2
Travel and Transport	There is unlikely to be a significant differentiation between the options in relation to this SA theme since the performance of the options will depend on the location of affordable housing provision and the delivery of infrastructure alongside such provision.	N/A	N/A

Appraisal of options relating to affordable housing

Ranking
1st
2nd

Option AH1 - Set out specific requirements as to the number of homes that are expected to be delivered on different types of site

Option AH2 - Do not set out specific affordable housing targets for sites, relying on a more general policy relating to the level and type of affordable housing provision required



Appraisal of options relating to renewable energy

- 4.29 The NPPF currently requires that wind energy development involving one or more turbines should not be considered acceptable unless they are in an area identified as suitable for wind energy development in the development plan. Whilst the Local Plan does not set out allocations or suitable areas for wind energy, current Local Plan policy indirectly allows wind energy to be allocated through Neighbourhood Plans.
- 4.30 Given the potential contribution onshore wind energy can provide to mitigating climate change in Lewes, LDC would like to explore extending Local Plan provisions relating to onshore wind energy by providing an additional degree of certainty as to the locations which are likely to be appropriate for new wind energy provision in the District. In this respect new local plan policy will be designed to encourage and support the principle of renewable energy generation in suitable locations providing proposals meet all other policies in the plan and take account of local constraints such as in relation to landscape and visual impacts, amenity impacts etc.
- 4.31 In light of this, the SA process has considered three options, as follows:
- **Option WE1:** Designate through the Local Plan broad areas or 'suitable areas' for wind energy with an accompanying criteria-based policy to evaluate development proposals as they come forward.
 - **Option WE2:** Designate specific sites for wind energy provision through the Local Plan.
 - **Option WE3:** Continue current Local Plan approach to wind power which indirectly allows Neighbourhood Plans to allocate areas for wind power.
- 4.32 The following table and infographics present appraisal findings in relation to the three options introduced above. These are organised by the ten SA themes.

Table 4.1: Appraisal of options relating to wind energy

Option WE1: Designate through the Local Plan broad areas or 'suitable areas' for wind energy with an accompanying criteria-based policy to evaluate development proposals as they come forward.

Option WE2: Designate specific sites for wind energy provision through the Local Plan.

Option WE3: Continue current Local Plan approach to wind power which indirectly allows Neighbourhood Plans to allocate areas for wind power.

SA theme	Discussion of potential effects and relative merits of options	Ranking		
		WE1	WE2	WE3
Energy and Waste	Option WE2, and to a lesser extent, Option WE1, have the potential to support increased provision of renewable energy by improving certainty for applicants and therefore their willingness to make applications. This will do more to support climate change mitigation than the business as usual option of WE3.	2	1	3
Flooding, Erosion, Drought	In terms of climate change adaptation, it is not possible to differentiate between the options. This is given impacts relating to aspects such as flood risk, drought and erosion depends on the location, scale and design of renewable energy provision.	?	?	?
Quality Environment	If managed appropriately, wind energy has the potential to reduce the use of fossil fuels for generating electricity, which in turn has the potential to reduce air pollution in other locations. ³ However, the air quality benefits of onshore wind will vary by location, depending on the mix of existing energy sources. Under all options the location of development sites is unknown; as such it is difficult to differentiate between options at this stage. Uncertain effects for all options are anticipated in relation to the land, soil and water resources as it is possible that such developments could result in the loss of high quality agricultural land (until the site is restored to its previous use at the end of its lifecycle).	?	?	?
Biodiversity	Under all options, the construction of wind turbines has the potential to result in habitat and species disturbance and loss. Wind turbine operation and maintenance may disturb sensitive species, and there is a risk of bird and bat collision with moving blades and any additional overhead wires. Geological impacts can include loss of geological exposures, damage or obscuring of geomorphological features, disruption to geomorphological processes and a range of impacts on soils. ⁴ As such, effects from each option on features and areas of biodiversity and geodiversity interest largely depend on the detailed location, scale and nature of development and the incorporation of avoidance, mitigation and enhancement measures. It is likely a broad areas approach would exclude from consideration for wind energy key internationally, nationally and locally designated biodiversity sites, and also key habitats. In addition, local planning policy provisions provide a level of protection to biodiversity, and the identification of broad areas is only the beginning of the development process; impacts on biodiversity will be considered in more detail later at the planning application stage. In terms of Option WE2, defining specific sites may restrict the likelihood for adverse effects through setting tighter	?	?	?

³ Lindenberg, S., B. Smith, K. O'Dell, E. DeMeo, and B. Ram. (2008) 20% Wind Energy by 2030: Increasing Wind Energy's Contribution to U.S. Electricity Supply. U.S. Dept. of Energy, Office of Energy Efficiency and Renewable Energy Technical Report

⁴ Natural England (date unknown) Assessing On-Shore Wind Energy Development [online] available at: <http://publications.naturalengland.org.uk/file/97013>

- Option WE1:** Designate through the Local Plan broad areas or ‘suitable areas’ for wind energy with an accompanying criteria-based policy to evaluate development proposals as they come forward.
- Option WE2:** Designate specific sites for wind energy provision through the Local Plan.
- Option WE3:** Continue current Local Plan approach to wind power which indirectly allows Neighbourhood Plans to allocate areas for wind power.

development parameters from the outset. With regard to Option WE3, given any proposal coming forward through the option would be community-led, impacts on the natural environment would likely be a key consideration for residents when considering specific sites for allocation. However, given all options would require biodiversity to be fully considered, it is not possible to differentiate between the options in this regard. In line with Natural England’s Technical Information Note⁵, some form of ecological assessment is likely to be required for any proposed wind farm, although very small developments away from vulnerable bird species may only require a limited desk study to confirm the low likelihood of an impact.⁶

A Habitats Regulations Assessment (HRA) is being undertaken alongside the development of the Local Plan which will determine whether the Local Plan, either alone or in combination with other relevant projects and plans is likely to result in a significant effect upon European sites. It is therefore assumed that under all options, consideration will be given to the impacts of wind energy on the District’s most sensitive biodiversity sites, notably in accordance with the conclusions and recommendations of the emerging HRA.

Green Infrastructure	It is not possible to differentiate between the options in relation to this SA theme given impacts would depend on location and scale of wind energy provision and the incorporation of green infrastructure and environmental net gains alongside such provision.	?	?	?
Landscape and Historic Environment	Under all options, consideration will be given to the impacts of wind energy on the historic environment and landscape character, in line with NPPG (para 019, 022 and 023), and Historic England’s guidance ⁷ and Natural England’s guidance ⁸ . Depending on their scale, design and prominence, a wind turbine within the setting of a heritage asset may cause substantial harm to the significance of the asset or landscape character. ⁹ As such, while the Local Plan policy framework would provide a level of protection to heritage assets, a ‘broad area of search’ approach (Option WE1) to development locations may not suitably mitigate against potential adverse effects. However, the identification of broad areas is only the start of the development process, and it is considered that heritage and landscape character constraints will later be considered at the planning application stage. In addition, key heritage assets and landscape character would be considered through the establishment of broad areas. In terms of Option WE2, it is considered that defining specific sites may restrict the likelihood for adverse effects through setting tighter development parameters. Similarly, it is	?	?	?

⁵ Natural England (2010) Natural England Technical Information Note TIN069 [online] available at: <http://planning.allerdale.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=109418>

⁶ Natural England (2010) Natural England Technical Information Note TIN069 [online] available at: <http://planning.allerdale.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=109418>

⁷ Historic England (2020) Wind Energy [online] available at: <https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/wind-energy/>

⁸ Natural England (date unknown) Assessing On-Shore Wind Energy Development [online] available at: <http://publications.naturalengland.org.uk/file/97013>

⁹ Ibid.

- Option WE1:** Designate through the Local Plan broad areas or ‘suitable areas’ for wind energy with an accompanying criteria-based policy to evaluate development proposals as they come forward.
- Option WE2:** Designate specific sites for wind energy provision through the Local Plan.
- Option WE3:** Continue current Local Plan approach to wind power which indirectly allows Neighbourhood Plans to allocate areas for wind power.

considered that through Option WE3, given any proposal coming forward would be community-led, impacts on the setting of historic assets would be likely to be a key consideration for residents when considering specific sites for allocation.

In light of the above, it is not considered possible to distinguish between the options in relation to the historic environment or landscape character.

Housing	The options will not directly affect housing delivery; in this respect the sustainability performance of the options cannot be differentiated in relation to this SA theme.	N/A	N/A	N/A
Resilient Communities	<p>Financial contributions from developers and investments in community projects will support the development of social capital; it is recognised that projects supported by community funds originating from wind energy have been wide ranging.¹⁰ It is considered that all options have merits, as allocating sites or identifying suitable areas for large-scale wind development should improve certainty for applicants and therefore their willingness to make applications.</p> <p>The approach outlined in Option WE1 provides less certainty than Option WE2 on the delivery of individual sites for wind energy. However, this approach through gives additional flexibility through enabling wind energy to come forward if relevant criteria are met. It is also less prescriptive than Option WE2 for local communities, which enables them to take a lead themselves if they so wish - whilst at the same time also encouraging communities through clearly highlighting that their area is appropriate for the relevant scale of wind energy.</p> <p>In terms of Option WE3, enabling Neighbourhood Plans to allocate wind turbines offers opportunities relating to community buy-in to such provision. This provides opportunity for local residents to take control of the process, delivering early stakeholder engagement to minimise conflict and increase public acceptance. Community-led development may, however be difficult to deliver where residents are not supportive of wind energy, for example through concerns relating to property values due to proximity to onshore wind farms, or a potential drop in tourism.¹¹ In this respect the requirement for a referendum ensures development can only come forward through a Neighbourhood Plan where there is an appropriate level of community support. It should also be noted that this approach has had limited success in delivering additional wind energy provision to date.</p> <p>Overall, whilst it is considered that the certainty provided through the allocations-led approach of Options WE2 and WE3 will help provide certainty to communities as to the design and location of wind energy, Option WE1 provides additional flexibility in how wind energy can come forward across the District. If combined with a community-led approach to wind energy provision, this has the potential to lead to an increased</p>	1	2	3

¹⁰ The Crown Estate (2015) Understanding the impacts of offshore wind farms [online] available at: <https://www.offshorewindindustry.com/sites/default/files/ei-understanding-the-impacts-of-offshore-wind-farms-on-well-being.pdf>

¹¹ The Crown Estate (2015) Understanding the impacts of offshore wind farms [online] available at: <https://www.offshorewindindustry.com/sites/default/files/ei-understanding-the-impacts-of-offshore-wind-farms-on-well-being.pdf>

Option WE1: Designate through the Local Plan broad areas or ‘suitable areas’ for wind energy with an accompanying criteria-based policy to evaluate development proposals as they come forward.

Option WE2: Designate specific sites for wind energy provision through the Local Plan.

Option WE3: Continue current Local Plan approach to wind power which indirectly allows Neighbourhood Plans to allocate areas for wind power.

	delivery of the significant community benefits which have the potential to arise from wind power in the District.			
Economy and Tourism	All options are expected to lead to positive effects in relation to jobs and the local economy due to the investment and employment opportunities that are likely to arise from renewable energy development. It is recognised that conflicts sometimes exist between onshore wind and recreation and tourism, which can impact upon health and wellbeing if activities are restricted. ¹² However, it is also considered that financial contributions from developers and investments in community amenities (as discussed above) may lead to positive effects in this respect; for example, through supporting community and economic vitality.	?	?	?
Travel and Transport	It is not possible to differentiate between the options in relation to this SA theme given impacts would depend on location and scale of wind energy provision.	?	?	?

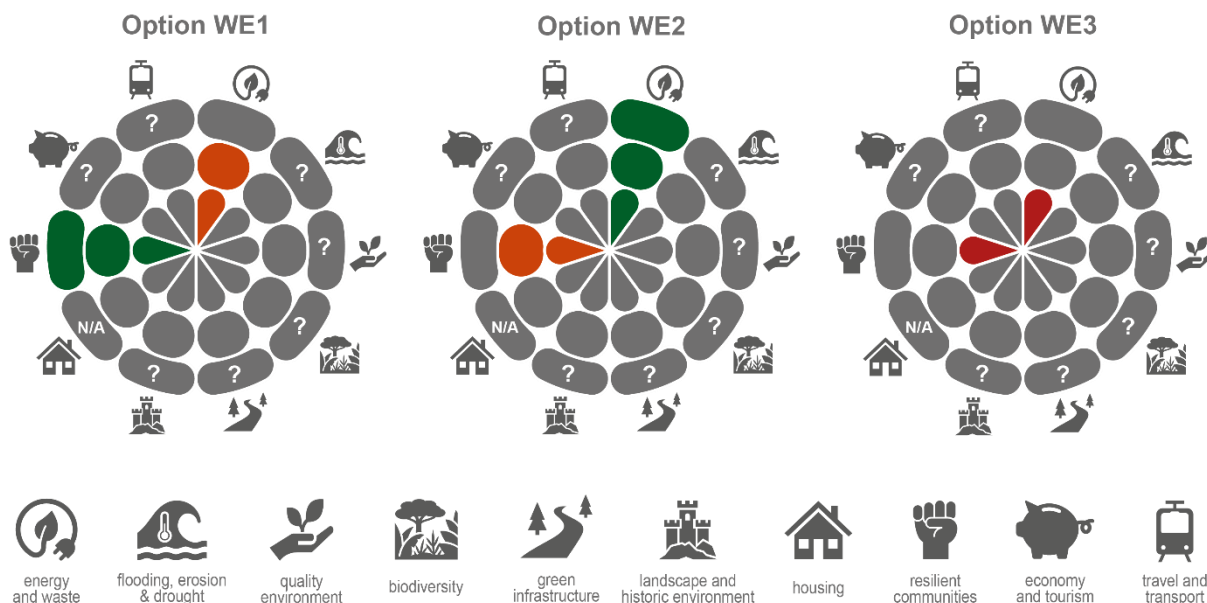
Appraisal of options relating to wind energy



Option WE1 - Designate through the Local Plan broad areas or ‘suitable areas’ for wind energy with an accompanying criteria-based policy to evaluate development proposals as they come forward

Option WE2 - Designate specific sites for wind energy provision through the Local Plan

Option WE3 - Continue current Local Plan approach to wind power which allows Neighbourhood Plans to allocate areas for wind power



¹² The Crown Estate (2015) Understanding the impacts of offshore wind farms [online] available at: <https://www.offshorewindindustry.com/sites/default/files/ei-understanding-the-impacts-of-offshore-wind-farms-on-well-being.pdf>

Appraisal of options relating to the energy performance of new development

- 4.33 Addressing climate change is one of the core land use planning principles which the NPPF expects to underpin plan making. In conjunction with the declaration of the Climate Emergency in June 2019 and the subsequent preparation and implementation of the Climate Change and Sustainability Strategy and Action Plans, LDC will place climate change mitigation at the centre of its Local Plan.
- 4.34 With regards to new development in the District, there is the potential for different approaches to be taken to facilitating the provision of low carbon development. In this respect two approaches can be taken. The first approach would be to rely on Building Regulations. These would provide a good standard of fabric performance; it is also expected that these would be improved further over time. A second approach would be for a new local plan policy to require all new developments to document an energy strategy in an Energy Statement. The Energy Statement would seek to reduce energy demands, use energy efficiently, generate and store renewable energy and monitor energy use.
- 4.35 In this respect the SA has considered two options, as follows:
- **Option LC1:** Rely solely on building regulations to decarbonise future development and not set any additional standards beyond this.
 - **Option LC2:** Require all new developments to document an energy strategy in an Energy Statement.
- 4.36 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Table 4.2: Appraisal of options relating to the use of energy performance of new developments

Option LC1: Rely solely on building regulations to decarbonise future development and not set any additional standards beyond this.

Option LC2: Require all new developments to document an energy strategy in an Energy Statement.

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		LC1	LC2
Energy and Waste	Option LC2, through seeking to ensure the delivery of an Energy Statement alongside new development, would perform more favourably in relation to this SA theme. In this respect an Energy Statement would be required which would set out how energy demands are reduced, how energy will be used efficiently, how renewable energy will be generated and stored and how energy use will be monitored. Whilst building regulations have the potential to become more stringent over time, this approach offers additional potential to support climate change mitigation. Through potentially delivering increased energy efficiency standards within new development, LC2 may also support a reduction in resource use. This includes from a likely increase in activities such as heat recovery, grey water recycling and on-site recycling.	2	1
Flooding, Erosion, Drought	The options address energy efficiency and the use of energy. This will not have any direct impacts in relation to adaptation to the effects of climate change. However, it is recognised that measures which support energy regulation such as the use of shading and passive solar gain have a role to play in terms of thermal efficiency, such as reducing the need for heating in the winter and avoiding overheating in the summer.	2	1

Option LC1: Rely solely on building regulations to decarbonise future development and not set any additional standards beyond this.

Option LC2: Require all new developments to document an energy strategy in an Energy Statement.

Quality Environment	Whilst there is no direct link between higher energy efficiency standards and localised air, noise and water quality in the District, Option LC2 may help reduce the need for (and limit emissions from) power generation, with benefits for air, noise and water quality elsewhere. However, the difference between the options in this respect is negligible.	2	1
Biodiversity	Encouraging new development to meet higher targets for energy efficiency is unlikely to lead to direct significant effects on biodiversity. However, it is recognised that measures which support biodiversity such green roofs, tree planting and shading have a role to play in terms of thermal efficiency, in particular avoiding overheating in the summer and need for air conditioning. Given a likely provision of higher standards, Option LC2 is considered to be best performing of the two options.	2	1
Green Infrastructure	Encouraging new development to meet higher targets for energy efficiency is unlikely to lead to the delivery of significant new areas of green infrastructure. However, it is recognised that measures undertaken at the microscale such as green roofs and tree planting may help enhance wider green infrastructure networks.	2	1
Landscape and Historic Environment	<p>By the delivery of potential higher energy efficiency standards through LC2, it is recognised that there are opportunities and challenges in terms of the built historic environment. Notably, standards for refurbishment and conversion can typically be challenging, reflecting the fact that many buildings may be in conservation areas. Some buildings may be listed, and changes to the external appearance of buildings will be restricted by wider policy. However, there is advice available from Historic England¹³ focusing on the challenges and opportunities for achieving energy efficiency in historic buildings and areas. This includes advice on secondary glazing, insulating solid walls and other interventions.</p> <p>Similarly, improving energy efficiency standards within buildings has the potential to impact both positively and negatively upon the character of the landscape and local distinctiveness. For example, a well-designed landscape or townscape can reduce heating and cooling costs through landscape features delivering effective shade and potentially acting as a windbreak.¹⁴ Conversely, energy efficiency measures that are poorly designed can adversely impact upon the character of the built environment, local distinctiveness and views. These effects are likely to exist both alone and in-combination with other development.</p> <p>However, it is considered that through careful management, following appropriate guidance, energy efficiency can be delivered while ensuring that the important characteristics of the landscape are not unacceptably harmed and the significance of the heritage resource is not impacted.</p> <p>Overall, impacts from the options depend on the detailed design, scale and layout of energy efficiency provision; as such it is not possible to differentiate between the options in terms of potential effects on the historic environment/landscape character.</p>	?	?

¹³ Historic England (2018) Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency [online] available at: <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

¹⁴ U.S Department of Energy (date unknown) Landscaping For Energy Efficient Homes [online] available at: <https://www.energy.gov/energysaver/design/landscaping-energy-efficient-homes>

Option LC1: Rely solely on building regulations to decarbonise future development and not set any additional standards beyond this.

Option LC2: Require all new developments to document an energy strategy in an Energy Statement.

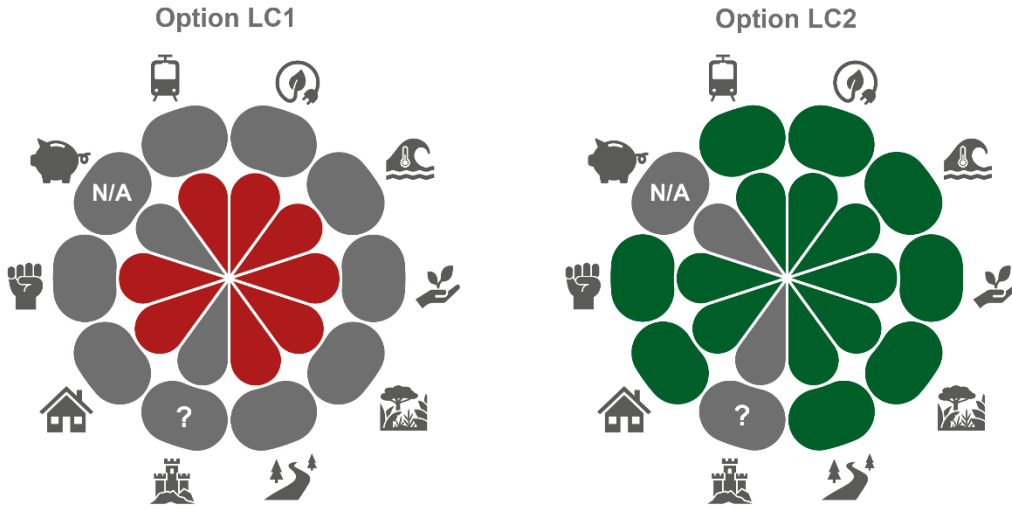
Housing	Whilst increased energy efficiency in new housing will bring a range of positive effects for the quality of housing, there is potential for a stricter policy to affect the deliverability and viability of new developments. This could result in a reduction in the rate of housing delivery. However, the effects of this are uncertain as the rate of housing delivery will ultimately depend on a wider range of factors. Overall though, the approach put forward through Option LC2 has additional potential to support the quality of new housing in the District.	2	1
Resilient Communities	The likely delivery of higher energy efficiency standards through Option LC2 will bring a range of benefits for the quality of life of residents, including through enhancing the energy efficiency of housing, lowering energy costs and reducing fuel poverty, and supporting health and wellbeing through the delivery of high-quality homes. Option LC2 also has increased potential to have significant effects for health and wellbeing. This is linked to the delivery of high quality, energy efficient housing, which will support good physical and mental health through creating healthy indoor living environments with healthy air temperatures, humidity levels, noise levels, and improved air quality. This has particular potential to benefit the health and wellbeing of groups with poor health, including older people or disabled people.	2	1
Economy and Tourism	It is not possible to differentiate between the options in relation to this SA theme given energy efficiency approaches are unlikely to directly address these issues.	N/A	N/A
Travel and Transport	Whilst the options are likely to focus on energy efficiency, the introduction of an Energy Statement through Option LC2 has the potential to encourage the incorporation of features in development which support active travel (such as cycle parking and storage or new walking and cycling connections) and electric vehicle provision. In this respect Option LC2 has additional potential to support sustainable transport use.	2	1

Appraisal of options relating to the energy performance of new development



Option LC1 - Rely solely on building regulations to decarbonise future development and not set any additional standards beyond this

Option LC2 - Require all new developments to document an energy strategy in an Energy Statement



- 
 energy and waste
- 
 flooding, erosion & drought
- 
 quality environment
- 
 biodiversity
- 
 green infrastructure
- 
 landscape and historic environment
- 
 housing
- 
 resilient communities
- 
 economy and tourism
- 
 travel and transport

Appraisal of options relating to carbon sequestration

4.37 LDC recognises that there is a need to prevent the loss of carbon storage in the natural environment through new development. As such, it would like to consider the introduction of a Local Plan policy which robustly evaluates the extent to which a new development affects the existing carbon storage of habitats on site.

4.38 In response to this, the SA process has considered two options, as follows:

- **Option CS1:** Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development.
- **Option CS2:** Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development.

4.39 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Table 4.3: Appraisal of options relating to carbon sequestration

Option CS1: Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development.

Option CS2: Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development.

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		CS1	CS2
Energy and Waste	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will have positive effects on climate change mitigation by safeguarding and enhancing carbon sequestrators (e.g. trees and hedgerows) within the townscape and landscape. In addition, increased planting and green infrastructure provision and associated improvements to the built environment will encourage lower carbon modes of travel, in particular active modes of travel such as walking and cycling.	1	2
Flooding, Erosion, Drought	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading, reducing surface water run-off and other elements which will support climate change adaptation.	1	2
Quality Environment	Improvements in the quality of neighbourhoods facilitated by increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator (Option CS1). This has the potential to have positive effects on air quality though facilitating increased absorption and dissipation of nitrogen dioxide, particulate matter and other pollutants from transport and other sources of pollution.	1	2
Biodiversity	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will support habitats, species and ecological networks. In this respect Option CS1 has more potential than the business-as-usual approach proposed by Option CS2 to support biodiversity in the District.	1	2
Green Infrastructure	Option CS1, through facilitating the use of a Carbon Storage Calculator, is likely to deliver development areas with an increased	1	2

Option CS1: Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development.

Option CS2: Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development.

	level of planting, trees and other green infrastructure provision. Through delivering an enhanced range of natural capital assets, the approach will help increase the range of ecosystem services provided by new development areas, including associated with a wider range of provisioning, regulating, supporting and cultural services.		
Landscape and Historic Environment	Increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator approach through Option CS1. This will help improve the setting of the historic environment and support landscape, townscape and villagescape character through facilitating the delivery of a high quality built environment and public realm.	1	2
Housing	Option CS1, through introducing the use of a Carbon Storage Calculation, has the potential to deliver development areas with increased planting, use of trees and other green infrastructure provision. This will help deliver higher quality residential environments. Whilst the approach may have some impacts on the viability of new development, the option will do more than the business-as-usual option (Option CS2) to support the overall quality of housing in the District.	1	2
Resilient Communities	Option CS1, through introducing the use of a Carbon Storage Calculation, has more potential than the business as usual option (CS2) to deliver development areas with increased planting, use of trees and other green infrastructure provision. This will help deliver higher quality built environments. This will support the liveability of neighbourhoods and promote physical and mental health and wellbeing.	1	2
Economy and Tourism	There is unlikely to be a significant difference between the options. However, Option CS1, through supporting the quality of neighbourhoods, may promote community and economic vitality and support the visitor economy.	1	2
Travel and Transport	Improvements in the quality of neighbourhoods facilitated by increased planting and green infrastructure provision is likely to be stimulated by the utilisation of a Carbon Storage Calculator. The relative merits of each option in this regard are however likely to be negligible.	N/A	N/A

Appraisal of options relating to carbon sequestration

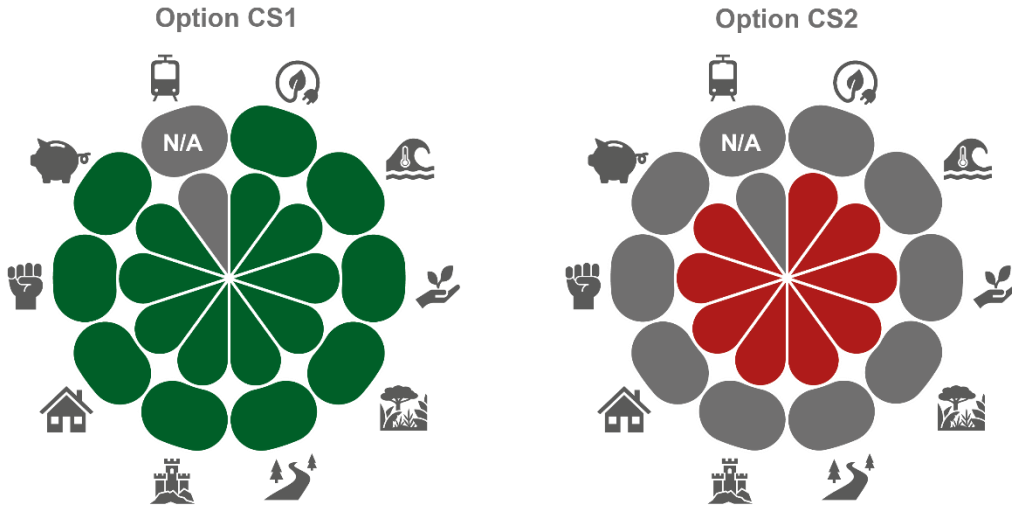


Ranking



Option CS1 - Utilise a Carbon Storage Calculation (if an appropriate metric is available) to compare the carbon storage capacity of habitats on the site before and after development

Option CS2 - Do not utilise a Carbon Storage Calculation to compare the carbon storage capacity of habitats on the site before and after development



energy and waste

flooding, erosion & drought

quality environment

biodiversity

green infrastructure

landscape and historic environment

housing

resilient communities

economy and tourism

travel and transport

Appraisal of options relating to Biodiversity Net Gain

- 4.40 At present, Biodiversity Net Gain is required by local and national planning policy. In this respect the Environment Act, which received Royal Assent in November 2021, requires all development schemes in England to deliver a mandatory 10% biodiversity net gain to be maintained for a period of at least 30 years. This is likely to be implemented in early 2024.
- 4.41 An alternative approach would be to explore the possibility of extending the 10% provision through introducing a requirement through the Local Plan that at least a 20% figure for biodiversity net gain on development sites is delivered.
- 4.42 To explore this issue further, the SA has considered two options, as follows:
- **Option BNG1:** Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).
 - **Option BNG2:** Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.
- 4.43 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Table 4.4: Appraisal of options relating to biodiversity net gain

Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		BNG1	BNG2
Energy and Waste	Green infrastructure provision can support climate change mitigation through enhancing natural features which act as carbon sequestrers. In this respect, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG).	2	1
Flooding, Erosion, Drought	As highlighted by the NPPF, well planned green infrastructure can help an area adapt to, and manage the risks of climate change (including flood risk). In this respect, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG).	2	1
Quality Environment	Biodiversity enhancements have the potential to deliver a range of ecosystem services which will support land, soil and water resources. These include soil formation; flood and erosion protection; and water quality regulation. Option BNG2 is therefore likely to perform most positively with regards soil and water resources in this respect given its increased net gain requirement. With respect to air quality, whilst Option BNG1 will provide benefits, Option BNG2 is likely to perform more favourably given green infrastructure enhancements will be a key element of biodiversity net gain (BNG). In this respect the provision of enhanced green infrastructure is recognised as an important element of the solution to addressing air pollution in built up areas, including through removing different types of air pollution, including particulate matter, sulphur dioxide, nitrogen dioxide and ozone. BNG can also deliver air quality benefits at the microscale. For example, the introduction	2	1

Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

	of green walls and roofs trap pollutants which in turn deliver cleaner air. As such, an increased requirement for net gain through Option BNG2 has additional potential to lead to positive effects in relation to air quality.		
Biodiversity	<p>BNG approaches include habitat creation and avoided habitat loss, notably through steering development towards the least environmentally damaging areas and design practice. Through introducing a 20% net gain requirement, Option BNG2 would therefore contribute most positively towards the 25 Year Environment Plan's¹⁵ commitment to protecting and restoring nature. In many cases a 10% uplift in biodiversity where the previous baseline is zero (for example often seen on brownfield sites) provides limited benefit. In this respect the Chartered Institute of Ecology and Environmental Management (CIEEM) argue that 10% may be within the margin of error for the valuation of habitats, and it may be too low to deliver real benefits; at most it might achieve no net loss.¹⁶ CIEEM also highlight the importance of a minimum mandatory requirement, to ensure that the Lawton principles (more, bigger, better and joined up) approach is applied, and suggest that 20% is set as this minimum requirement.¹⁷</p> <p>A requirement for 10% net gain (Option BNG1) would therefore lead to greater uncertainty over whether BNG would, in practice, be achieved at the site rather than the landscape scale.</p> <p>In Lewes' context, many species of conservation interest in the District are separated by large distances from other patches of suitable habitat which exceed their normal dispersion capabilities. Creating a more inter-connected network of habitats allows species to expand their range, counteracting the ongoing trend for habitat fragmentation and adapting to the threats of climate change. A requirement to demonstrate 20% net gain (Option BNG2) will likely provide greater certainty in terms of ensuring existing habitat is retained where possible and habitats and ecological connections enhanced. The obligation to deliver an increased level of net gain in biodiversity is also more likely to ensure that mitigation and compensation measures are adequately considered in relation to development, which may in some cases result in the need for offsite compensation.</p> <p>A stronger approach to BNG will also help to fund opportunities to work towards rebuilding the wider natural environment through the development of Nature Recovery Networks in the District, East and West Sussex, the South Downs and regionally.</p> <p>It is noted though that the requirement to secure a minimum 20% net gain could be difficult to achieve on major development sites where the site is more ecologically sensitive, or where the loss of higher value habitats is unavoidable. This would be likely to significantly increase the demand for habitat banks and biodiversity offsetting, and may lead to disproportionate implications for the viability of particular development types.</p>	2	1

¹⁵ Department for Environment, Food and Rural Affairs (2019) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

¹⁶ CIEEM (2019) Defra Biodiversity Net-Gain Consultation Response Document [online] available at: <https://cieem.net/wp-content/uploads/2019/02/CIEEM-Net-Gain-consultation-response-Feb2019-FINAL.pdf>

¹⁷ Ibid.

Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

	Overall though, Option BNG2 is considered to be the best performing in terms of improving and enhancing the District's biodiversity resource.		
Green Infrastructure	<p>Biodiversity enhancements have the potential to deliver a range of ecosystem services which will support land, soil and water resources. These include soil formation; flood and erosion protection; and water quality regulation. The provision of green infrastructure within new developments can support flood risk management through the provision of permeable surfaces and the introduction of sustainable drainage systems (SuDS).</p> <p>Option BNG2 is therefore likely to perform most positively in this respect. given its increased net gain requirement. Through delivering an enhanced range of natural capital assets, the approach will help increase the range of ecosystem services provided by new development areas.</p>	2	1
Landscape and Historic Environment	<p>Delivering net gains in biodiversity can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. With regards to Option BNG2, the increased provision of green infrastructure that will be utilised in developments to facilitate a 20% net gain in biodiversity has the potential to enhance and improve the quality of the public realm. In this respect enhancements to the built and natural environment supported by BNG has the potential to support the setting of the historic environment and contribute to historic landscape character.</p> <p>While positive effects in this respect may be delivered through Option BNG1, these are likely to be less significant than the benefits under Option BNG2.</p> <p>It should be noted though that habitat restoration and new habitat creation may have negative impacts (direct and indirect) on the significance of heritage assets including their settings. For example, heathland restoration can have impacts on archaeology. In addition, localised ecologies, which reflect historic character, should be considered for protection where possible. Care needs to be taken with the location, species and sizes of any new planting to avoid negative impacts, e.g. to archaeological sites or the setting of a listed building, or to minimise these and maximise opportunities for enhancement. Planting and other types of habitat restoration and re-creation will need to be informed by appropriate research and historic environment/landscape character assessments.</p> <p>For this reason, appropriate methods for biodiversity net gain should therefore be devised with input from historic environment specialists from the outset.</p> <p>Delivering net gains in biodiversity has the potential to help conserve and enhance landscape character, including its special qualities and sense of place. For example, enhanced habitats (trees, hedgerows, grass, shrubs, etc.) can form important parts of the landscape, and also provide a role in landscape buffering and planting, providing screening to restrict undesirable views. They can also play a role in contributing towards local distinctiveness and a sense of place.</p> <p>While positive effects in this respect may be delivered through Option BNG1, these are likely to be less significant than the benefits under Option BNG2.</p> <p>However, as for the historic environment it is recognised that BNG needs to be appropriately designed to reinforce the special qualities</p>	2	1

Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

	of a landscape. The design of BNG will therefore need to be sensitive to the surrounding landscape, and exercises in habitat restoration and creation should be carefully selected to complement existing character and setting.		
Housing	<p>The delivery of additional levels of net gain through Option BNG2 has the potential to lead to improved residential environments.</p> <p>From a development viability perspective, Option BNG1 seeks a requirement for biodiversity net gain which is in line with minimum requirements and is therefore not expected to have adverse impacts on housing development and infrastructure delivery. Under Option BNG2, there is potential for this stricter requirement to affect the viability of new developments, potentially reducing the overall rate of housing and employment delivery. The implications of net gain on the viability of development is likely to be disproportionate for certain development types, for example public service infrastructure and redevelopment of post-industrial developed land.¹⁸ Risks are uncertain.</p> <p>While further evidence is required to understand the scale of the risk involved, it is noted that elsewhere Lichfield District Council requires a net gain of 20% on new development, and experience there to date suggests that developers are able to meet this requirement and often achieve much greater levels of biodiversity net gain.</p>	2	1
Resilient Communities	<p>Attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. 'Green' neighbourhoods are also more desirable places to live, with access to green space found to markedly increase property values. The Office for National Statistics (2019) estimates that green and blue space add £2,813 to the price of the average house in Great Britain, and this is likely to increase in light of COVID-19 and the increased value placed on accessible green space.¹⁹</p> <p>In this respect Option BNG2 has the potential to deliver additional benefits for health and wellbeing, the quality of neighbourhoods and for community vitality.</p> <p>Biodiversity is of intrinsic value to people through supporting healthy lifestyles, however development often makes a significant contribution to land use change and to the loss of natural habitats that reduces biodiversity.²⁰ The 25 Year Environment Plan recognises this, acknowledging that there is unequal access to nature and green spaces, and therefore sets out commitments to better connect people with the environment to improve health and wellbeing.²¹ It is therefore considered that delivering at least a 20% net gain (Option BNG2) provides an increased opportunity to facilitate the wider social and wellbeing benefits that healthy ecosystems offer.</p>	2	1

¹⁸ Department for Environment, Food and Rural Affairs (2019) Net gain: Summary of responses and government responses [online] available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/819823/net-gain-consult-sum-resp.pdf

¹⁹ ONS (2019) Urban green spaces raise nearby house prices by an average of £2,500 [online] available at: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/urbangreenspacesraisenearbyhousepricesbyanaverageof2500/2019-10-14>

²⁰ RSPB (2016) State of Nature UK Report [online] available at <https://www.rspb.org.uk/globalassets/downloads/documents/conservation-projects/state-of-nature/state-of-nature-uk-report-2016.pdf>

²¹ Department for Environment, Food and Rural Affairs (2019) 25 Year Environment Plan [online] available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

Option BNG1: Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted).

Option BNG2: Seek to deliver at least a 20% measurable biodiversity net gain on major development sites.

A 20% net gain requirement may also encourage developers to take a strategic approach to protecting, restoring and creating quality habitat that contributes towards a network of multifunctional green infrastructure. This can have significant wellbeing benefits, including providing open space, leisure and recreational opportunities which in turn support healthy and active lifestyles. Numerous mental and physical health benefits can be anticipated as a result; with the potential for significant positive effects in the long-term.

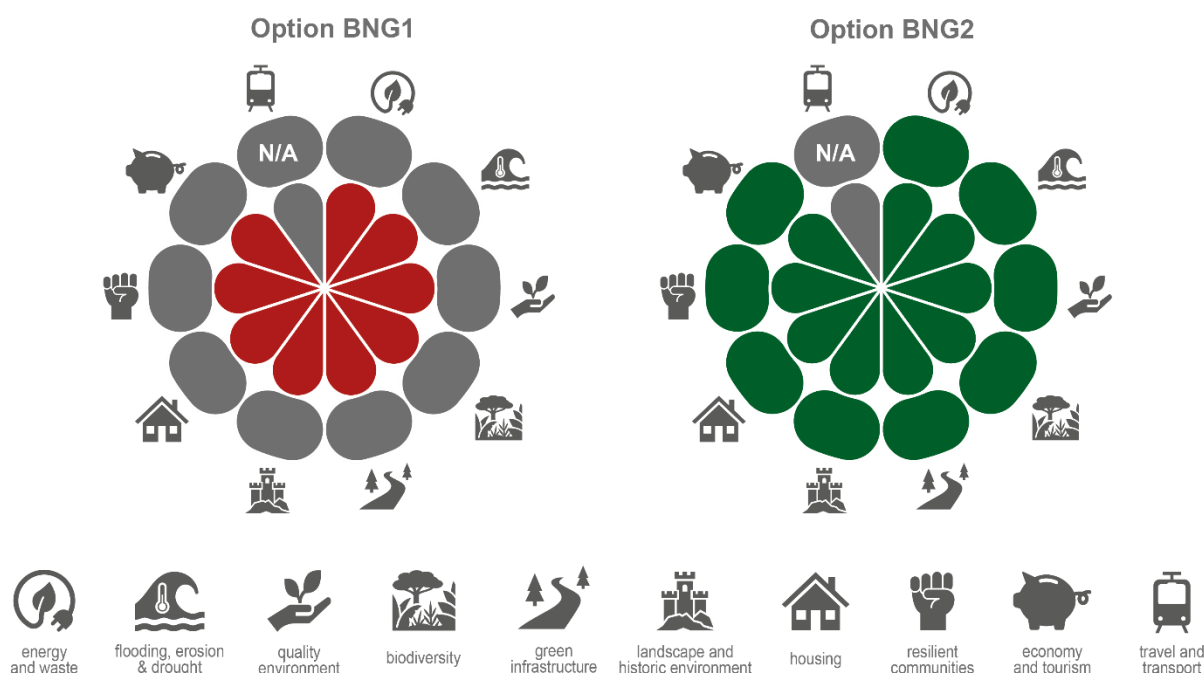
Economy and Tourism	Attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. 'Green' neighbourhoods are also more desirable places to live, with access to green space found to markedly increase property values. Wider benefits to the economy are similarly high, with biodiversity being a significant contributor to the economy. In this respect Lewes District's various habitats and wildlife, whether found in urban or rural greenspaces, bring substantial economic value through tourism and leisure, and indirectly supporting food production and agriculture. ²² As such	2	1
Travel and Transport	Whilst with regards to Option BNG2, the increased provision of green infrastructure that will be utilised in developments to facilitate a 20% net gain in biodiversity has the potential to enhance and improve the quality of walking and cycling networks, the relative merits of each option in this regard are likely to be negligible.	N/A	N/A

Appraisal of options relating to biodiversity net gain



Option BNG1 - Seek to deliver the soon-to-be mandatory minimum measurable 10% figure for biodiversity net gain on development sites (effectively business-as-usual once the Environment Act is enacted)

Option BNG2 - Seek to deliver at least a 20% measurable biodiversity net gain on major development sites



²² Ecological Expertise, Evolved (Building Biodiversity Net Gain into Housing https://assets.website-files.com/5e5fb414845bab39bfd2015f/5e6809ce13930fcb39f12bce_EPR-Report-NetGain-v01-compressed.pdf)

Appraisal of options relating to urban greening

4.44 With a view to further supporting green infrastructure delivery in the District, LDC would like to explore the possibility of applying an Urban Greening Factor approach to smaller sites. Urban Greening Factor is a tool that evaluates and quantifies the amount and quality of urban greening that a scheme provides to inform decisions about appropriate levels of greening in new developments. The purpose of this approach would be to provide an appropriate target for sites to deliver the appropriate provision of greening for new developments.

4.45 In light of the above, the SA process has considered two options, as follows:

- **Option UG1:** Continue to apply the Local Plan’s current green infrastructure policies.
- **Option UG2:** Apply an Urban Greening Factor, Small Site Biodiversity Metric or similar approach for smaller sites.

4.46 The following table and infographics present appraisal findings in relation to the two options introduced above. These are organised by the ten SA themes.

Table 4.5: Appraisal of options relating to urban greening

Option UG1: Continue to apply the Local Plan’s current green infrastructure policies.

Option UG2: Apply an Urban Greening Factor, Small Site Biodiversity Metric or similar approach for smaller sites.

SA theme	Discussion of potential effects and relative merits of options	Ranking	
		UG1	UG2
Energy and Waste	<p>The purpose of the Urban Greening Factor (UGF) or Small Site Biodiversity Metric (SSBM) is to ensure that appropriate greening measures are provided alongside new development, including through green infrastructure provision.</p> <p>The application of an Urban Greening Factor (UGF) can support climate change mitigation through enhancing natural features which act as carbon sequesters. In this respect, Option UG2 is likely to perform more favourably given the application of the tool has the potential to support the introduction of natural features within development.</p>	2	1
Flooding, Erosion, Drought	<p>Improved green infrastructure provision can help an area adapt to, and manage the risks of climate change (including relating to extreme weather events and flood risk). The provision of green infrastructure within new developments can support flood risk management through the provision of permeable surfaces and the introduction of sustainable drainage systems and help regulate extremes of temperatures. Whilst both approaches have benefits, it is considered that the application of a UGF/SSBM approach through Option UG2 has the potential to deliver additional benefits on development sites given the targeted approach it proposes.</p>	2	1
Quality Environment	<p>Application of a UGF/SSBM approach has the potential to bring a range of benefits for air quality; for example, trees in urban areas improve air quality by removing different types of air pollution, including particulate matter, sulphur dioxide, nitrogen dioxide and ozone. Applying an UGF/SSBM approach also encourages the greening of buildings. Green roofs and wall planting can similarly improve air quality.</p> <p>Both options support the provision of green infrastructure, potentially delivering numerous ecosystem services relating to this SA theme including soil formation and water quality regulation.</p> <p>Whilst both options will bring positive effects relating to this theme, it is considered that the application of a UGF/SSBM approach through Option UG2 has the potential to deliver additional benefits on development sites given the targeted approach it proposes. Option UG2 is therefore considered best performing of the options.</p>	2	1

Option UG1: Continue to apply the Local Plan’s current green infrastructure policies.

Option UG2: Apply an Urban Greening Factor, Small Site Biodiversity Metric or similar approach for smaller sites.

Biodiversity	<p>Both options perform positively in terms of supporting the delivery of green infrastructure in the District which in turn will support species, habitats and ecological networks. However, applying a UGF/SSBM approach to development sites through Option UG2 would provide a specific target for these sites to deliver an appropriate level of greening. This has the potential to deliver gains for biodiversity, proportionate to the scale of development proposed.</p> <p>Under the existing Local Plan policy framework (Option UG1), the provision of green infrastructure on smaller sites can often be an afterthought, with opportunities missed and low-quality greening delivered. Providing a target for green infrastructure delivery through Option UG2 can therefore ensure that greening measures are integral to the planning of smaller developments. Developers will be expected to set out the measures they have taken to achieve greening on-site and quantify their UGF/SSBM score. It is considered that this will help achieve an appropriate standard of greening, and ensure that locally important biodiversity features are prioritised, retained, and enhanced; optimising likely limited space.</p> <p>It is also anticipated that a UGF/SSBM approach will be developed to reflect local circumstances in the District. Allowing specific biodiversity features to be prioritised in new development is likely to lead to long-term positive effects on the District’s biodiversity resource.</p> <p>In light of the above, it is considered that Option UG2 is best performing of the two options in relation to the biodiversity SA theme.</p>	2	1
Green Infrastructure	<p>The purpose of the Urban Greening Factor (UGF) or Small Site Biodiversity Metric (SSBM) is to ensure that appropriate greening measures are provided alongside new development, including through green infrastructure provision. Under the existing Local Plan policy framework (Option UG1), the provision of green infrastructure on smaller sites can often be an afterthought, with opportunities missed and low-quality greening delivered. Providing a target for green infrastructure delivery through Option UG2 can therefore better ensure that greening measures are integral to the planning of smaller developments.</p>	2	1
Landscape and Historic Environment	<p>Applying a UGF/SSBM approach through Option UG2 can have beneficial impacts in terms of the quality of the public realm and built environment. In addition to supporting enhancements to the setting of features and areas of historic environment interest, it has the potential to support the quality of historic landscapes, townscapes and villagescapes in the District.</p> <p>It is noted though that applying a UGF/SSBM approach to historic environments can be difficult at times due to historic sensitivity; e.g. a green roof is unlikely to be appropriate on a historic building where it would not be sympathetic to its character.²³ However, UGF/SSBM approaches are designed to be flexible on how the target is reached and incentivises high quality greening, rather than quantity, thereby lending itself to implementation in sensitive settings.</p> <p>It is considered that a coordinated approach to greening through applying the Local Plan’s current green infrastructure policies (Option UG1) will likely facilitate the integration of green infrastructure into landscapes, with positive effects. These policies provide a framework for protecting and enhancing existing landscape character.</p>	2	1

²³ Historic England (2015) Energy Efficiency and Historic Buildings: How to Improve Energy Efficiency [online] available at: <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

Option UG1: Continue to apply the Local Plan’s current green infrastructure policies.

Option UG2: Apply an Urban Greening Factor, Small Site Biodiversity Metric or similar approach for smaller sites.

	<p>However, it is considered that the additional application of a UGF/SSBM approach on smaller sites (Option UG2) would perform more positively through increasing the level of greening that is delivered on smaller development sites. For example, biodiversity features (trees, hedgerows, grass, shrub, etc.,) can assist in landscape buffering, provide screening to restrict undesirable views and contribute towards sense of place. While positive effects in this respect may be delivered through Option UG1, these are likely to be less significant given current policy does not require greening to be considered at the early stages of planning for smaller sites.</p> <p>Overall, Option UG2 is considered to be best performing in relation to landscape and townscape character and the historic environment.</p>		
Housing	<p>Option UG2, through applying a UGF/SSBM approach, has the potential to deliver development areas with increased planting, use of trees and other green infrastructure provision. This will help deliver higher quality residential environments. Whilst Option UG1 will continue to have benefits in this regards, Option UG2 in particular may have benefits for smaller sites.</p>	2	1
Resilient Communities	<p>Increased ‘greening’ of developments facilitated by Option UG2 will support the quality of the built environment and neighbourhoods as places to live and work, and support community vitality. It will also support physical and mental health and wellbeing.</p> <p>It is considered that implementing a UGF/SSBM approach for smaller developments through Option UG2 could, drawing on application elsewhere, provide an additional contribution to supporting sustainable communities, improving quality of life for residents within new development.²⁴ In this respect applying a UGF/SSBM approach to development sites will accelerate greening of the built environment, delivering community benefits in the long-term.</p> <p>Overall, it is considered that securing the benefits of greening through applying a UGF/SSBM approach on development sites can make a contribution to supporting healthy, sustainable communities. Option UG2 is therefore considered the best performing of the two options in relation to health and wellbeing.</p>	2	1
Economy and Tourism	<p>Attractive and wildlife-rich green spaces support the quality of neighbourhoods, often supporting a high-quality public realm. ‘Green’ neighbourhoods are also more desirable places to live, with access to green space found to markedly increase property values. Wider benefits to the economy are similarly high, with the District’s high quality environment being a significant contributor to the economy. The District’s various habitats and wildlife, whether found in urban or rural greenspaces, bring substantial economic value through tourism and leisure, and indirectly supporting food production and agriculture.²⁵</p> <p>As such, through providing an initial impetus on the greening of neighbourhoods, Option UG2 has the potential to bring additional benefits in relation to this SA theme.</p>	2	1
Travel and Transport	<p>Whilst with regards to Option UG2, the increased greening that will be utilised in developments has the potential to encourage walking and cycling, the relative merits of each option in this regard are likely to be negligible.</p>	N/A	N/A

²⁴ The Ecology Consultancy (2017) Urban Greening Factor For London: Research Report [online] available at: https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

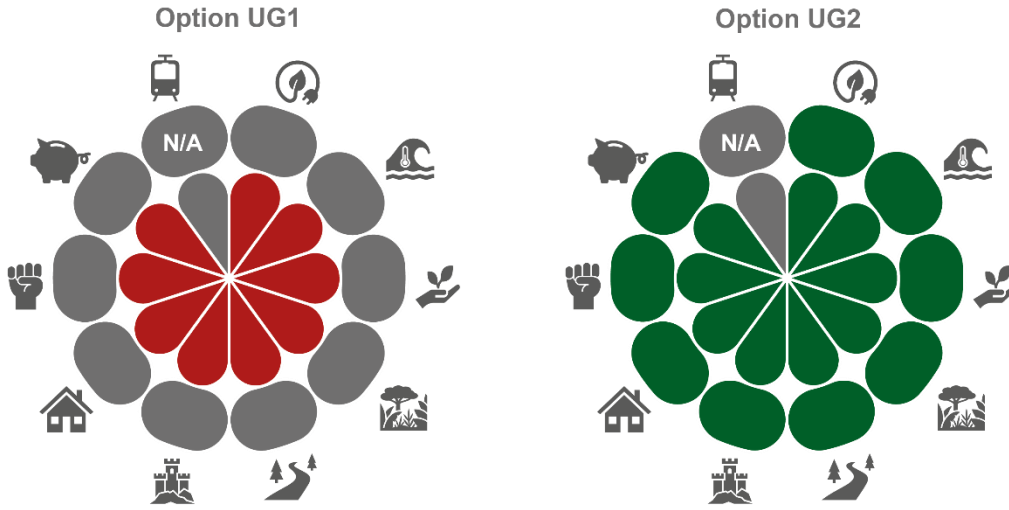
²⁵ Ecological Expertise, Evolved (Building Biodiversity Net Gain into Housing https://assets.website-files.com/5e5fb414845bab39bfd2015f/5e6809ce13930fcb39f12bce_EPR-Report-NetGain-v01-compressed.pdf)

Appraisal of options relating to urban greening



Option UG1 - Continue to apply the Local Plan's current green infrastructure policies

Option UG2 - Apply an Urban Greening Factor, Small Site Biodiversity Metric or similar approach for smaller sites



- 
energy and waste
- 
flooding, erosion & drought
- 
quality environment
- 
biodiversity
- 
green infrastructure
- 
landscape and historic environment
- 
housing
- 
resilient communities
- 
economy and tourism
- 
travel and transport

5. Next steps

- 5.1 This Interim SA Report accompanies the current consultation on the Lewes Local Plan (*Lewes Local Plan: Towards a Local Plan Spatial Strategy and Policies Directions*).
- 5.2 Following the receipt of consultation responses, the draft Local Plan will be prepared by LDC and released for Regulation 18 consultation during the first half of 2024. Development of the draft Local Plan will be informed by representations made through the current consultation, the outcomes of evidence base studies prepared to inform the Local Plan and the findings of the SA process.
- 5.3 As set out in **Chapter 3**, a central element of the ongoing SA process will be the appraisal of growth scenario options. This will comprise a detailed consideration of alternative spatial strategies for the District, reflecting land availability and different levels of growth. The appraisal of the growth scenario options will be presented in the SA Report accompanying the forthcoming Regulation 18 consultation on the draft Local Plan.
- 5.4 Following the receipt of consultation responses on the Regulation 18 consultation on the draft Local Plan, the Local Plan will be updated and released by LDC for Regulation 19 consultation with a full SA Report. Regulation 19 consultation is anticipated to take place in early 2025.
- 5.5 The SA Report, which will be presented alongside the Regulation 19 consultation version of the Local Plan, will present the information required by the SEA Regulations.
- 5.6 In line with the SEA Regulations, the SA Report will answer the three questions:
 - What has plan-making / SA involved up to this point?
 - Including with regards to the consideration of ‘reasonable alternatives’
 - What are the appraisal findings at this current stage?
 - i.e. in relation to the policies currently proposed for the Local Plan, as presented in the draft Local Plan document
 - What are the next steps for plan making?
- 5.7 These questions are derived from Schedule 2 of the SEA Regulations, which set out ‘the information to be provided within the [environmental] report’.
- 5.8 Once the period for representations on the Regulation 19 version of the Local Plan document / SA Report has finished, the main issues raised will be identified and summarised by LDC, which will then consider whether, in light of representations received, the plan can still be deemed ‘sound’. If this is the case, the Local Plan will be submitted to the Secretary of State for Examination, alongside a statement setting out the main issues raised during the consultation. The Council will also submit the SA Report alongside it.
- 5.9 At Examination, the Inspector will consider representations (alongside the SA Report) before then reporting back. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (and undergo SA) and will then be subject to consultation (with an SA Report Addendum published alongside).
- 5.10 Once found to be ‘sound’, the Local Plan will be formally adopted by LDC. At the time of adoption, an SA ‘Statement’ must be published that sets out (amongst other elements) ‘the measures decided concerning monitoring the Plan’.

