

Lewes District Local Plan Part 2

Site Allocations and Development Management Policies Document

Strategic Environmental Assessment Adoption Statement

February 2020

1. Introduction

Background

- 1.1. The Lewes District Local Plan Part 1 (LPP1), the Joint Core Strategy, is the overarching strategic Local Plan to 2030 for development within Lewes District. It sets out the long term spatial vision and objectives for the district and the core policies as well as the spatial strategy for future growth and the allocation of strategic sites.
- 1.2. The Lewes District Local Plan Part 2 Site Allocations and Development Management Policies Document (LPP2) builds upon the Joint Core Strategy by setting development management policies and non-strategic site allocations. The LPP2 however, only applies to that part of the Lewes District that lies outside the South Downs National Park.
- 1.3. Considerable work and consultation has been undertaken since 2013 to prepare the LPP2 and allow the Council to submit the plan for Examination in December 2018. The Inspector's Report on the LPP2 Examination was received on the 20th December 2019. The Inspector concluded that, subject to the inclusion of a number of main modifications, the LPP2 is legally compliant and sound. The Council adopted the LPP2 on the 24th February 2020.

Sustainability Appraisal explained

- 1.4. In accordance with European and national legislation, development plans, such as the Local Plan Part 2 (LPP2), must be subject to the Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA) processes.
- 1.5. The SEA predicts and assesses the environmental effects that are likely to arise from plans, policies and strategies. The SA widens the scope of the assessment to also include social and economic issues.
- 1.6. Sustainability Appraisals (SAs) assess the likely significant effects of an emerging plan, and the reasonable alternatives considered during the plan making process in terms of key sustainability issues. The aim of the SA is to inform and influence the plan-making process with a view to avoiding or mitigating negative effects and maximising positive effects. Through this approach, it seeks to maximise Local Plans' contribution towards promoting and achieving sustainable development as set out in legislation introduced at both European and national level.
- 1.7. For the purposes of undertaking the SA and SEA of the Local Plan Part 2, the SEA process has been incorporated into the SA process. Therefore, where this report solely refers to the SA it can be assumed that this also means the SEA.

This adoption statement

- 1.8. This Strategic Environment Assessment Adoption Statement has been prepared to comply with European and national legislation.
- 1.9. Regulation 16 of the SEA Regulations sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA Report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. This statement has been prepared in accordance with this regulation.
- 1.10. In addition Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) sets out a need to publish the final SA Report alongside the Adopted Local Plan.
- 1.11. Copies of the Adopted Lewes District Local Plan Part 2, the Policies Maps, the LPP2 Adoption Statement, the Sustainability Appraisal incorporating the Strategic Environmental Assessment, the SEA Adoption Statement, the Inspector's final Report and other associated document are available on our [LPP2 webpage](#). Paper copies are also available to view (free of charge) at the Council's principal officer at Southover House, Southover Road, Lewes, BN7 1AB (Mon-Fri 9am to 5pm).

Structure of this statement

- 1.12. In the context of the requirements of the SEA Regulations, this SEA Adoption Statement for the Local Plan Part 2 explains:
 - How environmental considerations have been integrated into the plan
 - How the Environmental Report has been taken into account during the preparation of the plan
 - The reasons for choosing the plan as adopted, in light of the other reasonable alternatives dealt with
 - How the opinion expressed by the public and consultation bodies during consultation on the plan and SA Report have been taken into account
 - The measures that are to be taken to monitor the significant effects identified for the Local Plan

2. How environmental and wider sustainability considerations have been integrated into the plan

- 2.1. The purpose of the LPP2 is to deliver the objectives and policies of the LPP1, the Joint Core Strategy. In accordance with the Local Planning Regulations, as a later development plan, LPP2 policies are required to be consistent with the Joint Core Strategy policies.
- 2.2. The Joint Core Strategy includes a number of strategic objectives directly related to sustainability. It was subject to [SA \(incorporating an SEA\)](#) and an [adoption statement](#) was published as required under the SEA Regulations. As the LPP2 seeks to deliver these objectives, sustainability and sustainability considerations are therefore inherent within it.

The LPP2 Sustainability Appraisal Stages

- 2.3. The Council is legally required to undertake Sustainability Appraisal (SA), and Strategic Environmental Assessment (SEA) alongside and informing the process of preparing the LPP2. An iterative SA process (incorporating SEA) has been integral to the production of the LPP2. This has included the preparation of a series of SA Reports throughout the process. The findings have had a key influence on the policy decisions made.

The Scoping Report

- 2.4. The SA Scoping Report was prepared alongside the Issues and Options Topic Papers and subsequently consultation upon in November 2013. Among other things, the SA Scoping Report had sections that:
 - Collated baseline information (Economic, social and environmental), presented the current picture of the plan area and identified a number of sustainability issues
 - Identified plans, programmes and policies relevant to the area and to the preparation of the development plan
 - Developed a Sustainability Framework, comprising of a set of sustainability objectives and indicators largely based on the LPP1, the Joint Core Strategy, SA to ensure consistency in the sustainability objectives applied to both documents
- 2.5. The Sustainability Framework was developed to assess the policy options and draft policies formulated through the preparation of the local development plan. The objectives were specifically identified to address the sustainability issues and so it is clear from the outset that environmental, social and economic considerations were integrated into the LPP2.

Draft SA Reports

- 2.6. The first Draft SA Report accompanying the Draft LPP2 was published for consultation in November 2017. Changes were made to sections of the original Scoping Report based on the responses received from the previous

consultation as well as updates to the datasets and the publication of additional plans, programmes and policies that the LPP2 must have regard to.

- 2.7. In addition, the Draft SA Report was prepared in order to present the appraisal of the impacts of the various reasonable options and alternatives developed for each policy area and the site allocations of the LPP2, helping to identify the most suitable and sustainable approach. The draft wording of the policies, including for the site allocations for residential development, was appraised against the sustainability framework and where possible refined to increase their sustainability credentials.
- 2.8. The report also set out a draft monitoring framework which will be used to monitor the LPP2 once adopted and explained in more detail what next steps the production process involved.
- 2.9. The second Draft SA Report which was published alongside the Pre-Submission LPP2 in September 2018 was built upon the outcomes of the previous consultation. This included the withdrawal of a housing site allocation for the settlement referred to in the LPP1 as 'Edge of Burgess Hill'. Further work was carried out on the reasonable alternatives and draft policies. Therefore the Draft SA Report provided an update on the previous version and additional policy options were appraised in relation to Gypsy and Traveller Accommodation and Employment allocations.

Submission SA Report

- 2.10. The Submission SA Report was submitted alongside the LPP2 to the Planning Inspectorate in December 2018. The changes to this version of the SA Report mainly corrected minor typographical errors of the previous version.

Addendum to the SA

- 2.11. Following the Hearing Sessions in April 2019, the Inspector provided a schedule of proposed Main Modifications to the LPP2, based upon discussions held at the Examination Hearings. The Main Modifications addressed matters that affect the soundness of the plan. The Inspector did not propose any modifications that would result in the deletion of any policies in the submission LPP2. However he did propose amendments to the wording of a number of policies and their associated supporting text. In the case of Policy E1 (land at East Quay, Newhaven), he also proposed a reduction in the size of the allocated employment site.
- 2.12. The SA Addendum Report published alongside the Schedule of Main Modifications in July 2019 considered the need to revise the appraisal in light

of the Main Modifications proposed by the Inspector. The Modifications were assessed in the context of the overall policy and accompanying supporting text being amended. The SA assessment tables included within this report replace, where necessary, the assessment tables in the Submission SA Report and additional commentary should be read alongside the commentary included in the Submission SA Report.

- 2.13. Overall the SA Addendum Report shows how the Main Modifications are likely to result in the LPP2 having further positive impacts on the sustainability objectives.

Adoption SA Report

- 2.14. The Adoption SA Report accompanies the adoption version of the LPP2. It compiles the various changes made to the previous SA reports during the preparation process and examination to provide a clean version for ease of reference.

Habitat Regulations Assessment

- 2.15. In addition to SA and SEA, an Habitat Regulations Assessment (HRA) was undertaken for LPP2 at key stages through the plan making process. National guidance states that a SA should take account of the findings of an appropriate assessment.
- 2.16. The HRA on the Draft LPP2 received endorsement from Natural England on the conclusions of no Likely Significant Effect. The HRA for the Pre-Submission LPP2 and Neighbourhood Plans was updated and the conclusions remain the same.
- 2.17. Further to The Examination in Public, the LPP2 was modified to ensure consistency with the HRA. This was a procedural amendment to ensure that the mitigation measures for the recreation impacts on the Ashdown Forest, identified at LPP1 stage, are considered at the Appropriate Assessment stage rather than the screening stage of the HRA. The conclusion is therefore a 'no adverse effect on integrity' rather than 'no likely significant effect'.

3. How the Environmental Report has been taken into account during the preparation of the plan

- 3.1. Throughout the plan-making process, the SA (incorporating the SEA) has been carried out as an iterative and ongoing process to inform decision making for the development Plan. The SA was undertaken in accordance with government guidance for a staged approach that integrates appraisals to consider the effects of the emerging LPP2 on socio-economic as well as environmental factors. This ensured that sustainability and environmental

considerations were at the heart of the preparation of the LPP2. It was progressed alongside the plan in an iterative way such that the findings and recommendations from the SA, along with all other components of the Council's evidence base, were integrated into the development stages of the Plan.

- 3.2. In the preparation of the LPP2, options ('reasonable alternatives') were identified for consideration. The detailed appraisal within the SA reports guided officers to identify environmental and wider sustainability implications. By identifying environmental and wider sustainability issues, the SA was able to recommend the most sustainable options, propose mitigation measures and refine policy wording. Ultimately, the conclusions of the appraisals were a key influence on the formulation of policies in the LPP2.
- 3.3. In his Report to the Council on the LPP2, the Inspector clarifies his satisfaction with the Plan as modified and stated that the SA process had been iterative and influential from the start of the plan-making process and that the Plan had been robustly tested in relation to SA (and Habitat Regulations Assessment (HRA)). The Inspector concluded that all of the legal requirements had been met including that an adequate Sustainability Appraisal had been carried out, including in respect of the Main Modifications.

4. How the opinions expressed by the public, consultation bodies during consultation on the Plan and Environmental Report have been taken into account

- 4.1. At each stage of the preparation of the Local Plan Part 2, an SA Report was published alongside the Local Plan for consultation with:
 - The three statutory bodies for SEA (the Environment Agency, Historic England and Natural England)
 - Other stakeholders; and
 - The general public
- 4.2. As explained in the [Consultation Statement](#) submitted with Local Plan Part 2, the Council maintains a database of people and organisations who have asked to be kept informed about the progress of the Local Plan and have previously made representations on the LPP1, the Joint Core Strategy. The database is a vital tool in engaging with various stakeholders and is constantly updated with new contacts and amended details.
- 4.3. Table 1 lists the consultation events held by the Council throughout the LPP2 preparation.

Table 1 LPP2 consultations

LPP2 Production Stage	SA Production Stage	Consultation dates
Issues and Options Topic Papers Reg. 18	Scoping Report	22 nd November 2013 – 17 th January 2014
Draft Local Plan Part 2 Reg. 18	Draft SA Report	30 th November 2017 – 25 th January 2018
Pre-submission Local Plan Part 2 Reg. 19	Draft SA Report	24 th September – 5 th November 2018
Main Modifications on the Local Plan Part 2	Addendum	8 th July – 19 th August 2019

Responses received at Regulation 18 and 19 consultations and at Submission

- 4.4. The responses received prior, and subsequent, to publication of the Local Plan Part 2 were presented in the [Consultant Statement](#). This included:
- A description of the key consultation processes undertaken for the Local Plan Part 2
 - Summary of the main issues raised by responses
 - How they have been addressed

Responses received at the Main Modifications stage

- 4.5. Lewes District Council prepared a [Consultation Statement Main Modifications Addendum](#) to provide a summary of the representations made during the six-week consultation on the Main Modifications undertaken in July and August 2019, and responses.

5. The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with

- 5.1. At each stage of the preparation of the LPP2, reasonable alternatives were identified, considered and tested through the SA process. The findings of the SA together with the reasons for selecting or rejecting the different options in plan-making were reported in the SA Reports and were subject to public consultation as set out in section 4.
- 5.2. The SEA Regulations require an assessment of the likely significant effects of implementing the plan and '*reasonable alternatives*' taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the SA Report. Extant SA/SEA guidance advises that the term '*reasonable alternative*' should be taken to mean '*realistic and relevant*' i.e. deliverable and within the timescale of the plan.

- 5.3. It is important to appreciate that the primary role of the LPP2 is to help to deliver the vision and objectives of the LPP1, the Joint Core Strategy. The Joint Core Strategy sets out the overarching spatial strategy and broad scale and distribution of development. The LPP2 adds detail in the form of development management policies and non-strategic site allocations. In accordance with planning legislation, the LPP2 must be in conformity with the LPP1, the Joint Core Strategy as the higher order development plan document.
- 5.4. The range of reasonable alternatives for the LPP2 was therefore limited by the need for consistency with the adopted LPP1, the Joint Core Strategy. Nevertheless, the SA did investigate in detail all reasonable alternatives within the scope and remit of the LPP2, and this has informed the decision-making for the plan.
- 5.5. Overall the reasons for choosing the LPP2 as adopted, in light of the other reasonable alternatives dealt with, included that the adopted LPP2 progresses the adopted vision, objectives and strategy for development planning in Lewes District outside the South Downs National Park, with the best sustainable outcomes.
- 5.6. It is anticipated that mitigation measures introduced into policy wording, in addition to the implementation of the other local plan policies, will cumulatively reduce potential adverse impacts, or negate them altogether. Furthermore, the planning application process will allow further consideration of site-specific issues through detailed supporting documents (where necessary) such as Ecological and Archaeological Assessment and the introduction of planning conditions or obligations that will also further offset or compensate for any unavoidable harm.

6. The measures that are to be taken to monitor the significant environmental effect of the implementation of the plan

- 6.1. The SEA Regulations requires that *“the responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen effects at an early stage and being able to undertake appropriate remedial action.”*
- 6.2. The Regulations also state that the SEA Adoption Statement should set out *“...the measure that are to be taken to monitor significant environmental effects of the implementation of the plan of programme.”*
- 6.3. The purpose of monitoring is to measure the significant sustainability effects of a plan, as well as to measure success against the plan’s objectives. This

will enable appropriate interventions to be undertaken if monitoring highlights negative trends relating to the relevant elements. It is therefore beneficial if the monitoring strategy builds on monitoring systems which are already in place. To this end, many indicators of progress chosen for the SA require data that is already being routinely collected at a local level by Lewes District Council and its partner organisations. It should also be noted that monitoring can provide useful information to inform the development of future plans and programmes, including future iterations of the Local Plan.

- 6.4. Table 2 outlines a monitoring framework which will monitor the effects of the Plan against the sustainability objectives. It includes a wide range of social, economic and environmental indicators which will enable the Council to identify any significant environmental effects that could lead to review of the Local Plan policies so that changes can be made to improve environmental performance and sustainability.
- 6.5. In addition to the SA monitoring process, a Monitoring and Delivery Framework has been prepared to monitor the implementation of the Lewes District Local Plan to determine whether the strategic objectives are being achieved. In addition to monitoring the performance of individual policies and objectives, the monitoring framework will also identify unexpected outcomes which will allow the authorities to take appropriate action, which may include triggering of a review of relevant policies. This flexibility will allow the Local Plan to respond to changing circumstances over the course of the plan period.
- 6.6. The monitoring process of the Local Plan and the SA will be carried out on an annual basis through the Authority Monitoring Report (AMR). It is clear that a flexible and thorough monitoring process is in place to ensure that no significant environmental effects occur as a result of the implementation of the Lewes Local Plan.

Table 2 SA monitoring framework for the Lewes District Local Plan

OBJECTIVES	INDICATORS
1. Housing	<ul style="list-style-type: none"> • Net housing completions per annum • Net affordable housing completions per annum • Lower quarter house prices • House prices to earnings ratio • Households on housing needs register • Number of households considered homeless • Percentage of unfit dwellings • Net additions Gypsy and Traveller pitches
2. Deprivation	<ul style="list-style-type: none"> • Rank and change in rank of Lewes District in the Index of Multiple Deprivation • Number and location of SOAs in the Plan Area considered to be in the most deprived 30% in the country

OBJECTIVES	INDICATORS
3. Travel	<ul style="list-style-type: none"> • Number of large development completions estimated to be within 30 minutes of public transport and walking and cycling journey time of services • Mode of travel to work • Levels of out-commuting • Percentage of the district connected to the internet
4. Communities	<ul style="list-style-type: none"> • Percentage of people satisfied with their local area as a place to live • Change in number of community meeting facilities • Change in the amount of public open space • Crime rate per 1000 of the population
5. Health	<ul style="list-style-type: none"> • Life expectancy at birth • Percentage of population not in good health • Percentage of the population over 65
6. Education	<ul style="list-style-type: none"> • Students achieving 5 or more A*-C GCSE grades (including Maths and English) • Numbers of adult learners • Percentage of adults without any qualifications • Percentage of adults with degree level (or equivalent) qualification
7. Land efficiency	<ul style="list-style-type: none"> • Percentage of new homes built on PDL • Number of empty homes • Density of new dwellings • Amount of grade 1, 2 and 3 agricultural land lost to new development
8. Biodiversity	<ul style="list-style-type: none"> • Condition and size of SSSIs • Number and extent of LWSs and LNRs • Area of ancient woodland
9. Environment	<ul style="list-style-type: none"> • Number of listed buildings on the buildings at risk register • Amounts of Rights of Way • Low/negligible sites in Plan Area as identified in the Landscape Capacity Study
10. Waste	<ul style="list-style-type: none"> • Domestic waste produced per head of population • Percentage of waste that is recycled or reused
11. Water	<ul style="list-style-type: none"> • Biological, ecological and physico-chemical quality of water • Bathing water quality • Water consumption per capita
12. Energy	<ul style="list-style-type: none"> • Annual consumption of energy per user • Percentage of waste converted to energy • Number of grants for renewable energy installations obtained • Number of planning applications received relating to renewable energy • Carbon dioxide emissions per sector
13. Air quality	<ul style="list-style-type: none"> • Number of Air Quality Management Areas • Air Quality Action Plan Indicators?
14. Flooding	<ul style="list-style-type: none"> • Number of residential properties at risk of flooding

OBJECTIVES	INDICATORS
	<ul style="list-style-type: none"> • Number of new developments with sustainable drainage systems or developments that minimise water consumption • Amount of land in flood risk zones 2 and 3 as a percentage of the Plan Area's coverage • Number of planning applications granted contrary to the advice on the Environment Agency flood defence grounds (fluvial)
15. Coastal Erosion	<ul style="list-style-type: none"> • Amount of erosion to coastal areas • Number of planning applications contrary to the advice by the Environment Agency on flood defence grounds (tidal)
16. Economy	<ul style="list-style-type: none"> • New business registration rate • Floorspace developed by employment type by PDL in coastal towns • Losses of employment land in employment regeneration areas • Retail unit vacancy rates in town centres • Number of vacant sites brought back into use in coastal towns • Amount of completed retail, office and leisure floorspace (net)
17. Economy	<ul style="list-style-type: none"> • Commercial permissions in rural areas.
18. Tourism	<ul style="list-style-type: none"> • Number of jobs in the tourism sector • Contribution to the district's economy made by visitors