

**Newhaven Town Council**  
**Neighbourhood Plan 2018 - 2030**  
**Basic Conditions Statement**  
**(Submission version)**

Town and Country Planning Act 1990 (as amended) Schedule 4B  
Paragraph 8 (2)



January 2019

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## 1.0 INTRODUCTION

### The Purpose of the Basic Conditions Statement

- 1.1 This Basic Conditions Statement has been prepared to accompany the Newhaven Neighbourhood Development Plan (NNDP) being submitted under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 to Lewes District Council (LDC).
- 1.2 The Neighbourhood Planning (General) Regulations 2012 states that when a plan proposal is submitted to the Local Planning Authority (LPA), it must include a statement explaining how the proposed Plan meets the requirements of paragraph 8, of Schedule 4B to the Town & Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The core basic conditions for Neighbourhood Plans are as follows:
- (i) the draft NNDP must have appropriate regard to national policies and advice contained in the National Planning Policy Framework (NPPF);
  - (ii) the draft NNDP must contribute to the achievement of sustainable development;
  - (iii) the draft NNDP must be in general conformity with the strategic policies contained in the development plan for the area of the local planning authority, in this case Lewes District Council's Joint Core Strategy (LDCJCS) also known as Local Plan Part 1 and the Submission South Downs Local Plan 2018; and,
  - (iv) the draft NNDP must meet the relevant EU obligations.
- 1.3 This Basic Conditions Statement addresses these requirements as follows:
- A. Demonstrates the conformity of the NNDP with the NPPF;
  - B. How the NNDP will contribute to sustainable development;
  - C. Demonstrates the conformity of the NNDP with the strategic policies of the Development Plan.
  - D. Demonstrates compliance with the appropriate EU obligations.

## **2.0 BACKGROUND TO THE NEIGHBOURHOOD PLAN**

- 2.1 The Localism Act 2011 enables Town and Parish Councils to create a Neighbourhood Plan. The key driver of Newhaven Town Council's decision to make a Neighbourhood Plan was the desire for the local community to have a greater say in future planning decisions.
- 2.2 Local community voices have often expressed concern that over the years, Newhaven has been forgotten and has had development forced upon it often to its detriment, with development that no other place would want. In addition, over the last few decades, the town has suffered from a lack of investment, a loss of industry and negative impacts on the public realm, which have eroded community and wider perceptions of the cultural value of the town. Producing a Neighbourhood Plan has given a voice to the local community, as to how they would like their town to grow and change over the coming years. This is sustainable thought leading to sustainable action.
- 2.3 The regulations require that a Neighbourhood Plan deals with planning matters (i.e. the use and development of land), is submitted by a qualifying body, covers a stated Plan period and identifies a designated Neighbourhood Area.

### **Submitting Body**

- 2.4 The Newhaven Neighbourhood Development Plan is submitted by Newhaven Town Council, the qualifying body as defined by the Localism Act 2011.

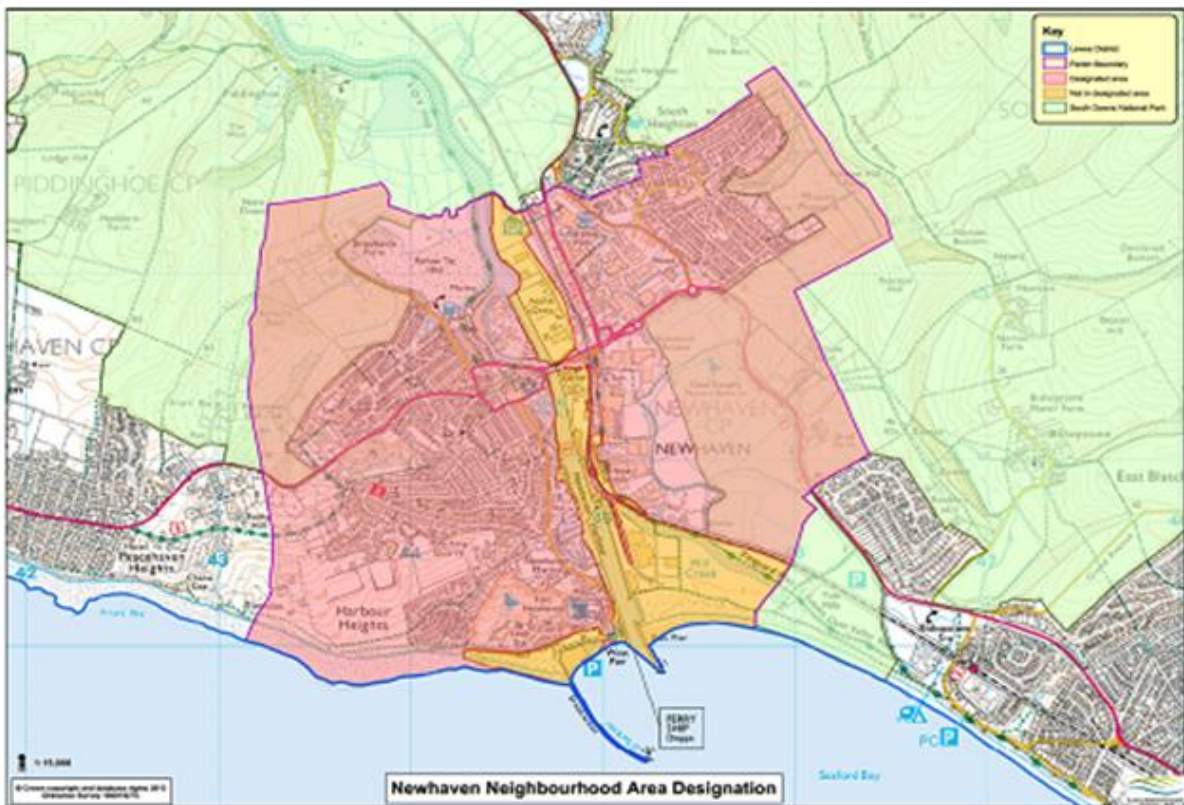
### **Neighbourhood Plan**

- 2.5 The policies set out within the Neighbourhood Plan relate to the development and use of land in the designated Neighbourhood Area. The plan period of the Neighbourhood Plan is from 2018 to 2030 and the document does not contain policies relating to excluded development, in accordance with the Regulations.
- 2.6 Once adopted, the Newhaven Neighbourhood Plan will become part of the Statutory Development Plan along with the Lewes Local Plan Part 1: Joint Core Strategy 2010-2030 strategy and the emerging South Downs Local Plan that will guide development in Newhaven up to 2030. What this means is that Lewes District

Council and the South Downs National Park Authority (SDNPA) will consult the plan and use the planning policies within it, to determine whether to grant planning permission for planning applications made within the Neighbourhood Plan Area.

## Neighbourhood Area

2.7 Following an objection to the Neighbourhood Area application by the Newhaven Port Authority, the District Council refused the initial application by Newhaven Town Council for the whole of the parish to be designated as a neighbourhood area, but designated a reduced neighbourhood area, excluding the area of the port, as shown at Map 1. The designation of the Neighbourhood Plan area was made on 8th July 2013.



Map 1: Neighbourhood Area

## **Why Newhaven Needs a Neighbourhood Plan**

- 2.8 Producing a Neighbourhood Plan is not compulsory and many areas have decided not to plan locally for their area, but rather leave it to the local planning authority to decide how their local areas are to grow and change. One of the comments often made by local people is that over the years Newhaven has been forgotten and often had development forced upon it that has been to its detriment, and that no other place would want. In addition, over the last few decades, the town has suffered from a lack of investment, a loss of industry and negative impacts on the public realm which have eroded community and wider perceptions of the cultural value of the town.
- 2.9 Change though is coming. We know that Newhaven is identified in the Lewes District Joint Core Strategy at Spatial Policy 2 to receive an additional 825 new homes. Spatial Policy 7 in this document allocates 20 hectares of land at Harbour Heights for a mixed-use development, including employment units and approximately 400 dwellings. The remaining 425 can be allocated either through the Neighbourhood Plan process or Lewes District Council's Local Plan Part 2: Site Allocations and Development Management Policies document, which is in the early stages of preparation.
- 2.10 In addition to these 'planned' homes, planning permission has already been given for some 700 dwellings on large and small sites. In addition, the availability of underused and vacant areas of the town centre, the opportunities for redevelopment presented by many brownfield sites, along with the designation of an Enterprise Zone have created a 'once in a generation' opportunity for positive change, building on Newhaven's maritime and manufacturing past to enhance this unique and charming town. Investment has already been seen with new initiatives such as strengthened flood defences, the opening of a new university technical college, extension to start up business centre and the promise of road infrastructure to the port, signal that change has begun.

## 3.0 CONFORMITY WITH NATIONAL POLICY

### Introduction

- 3.1 The NNDP was originally prepared with regard to national policies set out in the National Planning Policy Framework (NPPF) 2012. However, the NPPF has been recently updated (24<sup>th</sup> July 2018). The new Framework states that the 2012 Framework will apply for the purpose of examining plans, when those plans are ‘submitted’ on or before 24<sup>th</sup> January 2019.<sup>1</sup> However, reference has been made to the 2018 NPPF where relevant.
- 3.2 The 2012 NPPF set out how neighbourhood plans should be prepared and what they should facilitate in paragraphs 183 -185. Importantly, paragraph 183 explained that “neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.” What the above makes clear is that it must contain a clear vision that the plan itself must deliver. The NNDP does contain a central vision which has been subject to considerable community consultation and has heavily influenced the policies contained within.
- 3.3 The 2018 NPPF includes, in paragraphs 28-30, how neighbourhood plans set out non-strategic policies for an area. Paragraph 37 relates to the Basic Conditions.
- 3.4 Both versions of the NPPF refer to sustainable development. The ‘golden thread’ running through the NPPF 2012 is a requirement for development plans to comply with the aims of sustainable development. There is a presumption in favour of sustainable development. Paragraph 7 confirms that sustainable development comprises the three dimensions of economic, social and environmental. In order to achieve the aims of sustainable development policies must seek to deliver all three strands. Paragraphs 14 to 16 of the NPPF 2012 set out the presumption in favour of sustainable development, which is at the heart of national policy. Subsequent paragraphs in the NPPF discuss, in detail, how to deliver sustainable development.

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<sup>1</sup> For Neighbourhood Plans, submission in this context means where a qualifying body submits a plan proposal to the local planning authority in accordance with regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

- 3.5 NPPF 2018 states in paragraph 10 ‘ The presumption in favour of sustainable development does not change the statutory status of the development plan as the starting point for decision making. Where a planning application conflicts with an up-to-date development plan (including any neighbourhood plans that form part of the development plan), permission should not usually be granted. The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies (paras 12 and 13).
- 3.6 The NNDP is accompanied by a Sustainability Appraisal, which has fully assessed the sustainability of all policies in the NNDP found them to meet the aims of sustainable development.
- 3.7 The Table below sets out set out how the NP has had regard to national planning policies, most notably those contained in the NPPF 2012 and NPPF 2018. This statement confirms that the neighbourhood plan is in compliance with the revised NPPF (2018).
- 3.8 The development of the NNDP has also fully taken into account the guidance provided in the National Planning Practice Guidance covering the range of policy matters within the Plan and also generally on the approach to preparing neighbourhood plans



Neighbourhood Plan Section/Policy	Relevant NPPF 2012 Core Principle/Paragraph	Relevant revised NPPF 2018 Section	Summary/Conclusion – how the plan has had regard to both NPPFs
<p><b>Whole Plan</b></p>	<p><b>Core Principles: (para. 17)</b></p> <ol style="list-style-type: none"> <li>1. Genuinely plan led empowering local people to shape their surroundings with succinct local and neighbourhood plans setting out a positive vision for the future.</li> <li>2. The process is not simply about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives.</li> <li>3. Pro-actively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.</li> <li>4. Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</li> <li>6. Support the transition to a low carbon future in a changing climate, encourage the reuse of existing resources, including conversion of existing buildings.</li> <li>7. Encourage the effective use of land by reusing land that has been previously developed (brownfield land).</li> <li>10. Conserve heritage assets in a manner appropriate to their significance, so they can be enjoyed for their contribution to the quality of life of this and future generations</li> <li>12. Take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs</li> </ol>	<p>Para 17 was not carried forward in new NPPF.</p> <p><b>Section 3 Plan making/paragraph 15</b> onwards states: The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p><b>Para 16. Plans should:</b></p> <ol style="list-style-type: none"> <li>a) be prepared with the objective of contributing to the achievement of sustainable development</li> <li>b) be prepared positively, in a way that is aspirational but deliverable;</li> <li>c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;</li> <li>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;</li> <li>e) be accessible through the use of digital tools to assist public involvement and policy presentation; and</li> <li>f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).</li> </ol>	<p>The NP comprises policies that have been drafted to reflect the local community’s vision for the area. They are local policies of relevance to the NP area. The policies provide a practical framework in which to assess planning applications. The Town Council has sought to engage effectively with the local community and this is set out in the Consultation Statement.</p> <p>The NNDP is a succinct and up-to-date plan and provides a positive framework for a number of policy areas relevant to the area. Extensive engagement has been carried out with local organisations including schools and local businesses together with statutory authorities and landowners.</p> <p>The Neighbourhood Plan also seeks to not duplicate policies contained in national and local plans and ensures policies are relevant and focussed on Newhaven rather than being too general and non-specific.</p> <p>The NPPFs provides a policy presumption in favour of sustainable development. The policies in the neighbourhood plan are in compliance with the main thrust of both NPPFs and guidance.</p>

<p><b>Vision and Objectives</b></p>	<p><b>Para. 17</b> – Succinct local and neighbourhood plans should set out a positive vision for the future of the area.</p> <p><b>Para 58.</b> Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics.</p>	<p><b>Para 15.</b> The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p><b>Para 29.</b> Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.</p> <p>1</p>	<p>A clear vision is set out in the NNDP which has been subject to community consultation. The Plan has a focus on sustainability and sustainable development and supports high quality design and sense of place, new housing and a vibrant town centre, quality employment opportunities together with making it a safe place to live with a focus on well-being. It will make the area a more attractive place to live, work and visit. The vision is in compliance with the relevant NPPF principles.</p> <p>The neighbourhood plan does not promote less development and contains non-strategic policies. It is in general conformity with strategic policies in the local plans of Lewes District and South Downs National Park.</p>
<p><b>Town Centre policies</b>  <b>Policy TC1 - Regeneration of the Town Centre</b></p> <p><b>Policy TC2 Leisure Centre Provision</b></p> <p><b>Policy TC3 High Street Design and Shop Fronts</b></p>	<p><b>Chapter 2</b> – Ensuring the Vitality of Town centres.  <b>Para 23 onwards.</b>  Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:</p> <ul style="list-style-type: none"> <li>● recognise town centres as the heart of their communities and pursue policies to support their viability and vitality;</li> <li>● define a network and hierarchy of centres that is resilient to anticipated future economic changes;</li> <li>● define the extent of town centres and primary shopping areas.</li> <li>● promote competitive town centres that provide customer choice and a diverse retail offer.</li> </ul>	<p><b>Chapter 7</b> – Ensuring the Vitality of Town centres.  <b>Para 85 onwards</b>  Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should:</p> <p>a) define a network and hierarchy of town centres and promote their long-term vitality and viability –by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;</p> <p>b) define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive</p>	<p>The NP places Newhaven Town Centre at the start of the Plan in recognition of its importance within the wider Newhaven area. Policy TC1 allows the town centre to build on its strengths, counter weaknesses and address challenges. The policy and supports the role that town centres play at the heart of local communities by taking a positive approach to their growth (NPPF 2018 Para. 85). The policy allows for a mix of uses and the diversification of the High Street.</p> <p>Both NPPFs recognise the contribution that residential uses within town centres</p>

	<ul style="list-style-type: none"> <li>● retain and enhance existing markets and, where appropriate, re-introduce or create new ones.</li> <li>● allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres.</li> <li>● allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre.</li> <li>● set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres;</li> <li>● recognise that residential development can play an important role in ensuring the vitality of centres and set out policies to encourage residential development on appropriate sites; and</li> <li>● where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.</li> </ul> <p><b>Para 56.</b> The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.</p>	<p>strategy for the future of each centre;</p> <p>c) retain and enhance existing markets and, where appropriate, re-introduce or create new ones;</p> <p>d) allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead.</p> <p>e) where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre.</p> <p>f) recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.</p> <p><b>Para 106</b> - In town centres, local authorities should seek to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.</p> <p><b>Para 125.</b> Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.</p>	<p>can play. Policy TC1 includes a reference to change of use to residential as well as supporting a range of other uses which will enable the town centre to adapt to future changes in town centre dynamics and shopping habits.</p> <p>Policy TC2 refers to improving leisure facilities within the town.</p> <p>Policy TC3 relates to design standards for shop fronts. Both NPPFs have sections on design and well designed places. Policy TC3 reflects a specific desire to improve and enhance the design of shop fronts within the historic part of Newhaven town centre.</p> <p>This policy sets out a presumption in favour of renovating shopfronts original to the building consistent with the NPPF’s heritage and design policies.</p>
<p><b>Local Economy, Tourism and Employment Chapter</b></p>	<p><b>Core planning principles</b></p> <p><b>Para 17.</b> Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then</p>	<p><b>Building a strong, competitive economy</b></p> <p><b>Para 80.</b> Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business</p>	<p>The Newhaven Neighbourhood Plan is positively focussed on the need to support local businesses and the local economy. A key and central part of the town is the varied provision of businesses and the opportunity for</p>

<p><b>Policy E1 Avis Way Industrial Estate</b></p> <p><b>Policy E2 Denton Island</b></p> <p><b>Policy E3 The Visitor Economy</b></p> <p><b>Policy E4 Employment clusters</b></p>	<p>meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.</p> <p><b>Building a strong, competitive economy</b>  <b>Para 18.</b> The Government is committed to securing economic growth in order to create jobs and prosperity, building on the country's inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future.</p> <p><b>Para 21.</b> Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing.</p> <p>Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area.</p> <p>Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;</p> <p>Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.</p> <p><b>Para 37.</b> Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p>	<p>needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.</p> <p><b>Para 81.</b> Planning policies should:</p> <p>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;</p> <p>b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</p> <p>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and</p> <p>d) be flexible enough to accommodate needs not anticipated in the plan.</p> <p><b>Para 82.</b> Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.</p>	<p>inward investment. Newhaven has a number of Enterprise Zones and the NNDP sets out policies to improve the local offer and environment for businesses.</p> <p>The policies are in accord with both NPPF documents which seek to drive sustainable economic development.</p> <p>The policies set out locations for different types of employment with small business space located at Denton Island and existing and improved space on Avis Way industrial estate. In line with advice in the NPPFs – the Plan also supports clusters/sectors within the town including new and emerging sectors (Policy E4).</p>
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<p><b>Eastside Chapter</b></p> <p><b>Policy ES1 The Regeneration of Eastside</b></p> <p><b>Policy ES2 New development for Eastside and the Enterprise Zones</b></p> <p><b>Policy ES3 Nature Conservation</b></p>	<p><b>Core planning principles</b></p> <p><b>Para 17.</b> Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;</p> <p>Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value;</p> <p><b>Delivering sustainable development</b></p> <p>1. Building a strong, competitive economy</p> <p><b>Para 21.</b> Investment in business should not be overburdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:</p> <p>Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.</p>	<p><b>Para 81.</b> Planning policies should:</p> <p>a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration; b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;</p> <p>c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment.</p> <p>93. Planning policies and decisions should consider the social, economic and environmental benefits of estate regeneration. Local planning authorities should use their planning powers to help deliver estate regeneration to a high standard.</p>	<p>The Eastside Chapter relates to a particular part of Newhaven where the majority is commercial development with residential pockets. The policies in this chapter are in accordance with both NPPFs. The emphasis is on regeneration and improving the quality of the environment. The policies focus on regenerating brownfield land and enhancement projects. These policy areas will address potential barriers to investment.</p>
<p><b>Transport and Sustainable Movement Chapter</b></p> <p><b>Policy T 1 Congestion mitigation and sustainable movement, including integrated</b></p>	<p><b>Core planning principles</b></p> <p><b>Para 17.</b> Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable;</p> <p><b>Promoting sustainable transport</b></p> <p><b>Para 29.</b> Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.</p>	<p><b>Promoting healthy and safe communities</b></p> <p><b>Para 91.</b> Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.</p> <p><b>Promoting sustainable transport</b></p> <p><b>Para 102.</b> Transport issues should be considered from the earliest stages of plan-making and</p>	<p>The policies within the NNDP promote sustainable transport options for the area. The policies are integral to an overall Plan that concentrates development within the urban area and supports a mix of uses that can lead to minimising number and length of travel and journeys. The policies in this Chapter accord with the advice in both NPPFs and promote a range of transport options including footpaths and cycleways.</p>

<p>footpaths and cycle-ways.</p> <p><b>Policy T2</b> Accessibility to and within the Town Centre</p>		<p>development proposals.</p> <p><b>Para 104.</b> Planning policies should: Support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.</p> <p>Provide for high quality walking and cycling networks and supporting facilities such as cycle parking.</p>	
<p><b>Public Open Space, Sports and Recreation Facilities Chapter</b></p> <p><b>Policy R1</b> Recreation, Leisure and Local Green Spaces</p> <p><b>Policy R2</b> Lewes Road Community and Visitor Centre</p>	<p><b>Para 70.</b> Plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.</p> <p><b>Para 73.</b> Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.</p> <p><b>Para 76.</b> Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.</p>	<p><b>Para 91.</b> Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion –for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas;</p> <p><b>Para 92.</b> To provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities (such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments.</p> <p><b>Open space and recreation</b></p> <p><b>Para 96.</b> Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.</p> <p><b>Para 99.</b> The designation of land as Local Green</p>	<p>Policies within the NNDP seek to preserve and enhance existing open spaces, sports and recreation facilities. The policies also support the creation of new open spaces. The policies seek to allocate local green spaces in accordance with both NPPFs.</p> <p>In addition, the Plan supports the development of a new community centre and the improvement of sustainable access from this facility to the town centre.</p> <p>This chapter is in compliance with the advice set out in both NPPFs.</p>

		Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them.	
<p><b>Natural Environment, Biodiversity and Flood Protection Chapter</b></p> <p><b>Policy E1 Biodiversity protection and enhancement</b></p> <p><b>Policy E2 - Drainage and flooding</b></p>	<p><b>Para 99.</b> Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape.</p> <p><b>Para 100</b> Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk.</p> <p><b>Conserving and enhancing the natural environment</b></p> <p><b>Para 109.</b> The planning system should contribute to and enhance the natural and local environment by:</p> <ul style="list-style-type: none"> <li>● protecting and enhancing valued landscapes, geological conservation interests and soils;</li> <li>● recognising the wider benefits of ecosystem services;</li> <li>● minimising impacts on biodiversity and providing net gains in biodiversity where possible.</li> </ul> <p><b>Para 114.</b> Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.</p>	<p><b>Meeting the challenge of climate change, flooding and coastal change</b></p> <p><b>Para 48.</b> The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.</p> <p><b>Para 149.</b> Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.</p> <p><b>Para 165.</b> Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.</p> <p><b>Conserving and enhancing the natural environment</b></p> <p><b>Para 170.</b> Planning policies and decisions should contribute to and enhance the natural and local environment by:</p> <p>protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);</p> <p>recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.</p>	<p>The policies within the NNDP take into account the advice within both NPPFs with regard to biodiversity and nature conservation and matters relating to flooding and drainage.</p> <p>Neighbourhood Plans are a great opportunity to help improve the local environment including protecting and enhancing existing assets and ensuring that new development plans space for nature. Wildlife and green space in and around the town adds to the quality of life. Policy E1 seeks to protect and enhance biodiversity assets as part of development proposals.</p> <p>The Government sets out in the NPPFs the need to adapt to climate change where increased flooding could take place at coastal communities. Flooding has been an issue in Newhaven and as a result the Environment Agency is currently installing flood defences to increase flood protection. Policy E2 complies with the advice within the NPPFs and seeks to support the reduction of incidences of flooding.</p>

<p><b>Good Quality Design and Image Chapter</b></p> <p><b>Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change.</b></p>	<p><b>Core principles (para. 17)</b>          Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.</p> <p>Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</p> <p>Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy).</p> <p><b>Para. 56</b> - The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people</p> <p><b>Para. 58</b> - Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.</p> <p><b>Para. 60</b> - Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.</p>	<p><b>Achieving well-designed places</b>  <b>Para 124.</b> The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this.</p> <p><b>Para 125.</b> Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. Design policies should be developed with local communities so they reflect local aspirations, and are grounded in an understanding and evaluation of each area’s defining characteristics. Neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development.</p> <p><b>Para 127.</b> Planning policies and decisions should ensure that developments – a number of criteria is set out under this paragraph including:</p> <ul style="list-style-type: none"> <li>Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;</li> <li>Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);</li> <li>Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types</li> </ul>	<p>The Core principles of the NPPF 2012 are reflected in Policy D1. It is a comprehensive policy that confirms high quality and sustainable development will be expected for the area. The policy also seeks to create a strong sense of place which is safe and accessible to all.</p> <p>The policy requires development to seek to reduce energy emissions during the life cycle of the development.</p> <p>The policy therefore complies with the provisions of both NPPFs.</p>
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	<p><b>Para. 95</b> – LPAs should actively support energy efficiency improvements to existing buildings.</p> <p><b>Para. 97</b> – LPAs should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources</p>	<p>and materials to create attractive, welcoming and distinctive places to live, work and visit.</p> <p><b>Para 149.</b> Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.</p>	
<p><b>Housing Chapter</b></p> <p><b>Policy H1 A Spatial Strategy for Newhaven</b></p> <p><b>Policy H2: Newhaven’s Former Police Station, South Road</b></p> <p><b>Policy H3: Housing sites on Eastside</b></p> <p><b>Policy H4: Robinson Road Depot, Robinson Road</b></p> <p><b>Policy H5: Housing Sites in the Town Centre (land within the ring road)</b></p>	<p><b>Para 17 Core Principles:</b> Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth</p> <p><b>Para. 47</b> – To boost significantly the supply of housing - use evidence base to ensure plans meet the full, objectively assessed needs for market and affordable housing.</p> <p><b>Para. 49</b> – Housing applications should be considered in the context of the presumption in favour of sustainable development.</p> <p><b>Para. 50</b> – To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, LPAs should:</p> <p>Plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not</p>	<p><b>Plan Making</b></p> <p><b>Para 15.</b> The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.</p> <p><b>Delivering a sufficient supply of homes</b></p> <p><b>Para 59.</b> To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.</p> <p><b>Para 68.</b> Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly.</p> <p><b>Para 69.</b> Neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites (of a size consistent with paragraph 68a) suitable for housing in their area.</p>	<p>The policies in this chapter set out where new housing in Newhaven will be located and what type of housing needs to be delivered. The Government requires that local authorities should meet their objectively assessed housing needs for market and affordable housing. Lewes District Council has set out their over-arching approach to the distribution of housing to meet that need in their Core Strategy (Local Plan Part 1).</p> <p>The housing policies provide a clear direction on where housing development would be suitable within the town. The policies also set out where mixed communities would be appropriate and where a range of housing types can be accommodated. The policies comply with the provisions within both NPPFs.</p> <p>The site specific policies provide for a range of sites suitable for new housing developments including smaller sites, town centre opportunities and</p>

<p><b>Policy H6: Former Lewes District Council Offices, Fort Road</b></p> <p><b>Policy H7: Former Grays School</b></p> <p><b>Policy H8: Old Conservative Club, South Way</b></p>	<p>limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes).</p> <p>Identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.</p> <p><b>Para 174.</b> Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing.</p>	<p><b>Making effective use of land</b></p> <p><b>Para 117.</b> Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.</p>	<p>brownfield sites. This is in accordance with the NPPFs.</p>
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## 4.0 DELIVERING SUSTAINABLE DEVELOPMENT

- 4.1 For the NNDP, sustainable development has been the fundamental basis of each of its policies. The Plan is accompanied by a Sustainability Appraisal (SA), incorporating the Strategic Environmental Assessment (SEA), of its environmental, social and economic effects. A screening opinion was sought from Lewes District Council as to the need for an SEA and the opinion is set out at Appendix 1.
- 4.2 The SA demonstrates that the Neighbourhood Plan will positively contribute to achieving sustainable development and will not have any significant adverse impacts. This has been submitted at Regulation 16 stage as part of the evidence base supporting the NNDP and should be read alongside this Basic Conditions Statement.
- 4.3 The strategic objectives of the NNDP comprise a balance of social, economic and environmental goals. The submitted policies are therefore intended to accurately translate these strategic objectives into viable and effective development management policies and deliverable infrastructure proposals at the Parish level. All policies contained within the Submission Version of the NNDP have been tested within the SA to ensure that the most sustainable policy option was chosen. The SA carefully appraises each policy against a series of alternatives and then compares them to the sustainable objectives.
- 4.4 The Table below summarises how the objectives and policies in the NNDP sit under the sustainable development definition as defined in the NPPF 2018.

<b>Deliver economic sustainability</b>	
<b>NPPF Definition: To help build a strong, responsive and competitive economy</b>	
<b>NNDP Sustainability Objective</b>	<b>Objective 1:</b> The town centre (i.e. land within the ring road). The plan will seek ways to improve the vibrancy and viability of the town centre. <b>Objective 3:</b> Economy and employment. The plan will help businesses create jobs.
<b>NNDP Policies</b>	Policy TC1 - Regeneration of the Town Centre Policy TC2 Leisure Centre Provision Policy E1 Avis Way Industrial Estate Policy E2 Denton Island Policy E3 The Visitor Economy Policy E4 Employment clusters Policy ES1 The Regeneration of Eastside Policy ES2 New development for Eastside and the Enterprise Zones
<b>Deliver social sustainability</b>	
<b>NPPF Definition: To support strong, vibrant and healthy communities</b>	

<p><b>NNDP Sustainability Objective</b></p>	<p><b>Objective 2:</b> Transport and Access. The Plan will support better movement and access in and around Newhaven.</p> <p><b>Objective 4:</b> Open space, health wellbeing. The Plan will protect the facilities and services considered important for a vibrant community and support the development of new amenities for the benefit of local people and visitors</p> <p><b>Objective 7:</b> Housing To meet the requirements of the Lewes District Core Strategy.</p>
<p><b>NNDP Policies</b></p>	<p>Policy T 1 Congestion mitigation and sustainable movement, including integrated footpaths and cycle-ways.  Policy T2 Accessibility to and within the Town Centre  Policy H1 A Spatial Strategy for Newhaven  Policy H2: Newhaven’s Former Police Station, South Road  Policy H3: Housing sites on Eastside  Policy H4: Robinson Road Depot, Robinson Road  Policy H5: Housing Sites in the Town Centre (land within the ring road)  Policy H6: Former Lewes District Council Offices, Fort Road  Policy H7: Former Grays School  Policy H8: Old Conservative Club, South Way</p>
<p><b>Environmental sustainability</b></p>	
<p><b>NPPF definition: To contribute to protecting and enhancing our natural, built and historic environment</b></p>	
<p><b>NNDP Sustainability Objective</b></p>	<p><b>Objective 4:</b> Open space, health wellbeing. The Plan will protect the facilities and services considered important for a vibrant community and support the development of new amenities for the benefit of local people and visitors.</p> <p><b>Objective 5:</b> Natural Environment, biodiversity and flood protection. The Plan will encourage new ways of reducing flood risk and water pollution and enhancing biodiversity.</p> <p><b>Objective 6:</b> Good quality design and image. All future development will be well designed and will aim to enhance the image of the town.</p>
<p><b>NNDP Policies</b></p>	<p>Policy TC3 High Street Design and Shop Fronts  Policy R1 Recreation, Leisure and Local Green Spaces  Policy R2 Lewes Road Community and Visitor Centre  Policy E1 Biodiversity protection and enhancement  Policy E2 - Drainage and flooding  Policy ES3 Nature Conservation  Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change.</p>

## **5.0 GENERAL CONFORMITY WITH STRATEGIC POLICIES IN THE DEVELOPMENT PLAN**

- 5.1 One of the basic conditions that Neighbourhood Plans must satisfy is that they are in general conformity with the strategic policies of the adopted development plan for the local area, i.e. the high-level strategic elements in the adopted local plan that are essential to delivering the overall planning and development strategy for the local area.
- 5.2 In the case of the NNDP this includes the Lewes District Joint Core Strategy (Local Plan Part 1). However, the Submission South Downs Local Plan 2018 is due to be examined in December 2018 and therefore is at an advanced stage in the process. The Core Strategy forms 'Part 1' of the Local Plan, with a Site Allocations and Development Management Policies DPD providing non-strategic policies in 'Part 2' of the Local Plan. The Local Plan Part 2 will only apply to the part of Lewes District that lies outside the South Downs National Park boundary. The Core Strategy replaced a number of the current 'saved' Lewes District Local Plan (2003). However, several are retained.
- 5.3 The Lewes Joint Core Strategy (JCS) sets out the strategic policy context for the District of Lewes until 2030. It therefore forms the local planning policy with which the Newhaven Neighbourhood Plan must be in general conformity. As the South Downs Local Plan has reached a fairly advanced stage, the Newhaven Neighbourhood Plan has sought to be in general conformity with the strategic policies of this plan too. The East Sussex, South Downs and Brighton & Hove Waste & Minerals Sites Plan (WMSP) also form part of the Development Plan for the town of Newhaven.
- 5.4 The Table below shows how the NNDP policies conform with the strategic policies within the Development Plans (excluding the Waste & Minerals Plan) for the NP area.

## Neighbourhood Plan and Development Plan Conformity

Relevant Local Plan Policy	Neighbourhood Plan Policy
<b>Lewes District Local Plan Part I, Joint Core Strategy</b>	<b>Newhaven Neighbourhood Plan Policy</b>
Core Policy 1 (Affordable Housing)	Policy H1 A Spatial Strategy for Newhaven  Policies for individual housing sites include reference to affordable housing provision to be in line with the adopted Development Plan. Reference is also made to other types of housing such as sheltered housing in individual policies.
Core Policy 2 (Housing Type, Mix and Density)	Policies for individual housing sites include reference to housing types/mix/appropriate developments for the site. Reference is also made to other types of housing such as sheltered housing in individual policies.
Core Policy 4 (Economic Development & Regeneration)	Policy TC1 - Regeneration of the Town Centre. Policy E1 Avis Way Industrial Estate. Policy E4 Employment clusters. Policy ES1 The Regeneration of Eastside Policy ES2 New development for Eastside and the Enterprise Zones
Core Policy 5 (The Visitor Economy)	Policy E3 The Visitor Economy Policy ES2 New development for Eastside and the Enterprise Zones
Core Policy 6 (Retail and Town Centres)	Policy TC1 - Regeneration of the Town Centre. Policy TC3 High Street Design and Shop Fronts
Core Policy 7 (Infrastructure)	Policy E2 - Drainage and flooding
Core Policy 8 (Green Infrastructure)	Policy R1 Recreation, Leisure and Local Green Spaces
Core Policy 9 (Air Quality)	There are no specific policies within the NNDP relating to air quality however it is referenced throughout the plan in a number of policies and the Vision.
Core Policy 10 (Natural Environment and Landscape)	Policy ES3 Nature Conservation Policy E1 Biodiversity protection and enhancement
Core Policy 11 (Built and Historic Environment & Design)	Policy TC3 High Street Design and Shop Fronts. Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change
Core Policy 12 (Flood Risk, Coastal Erosion & Drainage)	Policy E2 - Drainage and flooding
Core Policy 13 (Sustainable Travel)	Policy T 1 Congestion mitigation and sustainable movement, including integrated footpaths and cycle-ways. Policy T2 Accessibility to and within the Town Centre
Core Policy 14 (Renewable and Low Carbon Energy)	Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change

<b>Relevant Local Plan Policy</b>	<b>Neighbourhood Plan Policy</b>
<b>Lewes District Local Plan 2003 (saved policies)</b>	<b>Newhaven Neighbourhood Plan Policy</b>
ST1 Environmental Principles	There are no specific policies within the NNDP
ST2 General Infrastructure	There are no specific policies within the NNDP
ST3 Design, Form	Policy TC3 High Street Design and Shop Fronts Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change
ST4 Setting of Development	There are no specific policies within the NNDP
ST6 Proposals for new buildings (or for the alteration or change of use of existing buildings)	There are a number of policies within the NNDP that relate to new buildings.
ST11 Landscaping of Development	Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change
ST14 Water Supply	Policy E2 - Drainage and flooding
E1 Planning for Employment	Policy E1 Avis Way Industrial Estate. Policy E4 Employment clusters. Policy ES1 The Regeneration of Eastside. Policy ES2 New development for Eastside and the Enterprise Zones
E3 Town Centres	Policy TC1 - Regeneration of the Town Centre
E10 Tourism General Strategy	Policy E3 The Visitor Economy
RE1 Provision of Sport, Recreation and Play	Policy TC2 Leisure Centre Provision Policy ES2 New development for Eastside and the Enterprise Zones Policy R1 Recreation, Leisure and Local Green Spaces
RE10 Community Infrastructure	Policy TC2 Leisure Centre Provision Policy R2 Lewes Road Community and Visitor Centre
T1 Public Transport, Travel Demand Management	Policy T 1 Congestion mitigation and sustainable movement, including integrated footpaths and cycle-ways.
T8 Pedestrian Routes and Traffic Calming	Policy T 1 Congestion mitigation and sustainable movement, including integrated footpaths and cycle-ways. Policy T2 Accessibility to and within the Town Centre
<b>Relevant Local Plan Policy</b>	<b>Neighbourhood Plan Policy</b>
<b>Pre-Submission South Downs Local Plan and Modifications</b>	<b>Newhaven Neighbourhood Plan Policy</b>
Core Policy SD1: Sustainable Development	There is no specific policy within the NNDP that relates solely to sustainable development. However, it is referenced throughout the plan in a number of policies and the Plan is accompanied by a SA/SEA

Core Policy SD2: Ecosystems Services	There are no specific policies within the NNDP
Core Policy SD3: Major Development	Policy ES2 New development for Eastside and the Enterprise Zones
Strategic Policy SD4: Landscape Character	There are no specific policies within the NNDP but the landscaping of sites and regeneration schemes is referenced within the plan.
Strategic Policy SD5: Design	Policy TC3 High Street Design and Shop Fronts
Strategic Policy SD6: Safeguarding Views	There are no specific policies within the NNDP
Strategic Policy SD7: Relative Tranquillity	There are no specific policies within the NNDP
Strategic Policy SD8: Dark Night Skies	There are no specific policies within the NNDP
Strategic Policy SD9: Biodiversity and Geodiversity	Policy ES3 Nature Conservation Policy E1 Biodiversity protection and enhancement
Strategic Policy SD10: International Sites	There are no specific policies within the NNDP
Strategic Policy SD12: Historic Environment	Policy TC3 High Street Design and Shop Fronts
Strategic Policy SD17: Protection of the Water Environment	Policy E2 - Drainage and flooding
Strategic Policy SD19: Transport and Accessibility	Policy T 1 Congestion mitigation and sustainable movement, including integrated footpaths and cycle-ways.
Strategic Policy SD20: Walking, Cycling and Equestrian Routes	Policy T 1 Congestion mitigation and sustainable movement, including integrated footpaths and cycle-ways. Policy T2 Accessibility to and within the Town Centre
Strategic Policy SD23: Sustainable Tourism	Policy E3 The Visitor Economy
Strategic Policy SD25: Development Strategy	Policy H1 A Spatial Strategy for Newhaven
Strategic Policy SD26: Supply of Homes	Policy ES2 New development for Eastside and the Enterprise Zones
Strategic Policy SD27: Mix of Homes	Policies for individual housing sites include reference to housing types/mix/appropriate developments for the site. Reference is also made to other types of housing such as sheltered housing in individual policies.
Strategic Policy SD28: Affordable Homes	Policy H1 A Spatial Strategy for Newhaven  Policies for individual housing sites include reference to affordable housing provision to be in line with the adopted Development Plan. Reference is also made to other types of housing such as sheltered housing in individual policies.
Strategic Policy SD29: Rural Exception Sites	There are no specific policies within the NNDP
Strategic Policy SD33: Gypsies and Travellers and Travelling Show people	There are no specific policies within the NNDP
Strategic Policy SD34: Sustaining	Policy TC1 - Regeneration of the Town Centre.



the Local Economy	Policy E1 Avis Way Industrial Estate. Policy E4 Employment clusters. Policy ES1 The Regeneration of Eastside Policy ES2 New development for Eastside and the Enterprise Zones
Strategic Policy SD35: Employment Land	Policy E1 Avis Way Industrial Estate Policy ES1 The Regeneration of Eastside Policy ES2 New development for Eastside and the Enterprise Zones
Strategic Policy SD36: Town and Village Centres	Policy TC1 - Regeneration of the Town Centre Policy TC3 High Street Design and Shop Fronts
Strategic Policy SD42: Infrastructure	There are no specific policies within the NNDP but infrastructure is referenced within the plan.
Strategic Policy SD45: Green Infrastructure	Policy R1 Recreation, Leisure and Local Green Spaces
Strategic Policy SD48: Climate Change and Sustainable Use of Resources	Policy D1 Good design, improving the image and attractiveness of Newhaven and design and climate change
Strategic Policy SD49: Flood Risk Management	Policy E2 - Drainage and flooding

## 6.0 EUROPEAN UNION OBLIGATIONS

- 6.1 NNDP has been the subject of a Sustainability Appraisal (SA) incorporating the provisions of Strategic Environmental Assessment (SEA) required by European law. A SA Scoping Report (September 2015) was submitted to the statutory environmental bodies (Historic England, Natural England and the Environment Agency) as well as Lewes District Council, East Sussex County Council and the South Downs National Park Authority.
- 6.2 A final Sustainability Appraisal report, together with a non-technical summary, is submitted in support of the NNDP.
- 6.3 Article 6 of the Habitats Directive (92/43/EEC) requires all Member States to undertake an ‘appropriate assessment’ of any plan or project requiring authorisation which would be likely to have a significant effect upon a European site (including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites; this is commonly referred to as a Habitats Regulations Assessment (HRA).
- 6.4 The nearest Sites are the Lewes Downs SAC and the Castle Hill SAC. Both of these are over 7km from the NP area and a direct impact from the policies or objectives of the NNP at this distance is not expected. The only site scoped in by the Core Strategy HRA as being affected from development in Lewes District was Ashdown Forest SPA and SAC. A 7km zone of influence for recreational pressure was established around the site. This site is 26km north of the NNP and therefore the NNP and its associated development can also be screened out of the Habitats Regulations Assessment.
- 6.5 Comments from Natural England on the Scoping Report state: *‘we accept the conclusion that the Plan is unlikely to have a significant effect on Ashdown Forest SAC/SPA or the other international sites within its zone of influence (Castle Hill and Lewes Downs)’*.
- 6.6 A Habitat Regulations Assessment screening opinion has been undertaken by Lewes District Council and has concluded that the NNDP will not result in a likely significant effect on a European or Ramsar site. The screening opinion is attached at Appendix

2. The Habitat Regulations Assessment screening opinion is being consulted on at the same time as this Plan.

6.7 The NNDP is considered to be compatible with EU obligations.

# Appendix 1 – Strategic Environmental Assessment Screening Opinion

## Introduction

1. Neighbourhood Development Plans are a relatively new tier of planning policy produced by local communities. When adopted, such plans will be used by local planning authorities to determine planning applications for the Neighbourhood Areas that they cover.
2. Newhaven Town Council had the majority of the Parish designated as a Neighbourhood Area which allows it to produce a Neighbourhood Development Plan.
3. The SEA regulations<sup>2</sup> transpose the EU's SEA Directive<sup>3</sup> into law. It requires those making plans that could impact on the environment to consider whether they are likely to have a significant effect or not.

## Screening Opinion

4. As part of the process of making the Neighbourhood Development Plan, the Town Council have requested a screening opinion to see whether a Strategic Environmental Assessment is required as part of the plan-making process. Such a requirement can be screened out if it is felt, based on the information available, that the Neighbourhood Development Plan would not have a likely significant environmental affect.
5. In order to assess the likely significance of the plan on the environment, the purpose of the plan has been appraised against the criteria detailed in the regulations and Directive. This analysis has been made in Table 1.
6. The District Council has based its screening opinion on the understanding that the Parish Council will prepare a Neighbourhood Plan that:
  - will have policies consistent with national policy
  - will have policies consistent with existing and emerging local policies
  - will allocate around 545 homes in Newhaven town
  - will base policies on the evidence it has gained from documents such as the Scoping Report
7. If it is presented with additional information that changes its understanding as to what the Newhaven Neighbourhood Plan will cover, the District Council reserves the right to undertake another Screening Assessment which may have different conclusions.

Criteria	Notes	Likely Significant Effect?
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<sup>2</sup> Known fully as The Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> Known fully as Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

<b>Criteria</b>	<b>Notes</b>	<b>Likely Significant Effect?</b>
<b>1. The characteristics of plans and programmes, having regard, in particular, to—</b>		
<b>(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;</b>	Neighbourhood Development Plans are the lowest-level statutory planning documents in the UK. However, when adopted, the plan will form part of the statutory development plan for the district and will be used to determine applications in the neighbourhood area until 2030.	No
<b>(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</b>	Neighbourhood Development Plans are influenced by other plans, such as the Lewes District Local Plan, emerging Core Strategy and National Planning Policy and Guidance. The plan is at the bottom of the hierarchy and is not intended to influence other plans and programmes.	No
<b>(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;</b>	The Neighbourhood Development Plan, as directed by the National Planning Policy Framework, will help to promote sustainable development and will consider the environment.	No
<b>(d) environmental problems relevant to the plan or programme; and</b>	The Scoping Report makes it clear that the neighbourhood plan will have a strong emphasis on protecting and conserving the character and quality of the environment. The Scoping Report also identifies sustainability issues relevant to the neighbourhood area. The neighbourhood plan will introduce policies to help overcome such issues and thus reducing environmental problems.  Therefore, no significant negative environmental impacts are envisaged through the provisions of the neighbourhood plan.	No
<b>(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).</b>	N/A for the Neighbourhood Development Plan	No
<b>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—</b>		
<b>(a) the probability, duration, frequency and reversibility of the effects;</b>	The Neighbourhood Development Plan will guide development in the neighbourhood area until 2030, with the aim of having a positive impact on the parish and by promoting sustainable development.	No
<b>(b) the cumulative nature of the effects;</b>	The sustainability appraisal of the Core Strategy considered the impact	No

Criteria	Notes	Likely Significant Effect?
<b>(c)the transboundary nature of the effects;</b>	<p>of development in the town alongside development in other settlements and towns, including in neighbouring districts. Development in the neighbourhood plan is likely to be consistent to the amount proposed in the Core Strategy.</p> <p>The Habitats Regulations Assessment for the Core Strategy also considered the effect of development in neighbouring districts on protected sites.</p>	No
<b>(d)the risks to human health or the environment (for example, due to accidents);</b>	<p>It is not thought the anything in the Neighbourhood Development Plan will increase risks to human health. The neighbourhood plan will aim to deliver sustainable development which does not adversely impact on the environment paying particular attention to the South Downs National Park which envelopes the town.</p>	No
<b>(e)the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);</b>	<p>The Neighbourhood Development Plan, unlike most plans, is written for a small area and modest population. The Newhaven Neighbourhood Plan will be allocating sites for development. Although the development planned for will be in line with the targets set in the Core Strategy, it is likely to be of a scale whereby it is difficult to rule out any likely significant effects.</p>	Yes
<p><b>(f)the value and vulnerability of the area likely to be affected due to—</b></p> <p><b>(i)special natural characteristics or cultural heritage;</b></p> <p><b>(ii)exceeded environmental quality standards or limit values; or</b></p> <p><b>(iii)intensive land-use; and</b></p>	<p>In collecting information for the Neighbourhood Development Plan, information has been gained on the characteristics of the area – including information on land use, listed buildings, TPOs and SSSIs. This information gathering will inform the contents of the Neighbourhood Development Plan.</p> <p>Although the development target for the town has been appraised through the Lewes District Core Strategy SA/SEA, the precise location of sites was not known. The neighbourhood plan will allocate the sites and so likely significant environmental effects cannot be ruled out.</p>	Yes

Criteria	Notes	Likely Significant Effect?
<b>(g)the effects on areas or landscapes which have a recognised national, Community or international protection status.</b>	<p>The neighbourhood area does include nationally designated landscape including small sections of the South Downs National Park.</p> <p>The Habitats Regulations Assessment for the Core Strategy considered the impact of development in the district, including development in Newhaven, on protected European sites and concluded that there was no significant effect on the protected sites' qualifying features subject to mitigation measures being introduced to protect the Ashdown Forest SAC/SPA. Newhaven is not within the 7km protection zone surrounding the Ashdown Forest SAC/SPA and so is not of concern.</p> <p>The two protected sites within proximity of the neighbourhood area were considered through a Habitat Regulations Screening for the Neighbourhood Development Plan, which arrived at the same conclusions as the Core Strategy's Habitat Regulations Assessment.</p>	No

**8. The above analysis was undertaken by Lewes District Council on behalf of the Parish Council for the Neighbourhood Development Plan and it was considered that likely significant environmental effects could not be ruled out and hence a Strategic Environmental Assessment is required to comply with National and European Regulations.**

This decision has been based on the assumptions set out in paragraph (6) and for the following Statement of Reasons:

- The Newhaven Neighbourhood Plan is likely to plan for a significant scale of development, including the allocation of development sites.
- As a precautionary measure to ensure that the requirements of the SEA Directive are met which is a key component of meeting the basic conditions<sup>4</sup> against which a neighbourhood plan is examined;
- To ensure the Plan has regard to National Planning Practice Guidance<sup>5</sup>;
- To ensure that sustainability is at the heart of the Newhaven Neighbourhood Plan, that all reasonable alternatives are assessed, and that the most sustainable options are delivered in light of the sensitive landscape setting and heritage assets of the parish;
- A Sustainability Appraisal/Strategic Environmental Assessment of the Lewes District Local Plan Part 2 has not yet been prepared.

<sup>4</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/neighbourhood-planning/the-basic-conditions-that-a-draft-neighbourhood-plan-or-order-must-meet-if-it-is-to-proceed-to-referendum/>

<sup>5</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>

## **Appendix 2 – Habitat Regulations Screening Report**



**Lewes District Council**

**Newhaven Neighbourhood Development Plan**

**Habitat Regulations Screening Report**

June 2015



## 1. Introduction

- 1.1 It is acknowledged that some of Europe's natural habitats are deteriorating and, as a result, a number of wild species are becoming seriously threatened. The effect is partly caused due to development. As a result, when preparing plans or projects, member states of the European Community are required to take into account habitats and wild species of European importance through Article 6 of Council Directive 92/43/EEC on the Conservation of Natural Habitats and of wild fauna and flora (known as the Habitats Directive).
- 1.2 The Conservation of Habitats and Species Regulations 2010 (known as the Habitats Regulations) transposes the requirements of the Habitats Directive into British Law.
- 1.3 In order to fulfil such requirements, those making land use plans must carry out a Habitats Regulations Assessment (HRA). This process, also known as an Appropriate Assessment, ensures that the protection of the integrity of sites protected by European Law is a part of the planning process. Such sites are referred to as "protected sites" throughout the rest of the report.
- 1.4 This report presents the finding of the screening stage of the HRA process, examining whether or not the emerging Newhaven Neighbourhood Development Plan (NNDP) is likely to have a likely significant effect on any protected sites.
- 1.5 This screening assessment should be read alongside the Habitat Regulations Assessment of the Lewes District Core Strategy: Proposed Submission Version<sup>6</sup> as amended by the HRA Addendum, March 2014<sup>7</sup>.
- 1.6 This report has been prepared by officers at Lewes District Council on behalf of Newhaven Parish Council in order to inform the preparation of the NNDP, to ensure that the NNDP meets the basic conditions as prescribed by the Neighbourhood Planning Regulations and related legislation and to meet the requirements of European Directives.
- 1.7 Natural England has commented on the Screening Opinion and has accepted the conclusion reached in this report that there is no need to progress to further stages in the Habitats Regulations Assessment process.

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<sup>6</sup> [http://www.lewes.gov.uk/Files/plan\\_2013\\_HRA.pdf](http://www.lewes.gov.uk/Files/plan_2013_HRA.pdf)

<sup>7</sup> [http://www.lewes.gov.uk/Files/plan\\_HRA\\_Addendum\\_2014.pdf](http://www.lewes.gov.uk/Files/plan_HRA_Addendum_2014.pdf)

## **2. Process**

- 2.1 In 2006, the Department for Communities and Local Government (DCLG) released draft guidance for the Appropriate Assessment on local development documents and Regional Spatial Strategies.
- 2.2 Whilst the guidance never progressed from the draft version and nor was it produced when neighbourhood planning had come into force, it still prescribes a useful process for undertaking HRA on land use plans, such as a NDP.
- 2.3 The draft guidance described three main tasks to follow when developing a land use plan. These are:
1. Screening for likely significant effects.
  2. Appropriate Assessment and ascertaining the effect on site integrity.
  3. Mitigation Measures and alternative solutions.
- 2.4 This report relates to the first stage of the process – the screening stage -and thus it is important to understand what this stage demands before carrying out the screening report.

### **Screening for likely significant effects**

- 2.5 The initial stage of the HRA is to assess whether a plan is likely to have a significant negative effect on a protected site. This is known as screening. This screening process determines whether it is necessary to carry out the subsequent stages of HRA.
- 2.6 If it is assessed that there is likely to be no significant effect on a protected site from the consequences of a plan, then carrying on with the HRA is deemed unnecessary and thus, the site can be screened out from the rest of the process.
- 2.7 Conversely, if it is found that a plan is likely to cause a significant effect on a protected site, the site would not be able to be screened out and would have to undergo the further stages.
- 2.8 Other plans and strategies that could have an impact on protected sites “in combination” with the plan under production, also have to be taken into account during the screening stage. As an example, it may be assessed that there would be no significant effect caused by an individual plan on a particular protected site, but when considering it with a number of other plans and strategies, the cumulative outcome could be assessed to cause a likely significant effect. In this case, the protected site impacted upon would be unable to be screened out of the further stages.
- 2.9 Importantly, the HRA process is underpinned by the precautionary principle, especially in the assessment of potential impacts and their resolution. Therefore if it is not possible to rule out a risk of harm, based on the evidence available, to a protected site, it is assumed a risk may exist. As a result, it

would mean that such a site could not be ‘screened out’ at the initial stage of the process.

### 3. The Protected Sites

3.1 There are three types of protected sites that a HRA would have to consider. These are:

- Special Areas of Conservation (SACs) – sites designated for flora, fauna and habitats of community interest under powers derived from the Habitats Directive; and
- Special Protection Areas (SPAs) – sites designated to conserve the habitat of protected wild birds to ensure their survival and reproduction in their area of distribution under powers derived from Directive 2009/147/EC on the conservation of wild birds<sup>8</sup> (the Birds Directive).
- Ramsar Sites – wetland sites of international importance, designated under the Ramsar Convention

3.2 The HRA for the Lewes District Core Strategy considered 4 protected sites, both within and outside of the district, which could be affected by development in the district. These were:

- Castle Hill SAC
- Lewes Downs SAC
- Pevensey Levels Ramsar Site and Candidate SAC
- Ashdown Forest SAC and SPA

3.3 The Newhaven Neighbourhood Area covers a far smaller geographical area than the Lewes District Core Strategy. The protected sites that lie near to the neighbourhood area are the Castle Hill SAC (approximately 4km from the nearest point of the protected site) and the Lewes Downs SAC (approximately 6km from the nearest point of the protected site). As such, it is only considered appropriate to carry out the screening for likely significant effects for these sites.

#### Lewes Downs SAC

3.4 The Lewes Downs site has been designated as a SAC for the following reasons<sup>9</sup>:

- This chalk grassland site consists largely of *Festuca ovina* – *Avenula pratensis* and *Bromus erectus* calcareous grasslands. This site contains an important assemblage of rare and scarce orchids, including early spider-orchid *Ophrys sphegodes*, burnt orchid *Orchis ustulata* and musk orchid *Herminium monorchis*. The colony of burnt orchid is one of the largest in the UK.

#### Castle Hill SAC

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<sup>8</sup> This directive replaced Council Directive 79/409/EEC on the same subject.

<sup>9</sup> taken from the summary provided on the Joint Nature Conservation Committee’s (JNCC’s) website

- 3.5 The Castle Hill SAC site has been designated as a SAC for the following reasons<sup>10</sup>:
- This chalk grassland consists of a mosaic of calcareous semi-natural grasslands, notably *Festuca ovina* – *Avenula* grassland, *Bromus erectus* grassland and *Brachypodium pinnatum* grassland. Castle Hill’s important assemblage of rare and scarce species includes early spider-orchid *Ophrys sphegodes* and burnt orchid *Orchis ustulata*. The colony of early spider-orchid is one of the largest in the UK.
- 3.6 When assessing whether the Newhaven NDP would cause a likely significant effect on the protected sites, the above reasons for designation will be considered.

#### 4. Screening the Protected Site

- 4.1 When producing a neighbourhood plan, one of the basic conditions is for it to be in general conformity with the strategic policies of the development plan. The adopted development plan for the district is the Lewes District Local Plan (2003). The Newhaven NDP is also being produced in conformity with the Lewes District Core Strategy. At the time of writing this report, the Core Strategy has been formally submitted for examination and so is at an advanced stage.

##### HRA on the Lewes District Core Strategy

- 4.2 Thus, when undertaking the screening assessment for the Newhaven NDP, consideration is made to the findings of the HRA on the Lewes District Core Strategy. That HRA assessed the implications of development levels in excess of 1,500 net additional homes at Newhaven between 2010 and 2030. This figure not only took account of planned levels of development through the Core Strategy and subsequent Local Plan Part 2 (Site Allocations Plan), but also of completions and commitments (all proposals for development that are subject of a current full or outline planning permission or are unimplemented allocations in an existing Local Plan).
- 4.3 With regards to the Lewes Downs SAC, the HRA found that **“as a result of the work undertaken, it has been determined, in consultation with Natural England, that the Core Strategy would not have a significant negative effect on the Lewes Downs SAC either alone or in combination with other plans.”**
- 4.4 With regards to the Castle Hill SAC, the HRA concluded that **“we have been able to ‘screen out’ Castle Hill..., as it is not assumed that there is likely to be a significant effect on the site caused by the Core Strategy.”**<sup>11</sup>
- 4.5 It is assumed that the Newhaven NDP will plan for an amount of housing (545 additional homes) that aligns with the development level that was tested in the

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<sup>10</sup> taken from the summary provided on the Joint Nature Conservation Committee’s (JNCC’s) website

<sup>11</sup> Quote slightly amended to omit reference to Pevensey Levels

HRA on the Core Strategy. It will also introduce a number of policies, covering a range of issues to deliver the vision of the community plan's key principles.

- 4.6 A further addendum to the Core Strategy HRA was published in March 2014 to consider the increased housing requirement proposed in the Focussed Amendments Core Strategy. The housing requirement figures which fed into the addendum assessment were updated from those previously used – the figure for Newhaven being 1,862 (including expected windfall sites). This addendum did not alter the outcomes from original Core Strategy HRA.

### **The Screening Assessment**

- 4.6 As can be seen in Table 1 and Table 2 overleaf, a screening assessment has been undertaken for the two protected sites. From the findings of the screening assessment, it has been determined that the Newhaven NDP would not cause a likely significant effect to either the Castle Hill SAC or the Lewes Downs SAC, either alone or in combination with other plans. As such, we have screened out the protected sites from further stages of the HRA process.
- 4.7 The Core Strategy HRA has been an important consideration in coming to this conclusion. The Core Strategy is not an adopted development plan, however, the accompanying HRA and underlying evidence is considered robust and has been prepared in line with advice and assistance from statutory bodies (i.e. Natural England). No concerns in relation to the Core Strategy HRA were raised by the Inspector during the Examination in Public Hearing Sessions or in his Interim Findings Letter<sup>12</sup> in which he concluded that all statutory and legal requirements had essentially been met.
- 4.8 The District Council has based this assessment on the understanding that the Parish Council will prepare a Neighbourhood Plan that:
- will have policies consistent with national policy
  - will have policies consistent with existing and emerging local policies
  - will allocate around 545 homes in Newhaven town
  - will base policies on the evidence it has gained from documents such as the Scoping Report
- 4.9 A further Screening Assessment may be undertaken at the Draft Plan (Regulations 14) stage when policies and site allocations are known. Also, if the Council is presented with additional information that changes its understanding as to what the Newhaven Neighbourhood Plan will cover, the District Council reserves the right to undertake another HRA Screening Assessment which may have different conclusions.

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<sup>12</sup> [http://www.lewes.gov.uk/Files/plan\\_ID-05\\_Letter\\_to\\_Councils\\_10\\_Feb\\_2015.pdf](http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf)

**Table 1: Screening Assessment of Lewes Downs SAC**

<b>SITE</b>
Lewes Downs SAC
<b>KEY ENVIRONMENTAL CONDITIONS NEEDED TO SUPPORT INTEGRITY</b>
<ul style="list-style-type: none"> <li>• Minimal air pollution.</li> <li>• Maintenance of Grazing.</li> <li>• Absence of direct fertilisation.</li> <li>• Low recreational pressure.</li> <li>• Absence Leaching and spray-drift of chemicals from bordering arable land.</li> </ul>
<b>POSSIBLE EFFECTS OF NEIGHBOURHOOD DEVELOPMENT PLAN</b>
<ul style="list-style-type: none"> <li>• Increasing traffic on the A26 and B2192. This could lead to increased air pollution, affecting the site's integrity.</li> <li>• Increasing recreational pressures on the site, affecting the protected habitats.</li> </ul>
<b>LIKELY SIGNIFICANT EFFECTS TO SITE (INCLUDING POTENTIAL 'IN-COMBINATION' IMPACTS)?</b>
<ul style="list-style-type: none"> <li>• <u>Increasing Traffic on the A26 and B2192</u></li> </ul> <p>No – the HRA for the Core Strategy tested the impact of traffic resulting from development levels set in the Core Strategy on the A26 and B2192. The assessment concluded that it would not cause a significant negative effect on the site. As the Newhaven NDP is likely to plan for a similar amount of housing, the conclusion remains the same.</p> <p>In-combination Impacts – The HRA Core Strategy assessed in-combination impacts with other Plans. There are no Plans that were not considered through the Core Strategy HRA that would lead to in-combination impacts with the Newhaven Neighbourhood Plan.</p> <ul style="list-style-type: none"> <li>• Increasing Recreational Pressures on the Site</li> </ul> <p>The Screening Assessment for increasing recreational pressure on the Lewes Downs SAC screened out the need for an appropriate assessment as development levels in the Core Strategy would not significantly increase the numbers of visitors to the site and thus is unlikely to have a likely significant effect. It is likely that the levels of development in the Newhaven Neighbourhood Development Plan will align with that assessed through the Core Strategy HRA and so it can be concluded that no further assessment is required.</p> <p>In-combination Impacts – The HRA Core Strategy assessed in-combination impacts with other Plans. There are no Plans that were not considered through the Core Strategy HRA that would lead to in-combination impacts with the Newhaven Neighbourhood Plan.</p> <p>It is not thought that development prescribed by the Newhaven NDP would change the above conclusions and thus it is not considered that the NDP would cause a significant negative effect on the site, either alone or in combination with other Plans.</p>

**FURTHER STAGES OF HRA NEEDED?**

No

**Table 2: Screening Assessment of Castle Hill SAC****SITE**

Castle Hill SAC

**KEY ENVIRONMENTAL CONDITIONS NEEDED TO SUPPORT INTEGRITY**

- Minimal air pollution.
- Maintenance of Grazing.
- Absence of direct fertilisation.
- Low recreational pressure.
- Absence Leaching and spray-drift of chemicals from bordering arable land.

**POSSIBLE EFFECTS OF NEIGHBOURHOOD DEVELOPMENT PLAN**

- Increasing traffic to/through the site as a result of new development, leading to increased air pollution, affecting the protected species.
- Increasing recreational pressures on the site, affecting the protected habitats.

**LIKELY SIGNIFICANT EFFECTS TO SITE (INCLUDING POTENTIAL 'IN-COMBINATION' IMPACTS)?**

- Increasing Traffic To/Through the Site

The screening assessment for the HRA on the Core Strategy found that it was unlikely that development levels set in the Core Strategy would significantly increase traffic, and associated pollution, to the extent that it could harm the site. There are only a few minor localised access roads that pass within 200m of the site. As the Newhaven NDP is likely to plan for a similar amount of housing, the conclusion remains the same.

In-combination Impacts – The HRA Core Strategy assessed in-combination impacts with other Plans. There are no Plans that were not considered through the Core Strategy HRA that would lead to in-combination impacts with the Newhaven Neighbourhood Plan.

- Increasing Recreational Pressures on the Site

It also concluded through the Core Strategy HRA that it was not thought likely that development in the district would significantly increase visitor numbers and thus associated recreational disturbance to the protected habitat. It is likely that the levels of development in the Newhaven Neighbourhood Development Plan will align with that assessed through the Core Strategy HRA and so it can be concluded that no further assessment is required.

In-combination Impacts – The HRA Core Strategy assessed in-combination impacts with other Plans. There are no Plans that were not considered through the Core Strategy HRA that would lead to in-combination impacts with the Newhaven Neighbourhood Plan.

It is not thought that development prescribed by the Newhaven NDP would change the above conclusions and thus it is not considered that the NDP would cause a significant negative effect on the site, either alone or in combination with

other Plans.

**FURTHER STAGES OF HRA NEEDED?**

No