



Local Plan Part 2

Site Allocations and Development Management Policies

SUSTAINABILITY APPRAISAL/SEA SCOPING REPORT

November 2013



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1. Introduction

- 1.1 Following the publication of Part 1 of the Lewes District Local Plan (the Joint Core Strategy – Proposed Submission Document) in January 2013, the Council has now commenced work on Part 2 - the Site Allocations and Development Management Policies Development Plan Document (Local Plan Part 2). Whereas the Joint Core Strategy covered the whole of Lewes District, Part 2 of the Local Plan only applies to the parts of the district that are outside of the National Park (i.e. the area that Lewes District Council are the planning authority for).
- 1.2 In accordance with European and National legislation, documents prepared for the Local Plan must be subjected to a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA). Therefore, the Sustainability Appraisal and SEA requirements will need to apply to development of the Site Allocations and Development Management Policies DPD.

Purpose of the report

- 1.3 This Scoping Report has been produced as the initial stage of the Sustainability Appraisal for the Local Plan Part 2. The intention of the report is to set out the necessary scope of the SA, including the identification of the proposed sustainability objectives that will be used to test different policy options, site allocations and eventual draft policies. The report includes the relevant baseline information and the identification of key sustainability issues that the district faces. This is especially pertinent for the Local Plan Part 2 as it applies to a different geographical area to Part 1 of the Lewes District Local Plan – the Joint Core Strategy (this is explained in more detail in Section 2). Therefore, it is important to determine a baseline and identify key issues at the outset.
- 1.4 This report is structured as follows:

Section 2 summarises the purpose of the Local Plan Part 2 and how it relates to the Joint Core Strategy. This section also includes an introduction to the Sustainability Appraisal and Strategic Environmental Assessment process.

Section 3 sets out how the Local Plan Part 2 will be influenced by other plans, programmes and policies. This section is linked to Appendix A which contains a review of the plans, programmes and policies of relevance to the DPD.

Section 4 presents the current baseline information, setting out the social, economic and environmental characteristics of the Plan Area. Any difficulties in collecting this information have been documented.

Section 5 outlines the key sustainability issues the Plan Area faces.

Section 6 sets out the sustainability objectives and indicators as a basis on which to measure the effectiveness of the Local Plan Part 2 and options considered in its development.

Section 7 presents a summary of the next stages of the Sustainability Appraisal process and the production of the Local Plan Part 2.

Appendix A outlines a list of plans, programmes and policies that have been updated or published since the publication of the Proposed Submission Joint Core Strategy.

Appendices B and C present maps linking to Section 4 which illustrate the environmental designations within the Plan Area.

How to comment on this report

- 1.5 This Scoping Report has been issued for consultation alongside the Site Allocations and Development Management Policies DPD Issues and Options Topic Papers. An 8 week period of consultation will commence between Friday 22nd November and Friday 17th January 2014, making an allowance for the Christmas period. At this stage we would welcome your views on the economic, social and environmental characteristics identified for the Plan Area, as well as the sustainability issues, objectives and indicators. We would also appreciate it if you are able to identify any plans, programmes or policies that we have not identified in Appendix A of this report.

Comments can be sent:

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2. Background

2.1 Local Planning Authorities are required to create locally based planning policies to guide development in their areas. The policies can be contained in either one document or a collection of documents. The collection of documents were known as a Local Development Framework (LDF), although recent changes to the planning system mean that this term is no longer used, and instead the collection of planning policy documents is known as the Local Plan. The Lewes District Council Local Plan will consist of two parts:

- Part 1 - the Joint Core Strategy – applies to the whole of Lewes District and produced in partnership by Lewes District Council and the South Downs National Park Authority
- Part 2 - the Site Allocations and Development Management Policies DPD and any Neighbourhood Plans that are adopted

2.2 At the time of preparing this Scoping Report, the Joint Core Strategy had reached the Proposed Submission stage. It is due to reach the examination stage in mid 2014 and adopted towards the end of 2014.

2.3 Part 2 of the Local Plan, the Site Allocations and Development Management Policies DPD will be in general conformity with the National Planning Policy Framework (NPPF) and in compliance with Part 1 of the Local Plan. The content of the DPD will contribute to meeting some or all of the strategic objectives guiding development in the district to 2030 (see section 5 of the Joint Core Strategy). One such objective which is key to delivering the Joint Core Strategy is Objective 3 – delivering the homes and accommodation for the needs of the district.

2.4 Also, a number of the policies within the Joint Core Strategy make reference to the Local Plan Part 2, most notably Part 3 of Spatial Policy 2 (planned housing growth in the settlements). The production of this DPD is an essential component of meeting the Council's obligations under Chapter 6 of the NPPF, to identify a supply of specific, developable sites for growth. The DPD will identify sites and appropriate timings, phasing and delivery mechanisms to meet the housing targets identified in Part 3 of Spatial Policy 2. A list of policies which make reference to the Local Plan Part 2 can be found below:

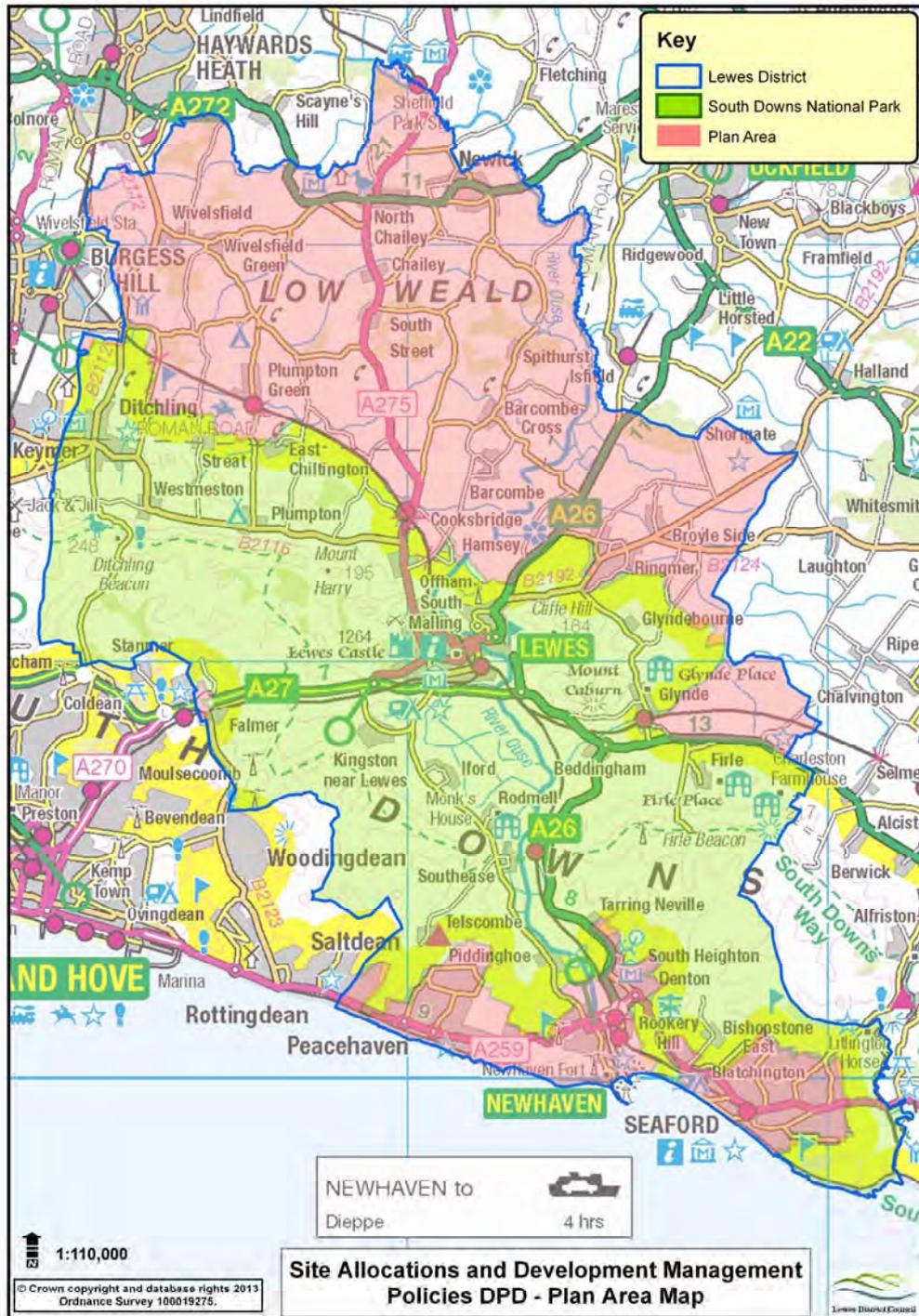
- **Spatial Policy 2** – individual sites to meet the planned level of housing provision for individual settlements will be identified in the Local Plan Part 2. Also relating to Spatial Policy 2, the Local Plan Part 2 will act as a contingency by identifying sites to meet the planned level of growth in Neighbourhood Plan areas should the Plans not be adopted by specified dates, or fail at the examination or referendum stages.

- **Core Policy 2** – The Local Plan Part 2 will be expected to identify, where appropriate, sites for special needs housing.

- **Core Policy 3** – The Plan Area’s requirement of Gypsy and Traveller accommodation will be allocated through the Local Plan Part 2.
 - **Core Policy 4** – The Local Plan Part 2 will allocate sites (within the Plan Area) to contribute towards the district’s employment land requirements, if necessary.
 - **Core Policy 8** – The DPD will identify areas within the Plan Area where there is potential to contribute towards the delivery of green infrastructure.
 - **Core Policy 10** – Any necessary Suitable Alternative Natural Greenspaces (SANGs) provision will be allocated through the Local Plan Part 2.
- 2.5 It will also include a set of development management policies to update, where appropriate, those saved from the 2003 Local Plan and to consider the need for further policy areas that will act as the framework for determining planning applications.
- 2.6 The DPD will be prepared in two stages, the first being the Issues and Options Topic Papers (which this report accompanies), and the second being a proposed submission document which will be subject to further consultation before submission to the Secretary of State for examination.
- 2.7 A Sustainability Appraisal (SA) was carried out for Part 1 of the Local Plan, the Joint Core Strategy. For this higher tier DPD, the Proposed Submission SA assisted in identifying and choosing policy options by predicting and evaluating the effects arising from the policies. The Sustainability Appraisal for the Joint Core Strategy can be viewed at: http://www.lewes.gov.uk/Files/plan_PS_SA.pdf

Who has prepared this document?

- 2.8 Part 1 of the Local Plan (Joint Core Strategy) was jointly prepared by Lewes District Council and the South Downs National Park Authority (SDNPA) and covered the whole of the district.
- 2.9 However, Part 2 of the Local Plan is produced by Lewes District Council and only relates to the non-National Park area (the SDNPA are producing a Local Plan which will cover the area of the district within the National Park). This area will be referred to as the **Plan Area**.



Sustainable Development

2.10 As paragraph 6 of the National Planning Policy Framework makes clear, “the purpose of planning is to contribute to the achievement of sustainable development.”

2.11 The term sustainable development has a worldwide meaning, defined in the World Commission on Environment and Development Report in 1987 (also known as the Brundtland Report), as “development that meets the

needs of the present without compromising the ability of future generations to meet their own needs.”

2.12 The UK government began developing its own strategy for delivering sustainable development following the Rio Earth Summit in 1992. In 2005, the government produced a Sustainable Development Strategy¹, recognising that considering the long-term social, economic and environmental issues and impacts in an integrated and balanced way was key to delivering sustainable development. The strategy set out five guiding principles to achieve sustainable development. These principles formed the basis for policy in the UK and were as follows:

- **Living Within Environmental Limits**

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

- **Ensuring a Strong, Healthy and Just Society**

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

- **Building a Strong, Stable and Sustainable Economy**

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

- **Promoting Good Governance**

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

- **Using Sound Science Responsibly**

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

2.13 The Coalition Government has a refreshed vision on sustainable development, which builds upon the principles contained within the 2005 Sustainable Development Strategy, and thus continues to recognise “the needs of the economy, society and the natural environment, alongside the use of good governance and sound science.”²

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

2.14 The commitment to the achievement of sustainable development was set out in legislation introduced at both a European and national level. In 2004 the European Directive on Strategic Environmental Assessment

¹ Defra (March 2005), *The UK Government Sustainable Development Strategy*.

² Defra (February 2011), *Mainstreaming sustainable development – the Government’s vision and what this means in practice*.

(known as the SEA Directive) was implemented in the UK, as was the Planning and Compulsory Purchase Act. These pieces of legislation set out the requirement for Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) of plans, such as the Local Plan Part 2.

- 2.15 A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from plans. It is a process for understanding whether policies, strategies or plans promote sustainable development, and for improving them to deliver more sustainable outcomes.
- 2.16 The Strategic Environmental Assessment (SEA) aims to predict and assess the environmental effects that are likely to arise from plans, policies and strategies. It is a process for assessing and mitigating the negative environmental impacts of specific plans and programmes. For the purposes of undertaking the SA and SEA of the Site Allocations and Development Management Policies DPD, the SEA process has been incorporated into the Sustainability Appraisal process. Therefore, where this report refers to the SA it can be assumed that this also means the SEA.

Stages of the Sustainability Appraisal

2.17 The Sustainability Appraisal process will be carried out in accordance with the Sustainability Appraisal section of the Communities and Local Government Plan Making Manual. This section has replaced the previous SA guidance set out by the Office of the Deputy Prime Minister (ODPM) on the subject³. Notwithstanding the above, the ODPM's guidance has been used to help with the production of this Scoping Report, as has the Planning Advisory Service (PAS) guide⁴ on SA's and best practice examples from other authorities. The ODPM guidance advocates a five stage approach to SA/SEA as demonstrated by the table below.

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

³ ODPM (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents

⁴ PAS (2010) Sustainability Appraisal Guidance Note

2.18 The Scoping Report focuses on Stage A of the process set out in the ODPM guidance. The key tasks to be undertaken during this stage are highlighted in the table below.

Stage A – Key Tasks

A1	Identifying other relevant policies, plans and programmes and the sustainability appraisal objectives
A2	Collecting baseline information
A3	Identifying key sustainability issues
A4	Developing the SA/SEA Framework
A5	Consulting on the scope of the SA/SEA

3. Plans, Programmes and Policies

- 3.1 In order to establish a clear scope for the Sustainability Appraisal it is necessary to review and develop an understanding of the plans, programmes and policies (PPPs) that are of relevance to the Site Allocations and Development Management Policies DPD.
- 3.2 The Local Plan Part 2 will be influenced by numerous PPPs, including national planning policy and guidance, strategies and guidance produced locally and the strategic plan for the district, which will be the Joint Core Strategy. In addition, the content of the PPPs has also been used to inform some of the key sustainability issues facing the Plan Area and in turn, the sustainability objectives of this SA Report.
- 3.3 The higher tier Sustainability Appraisal for Part 1 of the Local Plan – the Joint Core Strategy – set out a detailed section on the plans, programmes and policies that influenced the preparation of the DPD. Most of these PPPs are also relevant to the Local Plan Part 2, and considering the higher level SA was published in January 2013, and so very little has changed, it was not considered necessary to repeat this section. Instead, only the relevant PPPs that have been recently updated, published or were not included in the Joint Core Strategy SA will be highlighted in the table found in Appendix A of this document. Some of the key recent changes are outlined below.
- 3.4 In March 2013 the South East Plan was formally revoked. The Plan was an influence on the production of the Joint Core Strategy (particularly during the early stages of plan preparation), and as a result will have some indirect influence on the Local Plan Part 2, however it is no longer a statutory planning document. At the regional level, South East Water have recently published their draft Water Resources Management Plan for consultation which will help to inform issues such as infrastructure provision. Also, the East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan was adopted in February 2013. The vision, objectives and policies of the Plan will feed in to the Local Plan Part 2. At the local level, a number of Neighbourhood Plan Areas have recently been designated. The Town and Parish Council's which have decided to undertake a Neighbourhood Plan will have the option of allocating sites to meet their housing targets and so the Local Plan Part 2 will be influenced by emerging and adopted Neighbourhood Plans.
- 3.5 The full list of PPPs that have influenced the production of both parts of the Local Plan can be found in Appendix 1 of the Sustainability Appraisal for the Joint Core Strategy.

4. The Baseline Situation: A Portrait of the Plan Area



Difficulties in Collecting Data/ Data Limitations

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

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

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

General characteristics

- 4.6 Lewes District is located within the county of East Sussex, in the South East region of England, around 45 to 60 miles south of London. The district as a whole extends from the English Channel coast through the South Downs and into the countryside of the Sussex Weald to the north. The Plan Area comprises approximately 129 sq km of the entire district area (292 sq km), equating to approximately 44% of the entire district. This area is comprised of two distinct parts, namely the coastal towns and the Low Weald area.
- 4.7 The total population of the Plan Area is approximately 75,000⁵, which comprises almost three quarters of the entire district population.
- 4.8 The city of Brighton & Hove is located on the western boundary of the southern part of the Plan Area (i.e. the coastal towns area) and exerts a strong influence on the life of this area, as well as the Low Weald area, providing employment, shopping and leisure opportunities, together with other services and facilities. The towns of Haywards Heath and Burgess Hill in Mid Sussex District abut the north-western boundary, with the more rural district of Wealden located to the east, beyond which lies the coastal resort of Eastbourne.
- 4.9 The Plan Area benefits from good access to the trunk road network, with the A27/A26 linking the coastal towns to neighbouring Brighton and Eastbourne and the nearby A23/M23 providing access to London, Gatwick and the M25. In addition, the Plan Area is served by a number of key A roads. This includes the A259, which links the coastal communities, and the A26, A272 and A275, which are key routes

⁵ ONS, Census 2011, 16 July 2012

through the northern part of the district. Newhaven and Seaford are linked by rail connections to London and Gatwick and towns along the Sussex coast and beyond. The port of Newhaven provides cross channel passenger and freight services to Dieppe in France.

Environmental characteristics

- 4.10 The **landscape and historic environment** of the Plan Area of the district is highly valued by both residents and visitors. The coastal towns are tightly enclosed by the National Park and comprise of a coastal environment characterised by chalk cliffs and shingle beaches. The northern section of the Plan Area differs and is more typified by a gently undulating low weald landscape, abundant woodland and river valleys. The East Sussex County Landscape Assessment has identified and defined the landscape character of the County, which includes the Plan Area, in more detail (this includes more localised character areas). Problems, pressures and detracting features of the landscape areas are defined, such as the severe impact of the ring road (Newhaven), the removal of hedgerows and damage to ancient woodland (the Low Weald) and the scrub invasion of chalk grassland (various). The Landscape Capacity Study, produced by the District Council and National Park Authority, also recognises high quality landscape which should be protected.
- 4.11 Within the Plan Area (see Map 1, Appendix B) there are 4 **Sites of Special Scientific Interest (SSSIs)**, 3 **Local Nature Reserves (LNRs)**, 1 **Wildlife Trust Reserve** and 49 **Sites of Nature Conservation Importance (SNCIs)**. SSSIs are of national importance and are designated based on their nature conservation and/or geological value. Of the 560.33⁶ hectares of land designated as SSSI's, 38.1% has been assessed to be in a favourable condition and 61.9% is considered to be in an unfavourable but recovering condition. LNR's cover 354 hectares of land⁷ and have wildlife and/or geological features that are of local importance and allow people the opportunity to learn about and appreciate nature. SNCIs are non-statutory sites designated by local authorities to protect locally important conservation sites. The 49⁸ designated SNCI's cover 837 hectares⁹ (2.9%) of the Plan Area.
- 4.12 The two internationally important **Special Areas of Conservation (SACs)** (see Map 1, Appendix B), Castle Hill and Lewes Downs, are both located within the National park (and so not applicable to this document, although the potential impact of the Local Plan Part 2 on these protected sites, as well as others in the locality, such as the Ashdown Forest, will need to be considered in order to meet the requirements of the Habitats Directive). There are no designated Ramsar sites or Special Protection Areas (SPAs) in the district, albeit

⁶ Natural England, Dec 2012

⁷ Sussex Biodiversity Record Centre, December 2011

⁸ Natural England, ESCC GIS System, July 2011

⁹ Sussex Biodiversity Record Centre, December 2010

the Pevensey Levels (Ramsar) and the Ashdown Forest (SPA and SAC) are located nearby. A Habitats Regulation Assessment (HRA) has been undertaken and has found that the levels of development set out in the Joint Core Strategy will not have a significant negative effect on the protected sites in the district. It also found that the potential significant negative impact of the planned development set out in the Joint Core Strategy on the Ashdown Forest can be mitigated against, which has repercussions for the Local Plan Part 2.

- 4.13 **Ancient Woodland** is an important ecological resource that deserves protection. The Plan Area (see Map 1, Appendix B) contains almost all (90.7%) of the district's Ancient Woodland (1,048¹⁰ hectares in total, covering 3.6% of the Plan Area). The Wealds and Downs Ancient Woodland Survey (see link below) includes a map of the location of Ancient Woodland areas in the district as a whole, and it is evident that the vast majority of this woodland is located in the Low Weald area of the Plan Area.
- 4.14 Lewes District as a whole currently has a shortfall in **outdoor playing space** provision when compared with the Council's adopted standards. There are 131 playing pitches, which equates to one pitch for every 282 adults (the equivalent national figure is one pitch for every 989 adults). However, only 83 of these pitches are regularly available for community use and their quality varies across the District. Changing facilities are frequently inadequate and there are identified deficiencies in the provision of cricket pitches and junior football pitches in areas such as Newhaven and Seaford. All the towns and the majority of villages are provided with equipped children's play space, but there is a recognised deficiency in the level of provision across the district. The largest deficiency in children's play space is in Newhaven.
- 4.15 Lewes District benefits from a high quality built environment. Within the Plan Area there are 18 **Conservation Areas**, covering an area of 179.9 hectares and 349 **Listed Buildings**. **Grade I** buildings are considered to be of exceptional interest and there are 4 buildings within this classification located within the Plan Area. **Grade II*** are considered to be particularly important buildings of more than special interest and 14 buildings in the Plan Area fall into this category. There are also 331 **Grade II** buildings, which are buildings of special interest, thus warranting every effort to preserve them. The Plan Area also has one **Historic Park and Garden** and 7 **Scheduled Ancient Monuments**.
- 4.16 Lewes District Council is a signatory of the Nottingham Declaration on Climate Change and so has pledged to tackle the causes of climate change and prepare for its consequences. The generation of energy from non-renewable sources releases greenhouse gases and thus the district's consumption of energy contributes to climate change. As can be seen in the table below, **carbon dioxide emissions per capita** are

¹⁰ Weald and Downs Ancient Woodland Survey, 2010

lower in Lewes District than the national average, which is also the case for gas consumption, although the district's residents on average consume more electricity than the rest of the country. However, all three datasets have been improving over the last 7 years. There is no ward level data available for this dataset, however, it can be assumed that considering the dataset for CO² emissions is per person, the figure for the Plan Area would be approximately the same, as both the Plan Area and the National Park area of the district have a similar urban-rural mix.

Table 1: Energy Consumption

	Lewes District	East Sussex	National
Carbon Dioxide Emissions¹¹ (tonnes per person)	5.0	5.0	6.7
Gas Consumption¹² (Kilowatts per hour)	14,637	14,698	15,156
Electricity Consumption¹³ (Kilowatts per hour)	4,427	4,439	4,148

4.17 The table below shows that on average each person in the district produces far less **waste** than the county's average and it is also the case that the level of household waste has been steadily decreasing over the last 6 years. No ward level data was available for this dataset, although as the data represents waste per capita, it can be assumed that the Plan Area would have a similar rate of waste generation. Also, the table below shows that a very high proportion of the waste goes to landfill. However, the recently completed Energy from Waste Incinerator in Newhaven is likely to reduce the amount of domestic waste sent to landfill and increase the amount of energy that is recovered from waste in the district (this is not reflected in the latest figures which can be found below).

Table 2: Waste Generation¹⁴

	Lewes District	East Sussex
Domestic waste per capita (kg)¹⁵	293	2011/2012 figure not available (2010/11 - 375)
Percentage of waste to landfill	73%	37%

4.18 In general, **air quality** across the district is good. Currently, no Air Quality Management Areas (AQMA's) exist within the Plan Area, although in February 2013 the District Council submitted a detailed assessment of air quality in Newhaven to DEFRA. This could result in the designation of an AQMA in the area around the ring-road in Newhaven, as the levels of nitrogen dioxide found in this location are

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

¹² DECC, March 2012

¹³ DECC, March 2012

¹⁴ East Sussex County Council, 3 November 2011

¹⁵ Waste Data Flow, 2012

close to exceeding acceptable limits. This site is situated within the Plan Area.

- 4.19 The **Strategic Flood Risk Assessment** (SFRA) identified that there is significant risk of flooding in the Plan Area, both from inundation by the sea and by the River Ouse (see Map 1, Appendix B). In total, 4.6% of the Plan Area lies within Flood Zone 2 (Medium Probability of Flooding¹⁶), and 3.8% lies within Flood Zones 3a or 3b (High Probability of Flooding¹⁷ or Functional Floodplain¹⁸). There are 1,215 residential properties in Flood Zone 2 and 890 residential properties in Flood Zone 3. The likelihood of flooding is anticipated to increase due to climate change causing more extreme weather conditions, meaning that dealing with flooding is of high importance. The Environment Agency have recently (September 2013) issued updated flood risk maps, which overall does show changes to the flood risk zones in the Plan Area, although updated information for the datasets above is not yet available.
- 4.20 The whole of the South East of England, including Lewes District, is classed as a Water Stressed Area, meaning that prudent use of the Plan Area’s water resources is sought. Despite this, **water use** in the Southern area of the country is higher than the national average¹⁹. As can be seen from the 2013 statistics below²⁰, river **water quality** in the district is far below average in all three of the Environment Agency’s categories for assessing rivers and lakes. On a positive note, the beach at Seaford is rated in the top category (‘best’) for bathing quality and has consistently achieved this score for over a decade.

Table 3: Water Quality – Percentage of River Length

	Biological		Ecological		Physico-Chemical	
	High / Good	Poor / Bad	High / Good	Poor/Bad	High / Good	Poor/Bad
Lewes District	0	81.0	0	81.0	0	0
East Sussex	28.2	33.0	11.4	28.5	32.3	0
National	24.9	31.4	21.8	25.0	41.7	0

- 4.21 Lewes District has a high standard of soil, the majority of which is considered to be “Good to Moderate Quality” (Grade 3) agricultural land in the **Agricultural Land Classification**. There are some areas of Grade 1 Agricultural Land to the North East of Newick. There is some history of heavy industry in the Plan Area, particularly in Newhaven, and therefore there are some contaminated sites which can present problems to future development and degrade the soil quality.

¹⁶ Rivers: between 1% (1 in 100 years) and 0.1% (1 in 1000 years). Sea: between 0.5% (1 in 200 years) and 0.1% (1 in 1000 years)

¹⁷ Rivers: greater than 1% (1 in 100 years). Sea: greater than 0.5% (1 in 200 years)

¹⁸ Greater than 4% (1 in 25 years)

¹⁹ Daily Domestic Water Use. OFWAT, October 2010

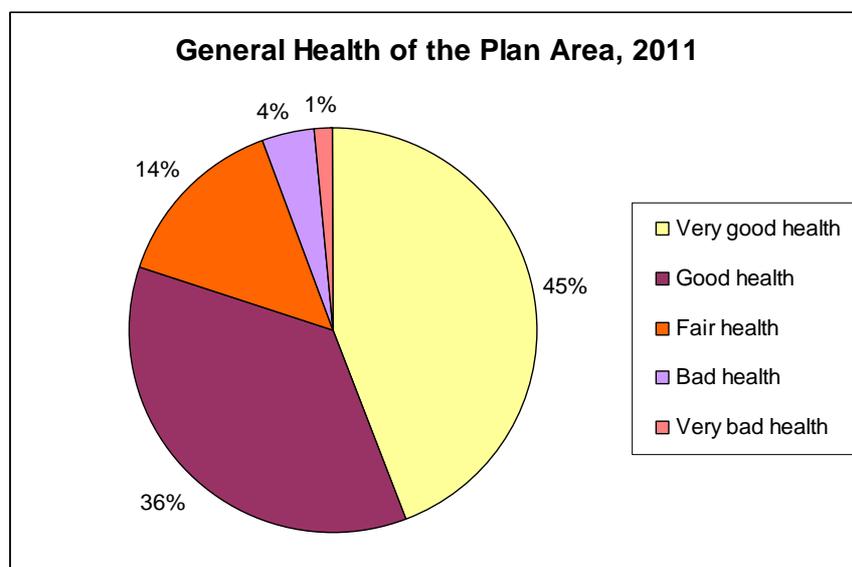
²⁰ Environment Agency, 22 December 2013.

4.22 The majority of the districts coastline is within the Plan Area. The majority of this consists of high chalk cliffs where the South Downs meet the sea. These cliffs are subject to erosion by wind, wave and tide. Erosion rates are typically 0.3 metres per year. This rate however is not regular, as significant cliff falls are often followed by several years of stability. The focus of the district's coastal defences is on the frontage from Saltdean to Peacehaven, where a 50 year strategy covering major renewal works for current defences exists. The cliffs between Peacehaven Heights and Newhaven, and at Seaford Head, do not have any coastal defences, nor are any proposed. At these locations, as there is little or no development to protect, the cliffs will continue to erode naturally.

Social characteristics

4.23 The recent Census Population data from 2011²¹ states that the Plan Area has a significantly higher percentage of **residents over 65 years of age** (23.7%) when compared with the National Park area of the district (19.8%) and the national average (16.4%) but is only slightly higher than the East Sussex average (22.7%). There are wide variations across the Plan Area, for example wards with a particularly high percentage of residents over 65 (Seaford West – 38.0%) and wards with much lower percentages (Newhaven Valley – 13.2%). This is a significant issue for the Plan Area in terms of planning to meet the needs of an ageing population, with future projections stating that the percentage of residents over 65 is likely to increase.

4.24 As the pie chart below and table 4 show, the **health** of the Plan Area is in line with county and national averages. There are however large variations across the district, with 8.8% of the residents of Peacehaven East being in bad or very bad health compared to the 2.9% of residents in the Plumpton ward being placed in this category.



²¹ ONS, 2011 Census, 16 July 2012

Table 4: Health

	Plan Area	East Sussex	National
Life Expectancy ²²	82.7	82.6	N/A
Percentage of population in bad or very bad health ²³	5.7%	5.8%	5.6%

4.25 The **Index of Multiple Deprivation** (IMD) measures levels of deprivation across a range of factors in the seven 'domains' of income, employment, health, education, housing, crime and living environment. Levels of deprivation are calculated using small geographic areas known as Super Output Areas (SOAs). The 2010 IMD²⁴ revealed that Lewes District is the 179th most deprived local authority. As there are a total of 326 local authority areas, Lewes District should therefore not be considered as a deprived area. Six SOAs in the Plan Area of Lewes rank in the top (least deprived) 20%, with an SOA in Newick being in the top two percent of least deprived areas nationwide. However, some of the SOA's in the Plan Area of the district are in the bottom 30% (most deprived), with an SOA in Peacehaven being in the bottom 24%. This disparity between the level of deprivation in the coastal towns and the low weald is an issue which needs to be considered through the Site Allocations and Development Management Policies DPD.

4.26 **Crime** figures suggest that Lewes District can be considered a safe place to live. The 2009/10²⁵ statistics show that there were 49.17 crimes recorded per 1000 residents, which is far lower than the England and Wales Average (78.0 crimes per 1000 residents) and slightly lower than the East Sussex average (58.6 crimes per 1000 residents). No ward level data was available for this dataset, although as the data represents the crime rate per 1000 of the population, it can be assumed that the Plan Area would have a similar crime rate.

4.27 The **population** of the Plan Area has risen by an average of 4.7% between 2001 and 2011²⁶ and the total number of households in the Plan Area has risen by an average of 5.75%²⁷, to approximately 32,050. In certain wards, these changes have been particularly significant. The bar chart below shows the percentage change for a number of selected wards which have seen significant changes between 2001 and 2011.

²² ONS, Life Expectancy at Birth Statistics, 2005-2010

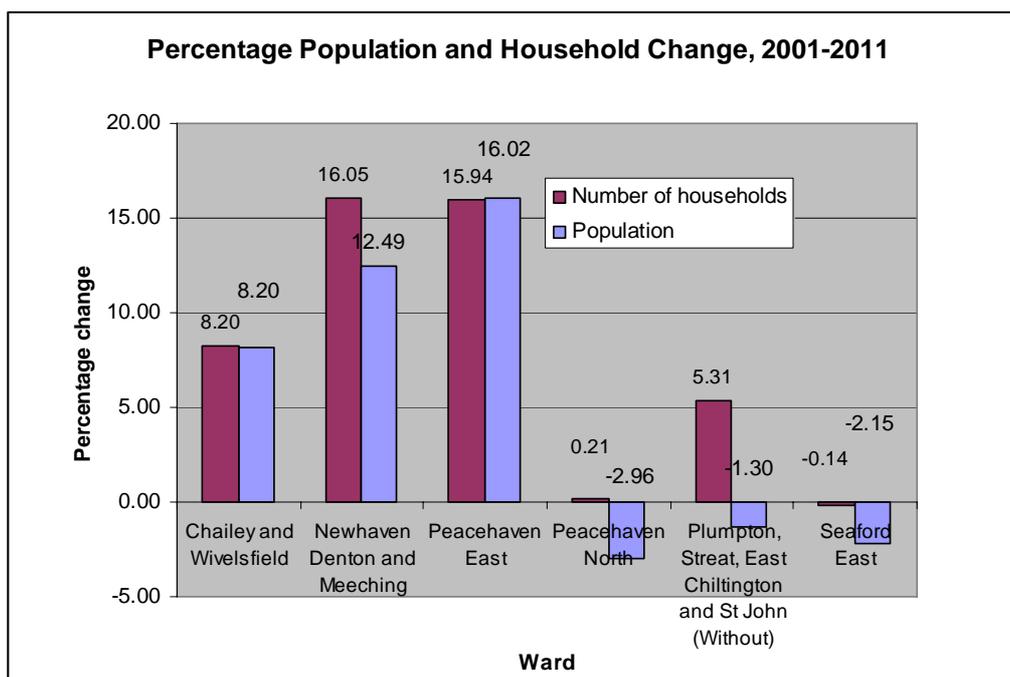
²³ ONS, 2011 Census, Table KS301

²⁴ DCLG, 2011

²⁵ Home Office recorded Crime Statistics, November 2010

²⁶ ONS Census 2001 & 2011, Ref 793

²⁷ ONS Census 2001 & 2011, Ref 826



4.28 Based on 2012 figures, there are approximately 1,320 **households** on the waiting list for local authority housing in the Plan Area, (the district figure has been growing at the rate of around 100 per year since 1998). The majority (83.3%) of those households require accommodation for up to 2 bedrooms in size. In addition, household sizes are steadily decreasing (from 2.29 people per household in 2001 to 2.27 in 2011²⁸), suggesting that there is a demand for smaller homes such as one and two bedroom properties. In addition, there are 63 homeless households in temporary accommodation²⁹ across the whole district.

4.29 Lewes District is not considered an affordable district to buy a house when compared with county or national figures. Even during the recession **house prices** are continuing to rise, as does its relationship with earnings.

Table 5: Affordability

	Lewes District	East Sussex	National
Median House Price (£)³⁰	231,995	212,250	190,000
House Prices to Earnings Ratio³¹	8.56:1	7.69:1	5.38:1

4.30 It is evident, through a combination of high house prices, a rising population, households, as well as a rising number of households on the

²⁸ ONS, Census 2011, 16th July 2012

²⁹ DCLG, Housing Live Table 784, June 2012

³⁰ DCLG, Live Table 582, April 2012

³¹ Land Registry/ONS/NOMIS, December 2011

Housing Needs register, that there is a strain on the housing supply in the Plan Area.

- 4.31 72.6%³² of homes in the district are **owner occupied**, which is almost 10% higher than the national average and 3% higher than the East Sussex average. 2005 figures indicate that 2.5% of dwellings in the Plan Area are **vacant**³³. 2.3%³⁴ of the housing within the district has been deemed to be unfit to live in, which compares favourably with the national (4.4%) and East Sussex (4.7%) averages. 79.8%³⁵ of households within the district own at least 1 car, which is higher than the national average (74.3%) and the East Sussex average (78.2%).
- 4.32 **Educational attainment** of the Plan Area's students is slightly higher than the East Sussex Average. 2010/11 statistics³⁶ show that 62.5% of students achieved 5 or more A*-C passes at GCSE level (including Maths and English). This is above the East Sussex average of 58.5%. There is a great deal of variation evident across the wards (even within individual towns), with 84% of student residents in Seaford West ward having achieved 5 or more A* - C passes compared to 45.9% of students resident in Seaford East gaining such results.
- 4.33 The figures³⁷ below identify that the working age population of the district is well qualified with a relatively high percentage having achieved a degree, albeit a higher than average amount have no qualifications.

Table 6: Qualifications

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

- 4.34 There are two key east to west **road routes** within the district. Although it does not run through the Plan Area of the district, the A27 is the primary route connecting Brighton to Eastbourne and so is of significance in linking the sub-region as a whole, including the Plan Area of the district. The A259 connects the coastal towns of Telscombe, Peacehaven, Newhaven and Seaford to both Brighton and Eastbourne. The district also has two main north to south routes. The A26 runs from Newhaven, through the eastern side of the town of Lewes and north towards Uckfield. The A275 runs north from Lewes town towards Chailey and beyond and the A272 provides a link from Newick and North Chailey and into Haywards Heath and Uckfield.

³² ONS, 2011 Census, Table KS402EW

³³ Neighbourhood Statistics, Vacant Dwellings 2005

³⁴ DCLG, 2006

³⁵ ONS, Census 2011, Table KS404 EW

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

³⁷ Nomis/ONS, Annual Population Survey, August 2011

- 4.35 Whilst the district benefits from major road routes, congestion is a feature particularly during peak times and on the A259. Along this route, there are particular congestion problems around the Newhaven Ring Road. In addition the A27, which carries an average daily traffic flow of 57,000 vehicles though the district is expected to exceed available road capacity by 2026³⁸. Traffic congestion is an issue within the Plan Area's towns.
- 4.36 The Plan Area is well served by **rail**. Stations at Seaford, Newhaven Harbour and Newhaven Town have regular services to Lewes, Brighton and further beyond to coastal towns to the west and the Gatwick area and London to the north. There are direct services in the weekday to London Victoria and Eastbourne from Cooksbridge and Plumpton, although these services are infrequent after peak hours. The provision of reasonable road and rail links partly explains the high rate of out-commuting to jobs outside of the district.
- 4.37 The towns within the Plan Area generally have regular **bus** services both within the Plan Area and to neighbouring towns and cities such as Lewes, Brighton, Burgess Hill, Eastbourne, Haywards Heath, Hastings and Uckfield. The population of Peacehaven and Telscombe are wholly reliant on bus services if they are to use public transport as they are not served by rail.
- 4.38 While the urban areas do have good public transport links, the rural settlements within the Plan Area are known to have varying levels of provision. Thus, the population depends heavily on private vehicles. This is of particular concern to those settlements without basic services and facilities, such as shops, schools, health centres, etc. A **Rural Settlements Study** (RuSS) has been undertaken which, among other things, has identified settlements within the district that suffer from poor accessibility to services and have infrequent public transport services, for example Plumpton Green and Barcombe Cross which both fall within the Plan Area. The RuSS is part of the evidence base used to inform the Joint Core Strategy and other development plan documents, such as the Local Plan Part 2.
- 4.39 In addition to the above, the Plan Area benefits from a significant amount of **Rights of Way**. Within the Plan Area there is a total 169 miles of Rights of Way, of which 141 miles are footpaths, 27 miles are bridleways, and there is 1 mile of byways.

Economic characteristics

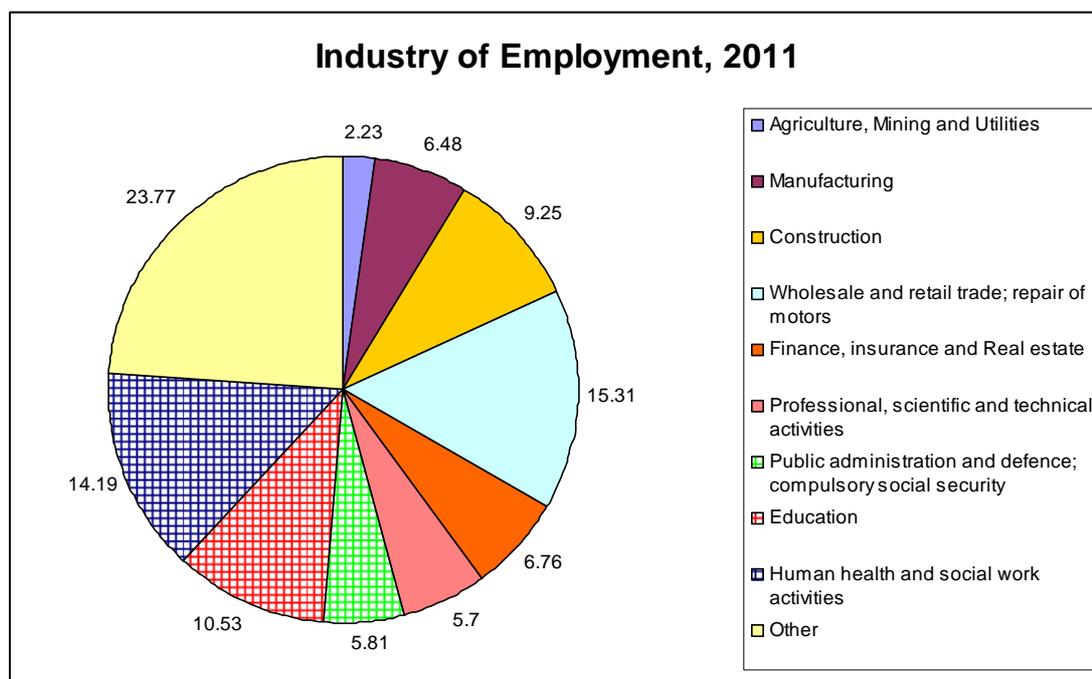
- 4.40 Of the 3,710³⁹ **business enterprises** located within Lewes District (as of 2012), the vast majority employ less than 10 people. As can be seen from the chart below⁴⁰, a sizeable proportion of the Plan Area's

³⁸ Highways Agency, Regional Network Report, 2008

³⁹ Office for National Statistics (ONS)/Inter Departmental Register (IDBR), September 2012

⁴⁰ ONS, Industry of Employment, February 2013.

workforce can be found in predominantly public sector industries (identified by the hatched sectors). The manufacturing sector is receding across the district, particularly in Newhaven which traditionally has had a strong manufacturing employment base, although now this is currently lower than the national average.



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

Table 7: Household Income, Unemployment Rate and JSA Claimants

	Plan Area	East Sussex	National
Mean Household Income ⁴¹	£36,734	£34,817	£35,992
Unemployment ⁴²	3.2%	3.6%	4.4% (England & Wales)
JSA Claimants (% of population) ⁴³	2.14%	2.6%	3.5%

4.42 The JSA claimant rate is higher in the Plan Area (2.14% as opposed to 1.4% in the National Park Area). It must also be pointed out that the JSA

⁴¹ CACI PayCheck data, July 2012

⁴² ONS/Nomis, January 2013

⁴³ ONS/Nomis, July 2013

claimant rate attributed to the towns of Newhaven, Peacehaven and Seaford is 62% of all claimants. And so being the principle towns of the Plan Area, this is an issue that this Scoping Report needs to draw attention to.

- 4.43 Lewes District is a net exporter of labour, with more residents travelling out of the district to work elsewhere than workers commuting into the district. In 2001⁴⁴, 17,400 residents (57% of the working population) commuted out of the district, predominantly to Brighton & Hove, Crawley/Gatwick and London. Whereas, 12,200 (43%) commuted into the district, primarily from Brighton, Wealden and Mid-Sussex.
- 4.43 An **Employment and Economic Land Assessment (EELA)** was undertaken in 2010 and updated in 2012 to assess the provision of employment land in Lewes District. The majority of employment space within the district is Industrial space and this is primarily located in the coastal towns (mainly Newhaven), whereas most of the office space is located within the National Park (in Lewes Town). It identified that there was no quantitative need within the Plan Area (and the district as a whole), although provision of small scale, flexible business units remains appropriate in the coastal towns. However, the EELA also suggested that there was a qualitative shortfall of industrial and office space across the district, although the document found that this would be best served by small sites in or near Lewes Town to meet the shortfall.
- 4.44 Surveys of the district's town centres were undertaken in both 2009 and 2010. In that time the vacancy rate in retail units dropped at Seaford Town Centre and Peacehaven/Telscombe. The vacancy rate remained unchanged at the Meridian Centre at Peacehaven. The amount of vacant retail units in Newhaven increased however, suggesting that the town's local economy is not performing well. In addition, some of Newhaven's factories and industrial units are no longer in operation, a number that has been added to by the closure of the Parker Pen factory in 2010. The **Lewes District Shopping and Town Centre Study** was published in 2012 and found that there was no shortage of retail space (although a lack of quality retail space) in the south coast towns and thus there is unlikely to be a need to allocate land for retail uses. However, it also recommended that planning policies for Newhaven Town Centre and the South Coast Road in Peacehaven should be made less stringent to allow for non-retail uses.
- 4.45 **Tourism** is of high importance to the district's economy, employing almost 2,300 people. In 2010⁴⁵, tourism generated £155,080,000 worth of income for local businesses in the entire district. 32% of this figure could be attributed to visitors to the town of Newhaven and 39% to the town of Seaford. Tourism is expected to increase within parts of the

⁴⁴ ONS, 2001

⁴⁵ Tourism South East, 2010

district, due to the creation of the South Downs National Park, which is likely to provide additional income for the sector.

Predicted future without the Local Plan Part 2

- 4.46 The Sustainability Appraisal for Part 1 of the Local Plan set out the predicted future without the Joint Core Strategy. This used projections, estimates and trend-based information to set out the expected state of the district without an adopted Core Strategy. As the purpose of the Local Plan Part 2 is to allocate the sites and outline the development management policies needed to support the implementation of the Joint Core Strategy and achieve its spatial vision (within the Plan Area), it is considered that the predicted future without the Local Plan Part 2 would essentially be the same as that outlined in the Joint Core Strategy Sustainability Appraisal. Therefore, this section has not been repeated in this document but can be found in paragraph 5.38 the Joint Core Strategy SA.
- 4.47 However, the Local Plan Part 2 does have a particular role as mentioned above and so future predictions without this specific DPD also need to be considered. Firstly, it must be pointed out that sites will be allocated within the Proposed Submission DPD taking into account the views of stakeholders (public consultation) and background documents. They will also be assessed as part of the sustainability appraisal process, have mitigation measures proposed and be scrutinized by statutory consultees as well as other stakeholders. Furthermore, the impacts of developing these sites will be monitored. If sites were not allocated in this way, less suitable sites could be put forward through the planning application process, leading to potentially less sustainable development within the Plan Area. Also, as previously mentioned, the Local Plan Part 2 will mirror work being carried out at the Parish level in neighbourhood plans. If these two plans failed to materialise, an opportunity for community-led policies would be lost.
- 4.48 Also, without the Site Allocations and Development Management Policies DPD the cumulative impacts of development sites on their settlements would not be assessed. The Local Plan Part 2 will assess where the most appropriate levels and locations of development are in and around individual settlements and take into account the cumulative impact of these sites as a whole. Whereas without the DPD, development would come forward on an adhoc basis and environmental constraints and the level of service and infrastructure provision, for example, would not be taken into account. It may also be the case that site boundaries are amended or other mitigations proposed in light of issues such as these in order to negate any concerns at the outset. Therefore, the Local Plan Part 2 will play a key role in ensuring development is of an appropriate scale and nature, as well as ensuring all issues are considered at the earliest possible stage.

4.49 The Local Plan Part 2 also outlines detailed development management policies which provide the necessary direction to ensure new development in the Plan Area is of an appropriate nature and in line with local priorities. Without this detailed policy guidance, development would be determined in line with the saved policies of the current Local Plan (2003) and higher-level policies (for example the NPPF), therefore development could come forward that is not entirely in keeping with the distinct characters of the Plan Area's settlements.

5. Key Sustainability Issues Affecting the Plan Area

- 5.1 Identifying the key sustainability issues facing the Plan Area is an important part of the Sustainability Appraisal (SA) process as it helps in preparing the sustainability framework which is used to test the Local Plan Part 2 to see whether policies will bring about sustainable development.
- 5.2 The key sustainability issues have been identified by the information gathered from both the collection and analysis of the baseline information (section 4) and the content of the plans, programmes and policies that impact on development within the Plan Area (See Chapter 3 and Appendix A).
- 5.3 The key sustainability issues are summarised as follows:
- There is pressure to supply additional housing within the Plan Area, particularly in the affordable housing sector, as well as reducing the affordability gap (difference between earning and average house prices). There is also a need to provide housing suitable for smaller households and an ageing population.
 - There is a need to protect and enhance the most important landscapes, areas of biodiversity and other protected areas. Of particular importance are the significant areas of Ancient Woodland which the Plan Area is home to.
 - The recent designation of the South Downs National Park, of which 55.6% of Lewes District is a part, is likely to increase the attractiveness of the area as a place to visit. A key issue will be ensuring that the economic benefits to be gained from this are fully realised within the area surrounding the National Park.
 - It is important to ensure that the Historic Buildings and features of the Plan Area are conserved and enhanced.
 - The amount of domestic waste that goes to landfill is comparatively high, although this is likely to decrease as the Energy from Waste Incinerator in Newhaven is fully operational. Despite this, there is a need to further promote prudent use of resources, including water, energy and waste materials by increasing the amount of recycling of waste and, where possible, the re-use of waste materials in new developments and in renovation.
 - There is a pressure to locate new development on previously developed land, thus avoiding the unnecessary loss of greenfield land, which is often locally sensitive to change, and valuable agricultural land.

- Flooding presents a clear risk to many parts of the Plan Area, including significant areas of many of the larger settlements, for example Newhaven. Along the coast there are also areas that are at a significant risk from coastal erosion.
- There is a need to improve the water quality of the rivers in the Plan Area, which is currently far below the national average.
- There are clear disparities between the most deprived and more prosperous parts of the Plan Area in terms of issues such as job unemployment and health. Accessibility to, as well as retaining and improving, important services and facilities is also a significant issue, particularly in some rural areas.
- The provision of open space varies across the Plan Area, with identified deficiencies in the provision of cricket pitches and children's play space in certain settlements.
- The ageing population of the Plan Area, which is already high, is likely to increase further, resulting in an additional strain on health and social care, particularly residential nursing care and intensive home care.
- Industry and business are suffering in parts of the Plan Area, partly as a result of the recession, causing damage to local economies. This is particularly evident in areas along the coastal strip. Accessibility to jobs will be key in reducing the high Job Seekers Allowance rate in certain parts of the Plan Area as well as tackling the high out-commuting rate.
- Car ownership is comparatively high and a number of key highway routes often suffer from congestion during peak hours including the A259, A27 and the A26.

6. Sustainability Objectives and Indicators

- 6.1 With the principal aim of the planning system to deliver sustainable development, the Sustainability Appraisal (SA) must assess the ability of the Site Allocations and Development Management Policies DPD to contribute to sustainable development.
- 6.2 The objectives, questions and indicators are collectively known as the sustainability framework (see below) and are used to test the allocations and policies set out in the Local Plan Part 2. The framework is largely based on the one that was incorporated into the Sustainability Appraisal for the Joint Core Strategy. Comments received during consultation exercises on the aforementioned SA have therefore fed into this process. Comments will now be sought on this document, and so any representations on the objectives and indicators of the framework will be considered in forthcoming versions of the Sustainability Appraisal. It must also be mentioned that some of the indicators in the table below are not specific to the Plan Area. More information on the difficulties in collecting data / limitations can be found in Section 4 of this report.
- 6.3 As mentioned in earlier sections of this report, the SEA aims to assess the environmental effects of the Plan, with the SA expanding on this to incorporate social and economic impacts. As such, the sustainability objectives have been placed into one of the three categories, although many of the objectives cover more than one category (e.g. objective 6 has an economic function as well as a social function). Where an objective relates to an SEA topic, this has been indicated.
- 6.4 The objectives on the tables which appraise policy options (section 10) have had to be shortened in name to save space. The shortened names of the objectives are shown in brackets in the table below.

Table 7: The Sustainability Framework

Objectives	Questions to consider	Indicators	SEA Factors
Social			
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home. (Housing)	Does the approach add to the housing stock? Does the approach help meet affordable housing needs? Does the approach meet the needs of all members of the community? Does the approach lead to more sustainably constructed homes?	<ul style="list-style-type: none"> • Net housing completions per annum • Net affordable housing completions per annum • Lower quarter house prices • House prices to earnings ratio • Households on housing needs 	Population

		<ul style="list-style-type: none"> register • Number of households considered homeless • Percentage of unfit dwellings • Net additions Gypsy and Traveller pitches 	
2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the Plan Area. (Deprivation)	<p>Does this approach benefit the most deprived areas of the district? Does the approach support social inclusion?</p>	<ul style="list-style-type: none"> • Rank and change in rank of Lewes District in the Index of Multiple Deprivation • Number and location of Super Output Areas in the Plan Area considered to be in the most deprived 30% in the country 	Population
3. To increase travel choice and accessibility to all services and facilities. (Travel)	<p>Does this approach encourage sustainable modes of transport? Will this approach have an impact on out-commuting? Will the approach increase congestion?</p>	<ul style="list-style-type: none"> • Number of large development completions estimated to be within 30 minutes of public transport and walking and cycling journey time of services • Mode of travel to work • Levels of out-commuting • Percentage of the district connected to the internet 	Population Material Assets
4. To create and sustain vibrant, safe and distinctive communities. (Communities)	<p>Will the approach impact on the happiness of the community? Does the approach impact on community safety? Does the approach create additional</p>	<ul style="list-style-type: none"> • Percentage of people satisfied with their local area as a place to live • Change in number of community meeting facilities 	Population Material Assets Human Health

	community facilities?	<ul style="list-style-type: none"> • Change in the amount of public open space • Crime rate per 1000 of the population 	
5. To improve the health of the Plan Areas population. (Health)	<p>Will the approach benefit the health of the population?</p> <p>Does the approach reflect the needs of the elderly and disabled population?</p>	<ul style="list-style-type: none"> • Life expectancy at birth • Percentage of population not in good health • Percentage of the population over 65 	Human Health Population
6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services. (Education)	<p>Will the approach increase attainment at schools?</p> <p>Will the approach increase the skill levels of the district?</p> <p>Will the approach improve access to educational services?</p>	<ul style="list-style-type: none"> • Students achieving 5 or more A*-C GCSE grades (including Maths and English) • Numbers of adult learners • Percentage of adults without any qualifications • Percentage of adults with degree level (or equivalent) qualification 	Population Material Assets
Environmental			
7. To improve efficiency in land use through the re-use of previously developed land and existing buildings and minimising the loss of valuable greenfield land. (Land efficiency)	<p>Does the approach bring vacant units back into use?</p> <p>Does the approach promote the best use of brownfield land?</p> <p>Will the approach protect quality agricultural land?</p>	<ul style="list-style-type: none"> • Percentage of new homes built on previously developed land • Number of empty homes • Density of new dwellings • Amount of grade 1, 2 and 3 agricultural land lost to new development⁴⁶ 	Soil Landscape Material Assets
8. To conserve	Will the approach	<ul style="list-style-type: none"> • Condition and 	Fauna

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

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

sources. (Energy)	sources?	installations obtained <ul style="list-style-type: none"> • Number of planning applications received relating to renewable energy • Carbon dioxide emissions per sector 	
13. To improve the Plan Area's air quality. (Air quality)	Does the approach increase air pollution? Will the approach lead to any additional AQMA designations?	<ul style="list-style-type: none"> • Number of Air Quality Management Areas 	Air Human Health
14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment. (Flooding)	Will the approach impact on flooding? Does the approach reduce the risk of flooding?	<ul style="list-style-type: none"> • Number of residential properties at risk of flooding • Number of new developments with sustainable drainage systems or developments that minimise water consumption • Amount of land in flood risk zones 2 and 3 as a percentage of the Plan Area's coverage • Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial) 	Human Health Water Climatic Factors Material Assets
15. To ensure that the Plan Area is prepared for the impacts of coastal erosion	Will the approach have an impact on or be impacted by coastal erosion? Will the approach	<ul style="list-style-type: none"> • Amount of erosion to coastal areas • Number of 	Water Climatic Factors Human Health Material Assets

and tidal flooding. (Coastal Erosion)	increase the risk of tidal flooding?	planning applications contrary to the advice by the Environment Agency on flood defence grounds (tidal)	
Economic			
16. To promote the economic growth of the Plan Area by encouraging vitality and regenerating and strengthening the economies of the coastal towns. (Economy)	Will the amount of employment land increase? Will this approach create jobs? Will the policies / allocations help bring about the regeneration of the coastal towns? Will this approach reduce the high unemployment rates in the coastal towns? Will the approach reduce retail vacancy rates?	<ul style="list-style-type: none"> • New business registration rate • Floorspace developed by employment type by PDL in coastal towns • Losses of employment land in employment regeneration areas • Retail unit vacancy rates in town centres • Number of vacant sites brought back into use in coastal towns • Amount of completed retail, office and leisure floorspace (net) 	Population
17. To support and expand the rural economy. (Economy)	Does the approach support the rural economy?	<ul style="list-style-type: none"> • Commercial permissions in rural areas. 	Population
18. To encourage the growth of a buoyant and sustainable tourism sector. (Tourism)	Will the approach increase the amount of jobs in the tourism sector? Will more people visit the district as a result of this approach?	<ul style="list-style-type: none"> • Number of jobs in the tourism sector • Contribution to the district's economy made by visitors 	Population

7. Next Stages for the Sustainability Appraisal and Site Allocations and Development Management Policies DPD

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

- 7.1 Stages A and B have now been completed and the Local Plan Part 2 and Scoping Report published for consultation. In reference to the Scoping Report, at this stage we would welcome any views and additional data which may help to further inform the document. This may include the baseline information, sustainability issues and the proposed objectives and indicators. Furthermore, we would welcome any relevant Plans, Programmes or Policies (PPP's) that have not been included in the Scoping Report.
- 7.2 Consultee views on the Issues and Options Topic Papers (which accompany this report) will help to identify all suitable options that will be considered for inclusion in the Proposed Submission DPD. These options will then be appraised against the SA objectives as part of the Sustainability Appraisal report to help identify the preferred and most sustainable policies and options. These will then be taken forward to the Proposed Submission document which will then be consulted upon. Following consultation on the Proposed Submission document and Sustainability Appraisal, any necessary minor amendments will be made to the documents before being formally submitted for examination.

Appendix A – Review of recently updated or published Plans, Programmes and Policies that are expected to influence the production of the Site Allocations and Development Management Policies DPD.

Please note that a full list of plans, programmes and policies that influence the higher level Joint Core Strategy and Sustainability Appraisal (and consequently the Local Plan Part 2) can be found within these documents. The list below includes only those plans, programmes and policies that have recently been updated or published since the publication of the Proposed Submission Joint Core Strategy.

Name of PPP	Broad aims/ relevant policies	Implications on Site Allocations and Development Management Policies (SADeVM) DPD / Sustainability Appraisal
Overarching PPPs		
Localism Act (2011)	<p>The Act introduces major changes to Local Government. Changes of major relevance to planning include the following:</p> <ul style="list-style-type: none"> • Allows for the removal of Regional Spatial Strategies (RSS) by Secretary of State • Introduces the neighbourhood planning tier into the planning system that allows for communities to guide development locally 	<p>The South East Plan was revoked in March 2013 and so no longer forms a part of the statutory planning framework. The housing targets set by Part 1 of the Local Plan (Joint Core Strategy) have considered options that differ from the South East Plan where more recent and locally derived evidence is available, although the South East Plan has undeniably fed into the production of the Local Plan Part 2.</p> <p>Neighbourhood planning will be influenced by the Local Plan Part 2 as communities will have to produce documents that conform to its allocations and policies.</p>
Regional Spatial Strategy for the South East – The South East Plan (GOSE, May 2009)	Sets out the planning framework and strategy for the South East until 2026, of which Lewes District is a part.	The South East Plan (SEP), as a statutory part of the planning system during much of the production period of the Joint Core Strategy, has exerted an influence over the document. The Joint Core Strategy in turn will influence the allocations and development management

		<p>policies of the Local Plan Part 2.</p> <p>However, on the 25th March 2013 the SEP was revoked. Notwithstanding the above, parts of the SEP evidence base (that which is up-to-date) has fed into the Joint Core Strategy and so may still be of relevance to the Local Plan Part 2.</p>
<p>East Sussex, South Downs and Brighton & Hove Waste and Minerals Local Plan (2013)</p>	<p>This document, adopted in February 2013, has recently superseded the East Sussex and Brighton & Hove Waste Local Plan (2006) and sets out the strategic policy decisions for waste and minerals in the Plan Area.</p>	<p>The Plan's vision, objectives and policies will need to be implemented into the Local Plan Part 2 as appropriate to ensure the sustainable management of waste and mineral resource use.</p> <p>It is also important to acknowledge the 2013 Local Plans predecessor (The 2006 Waste Local Plan) which fed into the production of the Joint Core Strategy and so in turn will influence the Local Plan Part 2.</p>
<p>Health</p>		
<p>Strategic Commissioning Plan 2010-2015 The Integrated Plan for Health, Social Care and Wellbeing in East Sussex (ESCC, 2010)</p>	<p>Set out a number of aims for meeting the health needs of the County in the short-term and encouraged working with the PCT (replaced by local commissioning groups as of April 2013) so that their views are integrated into plan making.</p>	<p>Through the allocation of appropriately located development and effective policies, the Local Plan Part 2 will aim to help achieve the strategic aims of those who provide health services in the district. This will also involve seeking the views of service providers on issues such as infrastructure planning.</p>
<p>Water</p>		
<p>The Water Resources Management Plans produced by Southern Water and South East Water</p>	<p>Sets out in detail how each company proposes to ensure that there is sufficient security of water supplies to meet the anticipated demands of all its customers over the 25 year planning period from 2010 to 2035.</p> <p>The South East Water</p>	<p>The Local Plan Part 2 will take account of these Plans, which will help to inform issues such as infrastructure requirements and site allocations.</p>

	Resource Management Plan is currently out for consultation.	
Social		
Town and Parish Council Plans / Neighbourhood Plans	<p>These plans set out the aims and priorities for each town / parish that have a plan and how they will achieve the aims.</p> <p>The following town and parish councils have designated Neighbourhood Plan Areas and are currently preparing their plans:</p> <ul style="list-style-type: none"> - Ringmer - Hamsey - Newick - Ditchling - Newhaven - Peacehaven and Telscombe - Wivelsfield 	<p>The priorities and aims of each plan can be used to inform the Local Plan Part 2 so that certain aims and priorities of these communities are addressed.</p> <p>The Town and Parish Councils who are preparing Neighbourhood Plans have the opportunity to allocate sites to meet their housing targets set in the Proposed Submission Joint Core Strategy if they chose to (therefore, the Local Plan Part 2 would not be required to allocate residential sites for these settlements and would only act as a contingency if these plans failed to materialise).</p>
Transport		
<p>Highways Agency Regional Network Report 2008</p> <p>East Sussex Local Transport Plan 2011-2026 (LTP)</p> <p>LTP Implementation Plan 2011/12 to 2015/16</p> <p>West Sussex Local Transport Plan 2011-2026</p> <p>Regional Planning Assessment (DfT)</p> <p>Sussex Route Utilisation Strategy 2010</p>	<p>These plans set out the aims and priorities of the various bodies tasked with strategic transport planning at the national, regional and local level.</p>	<p>These documents have been key contributors to the Infrastructure Delivery Plan, which in turn will have an impact on the Local Plan Part 2</p>

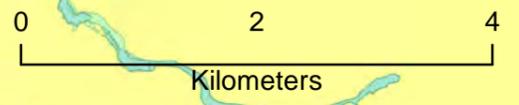
London and South East Route Utilisation Strategy 2011.		
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Network Rail CP4 Delivery Plan 2010		
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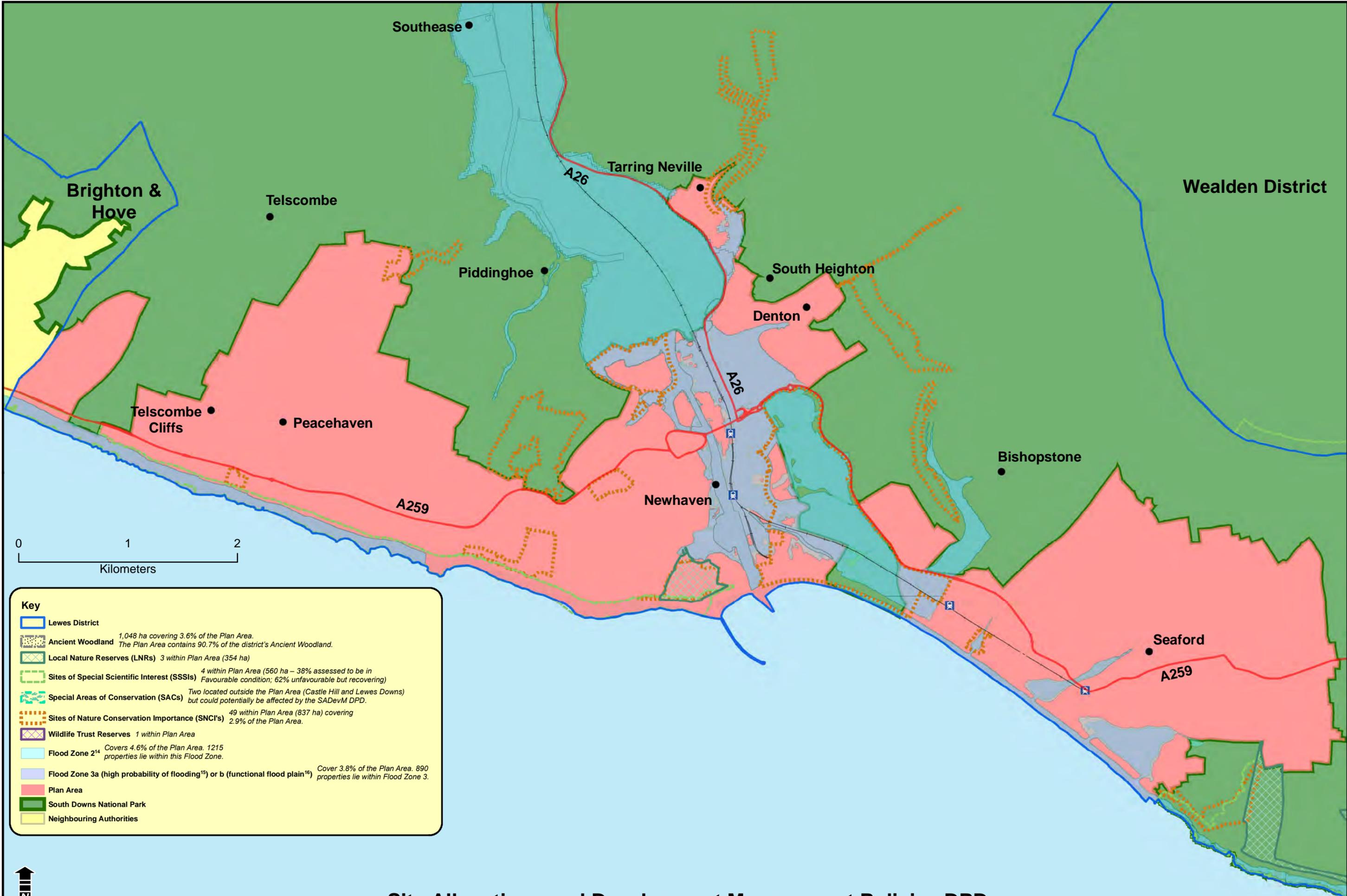


Key

- Lewes District
- Ancient Woodland 1,048 ha covering 3.6% of the Plan Area. The Plan Area contains 90.7% of the district's Ancient Woodland.
- Local Nature Reserves (LNRs) 3 within Plan Area (354 ha)
- Sites of Special Scientific Interest (SSSIs) 4 within Plan Area (560 ha – 38% assessed to be in Favourable condition; 62% unfavourable but recovering)
- Special Areas of Conservation (SACs) Two located outside the Plan Area (Castle Hill and Lewes Downs) but could potentially be affected by the SADevM DPD.
- Sites of Nature Conservation Importance (SNCI's) 49 within Plan Area (837 ha) covering 2.9% of the Plan Area.
- Wildlife Trust Reserves 1 within Plan Area
- Flood Zone 2¹⁴ Covers 4.6% of the Plan Area. 1215 properties lie within this Flood Zone.
- Flood Zone 3a (high probability of flooding¹⁵) or b (functional flood plain¹⁶) Cover 3.8% of the Plan Area. 890 properties lie within Flood Zone 3.
- Plan Area
- South Downs National Park
- Neighbouring Authorities



**Site Allocations and Development Management Policies DPD -
Plan Area Environmental Designations**



Key

- Lewes District
- Ancient Woodland *1,048 ha covering 3.6% of the Plan Area. The Plan Area contains 90.7% of the district's Ancient Woodland.*
- Local Nature Reserves (LNRs) *3 within Plan Area (354 ha)*
- Sites of Special Scientific Interest (SSSIs) *4 within Plan Area (560 ha – 38% assessed to be in Favourable condition; 62% unfavourable but recovering)*
- Special Areas of Conservation (SACs) *Two located outside the Plan Area (Castle Hill and Lewes Downs) but could potentially be affected by the SAdEvM DPD.*
- Sites of Nature Conservation Importance (SNCI's) *49 within Plan Area (837 ha) covering 2.9% of the Plan Area.*
- Wildlife Trust Reserves *1 within Plan Area*
- Flood Zone 2¹⁴ *Covers 4.6% of the Plan Area. 1215 properties lie within this Flood Zone.*
- Flood Zone 3a (high probability of flooding¹⁵) or b (functional flood plain¹⁶) *Cover 3.8% of the Plan Area. 890 properties lie within Flood Zone 3.*
- Plan Area
- South Downs National Park
- Neighbouring Authorities

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Site Allocations and Development Management Policies DPD - Plan Area Environmental Designations

