

# Strategic Environmental Assessment for the Peacehaven and Telscombe Neighbourhood Plan

Environmental Report to accompany the submission  
version of the Peacehaven and Telscombe  
Neighbourhood Plan

Peacehaven and Telscombe Neighbourhood Plan  
Steering Group

September 2022

## Quality information

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Front cover: Peacehaven and Telscombe Cliffs, sea defence and promenade, available on the [Discovering Fossils](#) webpage.

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# Non-Technical Summary

## What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Peacehaven and Telscombe Neighbourhood Plan. This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socio-economic effects through the Neighbourhood Plan and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

## What is the Peacehaven and Telscombe Neighbourhood Plan?

The Peacehaven and Telscombe Neighbourhood Plan (hereafter referred to as the “PTNP”) has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012.

## Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the PTNP, is the latest document to be produced as part of the SEA process. The first document was the SEA Scoping Report (February 2021), which includes information about the PTNP area’s environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the PTNP and alternatives.
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the PTNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the PTNP has been assessed.
- The appraisal of alternative approaches for the PTNP.
- The likely significant effects of the PTNP.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the PTNP.
- The next steps for the PTNP and accompanying SEA process.

## Assessing reasonable alternatives through the SEA

### Initial shortlisting of sites

There is an identified housing need within the PTNP area, and several potential site options for new development have been identified through the neighbourhood planning process to date, including through a site options assessment process.

In the context of the above, the PTNP Steering Group (with support from an independent planning consultancy) sought to consider the various sites which were available in the Neighbourhood Plan area for development. This was with the aim of shaping development at these locations through the introduction of appropriate Neighbourhood Plan planning policies.

In this respect, a total of ten sites were considered through an initial site assessment process in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation. The sites were identified from the latest available Strategic Housing and Employment Land Availability Assessment (SHELAA) for Lewes District and the South Downs National Park (SDNP), and via a local 'call for sites' process undertaken by Peacehaven Town Council and Telscombe Town Council. Further details on the site selection process (and the results of the assessment) can be found in the Site Assessment Report accompanying the submission version of the PTNP.

Initially the Steering Group were intending on allocating land for development through the PTNP. However, in response to recent engagement with (and advice from) Lewes District Council, the Neighbourhood Group has decided to no longer pursue allocations through the Neighbourhood Plan.

### Assessment of reasonable alternatives for the broad location of development

As mentioned above, the PTNP is not allocating sites for housing following advice from Lewes District Council. In this respect, it would not be appropriate to explore similar options through the SEA.

However, the Steering Group (and community) are keen to consider the potential constraints and opportunities for development within broad locations for development within the Neighbourhood Plan area. It was determined that the character areas identified within the Peacehaven and Telscombe Design Code (2021) would provide a good basis for identifying sub-areas to explore the potential constraints and opportunities associated for development. The Design Code identifies a total of ten areas, and it was appropriate for the purposes of the SEA that some of these areas could be combined. The areas identified for consideration through the SEA process are set out below (and described in detail within the landscape baseline presented in **Appendix A** of the Environmental Report) and their location presented in **Figure 4.1** within the main body of the Environmental Report.

- Area 1: East Saltdean
- Area 2: Telscombe Village
- Area 3: South Downs Fringe
- Area 4: Telscombe & North Peacehaven
- Area 5: Plotlands

- Area 6: Meridian Centre
- Area 7: Coastal Plotlands; and Coastal Road
- Area 8: East Peacehaven; and Mobile Homes

For each of the eight areas a narrative is provided to identify any potential constraints as well as opportunities for development in relation to the SEA Themes. A summary of the key findings is provided below, with the detailed appraisals for each area provided within **Chapter 4** in the main body of the Environmental Report.

**Area 1: East Saltdean:** While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

**Area 2: Telscombe Village:** There are a number of significant constraints to development within this area as a result of landscape and historic environment sensitivity. These constraints and the scale of the existing settlement mean that only small-scale growth could be accommodated.

**Area 3: South Downs Fringe:** Development in this area would be further away from the facilities and services on offer in the existing settlement. Further to this, existing development within this area is at a much lower density compared to the rest of the settlement. The lower density of housing and the presence of the SDNP may restrict potential opportunities for development.

**Area 4: Telscombe & North Peacehaven:** While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

**Area 5: Plotlands:** While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

**Area 6: Meridian Centre:** The area contains a number of important community assets including the Peacehaven Community School, Leisure Centre and Meridian Surgery. There is also a number of existing employment areas. The Meridian Centre is an out of date, low-rise building surrounded by large car parks. As the area is designed for vehicles, it is not very pedestrian friendly and therefore does not support active transport. Development could present an opportunity to improve the pedestrian environment and connectivity to surrounding areas (including the strategic site allocation at Hodder Farm, Peacehaven, which is located immediately to the north of the Meridian Centre).

**Area 7: Coastal Plotlands; and Coastal Road:** While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

**Area 8: East Peacehaven; and Mobile Homes:** The area contains and is in close proximity to a number of constraints, including the SDNP and a range of designated heritage assets. Development in the west of this area is likely to have reasonable access to the services and facilities in Peacehaven, although if development is delivered in the east of the area then accessibility would be reduced.

## Preferred approach in the Neighbourhood Plan in light of the appraisal findings

It is important to acknowledge that the submission version of the Neighbourhood Plan does not allocate sites for new development. This is in response to engagement with Lewes District Council, advising emerging Neighbourhood Plans to not allocate sites at present. Nevertheless, the PTNP is supportive in principle of proposals which would (amongst other considerations):

- Encourage a master planning approach to new development areas which incorporate excellent place-making principles as informed by the Design Code and wider PTNP policy provisions.
- Facilitate a mix of housing (i.e. type, tenure, and affordability) which is accessible and adaptable for all users; and
- Unlock potential opportunity areas for employment and community uses which have been identified in the PTNP area. Such areas include Peacehaven town centre, including the Meridian Centre (as discussed within the appraisal for Character Area 6, presented above), broadly aligning with the provisions for local and district centres in the Lewes Local Plan (see Core Policy 2 and 6).

Additionally, the PTNP does not seek to preclude high quality development in other locations within the PTNP area which meet the policies and objectives of the Neighbourhood Plan. This is further discussed as part of the plan appraisal presented in **Chapter 5** in the main body of this Environmental Report.

## Assessment of the submission version of the Peacehaven and Telscombe Neighbourhood Plan

The submission version of the PTNP presents 39 planning policies for guiding development in the Neighbourhood Plan area. These were developed following extensive community consultation and evidence gathering. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received through community consultation, Regulation 14 consultation, and through recommendations and suggestions proposed through the SEA process.

Chapter 5 within the main body of the Environmental Report presents the findings of the appraisal of the submission version of the PTNP. Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the PTNP. The Environmental Report has presented the findings of the assessment under the following SEA Themes:

- Biodiversity and Geodiversity
- Climate Change
- Landscape
- Historic Environment
- Land, Soil, and Water Resources.
- Population and Community
- Health and Wellbeing
- Transportation

In the context of the above, the assessment has concluded that the submission version of the PTNP is likely to have significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA Themes. This principally links to the PTNP's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), improve availability and accessibility to services, facilities and amenities, and support the regeneration of key opportunity areas within the PTNP area (such as Peacehaven town centre and the Meridian Centre) and opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The PTNP is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthier and active lifestyles. These policy provisions will support the quality of life of residents.

The PTNP will also bring positive effects in relation to the 'Landscape' and 'Historic Environment' SEA Themes. These benefits largely relate to the PTNP's emphasis on protecting and enhancing the relationship between the PTNP area and the South Downs National Park, delivering high-quality design which respects and enhances local distinctiveness and sense of place, protects important landscape, townscape and villagescape features, facilitates improvements to quality of the public realm, and increases awareness, understanding and appreciation of the historic environment. Given the Design Code accompanying the PTNP also sets out a comprehensive range of provisions relating to the natural and built environment, this will help provide an appropriate basis for any development proposals which may come forward during the plan period.

Additionally, the PTNP will bring positive effects in relation to the 'Biodiversity and Geodiversity' SEA Theme by encouraging proposals to protect existing and establish new habitats and wildlife corridors, enhance ecological networks (including through green infrastructure enhancements), and embrace opportunities for nature conservation.

Regarding the 'Climate Change' SEA Theme, the PTNP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (i.e. flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the PTNP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.

The PTNP will also initiate several beneficial approaches regarding the 'Transportation' SEA Theme, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation.

More broadly in relation to the 'Land, Soil, and Water Resources' SEA Theme, the PTNP outlines several provisions will help support the capacity of the landscape and villagescape to regulate soil and water quality. As the PTNP does not contain any site allocations for development, it is also not likely that the PTNP (in its current form) would result in the loss of any areas of productive agricultural land.

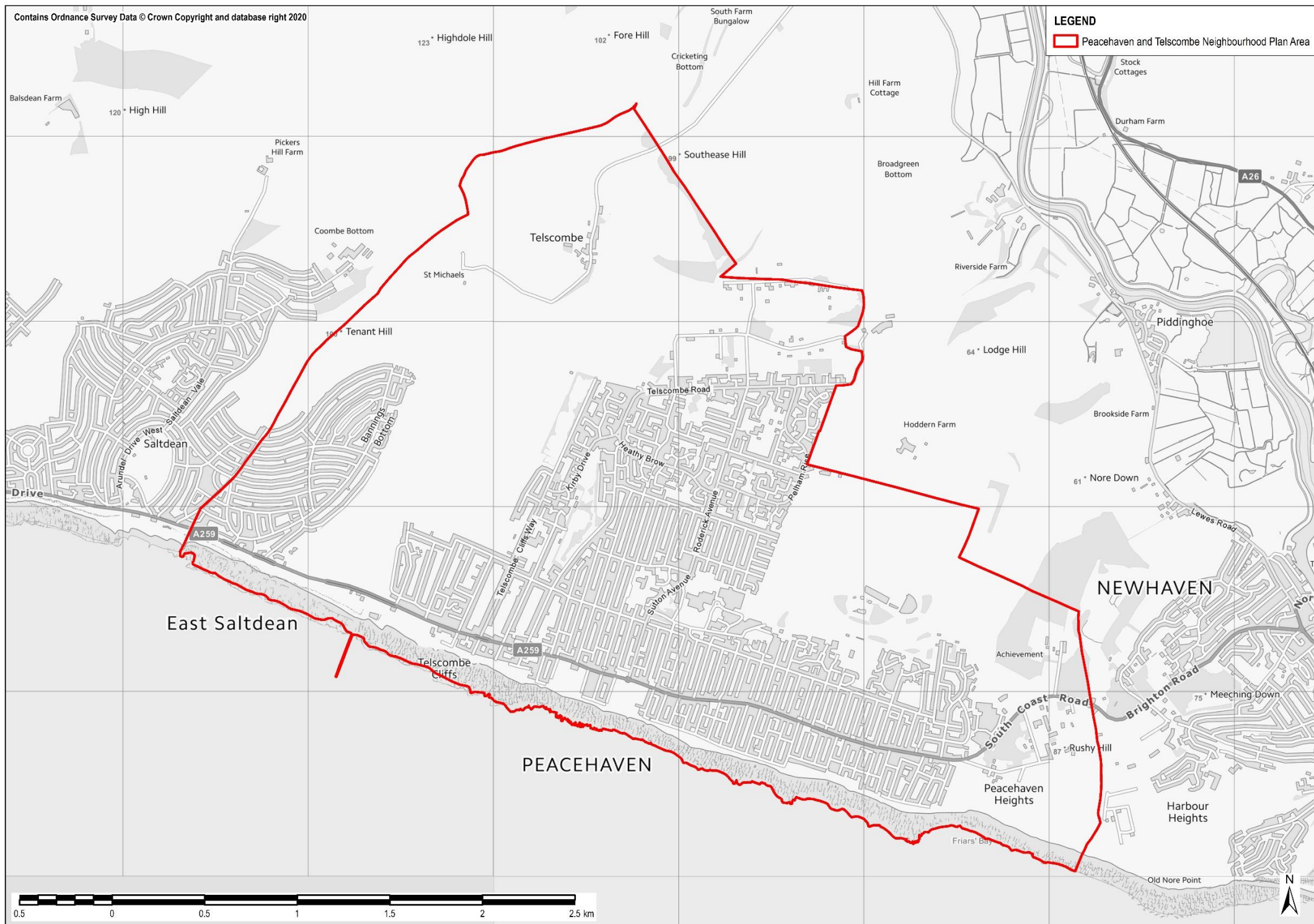


## Next steps

The SEA Environmental Report accompanies the submission version of the PTNP to the responsible authorities, Lewes District Council and the South Downs National Park Authority, for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.

If the Independent Examination is favourable, PTNP will be subject to a referendum, organised by Lewes District Council. If more than 50% of those who vote agree with the PTNP, then it will be 'made'. Once made, PTNP will become part of the Development Plan for the parishes.



# 1. Introduction

## Background

- 1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment in support of Peacehaven and Telscombe's emerging Neighbourhood Plan.
- 1.2 The Peacehaven and Telscombe Neighbourhood Plan (hereafter referred to as "the PTNP") is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The PTNP is being prepared in the context of the Lewes Local Plan, the key documents of which include the Lewes Core Strategy: Local Plan Part 1 (adopted in May 2016) and the Lewes Local Plan Part 2: Site Allocations and Development Management Policies (adopted in February 2020). The PTNP is also being prepared in the context of the South Downs Local Plan (2014-2033).
- 1.3 It is anticipated that the PTNP will be submitted to Lewes District Council and the South Downs National Park Authority later in 2022 for subsequent examination. Key information relating to the PTNP is presented in **Table 1.1**.

**Table 1.1: Key facts relating to the Neighbourhood Plan**

|                               |   |
|-------------------------------|---|
| Name of Responsible Authority | Peacehaven Town Council and Telscombe Town Council  |
| Title of Plan                 | Peacehaven and Telscombe Neighbourhood Plan   |
| Subject                       | Neighbourhood planning  |
| Purpose                       | The PTNP is being prepared as a Neighbourhood Development Plan under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012. The plan will be in general conformity with the Lewes Local Plan (Part 1 and Part 2) and the South Downs Local Plan and will be used to guide and shape development within the PTNP area. |
| Timescale                     | To 2030   |
| Area covered by the plan      | The PTNP area covers the parishes of Peacehaven and Telscombe, located in Lewes District and part of the South Downs National Park.   |
| Summary of content            | The PTNP will set out a vision, strategy, and range of policies for the Neighbourhood Plan area.  |
| Plan contact point            | Jim Boot, Community Planner<br>Email address: <a href="mailto:jimbootcp@gmail.com">jimbootcp@gmail.com</a>  |

## SEA Screening for the Peacehaven and Telscombe Neighbourhood Plan

- 1.4 The PTNP has been screened in by Lewes District Council as requiring a Strategic Environmental Assessment (SEA).
- 1.5 A Neighbourhood Plan requires SEA where it is likely to have significant environmental effects. In this respect, the PTNP has been screened in as requiring an SEA process for the following reasons:
  - The PTNP will encourage and support opportunities for new development. This includes potentially in environmentally sensitive locations, such as:
    - locations within the setting of the South Downs National Park.
    - locations with sensitivity for the historic environment, including nationally designated listed buildings, scheduled monuments, and the Telscombe Conservation Area.
    - locations with sensitivity for biodiversity, including the Brighton to Newhaven Cliffs Site of Special Scientific Interest (SSSI) and Beachy Head West Marine Conservation Zone (MCZ).
- 1.6 In light of this screening outcome, an SEA process is being undertaken to meet the specific requirements prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

## SEA explained

- 1.7 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues.
- 1.8 The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts. Through this approach, the SEA for the PTNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 This is the third document to be produced as part of the SEA process. The first document was the SEA Scoping Report (February 2021), which includes information about the neighbourhood area's environment and community. The second document was the SEA Environmental Report (February 2022) which accompanied the WCNP at Regulation 14 consultation. This Environmental Report accompanies the submission version of the WCNP.

## Structure of this SEA Environmental Report

1.10 This document is the SEA Environmental Report for the PTNP and hence needs to answer all four of the questions listed below with a view to providing the information required by the SEA Regulations. Each of the four questions is answered in turn within this report, as follows:

**Table 1.2: Questions that must be answered by the SEA Environmental Report to meet the regulatory<sup>1</sup> requirements**

| Environmental Report question                       | In line with the SEA Regulations, the report must include... <sup>2</sup>  |
|---|--|
| What is the plan seeking to achieve?                | <ul style="list-style-type: none"> <li>An outline of the contents and main objectives of the plan.</li> </ul>  |
| What is the sustainability 'context'?               | <ul style="list-style-type: none"> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection objectives established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>   |
| What's the scope of the SEA?                        | <ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul> |
| What is the sustainability 'baseline'?              | <ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul> |
| What are the key issues and objectives?             | <ul style="list-style-type: none"> <li>Key problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment.</li> </ul>  |
| What has plan-making/SEA involved up to this point? | <ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with.</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>                                   |
| What are the assessment findings at this stage?     | <ul style="list-style-type: none"> <li>The likely significant effects associated with the submission version of the plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the submission version of the plan.</li> </ul>  |
| What happens next?                                  | <ul style="list-style-type: none"> <li>The next steps for the plan making / SEA process.</li> </ul>  |

<sup>1</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>2</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.



## 2. Local Plan context and vision for the Neighbourhood Plan

### Local Plan context for the Peacehaven and Telscombe Neighbourhood Plan

- 2.1 The Peacehaven and Telscombe Neighbourhood Plan is being prepared in the context of the Lewes Local Plan, the key documents of which include the Lewes Core Strategy: Local Plan Part 1 (adopted in May 2016)<sup>3</sup> and the Lewes Local Plan Part 2: Site Allocations and Development Management Policies (adopted in February 2020)<sup>4</sup>. The Core Strategy sets the overall vision for future land use and provides the framework for the scale and distribution of development up to 2030. It also contains 'core policies' that address key issues facing the district, in relation to sustainable resource management, community development, housing, the economy, the environment and transport. The Local Plan Part 2 contains specific site allocations and sets out more detailed policies for the effective management of development in relation to key issues.
- 2.2 Within the Lewes Core Strategy: Local Plan Part 1, Spatial Policy 1 'Provision of housing and employment land' determines the quantity of housing development across Lewes District over the Plan period. It states that, "in the period between 2010 and 2030, a minimum of 6,900 net additional dwellings will be provided in the plan area (this is the equivalent of approximately 345 net additional dwellings per annum". Spatial Policy 2 'Distribution of housing' sets a minimum of 255 net units within Peacehaven and Telscombe which is contingent on developers identifying and delivering a coordinated package of transport measures required to mitigate the impacts of development on the A259.
- 2.3 In areas where an emerging neighbourhood plan is identifying housing allocations, Local Plan Part 2: Site Allocations and Development Management Policies anticipates that the local needs will meet the minimum requirements as set out in Spatial Policy 2. In this respect, the Local Plan Part 2 outlines that the housing numbers in Spatial Policy 2 are expressed as minimum targets and, where appropriate, growth should exceed the minimum figures.
- 2.4 An Interim Policy Statement for Housing was issued by Lewes District Council in March 2021<sup>5</sup>, which indicated that the housing need figure for Lewes District had been significantly increased by the Government. Due to this, the Neighbourhood Plan requirement of providing 255 homes has been removed, so that any future growth in the district is not limited.
- 2.5 Most of the western area of the Neighbourhood Plan area (including most of Telscombe Parish) is within the boundaries of the South Downs National Park (SDNP). A small area of land within the north western section of Peacehaven Parish is also within the National Park. Adopted in July 2019, the South Downs Local Plan<sup>6</sup> (2014-2033) sets out how the South Downs National Park Authority

<sup>3</sup> Lewes District Council (2016): 'Lewes Core Strategy: Local Plan Part 1', [online] available to access via: [this link](#)

<sup>4</sup> Lewes District Council (2019): 'Lewes Local Plan Part 2: Site Allocations and Development Management Policies', [online] available to access via: [this link](#)

<sup>5</sup> Lewes District Council (2021): 'Draft Interim Policy Statement for Housing Delivery', [online] available to access via [this link](#)

<sup>6</sup> South Downs National Park Authority (2019): 'South Downs Local Plan 2014-2033', [online] available to access via [this link](#)

(SDNPA) will manage development over the plan period, based on the two statutory purposes and duty for national parks, namely:

- Statutory Purpose: To conserve and enhance the natural beauty, wildlife, and cultural heritage of the area.
- Statutory Purpose: To promote opportunities for the understanding and enjoyment of the special qualities of the National Park by the public; and
- Duty: To seek to foster the social and economic well-being of the local communities within the National Park in pursuit of their statutory purposes.

2.6 Neighbourhood plans will form part of the development plan for Lewes District and the SDNP, alongside, but not as a replacement for the Local Plans. Neighbourhood plans are required to be in general conformity with the Local Plans and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plans to provide a clear overall strategic direction for development in Lewes District and the SDNP, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.

## Vision, aims, and objectives for the Peacehaven and Telscombe Neighbourhood Plan

2.7 Developed during the earlier stages of plan making and via community consultation, the vision for the PTNP is as follows:

“

*Peacehaven and Telscombe Towns aim to be sustainable, with clean air and a healthy environment providing a good quality of life for all inhabitants and visitors.*

Vision Statement for the Peacehaven and Telscombe  
Neighbourhood Plan

”

2.8 The vision statement for the PTNP is underpinned by the following strategic aims for development during the plan period:

- By 2030, the area will incorporate active movement for all ages by creating better accessibility to public transport, better cycle routes and walkways. Thus, improving air quality and people's well-being.
- There will be better designed buildings contributing to the character of the area.
- There will be improvements to the public realm, encouraging more outside events and social gatherings.
- Better quality (both physical and technological) employment spaces, encouraging more people to work locally.
- A wider and more diverse range of retail and leisure outlets that will support the needs of the local community, encourage a more vibrant centre, and discourage travel to neighbouring towns for essential goods and services.

- Improvements to community facilities such as libraries, food growing spaces, and meeting spaces, to enable more community interaction and knowledge sharing.
- Improvements to the accessibility of the National Park, Telscombe Village and the cliff top/beach areas which will attract visitors and develop a tourism market.

## 3. What is the scope of the SEA?

### Summary of SEA Scoping

- 3.1 The SEA Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”*.
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England.<sup>7</sup> These authorities were consulted on the scope of the SEA in February 2021.
- 3.3 The purpose of scoping was to outline the ‘scope’ of the SEA through setting out the following information:
  - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the PTNP.
  - Baseline data against which the PTNP can be assessed.
  - The key sustainability issues for the PTNP.
  - An ‘SEA Framework’ of objectives against which the PTNP can be assessed.
- 3.4 Responses received on the Scoping Report, and how they were addressed, have been summarised below.

**Table 3.1: Consultation responses received on the SEA Scoping Report**

| Consultation response   | How the response was considered and addressed |
|---|---|
| <b>Historic England</b><br><i>Historic Places Adviser (email response received on 9<sup>th</sup> March 2021)</i>  |   |
| Thank you for forwarding this scoping report for the Telscombe and Peace Haven Neighbourhood Plan for consultation. The report provides a perfectly comprehensive review of the historic environment features, data sources and issues within the neighbourhood plan area and an appropriate proposed framework for assessment of the plan’s effects for the historic environment and the heritage assets within the plan area. | Comment noted.                                |

<sup>7</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme’.

| Consultation response   | How the response was considered and addressed  |
|---|--|
| <b>Environment Agency</b><br><i>Sustainable Places Team (email response received on 9<sup>th</sup> March 2021)</i>  |  |
| <p>Thank you very much for consulting us on the Scoping Report for the Strategic Environmental Assessment (SEA) for the Peacehaven and Telscombe Neighbourhood Plan (report dated February 2021, V2.0, by AECOM Limited).</p> <p>Overall, we are satisfied with the scope of the report and the range of topics that have been proposed to be 'scoped in' for the SEA, and also the assessment questions set out within the report.</p> <p>The following topics will be of most interest to us within our remit:</p> <ul style="list-style-type: none"> <li>• Biodiversity and geodiversity</li> <li>• Climate change (in respect of coastal erosion, flooding from the sea and rivers)</li> <li>• Land, soil, and water resources</li> </ul> | <p>Comment noted.</p>  |
| <p>For your information, we are in the initial stages of looking at options for a flood and coastal risk management scheme for Telscombe, including options for both the protection of the cliffs and the alternative option of rolling back development from the coast. We note that the report (section 4.8) mentions the latter option in relation to the Flood and Water Management Act 2010.</p>   | <p>Comment noted.</p>  |
| <b>Natural England</b><br><i>Consultations Team (email response received on 2<sup>nd</sup> February 2021)</i>   |  |
| <p>If you do not receive a response from Natural England (or communication on a revised response date), we have no specific comments to make. Please refer to our general advice in the Annex below.</p>  | <p>Comment noted. The advice within the annex has been a useful reference point during the subsequent stages of the SEA.</p>   |
| <b>South Downs National Park Authority</b><br><i>Senior Planning Policy Officer (email response received on 9<sup>th</sup> March 2021)</i>  |  |
| <p>General:</p> <ul style="list-style-type: none"> <li>• Map on page 4 may be useful to show the South Downs National Park. Show the distinction between what parts of the Neighbourhood Area are within the National Park.</li> <li>• Showing this on all maps in general would be useful.</li> </ul>  | <p>Comment noted. The boundary of the South Downs National Park is included in the historic environment and landscape designation figure in Appendix A of this Environmental Report (specifically section A.4)</p> |



| Consultation response  | How the response was considered and addressed   |
|--|---|
| <p>Chapter 1, Introduction Table 1.1:</p> <ul style="list-style-type: none"> <li>This section does not mention the South Downs National Park development plan. The table omits the relationship with the South Downs Local Plan (SDLP). As the part of the Neighbourhood Area within the National Park will need to be in conformity with the Development Plan of the South Downs.</li> </ul>  | <p>Comment noted. Chapter 1 has been appropriately revised to acknowledge the relationship with the South Downs Local Plan.</p>   |
| <p>Baseline Information – Biodiversity and Geodiversity:</p> <ul style="list-style-type: none"> <li>Does not mention SDLP Section 5B and Policy SD9: Biodiversity and Geodiversity.</li> <li>Could also refer to the Background paper (Evidence base for SDLP): accessible <a href="#">here</a></li> </ul>   | <p>Comment noted. The background paper has been a useful source of reference during the preparation of the Neighbourhood Plan and through the SEA process.</p>  |
| <p>Climate Change:</p> <ul style="list-style-type: none"> <li>SDLP Section 7K Climate Change and Policy SD48: Climate Change and Sustainable use of Resources</li> <li>Could refer to Climate change adaptation plan (SDNPA): accessible <a href="#">here</a></li> </ul>   | <p>Comment noted. The adaptation plan has been a useful source of reference during the preparation of the Neighbourhood Plan and through the SEA process.</p>   |
| <p>Landscape:</p> <ul style="list-style-type: none"> <li>No mention of the SDLP in the Landscape section or introduction to the National Park. Could have a map that shows the part of the Neighbourhood Area within the SDNP for clarity.</li> <li>Landscape background paper (SDNPA 2017) – accessible <a href="#">here</a> and <a href="#">here</a></li> <li>More updated information on our website - <a href="#">here</a> and our new mapping system.</li> <li>South Downs Viewshed Analysis 2015 Views are one of the special qualities of the National Park, and we have undertaken research in order to protect and conserve these views and others like them. This is shown in our Viewshed study. These should be taken in account in the Sustainability Appraisal.</li> <li>The English National Parks and the Broads Circular (2010)</li> <li>Environment Act 1995</li> <li>We appreciate the information on the National Park in this section.</li> </ul> | <p>Comment noted. The background documents and papers have been a useful source of reference during the preparation of the Neighbourhood Plan and through the SEA process.</p> <p>Potential landscape and visual impacts associated with the Neighbourhood Plan are considered through the appraisal of the PTNP policies. This is presented within Chapter 5 of the Environmental Report, specifically within the Landscape section.</p> |
| <p>Other:</p> <ul style="list-style-type: none"> <li>South Downs National Park has International Dark Night Skies Reserve Status. It would be good to see the protection of dark night skies within the landscape objective of the sustainability framework.</li> <li>Heritage assets should also include archaeology.</li> </ul>  | <p>Comment noted. The landscape objectives and historic environment objectives within the SEA Framework have been revisited and enhanced as recommended.</p>  |

3.5 Baseline information (including the context review and baseline data) is presented in Appendix A. The key sustainability issues and SEA Framework are presented below.

## Key Sustainability Issues

### Air Quality

- There are no AQMAs within the Neighbourhood Plan area. Reflecting the results of the air quality monitoring, all three sites in Peacehaven did not exceed the national objective of 40 µg/m<sup>3</sup> for the annual mean concentrations of NO<sub>2</sub> throughout 2017 or 2018.
  - NO<sub>2</sub> is the key pollutant of concern within the Neighbourhood Plan area, particularly along South Coast Road (the A259).
  - There are two AQMAs to the east and west of the Neighbourhood Plan area which may be impacted by future growth within Peacehaven and Telscombe, specifically: Newhaven AQMA and Brighton and Hove AQMA.
  - It will be important to consider any potential traffic and congestion issues arising within and surrounding the Neighbourhood Plan area as a result of new development proposals.
- 3.6 Nonetheless, due to the absence of any significant air quality issues within the Neighbourhood Plan area, **the Air Quality Theme has been scoped out of the SEA process.**

### Biodiversity and Geodiversity

- There are two Special Areas of Conservation within a 10km radius of Peacehaven and Telscombe, namely: Castle Hill SAC (to the north west) and Lewes Downs SAC (to the north).
- The 'Brighton to Newhaven Cliffs' Sites of Special Scientific Interest (SSSI) is located along the coastal boundary of the Neighbourhood Plan area.
- The southern half of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward during the plan period (i.e., residential, rural-residential or rural non-residential development types).
- A key reason for the Beachy Head West MCZ designation (along the coastal Neighbourhood Plan area boundary) is the extensive intertidal wave cut chalk platforms and subtidal chalk ridges, which are among the best examples of marine chalk habitat in the South East.
- There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of good quality semi-improved grassland, areas of deciduous woodland, and areas of maritime cliff and slope.
- The Sussex Biodiversity Records Centre contains records of protected or notable species within Peacehaven and Telscombe. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians, and reptiles.

## Climate Change

- Source data from the Department of Energy and Climate Change suggests that Lewes District has observed a 39.9% reduction in total emissions per capita since 2005, lower than the totals for East Sussex (40.0%), the South East (41.3%) and England (41.1%).
- Lewes District Council declared a climate emergency in 2019, and has resolved to support local authorities (and, by extension, Neighbourhood groups) to help tackle climate change through plan-making where possible.
- The Neighbourhood Plan should seek to maximise opportunities to support actions in tackling climate change. This may include through encouraging sustainable transport technologies, such as the use of EVs, and through the use of sustainable drainage systems.
- The transportation sector is the second largest source of emissions within Lewes District, contributing 37% of the district's total emissions.
- Areas of land within Flood Zone 3 are broadly confined to the coastal boundary of the Neighbourhood Plan area. Future growth and development should be directed away from the high-risk areas.
- There are several areas of Peacehaven and Telscombe which have a medium-high surface water flood risk, primarily the local road network. This includes sections of South Coast Road, Telscombe Cliffs, Saltdean,
- Banning's Bottom, Buckhurst Road, Cliff Gardens, Ashington Gardens, The Oval, View Road, Firle Road, and at Peacehaven Sewage Treatment Works.
- Peacehaven and Telscombe are located within proximity to the Brighton to Newhaven Cliffs. The cliff-edge is particularly vulnerable to erosion, both at the base and at the cliff-face. Climate change impacts have the potential to increase the risk of erosion, with more frequent rainfall events and intense storms speeding the weathering process.

## Landscape

- Most of the western area of the Neighbourhood Plan area (including most of Telscombe Parish) is within the boundaries of the South Downs National Park (SDNP). A small area of land within the north western section of Peacehaven Parish is also within the SDNP.
- The Neighbourhood Plan area is within the South Downs NCA. The NCA meets the sea in the distinctive chalk cliffs of Beachy Head and the Seven Sisters, and 90% of the NCA falls within the South Downs National Park. The NCA profile for this landscape details four statements of environmental opportunity and one additional opportunity.
- The Design Code for the emerging Peacehaven and Telscombe Neighbourhood Plan classifies the Neighbourhood Plan area into eight local character areas. New development areas should safeguard and positively contribute to the distinctiveness of these areas.
- Based on the results of the Landscape Capacity Study, most of the undeveloped areas surrounding Peacehaven and Telscombe have limited capacity to accommodate new development areas.

- Lewes District Council have designated numerous TPOs in the interest of their amenity value, including within Telscombe village.
- Locally important viewpoints include of the Brighton to Newhaven chalk cliffs which stretch along the coastline of the Neighbourhood Plan area. There are also some longer views to the South Downs National Park to the north east and to the north west.

## Historic Environment

- The Neighbourhood Plan area contains 18 Grade II listed buildings and one Grade I listed building, namely: 'The Parish Church of St Lawrence' (located in Telscombe). Notably, 17 out of the 18 Grade II listed buildings are within Telscombe, with most overlapping with the boundaries of the Telscombe Conservation Area.
- It is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.
- There are four scheduled monuments within the Neighbourhood Plan area, including: Bowl barrow on Peacehaven Heights, 242m south-west of Warren Court; Bowl barrow on Telscombe Tye, 650m south-west of Pedlersburgh; Cross dyke on Telscombe Tye; and Pedlersburgh: a bowl barrow on Telscombe Tye.
- Telscombe Conservation Area was designated in August 1973 and encompasses the village of Telscombe. Important buildings which contribute to the special qualities of the Telscombe Conservation Area include: Manor House, The Old Rectory, Telscombe Village Club, The Old School House, Stud House and Farm, and the Parish Church of St Laurence.
- In between the more imposing buildings of the Telscombe Conservation Area are many modest attractive cottages, including Manor Cottage, Oak Cottage, Box Tree Cottage, Bank Cottages and White Cottages. The mature trees, flint walls and open spaces that surround and thread through the village help to identify the settlement.
- The Telscombe Conservation Area Appraisal notes that that the village does not contain a great number of features which actively detract from its overall character. However, the northernmost 90 metres of kerbstones around Hillview are concrete, and their replacement with more appropriate materials is encouraged.
- Following a high-level review of the East Sussex HER, there are 99 records within Peacehaven and 37 records within Telscombe. During the subsequent stages of the SEA process, the East Sussex HER will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred development strategy within the Neighbourhood Plan.

## Land, Soil, and Water Resources

- The provisional ALC dataset provided by Natural England indicates that the undeveloped areas surrounding Peacehaven and Telscombe are predominantly underlain by areas of Grade 2 and Grade 3 agricultural land. In the absence of a detailed ALC assessment it is currently not possible to

determine whether the Grade 3 areas can be classified as Grade 3a (i.e. best and most versatile land) or Grade 3b land.

- The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England provided by Natural England indicates that most of the undeveloped areas of land in surrounding Peacehaven has a greater than 60% chance of being underlain by BMV agricultural land.
- The water resources located within and within proximity to the Neighbourhood Plan area are limited to a few isolated dew ponds.
- The whole of the Neighbourhood Plan area is within the Sussex Chalk Groundwater NVZ, with the north western section of Telscombe Parish within a Zone III – Total Catchment SPZ.
- Reflecting the results of the 2019 water quality assessments undertaken by the Environment Agency, none of the waterbodies within the Ouse Upper Operational Catchment are classified as 'good'. The RNAGs for these watercourses are primarily attributed to the water industry sector and the agriculture and rural land management sector.
- Regarding waste management, Hoyle Road in Peacehaven is identified as a potential area of opportunity within the East Sussex Minerals and Waste Plan.

## Population and Community

- Based on mid-2018 population estimates, the total population of the Neighbourhood Plan area has grown to 23,273 residents, a further increase of approximately 8% since 2011 levels.
- The largest group of residents in the Neighbourhood Plan area are in the 60+ age category (29.5%), higher than comparative figures for the South East (23.4%) and England as a whole (22.3%).
- As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community, whilst also placing additional pressures on existing services and facilities.
- For those households which demonstrate deprivation in the Neighbourhood Plan area, most are deprived in one dimension (35.2%), and this is similar compared to the figures for Lewes District (33.7%), the South East (32.2%) and England (32.7%). Notably however, there is a higher percentage of households deprived in two dimensions when compared to Lewes District, the South East, and England.
- Based on the 2019 IMD, the highest overall levels of deprivation are within the north eastern section of the Neighbourhood Plan area, in Peacehaven Parish. Barriers to housing and services is a particular issue.
- The services and facilities within the Neighbourhood Plan area supports community vitality and the quality of life of residents, with the availability of community assets essential for continued growth within the Neighbourhood Plan area.
- As the requirements of the working population continue to change, particularly in response to the COVID-19 pandemic, there is likely to be a



requirement for adaptable dwellings which can accommodate more flexible working practices.

## Health and Wellbeing

- Green spaces within the Neighbourhood Plan area include Centenary Park, Chatsworth Park, Telscombe Tye, Telscombe Cliffs, Epinay Park, Firle Road West Play Area, Mitcheldean, Howards Park, Shepherds Down, The Dell, The Oval, and Sports Park / Big Park.
- The Public Health Profile for Lewes District indicates that the rate of killed and seriously injured on roads is worse than the England average.
- The percentage of residents that have 'bad' health or 'very bad health' in the Neighbourhood Plan area (6.9%), is slightly above that of Lewes District (5.4%), South East England (4.3%) and England (5.4%).
- Based on 2011 Census data, approximately 22% of residents in the Neighbourhood Plan area report that their daily activities are limited in some way.
- Access to health care provision within the Neighbourhood Plan area will continue to be important in response to population growth and an increasing ageing population.

## Transportation

- There are no rail stations located in the Neighbourhood Plan area. The nearest stations are in the neighbouring settlements of Brighton and Hove, and Newhaven.
- There are several bus routes passing through Peacehaven and Telscombe. The frequency of services varies, and it will be important for the Neighbourhood Plan to continue to facilitate and encourage a transition to more sustainable methods of transportation.
- The A259 road, or the South Coast Road, is where most congestion is reported and is a concern for the residents of Neighbourhood Plan area. Development within the Neighbourhood Plan area should consider ways to mitigate congestion along the A259.
- Additional traffic pinch points include the roundabout between Sutton Avenue and Greenwich Way, traffic merging into Roderick Avenue from side streets, and Kirby Drive which becomes Telscombe Road.
- The most common form of travel to work for Peacehaven and Telscombe residents is via car or van (40.1%), higher than averages for Lewes District (37.6%) and England (37.0%).
- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the village in the short, medium and (potentially) longer term.

## SEA Framework

3.7 The SEA Framework provides a way in which environmental effects can be defined and subsequently analysed based on standard 'tests'. Each proposal within the current version (i.e., the submission version) of the PTNP will be assessed consistently using the framework.

**Table 3.2: SEA Framework of objectives and assessment questions**

| SEA Objective  | Assessment questions to consider for the allocations / proposals within the Peacehaven and Telscombe Neighbourhood Plan   |
|--|---|
| <b>Biodiversity and Geodiversity</b>   |   |
| Protect and enhance all biodiversity and geodiversity  | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the integrity of the European designated biodiversity sites located within proximity to the Neighbourhood Plan area?</li> <li>• Support the status of the nationally and locally designated sites biodiversity sites within and within proximity to the Neighbourhood Plan area?</li> <li>• Protect and enhance priority habitats and species, including those listed in the annexes of the European Habitats Directive and the European Birds Directive?</li> <li>• Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks?</li> <li>• Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> <li>• Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul> |
| <b>Climate Change</b>  |   |
| Reduce the contribution to climate change made by activities within the Neighbourhood Plan area                      | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the number of journeys made?</li> <li>• Reduce the need to travel?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Increase the number of new developments meeting or exceeding sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>   |
| Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that inappropriate development does not take place in areas at higher risk of fluvial, groundwater and surface water flooding, taking into account the likely future effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the Neighbourhood Plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the Neighbourhood Plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area?</li> <li>• Encourage the use of sustainable drainage techniques through new infrastructure provision?</li> </ul>  |

| SEA Objective   | Assessment questions to consider for the allocations / proposals within the Peacehaven and Telscombe Neighbourhood Plan  |
|---|--|
| <b>Landscape</b>  |  |
| Protect and enhance the character and quality of landscapes, townscapes and villagescapes.                  | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the special qualities of the South Downs National Park and the Neighbourhood Plan area?</li> <li>• Conserve and enhance locally important landscape, townscape and villagescape features within the Neighbourhood Plan area?</li> <li>• Conserve and enhance local diversity and character?</li> <li>• Protect and enhance locally important viewpoints which contribute to the unique sense of place and visual amenity of the Neighbourhood Plan area?</li> <li>• Protect dark night skies?</li> </ul>  |
| <b>Historic Environment</b>   |  |
| Protect, conserve, and enhance heritage assets within the Neighbourhood Plan area                           | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting?</li> <li>• Conserve and enhance the special interest, character and appearance of locally important features and their settings?</li> <li>• Guide development proposals to secure remediation of issues identified as affecting the conservation areas and prevent cumulative impacts?</li> <li>• Support the integrity and the historic setting of sites of archaeological or historic interest recorded on the East Sussex HER?</li> <li>• Support access to, interpretation and understanding of the historic evolution and character of the environment?</li> <li>• Conserve and enhance archaeological remains, including historic landscapes?</li> </ul> |
| <b>Land, Soil, and Water Resources</b>  |  |
| Ensure the efficient and effective use of land.   | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1 to 3a agricultural land?</li> <li>• Protect the integrity of mineral resources?</li> </ul>   |
| Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste. | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>   |
| Use and manage water resources in a sustainable manner.   | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that there is no deterioration to water quality, whilst supporting improvements consistent with the aims of the River Basin Management Plan?</li> <li>• Protect surface water and groundwater resources?</li> <li>• Minimise water consumption?</li> </ul>  |

| SEA Objective  | Assessment questions to consider for the allocations / proposals within the Peacehaven and Telscombe Neighbourhood Plan   |
|--|---|
| <b>Population and Community</b>  |   |
| Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities. | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Encourage and promote employment opportunities to support economic vitality?</li> </ul>  |
| Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.                                 | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>  |
| <b>Health and Wellbeing</b>  |   |
| Improve the health and wellbeing residents within the Neighbourhood Plan area.   | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Address the key challenges identified in the JSNA?</li> <li>• Support green infrastructure networks?</li> <li>• Provide and enhance the provision of community access to green infrastructure in accordance with Accessible Natural Greenspace Standards?</li> <li>• Protect and enhance access to nature via greenspace, footpaths and cycleways?</li> <li>• Promote the use of active modes of travel?</li> <li>• Encourage healthy lifestyles and reduce health inequalities?</li> <li>• Improve access to the countryside for recreational use?</li> <li>• Avoiding any negative impacts to the quality and extent of existing recreational assets, such as formal or informal footpaths?</li> </ul> |
| <b>Transportation</b>  |   |
| Promote sustainable transport use and reduce the need to travel.   | <p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents and the built environment from the road network?</li> </ul>  |

## 4. Assessing reasonable alternatives through the SEA

### Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include...
- An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, the following sections describe how the SEA process to date has informed the consideration of different approaches for key elements of the PTNP.

### Overview of plan making undertaken to date

#### Consultation events to support the development of the Neighbourhood Plan

- 4.3 Significant public consultation has been carried out to date to support the emerging PTNP. This has gathered local views and opinions, with a view to engaging local people throughout the Neighbourhood Plan's development process. This has included (but is not limited to) the following key events, community surveys, and evidence base studies for the PTNP (the results of which are accessible on the Neighbourhood Plan's webpages)<sup>8</sup>:
- Initial conversations in April 2018 to discuss the strengths, weaknesses, and opportunities for Peacehaven and Telscombe, along with public exhibitions to inform and engage the community in the process.
  - Site Options and Assessment Report (November 2019).
  - Evidence base reports prepared by the University of Brighton in June 2020 on behalf of the PTNP Steering Group, specifically focusing on climate and coastal change and transport and air quality.
  - Peacehaven Town Centre (including the Meridian Centre) Masterplan (October 2020) and Consultation Report and Analysis (March 2021).
  - Publication of regular newsletters, local surveys (and results), and regular public meetings throughout the development of the PTNP.
  - Preparation of the Peacehaven and Telscombe Design Code (June 2021).
  - Regulation 14 consultation (between February and March 2022)

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<sup>8</sup> PTNP Steering Group (2022): 'Neighbourhood Plan Documents', [online] available to access via [this link](#)



## Initial shortlisting of sites

- 4.4 There is an identified housing need within the PTNP area, and several potential site options for new development have been identified through the neighbourhood planning process to date, including through a site options assessment process.
- 4.5 In the context of the above, the PTNP Steering Group (with support from an independent planning consultancy) sought to consider the various sites which were available in the Neighbourhood Plan area for development. This was with the aim of shaping development at these locations through the introduction of appropriate Neighbourhood Plan planning policies.
- 4.6 In this respect, a total of ten sites were considered through an initial site assessment process in terms of their suitability, availability, and achievability for the purposes of a potential Neighbourhood Plan allocation. The sites were identified from the latest available Strategic Housing and Employment Land Availability Assessment (SHELAA) for Lewes District and the SDNP, and via a local 'call for sites' process undertaken by Peacehaven Town Council and Telscombe Town Council. Further details on the site selection process (and the results of the assessment) can be found in the Site Assessment Report accompanying the submission version of the PTNP.
- 4.7 Initially the Steering Group were intending on allocating land for development through the PTNP. However, in response to recent engagement with (and advice from) Lewes District Council, the Neighbourhood Group has decided to no longer pursue allocations through the Neighbourhood Plan.

## Assessment of reasonable alternatives for the broad location of development

- 4.8 As mentioned above, the PTNP is not allocating sites for housing following advice from Lewes District Council. In this respect, it would not be appropriate to explore similar options through the SEA.
- 4.9 However, the Steering Group (and community) are keen to consider the potential constraints and opportunities for development within broad locations for development within the Neighbourhood Plan area. It was determined that the character areas identified within the Peacehaven and Telscombe Design Code (2021) would provide a good basis for identifying sub-areas to explore the potential constraints and opportunities associated for development. The Design Code identifies a total of ten areas, and it was appropriate for the purposes of the SEA that some of these areas could be combined. The areas identified for consideration through the SEA process are set out below (and described in detail within the landscape baseline presented in Appendix A of the Environmental Report) and their location presented in **Figure 4.1**.
- Area 1: East Saltdean
  - Area 2: Telscombe Village
  - Area 3: South Downs Fringe
  - Area 4: Telscombe & North Peacehaven
  - Area 5: Plotlands

- Area 6: Meridian Centre
- Area 7: Coastal Plotlands; and Coastal Road
- Area 8: East Peacehaven; and Mobile Homes

4.10 For each of the eight areas a narrative is provided to identify any potential constraints as well as opportunities for development in relation to the SEA Themes.

4.11 The sources of information used include (amongst others): Ordnance Survey maps; MAGIC Interactive Map<sup>9</sup>; the Environment Agency's Flood Risk Maps for England<sup>10</sup>; Google Earth<sup>11</sup>; interactive maps and documents available to access on Lewes District Council's and the SDNPA's webpages; national and local planning policy documents; and baseline studies accessible via the Peacehaven and Telscombe Neighbourhood Planning website<sup>12</sup>.

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<sup>9</sup> MAGIC (2022): 'Interactive Map', [online] available to access via [this link](#)

<sup>10</sup> Environment Agency (2022): 'Flood Map for Planning', [online] available to access via [this link](#)

<sup>11</sup> Google (2022): 'Google Earth', [online] available to access via [this link](#)

<sup>12</sup> PTNP Steering Group (2022): 'Neighbourhood Plan Documents', [online] available to access via [this link](#)



**Figure 4.1 Character areas which have been considered through the SEA**



## Appraisal findings

4.12 The potential opportunities and constraints for each of the eight areas are set out below.

### Character Area 1: East Saltdean



Figure 4.2: East Saltdean

- 4.13 In terms of constraints, Area 1 borders Brighton to Newhaven Cliffs Site of Special Scientific Interest (SSSI) to the south. It falls within the Impact Risk Zone (IRZ) for this SSSI, and residential development in the south of the area is more restricted than in the north. Specifically, within 50 metres of the SSSI the IRZ is for 'all planning applications', within 200 metres it is for 'residential development of 10 units or more', and within 500 metres it is for 'any residential development of 50 or more houses outside existing settlements / urban areas'.
- 4.14 This area is in close proximity to Beachy Head West Marine Conservation Zone (MCZ) on the coastline and it also borders a large swathe of 'good quality semi-improved grassland' to the east and 'maritime cliff and slope' to the south.
- 4.15 Bannings Vale, a road that spans the length of Area 1, running close to the eastern boundary of the area, is at risk of surface water flooding with some parts of the road classed as medium to high risk of flooding.
- 4.16 In terms of landscape, Area 1 borders the South Downs National Park (SDNP) to the north west and east.
- 4.17 There are two Grade II listed buildings in close proximity to the western boundary of Area 1, which are Walls and Gate Piers to the Ocean Hotel<sup>13</sup> and The Ocean Hotel Front Block<sup>14</sup>. Moreover, there are two scheduled

<sup>13</sup> Historic England (no date): 'Walls and Gate Piers to the Ocean Hotel', [online] available to access via [this link](#)

<sup>14</sup> Historic England (no date): 'The Ocean Hotel Front Block', [online] available to access via [this link](#)

monuments near the northern eastern / eastern boundary of Area 1, which are Pedlersburgh<sup>15</sup> and Bowl barrow on Telscombe Tye<sup>16</sup>.

- 4.18 While there are few services/ facilities within the area residents have access to a good range of services/ facilities in the wider area.
- 4.19 While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

### Character Area 2: Telscombe Village



Figure 4.3: Telscombe Village

- 4.20 In terms of constraints, Area 2 falls within the IRZ for Lewes Brooks SSSI, located north east of the area. However, as the area is located in one of the outer IRZs, residential development is not restricted. The area contains a small area of 'traditional orchid' in the west half and 'deciduous woodland' in the eastern half. The latter forms part of a wildlife corridor connecting it to a larger area of deciduous woodland to the east.
- 4.21 Only a very small area on the eastern side of Area 2 is at high risk of surface water flooding.
- 4.22 The area falls within the SDNP and contains the Telscombe Conservation Area. There is one Grade I listed building in Area 2, which is the Parish Church of St Lawrence. In addition to this, there are 16 Grade II listed buildings concentrated in the middle of the area. There is also a scheduled monument, cross dyke on Telscombe Tye, located to the south west. Two features listed on

<sup>15</sup> Historic England (no date): 'Pedlersburgh: a bowl barrow on Telscombe Tye', [online] available to access via [this link](#)

<sup>16</sup> Historic England (no date): 'Bowl barrow on Telscombe Tye, 650m south west of Pedlersburgh', [online] available to access via [this link](#)



the HER are present in Area 2, which are the Old Rectory and land at Southover (flood alleviation scheme).

- 4.23 Telscombe Village is remote and only accessible via a winding dead-end road, and as most of the amenities are within Peacehaven, residents are largely reliant on the use of private vehicle.
- 4.24 There are a number of significant constraints to development within this area as a result of landscape and historic environment sensitivity. These constraints and the scale of the existing settlement mean that only small-scale growth could be accommodated.

### Character Area 3: South Downs Fringe



Figure 4.4: South Downs Fringe

- 4.25 In terms of constraints, this area falls within the IRZ for Lewes Brooks SSSI and part of the IRZ for Brighton to Newhaven Cliffs SSSI. However, as the area is located in one of the outer IRZs for both sites, residential development is not restricted.
- 4.26 Over half of Area 3 is covered by good quality semi-improved grassland priority habitat. It also contains smaller areas of deciduous woodland, concentrated in the southern half of the site.
- 4.27 Valley Road, which runs through the middle of Area 3 and spans the width of it, is at risk of surface water flooding with some parts of the road classed as medium risk of flooding.

- 4.28 In terms of landscape, the area borders the SDNP on all sides apart from the southern boundary. There is one Grade II listed building, Halcombe Farmhouse<sup>17</sup>, in close proximity to the eastern boundary.
- 4.29 The north western half of Area 3 contains agricultural land. According to the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England<sup>18</sup>, this area has a high likelihood (>60%) of being underlain by BMV land.
- 4.30 Development in this area would be further away from the facilities and services on offer in the existing settlement. Further to this, existing development within this area is at a much lower density compared to the rest of the settlement. The lower density of housing and the presence of the SDNP may restrict potential opportunities for development.

#### Character Area 4: Telscombe & North Peacehaven



Figure 4.5: Telscombe & North Peacehaven

- 4.31 Area 4 falls within the IRZ for Brighton to Newhaven Cliffs SSSI and part of the IRZ for Lewes Brooks SSSI. However, as the area is located in one of the outer IRZs for both sites, residential development is not restricted.
- 4.32 In terms of BAP Priority Habitats, Area 4 contains three small areas of deciduous woodland located in the north, north east and south west.
- 4.33 Surface water flooding is relatively widespread across Area 4, with roads classed as medium to high risk of flooding being St Peters Avenue, Central Avenue, Firlie Road, Roderick Avenue, Heathy Brow, Kirby Drive, Carey Down,

<sup>17</sup> Historic England (no date): 'Halcombe Farmhouse', [online] available to access via [this link](#)

<sup>18</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)', [online] available to access via [this link](#)



Woodlands Close, Abbey Close, Pelham Rise, Trafalgar Close, Rosemary Close, Collingwood Close, and The Bricky.

- 4.34 In terms of landscape, Area 4 borders the SDNP to the north east and west. There is one Grade II listed building in the western half of Area 4, which is the former Shepherd's hut in the garden of 7.<sup>19</sup> Four features listed on the HER are present in Area 4, which are Meridian CP School, land at 10 Stanley Road, Lower Hoddern Farm, and near Hoddern Farm.
- 4.35 While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

### Character Area 5: Plotlands



Figure 4.6: Plotlands

- 4.36 Area 5 is in close proximity to Brighton to Newhaven Cliffs SSSI to the south. It falls within the IRZ for this SSSI, with residential development in the south of the site being more restricted than in the north. Area 5 falls within 500 metres of the SSSI where the IRZ is for 'any residential development of 50 or more houses outside existing settlements / urban areas'.
- 4.37 In terms of BAP Priority Habitats, Area 5 borders good quality semi-improved grassland to the east and west.
- 4.38 Surface water flooding is relatively widespread across Area 5, with roads classed as medium to high risk of flooding being Amhurst Road, Buckhurst Road, Cliff Gardens, Fairlight Avenue, Telscombe Cliffs Way, St Peters Avenue, Malines Avenue, Rowe Avenue, Sutton Cavell Link Road, Cavell Avenue, Roderick Avenue, Greenwich Way, Slindon Avenue, Vernon Avenue, Ashington

<sup>19</sup> Historic England (no date): 'Former Shepherd's hut in the garden of 7, The Compts', [online] available to access via [this link](#)

Gardens, Balcombe Road, Lake Drive, Firle Road, Dorothy Avenue North, Bramber Avenue North, and View Road.

- 4.39 In terms of landscape, Area 5 borders the SDNP to the north west. There is one scheduled monument, Bowl barrow on Telscombe Tye<sup>20</sup>, in close proximity to the north western boundary of Area 5. Four features listed on the HER are present in this area, which are Telscombe Cliffs and land at 43, 46 and 52 Dorothy Avenue.
- 4.40 While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

### Character Area 6: Meridian Centre



Figure 4.7: Meridian Centre

- 4.41 Area 6 falls within the IRZ for Brighton to Newhaven Cliffs SSSI. However, as the area is located in one of the outer IRZs, residential development is not restricted. In terms of BAP Priority Habitats, the south western corner of Area 6 contains a small area of deciduous woodland.
- 4.42 Greenwich Way, a road which runs through most of Area 6, is at risk of surface water flooding with some parts of the road classed as medium to high risk of flooding.
- 4.43 One feature listed on the HER is present in the north eastern corner of Area 6, which is Brighton and Hove WWTW.
- 4.44 The area contains a number of important community assets including the Peacehaven Community School, Leisure Centre and Meridian Surgery. There is also a number of existing employment areas. The Meridian Centre is an out

<sup>20</sup> Historic England (no date): 'Bowl barrow on Telscombe Tye, 650m south west of Pedlersburgh', [online] available to access via [this link](#)



of date, low-rise building surrounded by large car parks. As the area is designed for vehicles, it is not very pedestrian friendly and therefore does not support active transport. Development could present an opportunity to improve the pedestrian environment and connectivity to surrounding areas (including the strategic site allocation at Hoddern Farm, Peacehaven, which is located immediately to the north of the Meridian Centre).

### Character Area 7: Coastal Plotlands; and Coastal Road

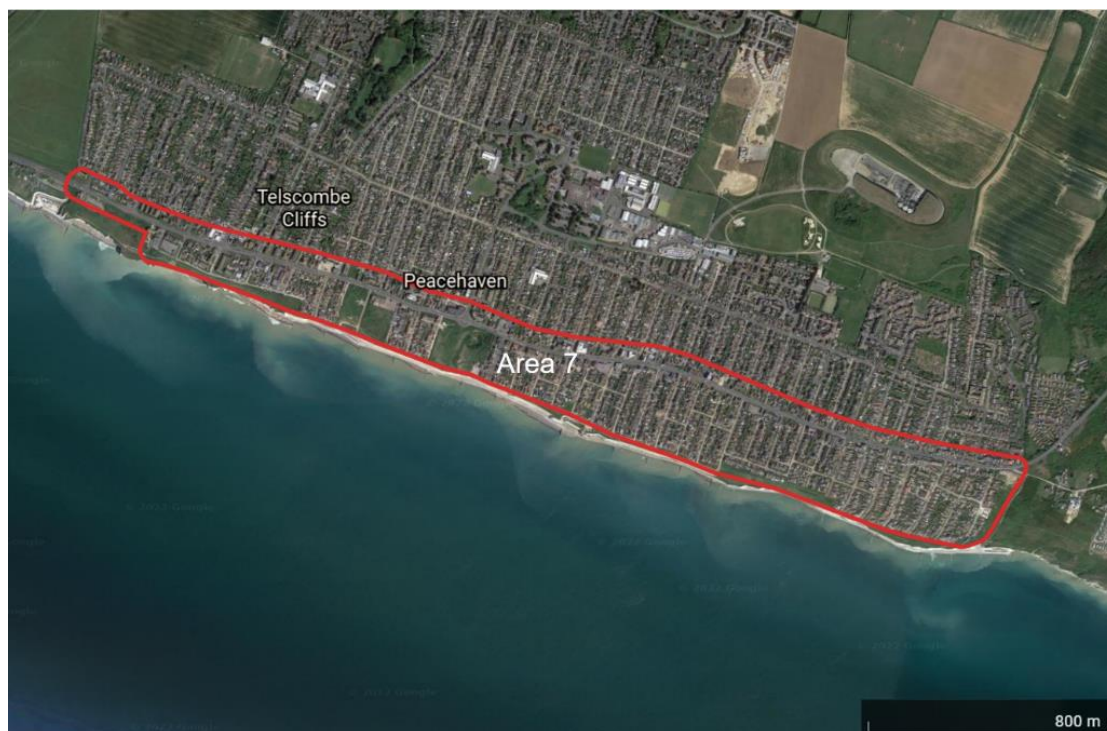


Figure 4.8: Coastal Plotlands and Coastal Road<sup>21</sup>

- 4.45 The Coastal Road forming part of Area 7 is used as a through road to Brighton and Newhaven. There are no Air Quality Management Areas (AQMA) within the PTNP area; however, air pollution is likely to be concentrated around the Coastal Road due to emissions from vehicles passing through.
- 4.46 Area 7 borders Brighton to Newhaven Cliffs SSSI to the south. It falls within the IRZ for this SSSI, with residential development in the south of the site being more restricted than in the north. Specifically, within 50 metres of the SSSI the IRZ is for 'all planning applications', within 200 metres it is for 'residential development of 10 units or more', and within 500 metres it is for 'any residential development of 50 or more houses outside existing settlements / urban areas'. The entirety of Area 7 falls within 200m of the SSSI.
- 4.47 Area 7 is also adjacent to Beachy Head West Marine Conservation Zone (MCZ) on the coastline. In terms of BAP Priority Habitats, the area contains a small area of good quality semi-improved grassland in the north west and borders the same Priority Habitat to the south east, as well as maritime cliff and slope.
- 4.48 Some parts of the South Coast road are at medium to high risk of surface water flooding, particularly where the road intersects with Broomfield Avenue and

<sup>21</sup> This character area is a combination of the 'Coastal Plotlands' and 'Coastal Road' character areas as described within the Design Code accompanying the Neighbourhood Plan.



onto Amhurst Road and Buckhurst Road, Malines Avenue, Sutton Avenue, Steyning Avenue, and Piddinghoe Avenue.

- 4.49 There is one Grade II listed building, 17<sup>th</sup> Century House<sup>22</sup>, in the western corner of Area 7. Three features listed on the HER are present in Area 7, which are land at 325 Coast Road, 57 South Coast Road, and barrow at Peacehaven.
- 4.50 While there are a number of constraints within and surrounding this area, any development would have good accessibility to the services and facilities within the existing settlement.

### Character Area 8: East Peacehaven; and Mobile Homes



Figure 4.9: East Peacehaven and Mobile Homes<sup>23</sup>

- 4.51 Area 8 is in close proximity to Brighton to Newhaven Cliffs SSSI to the south. It falls within the IRZ for this SSSI, and residential development in the south of the area is more restricted than in the north. Specifically, within 200 metres of the SSSI the IRZ is for 'residential development of 10 units or more', and within 500 metres it is for 'any residential development of 50 or more houses outside existing settlements / urban areas'.
- 4.52 The mobile homes, located in the south eastern corner of Area 8, are in close proximity to Beachy Head West MCZ on the coastline. In terms of BAP Priority Habitats, the eastern half of the area is covered by a large swathe of good quality semi-improved grassland, as well as smaller areas of deciduous woodland.
- 4.53 There are a few areas at medium to high risk of surface water flooding in Area 8, particularly Seaview Avenue, Cornwall Avenue, Cliff Park Close, Downland

<sup>22</sup> Historic England (no date): '17<sup>th</sup> Century House', [online] available to access via [this link](#)

<sup>23</sup> This character area is a combination of the 'East Peacehaven' and 'Mobile Homes' character areas as described within the Design Code accompanying the Neighbourhood Plan.

Avenue, Ashington Gardens, the green space south of the South Coast Road, and parts of the mobile homes area in the south east.

- 4.54 In terms of landscape, the north eastern corner of Area 8 is within the SDNP. A scheduled monument, Bowl Barrow on Peacehaven Heights<sup>24</sup>, is located south east of the site near the mobile homes. Ten features listed on the HER are present in Area 8, which are Keymer Avenue/Seaview Avenue (two features), land at Seaview Avenue (two features), land to the north of Keymer and Seaview Avenues, former Seaview Avenue garage, land at Piddinghoe Avenue, Piddinghoe Sports Park, Piddinghoe Sports Ground, and land at 12 Arundel Road.
- 4.55 The north eastern corner of Area 8 is the only part of the site that contains agricultural land. According to the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England, this area has a low likelihood (<20%) of being underlain by BMV land.
- 4.56 The area contains and is in close proximity to a number of constraints, including the SDNP and a range of designated heritage assets. Development in the west of this area is likely to have reasonable access to the services and facilities in Peacehaven, although if development is delivered in the east of the area then accessibility would be reduced.

## Preferred approach in the Neighbourhood Plan in light of the appraisal findings

### Preferred approach in the Neighbourhood Plan

- 4.57 It is important to acknowledge that the submission version of the Neighbourhood Plan does not allocate sites for new development. This is in response to engagement with Lewes District Council, advising emerging Neighbourhood Plans to not allocate sites at present. Nevertheless, the PTNP is supportive in principle of proposals which would (amongst other considerations):
- Encourage a master planning approach to new development areas which incorporate excellent place-making principles as informed by the Design Code and wider PTNP policy provisions.
  - Facilitate a mix of housing (i.e. type, tenure, and affordability) which is accessible and adaptable for all users; and
  - Unlock potential opportunity areas for employment and community uses which have been identified in the PTNP area. Such areas include Peacehaven town centre, including the Meridian Centre (as discussed within the appraisal for Character Area 6, presented above), broadly aligning with the provisions for local and district centres in the Lewes Local Plan (see Core Policy 2 and Core Policy 6).
- 4.58 Additionally, the PTNP does not seek to preclude high quality development in other locations within the PTNP area which meet the policies and objectives of

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<sup>24</sup> Historic England (no date): 'Bowl Barrow on Peacehaven Heights, 242m south-west of Warren Court', [online] available to access via [this link](#)

the Neighbourhood Plan. This is further discussed as part of the plan appraisal presented in **Chapter 5** of this Environmental Report.

## Neighbourhood Plan policies

- 4.59 To support the implementation of the vision statement for the Neighbourhood Plan, the submission version of the PTNP puts forward 39 policies to guide new development within the Neighbourhood Plan area.
- 4.60 Policies were developed following extensive community consultation and evidence gathering. Earlier draft versions of the policies have been revisited and updated in light of the responses which were received through community consultation, Regulation 14 consultation, and through recommendations and suggestions proposed through the SEA process. The policies are listed below in **Table 4.9**.

**Table 4.9: Neighbourhood Plan policies**

| Reference   | Policy Name  |
|-------------|--|
| Policy PT1  | High Quality Design  |
| Policy PT2  | Innovation and Good Management   |
| Policy PT3  | Landscaping  |
| Policy PT4  | Impacts on the South Downs National Park                                   |
| Policy PT5  | Sustainable Design   |
| Policy PT6  | Housing Design   |
| Policy PT7  | Adaptable Housing  |
| Policy PT8  | Low-Cost Housing   |
| Policy PT9  | Housing Mix  |
| Policy PT10 | Reusing the Existing   |
| Policy PT11 | Promoting All-Inclusive Travel   |
| Policy PT12 | Enhancing Accessibility to the South Downs National Park and Coastal Areas |
| Policy PT13 | Enhancing Public Transport in the Neighbourhood Plan Area                  |
| Policy PT14 | Protection of Green Spaces within the Neighbourhood                        |
| Policy PT15 | Amenity and Green Spaces   |
| Policy PT16 | Enhancement of Formal Sports Areas and Children's Equipped Play Spaces     |
| Policy PT17 | Protection of Biodiversity and Habitats                                    |
| Policy PT18 | Biodiversity Net Gain  |
| Policy PT19 | Urban Greening   |
| Policy PT20 | Drainage Management  |
| Policy PT21 | Renewables   |
| Policy PT22 | Net Zero   |
| Policy PT23 | Air Quality  |
| Policy PT24 | Providing for a Mix of Employment Opportunities                            |

| Reference   | Policy Name                               |
|-------------|---|
| Policy PT25 | Open Workspace                            |
| Policy PT26 | Tourism                                   |
| Policy PT27 | Local Labour Agreement                    |
| Policy PT28 | Digital Infrastructure                    |
| Policy PT29 | Heritage Assessment                       |
| Policy PT30 | Community Facilities                      |
| Policy PT31 | Loss of Community Facilities              |
| Policy PT32 | Statement of Community Engagement         |
| Policy PT33 | Shutters                                  |
| Policy PT34 | Signage                                   |
| Policy PT35 | Masterplanning                            |
| Policy PT36 | Design and Placemaking Principles         |
| Policy PT37 | Peacehaven Centre                         |
| Policy PT38 | Community Facilities in Peacehaven Centre |
| Policy PT39 | Market Place and Outdoor Events           |

## 5. What are the appraisal findings at this current stage?

### Introduction

5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the submission version of the PTNP. This chapter presents:

- An appraisal of the current version of the PTNP under the eight SEA theme headings.
- The overall conclusions at this current stage and recommendations for the next stage of plan-making.

### Appraisal of earlier versions of the PTNP policies

5.2 Prior to the finalisation of the submission version of the PTNP, the SEA team undertook an appraisal of earlier versions of PTNP policies<sup>25</sup>. At that stage, the following recommendations were made to plan makers for further improving the sustainability performance of the PTNP.

5.3 These recommendations included:

- Encouraging initiatives which support retrofits to existing buildings wherever practicable (see Historic England's guidance for retrofitting historic buildings, accessible [here](#)). Could be included within Policy PT5 'Sustainable Design' alongside the range of measures which have already been included with regards to delivering energy efficiency through design, or within Policy PT6 'Housing Design' alongside the measures which are currently included.
- With reference to the setting of designated and non-designated heritage assets (including views into and out of these features), development proposals could be encouraged to complete a proportionate heritage impact assessment at the planning application stage to help to understand the significance of the heritage features and the potential impacts of new development areas. This will ensure that appropriate mitigation is provided to assuage any concerns by Historic England.
- For any areas of land which have been identified for their archaeological importance, new development proposals could undertake archaeological evaluations prior to construction, with any findings appropriately reported and documented on the local historic environment record in line with best practice guidance.
- Potential to include a statement within a relevant policy which encourages proposals to source construction materials locally and use recyclable materials wherever possible. Whilst this is difficult to enforce, it will demonstrate a positive and proactive response to the climate emergency by supporting proposals which seek to reduce embedded carbon and work towards delivering carbon neutrality through design.

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<sup>25</sup> The appraisal findings are presented in the earlier version of the SEA Environmental Report which accompanied the PTNP at Regulation 14 consultation.



- 5.4 Alongside the responses received following the close of Regulation 14 consultation, the recommendations have been considered by plan makers during updates to the PTNP.

## Approach to this appraisal

- 5.5 The appraisal is structured under the eight themes taken forward for the purposes of the SEA.
- 5.6 For each SEA theme, ‘significant effects’ of the current version of the PTNP on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. These effect ‘characteristics’ are described within the assessment, as appropriate.
- 5.7 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the PTNP. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects to ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

## Biodiversity and Geodiversity

- 5.8 One of the key objectives within the PTNP is to respect and enhance the natural environment. This is recognised and acknowledged within several policies which will 1) help limit potential effects on features and areas of ecological interest and 2) support the resilience of green infrastructure networks. This is further discussed below.
- 5.9 Published in July 2021, paragraph 174 (d) within the revised NPPF<sup>26</sup> states that planning policies and decisions should contribute to and enhance the natural and local environment by *‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks’*, with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government’s 25-Year Environment Plan<sup>27</sup> (which was published in January 2018) and the Environment Act<sup>28</sup> (which received Royal Assent in November 2021). In this respect, Policy PT18 (Biodiversity Net Gain) states that all developments should be in accordance with the latest local guidance and advice with respect to delivering net gains. Policy PT15 (Amenity and Green Spaces) supports proposals which *“create new wildlife habitats”*, and *“connect, enhance, and retain existing wildlife habitats”*. Additionally, Policy PT17 (Protection of Biodiversity and Habitats) affirms that proposals will be expected to incorporate appropriate mitigation measures in accordance with Lewes District Council’s Biodiversity Net Gain Technical Advice Note<sup>29</sup>. As the

<sup>26</sup> DLUHC (2018): ‘Revised National Planning Policy Framework’, [online] available to access via [this link](#)

<sup>27</sup> DEFRA (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via [this link](#)

<sup>28</sup> GOV.UK (2021): ‘Environment Act’, [online] available to access via [this link](#)

<sup>29</sup> Lewes District Council (2021): ‘Biodiversity Net Gain Technical Advice Note’ available to access via [this link](#)

PTNP does not allocate sites for new development, it is anticipated that the provisions of these policies (in their current form) are likely to enhance the natural environment of the PTNP area, even if they do not mention specific targets for the area.

- 5.10 The nature, scale, timing, and duration of some development activities can result in the disturbance of protected species. This can include effects of poor air quality on designated sites, and severance of ecological networks from new development areas. In this respect, the PTNP also sets out provisions which will support and enhance habitats, species, and ecological networks.
- 5.11 For example, Policy PT15 (Amenity and Green Spaces) requires proposals to demonstrate how the design options creatively incorporate existing trees into new development areas and maximise the potential for new trees and hedges to be planted. Policy PT15 also seeks to improve green corridors within the PTNP area and embrace opportunities for nature conservation. A coordinated approach is encouraged to maximise the positive outcomes for wildlife and the local community. This includes through improving connections to the South Downs National Park, cliff tops and undercliff walkways (which contain some of most significant areas of semi-natural habitat within the Neighbourhood Plan area) to form a multifunctional landscape. These provisions will safeguard and enhance areas which are likely to provide roosting and foraging sites for protected species, maintaining habitat connectivity and reducing fragmentation. Ecological sensitivities are further reflected by Policy PT17, stating that developments should “*seek to incorporate safe nesting spaces such as bat and bird boxes, insect housing and pollinators*” and Policy PT19 which encourages proposals to deliver urban greening.
- 5.12 Overall, Neighbourhood Plan policies should help ensure that ecological sensitivities are appropriately considered during the planning, construction, and operational phases for new development proposals which come forward during the plan period, whilst also delivering net gains.

## Climate Change

- 5.13 The UK Government has outlined a commitment to secure a ‘green recovery’ from the COVID-19 pandemic. Reflecting the conclusions of the Institute for Government’s ‘Net Zero’ report<sup>30</sup>, a green recovery is only likely to happen if net zero becomes a core part of the Government’s thinking and its economic policy. Within the report, net zero is described as “*decarbonising not just the power sector but much more difficult sectors including transport, housing and agriculture, where progress has long been stalled and the UK is off track*”. In this respect, policies, and proposals within the PTNP support these principles by reducing the reliance on fossil fuels and supporting the introduction of low carbon technologies.
- 5.14 Key policies in this regard include Policy PT5 (Sustainable Design) which seeks to ensure that proposals incorporate the highest levels of energy efficient technology, eliminating the use of fossil fuels by adopting low and zero carbon energy sources (where appropriate). Policy PT23 (Air Quality) states that proposals should comply with all minimum UK environmental requirements in

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<sup>30</sup> Institute for Government (2020): ‘Net zero: how government can meet its climate change target’. [online] available to access via [this link](#)

relation to air pollutants (i.e. not increasing emissions of harmful pollutants, including greenhouse gases). Furthermore, Policy PT21 (Renewables) encourages applications for renewable energy schemes and community initiatives which seek to deliver renewable and low carbon energy (subject to the conditions listed within the policy). In terms of tackling the climate crisis, the provisions of these policies will also help to positively contribute to Lewes District Council's ambition for carbon neutrality by 2030 (following their declaration of a climate emergency in 2019).

- 5.15 Policy PT5 and Policy PT22 (Net Zero) within the PTNP also encourage the use of electric vehicles (EV), with an objective to ensure that new developments are delivered in appropriate settings to cater for growths in EV uptake. However, a reduction in transport carbon emissions cannot solely rely on the switch to EV alone, particularly given that for many residents, an electric car will remain unaffordable. In this regard, the PTNP also outlines several proposals which seek to further reduce the reliance on fossil fuels. Such proposals include delivering more active travel infrastructure, encouraging a healthy-streets approach to the design of new development areas by enhancing opportunities for walking and cycling, and improving public transport options (including the number and frequency of journeys). Key policies in this respect include Policy PT11 (Promoting All-Inclusive Travel) and Policy PT13 (Enhancing Public Transport in the Neighbourhood Plan Area) and will positively contribute to climate change mitigation efforts by encouraging the use of sustainable transport options.
- 5.16 With regards to adapting to the effects of climate change, Policy PT1 (High Quality Design) and Policy PT5 encourage the use of permeable materials and natural features through design (including through sustainable drainage solutions and open spaces) to address any flood risk concerns. Policy PT20 (Drainage Management) goes on to state that all proposals should clearly demonstrate how new developments provide for surface water drainage and capacity of the sewer systems, including via the preparation of a drainage impact assessment for proposals in the most sensitive locations. Additionally, the protection of open spaces and habitats within the PTNP area through the provisions of Policy PT14 (Protection of Green Spaces within the Neighbourhood), Policy PT15 (Amenity and Green Spaces), Policy PT17 (Protection of Biodiversity and Habitats) and Policy PT19 (Urban Greening) will safeguard natural carbon sequesters located within the landscape (i.e. trees and hedgerows). These policy provisions will positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and shelter and reducing surface water run-off issues.

## Landscape

- 5.17 Landscape, townscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns which make one area different from another. Landscape, townscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from new development areas, both in visual and amenity terms. The relationship between the PTNP area and the South Downs National Park is a defining feature and contributes strongly to the Neighbourhood Plan area's sense of

place and quality of its environment. In this context, proposals within the PTNP have a strong focus on protecting the sense of place and special qualities which contribute to its character.

- 5.18 A key policy in this respect is Policy PT4 (Impacts on the South Downs National Park), affirming that proposals must respect the setting of this nationally designated landscape, protect the character of its coastal location, ensure views are maintained, and protect its tranquillity and dark skies. Additionally, Policy PT12 seeks to enhance accessibility to the South Downs National Park by encouraging proposals to (amongst other considerations) integrate with walking, cycling and horse-riding networks within the PTNP area and incorporate new links and routes for all users. This policy will positively support one of the two statutory duties of the National Park which is to promote opportunities for the understanding and enjoyment of its special qualities.
- 5.19 With reference to new development proposals which may potentially come forward during the plan period, Policy PT1 (High Quality Design) requires all new development to complement, enhance and positively contribute to local character and identity, including in relation to the following factors: scale, massing, colours, architecture, materials, street-scene, form, and function. This will facilitate opportunities for high quality design and layout to be incorporated within new development areas which are sensitive to the character of the surrounding environment. More broadly, Policy PT2 (Innovation and Good Management) encourages proposals which *“establish bespoke design solutions and residential typologies... and which demonstrate an imaginative sense of place whilst respecting the surrounding context”*. Alongside the Design Code which accompanies the submission version of the PTNP (which includes a specific requirement for proposals to appropriately consider the requirements within the South Downs National Park Sustainable Construction Supplementary Planning Document<sup>31</sup>, these policies will help to facilitate opportunities for high quality design and layout to be incorporated within new development areas.
- 5.20 Policy PT21 (Renewables) encourages applications for renewable energy schemes providing there would be no adverse landscape impacts. Policy PT33 (Shutters) and Policy PT34 (Signage) outlines that proposals which include shopfronts, advertisements and signages should complement and enhance the character, proportions, materials and detailing within the building and the wider street-scene. Additionally, Policies PT35 – PT36 and Policies PT37 – PT38 support a master planning and coordinated approach to major development proposals which, amongst other considerations, integrate with the existing buildings, delivers buildings which complement the height of the surrounding buildings, minimise visual impacts, and provide street-based layouts which follow the vernacular and form of the existing street pattern.
- 5.21 Further contributing to the quality of the natural environment, Policy PT3 (Landscaping) also encourages proposals to make a positive contribution to the public realm through biodiversity and green infrastructure provision. Specifically, the policy outlines that proposals should deliver a net greening within the PTNP area, retaining mature trees and hedges, and integrating species which are appropriate for a cliff-top location. By ensuring that proposals are accompanied by an appropriate management and/or

<sup>31</sup> SDNPA (2020): 'Sustainable Construction SPD', [online] available to access via [this link](#)

maintenance plan so that such landscaping and boundary treatments do not fall into disrepair, Policy PT3 signals a strong commitment to delivering positive longer-term outcomes and aspirations in this respect. These provisions should further ensure that proposals reflect the character and sense of place of the PTNP area.

- 5.22 More broadly, enhanced habitats (trees, hedgerows, grass, shrub, etc.,) can also form important parts of landscape, townscape and villagescape character, enhancing the street scene and providing screening to restrict undesirable views. A key policy in this regard includes Policy PT15 (Amenity and Green Spaces) which seeks to improve green connections and the quality of the public realm between Peacehaven, Telscombe, and the surrounding landscape. In this respect, proposals for new tree planting, habitat creation, pocket parks, and community gardens will be supported.
- 5.23 Overall, the PTNP policies have a strong focus on protecting and enhancing landscape, townscape and villagescape character, the quality of the public realm, and local distinctiveness.

## Historic Environment

- 5.24 The PTNP area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their heritage interest. This includes four scheduled monuments, 18 Grade II listed buildings and one Grade I listed building, namely: 'The Parish Church of St Lawrence' (located in Telscombe). Notably, 17 out of the 18 Grade II listed buildings are within Telscombe village, with most overlapping with the boundaries of the Telscombe Conservation Area. As the submission version of the PTNP does not contain any site allocations for development, significant adverse impacts to the historic environment are not anticipated. Nonetheless, the sensitivities listed above are reflected by PTNP policies and proposals which focus on the conservation and enhancement of both designated and non-designated heritage assets, and their settings.
- 5.25 For example, Policy PT29 (Heritage Assessment) encourages applications to be accompanied by a proportionate assessment which details the special characteristics of the site (from a heritage perspective) and identifies an appropriate mitigation strategy. Policy PT1 (High Quality Design) requires proposals to ensure that the design of future developments respects and utilises the existing built form, architectural quality, scale, materials, and density of the area so that they integrate sympathetically with the surrounding environment. New development within the PTNP area shall also be expected to be taken forward in conjunction with the provisions of the Design Code prepared to support the PTNP. Given the Design Code sets out a comprehensive range of provisions relating to the historic environment, this will help provide an appropriate basis for the conservation and enhancement of the historic environment surrounding any new development areas which may be brought forward during the plan period. Specifically, this includes a requirement for proposals to appropriately consider the guidance within the Telscombe Conservation Area Appraisal<sup>32</sup> (which contains the greatest concentration of heritage assets within the PTNP area).

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<sup>32</sup> Lewes District Council – Telscombe Conservation Area Appraisal: accessible via [this link](#)



5.26 More broadly, delivering net gains in biodiversity and facilitating green infrastructure enhancements can have beneficial impacts in terms of the built environment, and by extension, the setting of the historic environment. Key policies in this regard include Policy PT14 (Protection of Green Spaces within the Neighbourhood), Policy PT15 (Amenity and Green Spaces), Policy PT17 (Protection of Biodiversity and Habitats) and Policy PT19 (Urban Greening), which are discussed in more detail within the 'Biodiversity and Geodiversity' appraisal, above. In addition to supporting enhancements to the setting of features and areas of historic environment interest, it has the potential to support and strengthen the character of the built environment. Additionally, policies which support the principle of walkable neighbourhoods and healthy streets (including Policies PT11 – PT13) has the potential to facilitate pedestrian accessibility to heritage assets and areas, which in turn can enhance the understanding and appreciation of their special qualities. This will also help to rejuvenate areas with historic interest.

## Land, Soil, and Water Resources

5.27 Although a detailed agricultural land classification assessment has not been undertaken for most of the PTNP area, it is noted in the predictive land quality assessment that the undeveloped areas surrounding the existing built-up areas of Peacehaven and Telscombe (and East Saltdean) have a relatively high likelihood (greater than 60%) of containing best and most versatile (BMV) agricultural land. As the submission version of the PTNP does not contain any site allocations for development, it is not likely that the PTNP (in its current form) would result in the loss of any areas of productive agricultural land. Additionally, Policy PT10 (Reusing the Existing) supports the reuse of brownfield land, which will encourage the most efficient use of land within the Neighbourhood Plan area.

5.28 The PTNP also has a strong focus on encouraging development within the existing settlement boundaries (see Policies PT37 – PT38), unlocking potential opportunity areas such as Peacehaven town centre, including the Meridian Centre, which is also supported through local policy provisions. Several policies also seek to protect key features of landscape and biodiversity interest and promote green space and open space. Key policies in this regard include Policy PT14 (Protection of Green Spaces within the Neighbourhood), Policy PT15 (Amenity and Green Spaces), Policy PT17 (Protection of Biodiversity and Habitats) and Policy PT19 (Urban Greening). While these policies do not specifically seek to address land, soil and water resources, the policies will indirectly help promote and protect these resources, including the promotion of high-quality green networks in the Neighbourhood Plan area and the protection and enhancement of key landscape features. This will help support the capacity of the landscape and villagescape to regulate soil and water quality.

5.29 Concerning the protection of water resources, Policy PT20 (Drainage Management) affirms that new development areas should not increase the risk of surface water run-off. The policy also outlines that no development in sensitive locations (i.e. adjacent or close to the cliff-edge) shall commence until full details of the proposed drainage schemes for surface and foul water have been submitted to and approved by the planning authority. This will indirectly contribute to water quality improvements through limiting suspended solids entering watercourses from surface water run-off.



## Population and Community

5.30 It is important to acknowledge that the submission version of the Neighbourhood Plan does not allocate sites for new development. This is in response to engagement with Lewes District Council, advising emerging Neighbourhood Plans to not allocate sites at present. Nevertheless, the PTNP is supportive in principle of proposals which would (amongst other considerations):

- Encourage a master planning approach to new development areas (see Policies PT35 – PT36) which incorporate excellent place-making principles as informed by the Design Code and wider PTNP policy provisions.
- Facilitate a mix of housing (i.e. type, tenure, and affordability) which is accessible and adaptable for all users (see Policies PT7 – PT9); and
- Unlock potential opportunity areas for employment and community uses which have been identified in the PTNP area. Such areas include Peacehaven town centre, including the Meridian Centre (see Policies PT37 – PT38), broadly aligning with the provisions for local and district centres in the Lewes Local Plan (see Core Policy 2 and Core Policy 6).

5.31 Additionally, the PTNP does not seek to preclude high quality development in other locations within the PTNP area which meet the policies and objectives of the Neighbourhood Plan. This is further considered below.

5.32 The quality of development is a key influence on the quality of life of residents. Along with the Design Code which accompanies the submission version of the PTNP, several policies also provide criteria and guidance for potential proposals with a view to implementing high quality design and layout within new development areas. The provisions primarily focus on ensuring that appropriate mitigation measures are incorporated to address any potential constraints to development, in addition to ensuring that new development is safe, attractive, inclusive, and accessible, and does not cause unnecessary noise and light pollution. Key policies in this regard include Policy PT1 (High Quality Design), Policy PT6 (Housing Design) and Policy PT7 (Adaptable Housing). In this respect the PTNP will help facilitate the delivery of high quality and inclusive homes and neighbourhoods with the potential to promote the physical and mental health and wellbeing of residents.

5.33 The quality of the living environment will also be supported by policies which encourage the delivery of adequate and well-located public and private amenity space of an appropriate size and type, see Policy PT3 (Landscaping) and Policy PT15 (Amenity and Green Spaces). The quality of housing will also be supported by Project NP Sustainable Design 1 and Policy PT5 (Sustainable Design) which set out several provisions which seek to support energy efficient and low carbon development. This will help to address issues such as fuel poverty, which is important in the current economic climate given the rising costs of living.

5.34 A key aspect of the PTNP is to ensure that the provision of community facilities continues to reflect the needs of a changing and increasingly diverse population, and that these facilities are accessible to all. PTNP policies are therefore consistent with the NPPF (paragraph 93), which encourages planning policies and decisions to “*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 “ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”* Key policies in this respect include Policy PT30 (Community Facilities) and Policy PT31 (Loss of Community Facilities) which seek to protect and support the provision of local services and facilities to enable people to live locally.

- 5.35 The PTNP also seeks to promote the economic vitality of the PTNP area and support employment opportunities. Policy PT24 (Providing for a Mix of Employment Opportunities) and Policy PT26 (Tourism) seek to preclude the loss of existing employment land, and supports new business, commercial, and employment development subject to the criteria listed within the policies. Recognising the importance of small businesses and homeworking in the area, Policy PT24 and Policy PT28 (Digital Infrastructure) also seeks to support home-based businesses working from home, including through improvements to communications networks to provide high-speed broadband access and connectivity (subject to other PTNP policies and the Design Code).
- 5.36 Overall, therefore, the Neighbourhood Plan has the potential to have significant positive effects in relation to the Population and Community SEA Theme. This relates to the PTNP’s focus on encouraging high-quality development which positively and proactively responds to the needs of the local community, maximising accessibility to services, facilities, and opportunities, and supporting community and economic vitality.

## Health and Wellbeing

- 5.37 Overarching principles for the PTNP includes supporting healthy and active lifestyles, ensuring that the community is a safer and more enjoyable place to live, and providing equal opportunities for everyone. In this context, policies within the PTNP set out a range of provisions which will support and enhance residents’ quality of life. Specifically, Policy PT1 (High Quality Design) and Policy PT6 (Housing Design) proposes that the design and layout of development sites meet streetscape design standards (‘Secured by Design’). Policy PT7 (Adaptable Housing) encourages proposals to deliver accommodation which is suitable for all users and accessible to public transport and community facilities. Additionally, Policy PT16 supports the provision of formal sports areas and children’s equipped play spaces which are inclusive and accessible for all. The provisions of these policies will positively support and encourage healthier and active lifestyles.
- 5.38 Travel patterns are changing, with an increase in online shops and services and more people, especially office workers, now working from home; a change which is being accelerated in response to the COVID-19 pandemic. Combined with improvements to broadband connectivity, this is likely to mean that more people can work or run a business at home but will potentially still need to make frequent journeys for day to day needs. Therefore, measures to help increase sustainability, connectivity, accessibility and reduce the need to travel are also important considerations for the PTNP. Key policies in this regard include Policies PT11 – PT13, which support active travel and encourage

opportunities for walking and cycling (which are healthier modes of transport). This is considered in further detail within the 'Transportation appraisal, below.

- 5.39 More broadly, PTNP policies and proposals will bring a range of further benefits for health and wellbeing, particularly through facilitating and delivering public realm improvements (including through green infrastructure provision). Green infrastructure provides space for recreation and relaxation, and access to nature has been evidenced to improve people's health and wellbeing, through encouraging healthy outdoor recreation and relaxation<sup>33</sup>. Key policies in this respect include Policy PT14 (Protection of Green Spaces within the Neighbourhood) and Policy PT15 (Amenity and Green Spaces). This will support physical and mental health and wellbeing of the local community.

## Transportation

- 5.40 The impact of the COVID-19 pandemic means that the future baseline of travel demand is likely to be different for all residents. In the longer term it is hard to predict how behaviours will evolve and whether some of the travel responses observed during the national lockdowns will be maintained in some form. However, reflecting the results of the National Travel Attitudes Study, 94% of respondents thought it likely that they would continue to rely on active travel methods (walking and cycling) once travel restrictions were removed<sup>34</sup>.
- 5.41 Regarding connectivity and accessibility within the PTNP area, policies and proposals seek to maximise the ability for residents to make trips by public, sustainable, and active modes of transport. Key policies in this regard include Policy PT1 (High Quality Design), Policy PT11 (Promoting All-Inclusive Travel), Policy PT13 (Enhancing Public Transport in the Neighbourhood Plan Area). This includes through prioritising and safeguarding walking, cycling, and public transport in line with the modal hierarchy for transport users, delivering more active travel infrastructure, providing healthy streets and low-traffic neighbourhoods, and providing a more reliable and resilient public transport network. This should also support the creation of mixed and vibrant places that are designed for people rather than vehicles. Furthermore, the recommended further actions listed within the PTNP (including through Project NPTRAVEL1) encourages a collaborative and proactive approach to delivering transport services and infrastructure within the PTNP area. These policies should enable the local community to engage with opportunities to be involved in the development of more sustainable transport solutions.

## Conclusions at this current stage

- 5.42 The assessment has concluded that the submission version of the PTNP is likely to have significant positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA Themes. This principally links to the PTNP's support for high-quality development proposals which would deliver suitable and appropriate housing for the local community (via a range of types and tenures), improve availability and accessibility to services, facilities and amenities, support the regeneration of key opportunity areas within the PTNP area (such as Peacehaven town centre and the Meridian Centre) and

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<sup>33</sup> Natural England (2021): 'Green Infrastructure Network Framework' [online] available to access via: [this link](#)

<sup>34</sup> Department for Transport (2020): 'National Travel Attitudes Study: Wave 4 (Provisional)': [online] available to access via: [this link](#)

opportunities for local employment. These policy provisions will support social inclusion, and community and economic vitality. The PTNP is also likely to facilitate improvements to the public realm (including through green infrastructure enhancements) and encourage healthier and active lifestyles. These policy provisions will support the quality of life of residents.

- 5.43 The PTNP will also bring positive effects in relation to the ‘Landscape’ and ‘Historic Environment’ SEA Themes. These benefits largely relate to the PTNP’s emphasis on protecting and enhancing the relationship between the PTNP area and the South Downs National Park, delivering high-quality design which respects and enhances local distinctiveness and sense of place, protects important landscape, townscape and villagescape features, facilitates improvements to quality of the public realm, and increases awareness, understanding and appreciation of the historic environment. Given the Design Code accompanying the PTNP also sets out a comprehensive range of provisions relating to the natural and built environment, this will help provide an appropriate basis for any development proposals which may come forward during the plan period.
- 5.44 Additionally, the PTNP will bring positive effects in relation to the ‘Biodiversity and Geodiversity’ SEA Theme by encouraging proposals to protect existing and establish new habitats and wildlife corridors, enhance ecological networks (including through green infrastructure enhancements), and embrace opportunities for nature conservation.
- 5.45 Regarding the ‘Climate Change’ SEA Theme, the PTNP will potentially lead to positive effects through supporting proposals which deliver energy efficient designs and layouts, proactively respond to the potential impacts of climate change (i.e. flood risk concerns from increased storms / rainfall events), and by encouraging active and sustainable travel within the PTNP area. However, this is dependent on the extent to which development proposals incorporate these mitigation and adaptation measures through design.
- 5.46 The PTNP will also initiate several beneficial approaches regarding the ‘Transportation’ SEA Theme, given its focus on enhancing the active travel network (including public rights of way and cycle routes), supporting healthy streets and low-traffic neighbourhoods, and encouraging a greater use of sustainable modes of transportation.
- 5.47 More broadly in relation to the ‘Land, Soil, and Water Resources’ SEA Theme, the PTNP outlines several provisions will help support the capacity of the landscape and villagescape to regulate soil and water quality. As the PTNP does not contain any site allocations for development, it is also not likely that the PTNP (in its current form) would result in the loss of any areas of productive agricultural land.

## 6. What are the next steps?

- 6.1 The SEA Environmental Report accompanies the submission version of the PTNP to the responsible authorities, Lewes District Council and the South Downs National Park Authority, for Independent Examination.
- 6.2 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.3 If the Independent Examination is favourable, PTNP will be subject to a referendum, organised by Lewes District Council. If more than 50% of those who vote agree with the PTNP, then it will be 'made'. Once made, PTNP will become part of the Development Plan for the parishes.



# Appendix A Context Review and Baseline

## A.1 Air Quality

### Policy Context

Key messages from the National Planning Policy Framework (NPPF)<sup>35</sup> include:

- *‘Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.’*
- *‘Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.’*
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

The Air Quality Standards Regulations 2010 transpose into UK law the Ambient Air Quality Directive (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health.

Published in January 2018 by the UK Government, ‘A Green Future: Our 25 Year Plan to Improve the Environment’<sup>36</sup> sets out a number of goals and policies in order to help the natural world regain and retain good health. In this context, Goal 1 ‘Clean Air’ and the policies contained within ‘Chapter 4: Increasing resource efficiency and reducing pollution and waste’ within the 25-year plan directly relate to the air quality SEA theme.

The government published the ‘UK plan for tackling roadside nitrogen dioxide concentrations’ in July 2017.<sup>37</sup> This is the air quality plan for bringing nitrogen dioxide within statutory limits in the shortest possible time. The plan identifies that *“the link between improving air quality and reducing carbon emissions is particularly important”* and that consequently the UK government is determined to be at the forefront of vehicle innovation by making motoring cleaner.

The Clean Air Strategy 2019 identifies how government will tackle all sources of air pollution and is aimed at complementing the Industrial Strategy, Clean Growth

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<sup>35</sup> HM GOV (2018): ‘Revised National Planning Policy Framework’, [online] available to access via [this link](#)

<sup>36</sup> HM GOV (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via [this link](#)

<sup>37</sup> DEFRA (2017) ‘UK plan for tackling roadside nitrogen dioxide concentrations’, [online] available to access via [this link](#)

Strategy and 25 Year Environment Plan. The strategy proposes new goals to cut public exposure to particulate matter pollution and sets out the comprehensive action that is required from across all parts of government and society to meet these goals. The proposed measures include new legislation and new local powers to take action in areas with an air pollution problem, including through the creation of 'Clean Air Zones'.

In February 2020, the UK government updated the Clean Air Zone<sup>38</sup> Framework<sup>39</sup>, which sets out the principles for the operation of Clean Air Zones England and provides the expected approach to be taken by local authorities when implementing and operating a Clean Air Zone. Clean Air Zones bring together local measures to deliver immediate action to improve air quality and health with support for cities to grow while delivering sustained reductions in pollution and a transition to a low emission economy. Where a Clean Air Zone is introduced it will be identified in the local plans and policies, and within local transport plans at the earliest opportunity to ensure it is consistent with wider ambition.

Local Planning Authorities are required to publish annual Air Quality Annual Status Reports (ASRs) to discharge their monitoring obligations under Part IV of the Environment Act (1995). Part IV of the Environment Act 1995 and Part II of the Environment (Northern Ireland) Order 2002 requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMAs) if improvements are necessary. Where an AQMA is designated, an Air Quality Action Plan (AQAP) must then be put in place. The most recently completed AQAP<sup>40</sup> for Lewes District was completed in May 2009, and primarily includes measures to improve air quality within the Lewes Town Centre AQMA.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Air Quality theme:

- Core Policy 8: Green Infrastructure.
- Core Policy 9: Air Quality.
- Core Policy 13: Sustainable Travel.
- Core Policy 14: Renewable and Low Carbon Energy.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Air Quality theme:

- Policy DM14: Multi-Functional Green Infrastructure.
- Policy DM20: Pollution Management.

## Current Baseline

There are no Air Quality Management Areas (AQMAs) located within the Neighbourhood Plan area. In the wider context, there is a small AQMA in Brighton and Hove located on Rottingdean High Street from the A259 junction to the T-junction with Vicarage Lane (to the west of Peacehaven and Telscombe)<sup>41</sup>. There is

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<sup>38</sup> Defined as: 'an area where targeted action is taken to improve air quality and resources are prioritised and coordinated in order to shape the urban environment in a way that delivers improved health benefits and supports economic growth'.

<sup>39</sup> Department for Environment, Food and Rural Affairs (2020) 'Clean Air Zone Framework: Principles for setting up Clean Air Zones in England', [online] available to access via [this link](#)

<sup>40</sup> Lewes District Council (2009): 'Air Quality Action Plan', [online] available to access via [this link](#)

<sup>41</sup> Defra: 'AQMA Details', [online] available to access via [this link](#)

another small AQMA located in Newhaven to the east of the Neighbourhood Plan area, which incorporates Newhaven Town Centre, Southway, Northway, and sections of the A259 Brighton Road, Lewes Road, and the swing bridge<sup>42</sup>. Both AQMAs have been designated due to exceedances in the annual objective concentrations for nitrogen dioxide (NO<sub>2</sub>).

The 2019 Air Quality Annual Status Report for Lewes District<sup>43</sup> confirms that there are three diffusion tubes within Peacehaven which monitor air quality, including: South Coast Road (Cornwall Avenue o/s 223), Steyning Avenue, and South Coast Road (o/s 53). South Coast Road (part of the A259) is the main route into and out of Peacehaven, and the air quality monitoring is kerbside (approximately 3m from the road). Reflecting the results of the air quality monitoring, all three sites did not exceed the national objective of 40 µg/m<sup>3</sup> for the annual mean concentrations of NO<sub>2</sub> throughout 2017 or 2018. The average concentration was 24.6 µg/m<sup>3</sup> across the three sites.

### Future Baseline

New housing and employment provision taken forward within the Neighbourhood Plan area has the potential for adverse effects on air quality through increasing traffic flows and associated levels of pollutants. Improvements to future air quality are dependent, in part, on whether the measures within the AQAP and the East Sussex Local Transport Plan (later discussed in the Transportation chapter of this SEA Scoping Report) are successfully implemented.

## A.2 Biodiversity and Geodiversity

### Policy Context

At the European level, the EU Biodiversity Strategy<sup>44</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to *'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'*.

Key messages from the National Planning Policy Framework (NPPF) include:

- One of the three overarching objectives of the NPPF is an environmental objective to *'contribute to protecting and enhancing our natural, built and historic environment' including by 'helping to improve biodiversity.'*
- *'Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value [...], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.'*
- *'Planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with the statutory status or identified quality in the development plan); and minimising impacts on and providing net gains for biodiversity, including establishing*

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<sup>42</sup> Defra: 'AQMA Details', [online] available to access via [this link](#)

<sup>43</sup> Lewes District Council (2019): 'Air Quality Annual Status Report', [online] available to access via [this link](#)

<sup>44</sup> European Commission (2011): 'Our life insurance, our natural capital: an EU biodiversity strategy to 2020', [online] available to access via [this link](#)

*coherent ecological networks that are more resilient to current and future pressures.'*

- *'To protect and enhance biodiversity and geodiversity, plans should:*
  - a. Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and steppingstones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and*
  - b. Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity'.*
- Paragraph 175: *When determining planning applications, local planning authorities should apply the following principles:*
  - a. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.*
  - b. development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest.*
  - c. development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.*
  - d. development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged.*

The Natural Environment White Paper (NEWP)<sup>45</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities, and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

- Halt biodiversity loss support functioning ecosystems and establish coherent ecological networks by 2020.

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<sup>45</sup> Defra (2012): 'The Natural Choice: securing the value of nature (Natural Environment White Paper)', [online] available to access via [this link](#)

- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas.
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas.
- Address barriers to using green infrastructure to promote sustainable growth.

The UK Biodiversity Action Plan<sup>46</sup> (BAP) identifies priority species and habitats requiring conservation action. Although the UK BAP has been superseded, BAP priority species and habitats have been used to draw up statutory lists of priority species and habitats in England.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*<sup>47</sup>.

The recently published 25 Year Environment Plan<sup>48</sup> sets out the Government's environmental plan of action over the next quarter century, in the context of Brexit. The Plan aims to tackle the growing problems of waste and soil degradation, improving social justice through tackling pollution and promoting the mental and physical health benefits of the natural world. It also sets out how the Government will address the effects of climate change. These aims are supported by a range of policies and initiatives (including mandatory biodiversity net gain, the development of a Nature Recovery Network, enhancing natural capital, and establishing Local Nature Recovery Strategies) which are focused on the following six key areas:

- Using and managing land sustainably.
- Recovering nature and enhancing the beauty of landscapes.
- Connecting people with the environment to improve health and wellbeing.
- Increasing resource efficiency and reducing pollution and waste.
- Securing clean, productive, and biologically diverse seas and oceans; and
- Protecting and improving the global environment.

In this context, Goal 3 'Thriving plants and wildlife' and the policies contained within Chapter 2 'Recovering nature and enhancing the beauty of landscapes' and Chapter 5 'Securing clean, productive, and biologically diverse seas and oceans' directly relate to the Biodiversity and Geodiversity SEA theme.

Additionally, Natural England's Natural Capital Atlas for East Sussex (June 2020) sets out indicators to explore the distribution and condition of natural assets across the county and the benefits they provide to society<sup>49</sup>. The Atlas maps the quality of broad habitat types across East Sussex, including freshwater, farmland, grasslands,

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<sup>46</sup> JNCC (2007) UK BAP priority species [online] available to access via [this link](#)

<sup>47</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] available to access via [this link](#)

<sup>48</sup> HM GOV (2018): 'A Green Future: Our 25 Year Plan to Improve the Environment', [online] available to access via [this link](#)

<sup>49</sup> Natural England (2020): 'Natural Capital Atlas 12 – East Sussex', [online] available to access via [this link](#)



moorland / heathland, woodland, urban, coastal / marine, and will provide a useful source of reference for the subsequent stages of the SEA process.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Biodiversity and Geodiversity theme:

- Core Policy 8: Green Infrastructure; and
- Core Policy 10: Natural Environment and Landscape.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Biodiversity and Geodiversity theme:

- Policy DM14: Multi-Functional Green Infrastructure; and
- Policy DM24: Protection of Biodiversity and Geodiversity.

## Current Baseline

### European and nationally designated sites

The Neighbourhood Plan area does not contain any European designated sites. In the wider context, there are two Special Areas of Conservation (SAC) within a 10km radius of Peacehaven and Telscombe, namely: Castle Hill SAC (to the north west) and Lewes Downs SAC (to the north).

Nationally designated, the 'Brighton to Newhaven Cliffs'<sup>50</sup> Sites of Special Scientific Interest (SSSI) is located along the coastal boundary of the Neighbourhood Plan area. The SSSI comprises two sites formerly known as Black Rock and Peacehaven Cliffs to Castle Hill. Notified in December 1986 and covering approximately 165 ha, the citation for the SSSI states:

"Although the main interest of the site is geological, some rare and uncommon plants grow both on the cliff face and in the narrow strip of cliff-top chalk grassland. The cliffs support a locally important colony of breeding seabirds and a diverse community of beetles. The wave-cut platform is worn into a characteristic pattern of gullies and ridges at right angles to the sea and supports a variety of typical invertebrates and algae.

"Unimproved chalk grassland grows in small pockets between the cliff top and the adjacent fenceline. Amongst the red fescue (*Festuca rubra*) and sea couch (*Agropyron pungens*) grow herbs such as wild carrot (*Daucus carota*), common bird's-foot trefoil (*Lotus corniculatus*) and lady's bedstraw (*Galium verum*). Several uncommon maritime plants grow both on the top and face of the cliff. These include the rare species hoary stock (*Matthiola incana*), rock sea-lavendar (*Limonium binervosum*) and sea-heath (*Frankenia laevis*).

"Brighton to Newhaven Cliffs provides the best and most extensive exposure of the *Offaster pilula* Zone in England. The gentle folding and the superb accessibility of the base of the cliff make this an important collecting site for faunas of the upper Santonian and lower Campanian. It is a nationally important reference section for the upper Cretaceous. The beach and cliff are generally thought to date from the second half of the last (Ipswichian) interglacial. The angle between the beach and the old cliff is filled by great quantities of coarse chalk rubble apparently derived from

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<sup>50</sup> Natural England (no date): 'Brighton to Newhaven Cliffs SSSI', [online] available to access via [this link](#)

the weathering and erosion of the cliff in Devensian times. The chalk rubble is also particularly notable for its fossil remains of many Devensian mammals.”

Based on the most recent condition assessments for the Brighton to Newhaven Cliffs SSSI completed between 2007-2014, 91.12% of the SSSI was classified as having a ‘favourable’ condition. The remaining 8.88% of the SSSI was classified as having an ‘unfavourable -recovering’ condition.

SSSI Impact Risk Zones (IRZ) are a GIS tool/dataset which maps zones around each SSSI according to the sensitivities of the features for which it is notified. They specify the types of development that have the potential to have adverse impacts at a given location, including residential, rural-residential and rural non-residential. Natural England is a statutory consultee on development proposals that might impact on SSSIs. In this respect, the southern half of the Neighbourhood Plan area overlaps with either one or multiple SSSI Impact Risk Zones for the types of development likely to be taken forward during the plan period (i.e., residential, rural-residential or rural non-residential development types).

Marine Conservation Zones (MCZs) are areas that protect a range of nationally important, rare or threatened habitats and species within the ‘blue belt’ around the English Coast<sup>51</sup>. The UK Government has designated over fifty MCZs since 2013, including ‘Beachy Head West’ which extends along the coastal boundary of the Neighbourhood Plan area<sup>52</sup>. The MCZ consists of two spatially separate sites, Brighton Marina to Newhaven and Newhaven to Beachy Head, with a gap at Newhaven port. One of the main reasons for the MCZ designation is the extensive intertidal wave cut chalk platforms and subtidal chalk ridges, which are among the best examples of marine chalk habitat in the South East. The chalk supports a great diversity of species, including rock-boring worms, barnacles, anemones, crustaceans (e.g., velvet swimming crabs, lobsters, prawns) and molluscs (e.g., rock-boring piddocks, top shell snails, periwinkles, limpets). The MCZ has a total of 14 designated features, including:

- **Sediments:** Intertidal coarse sediment, Infralittoral sandy mud, Infralittoral muddy sand, Subtidal mixed sediment, Subtidal sand and Subtidal mud.
- **Rock:** Low energy infralittoral rock and thin sandy sediment, Littoral chalk communities, Subtidal chalk, Moderate energy circalittoral rock and High energy circalittoral rock.
- **Species:** Short-snouted seahorse (*Hippocampus hippocampus*), Native oyster (*Ostrea edulis*) and Blue mussel beds (*Mytilus edulis*).

### Locally important sites

Local Nature Reserves (LNRs) may be established by Local Authorities in consultation with English Nature under Section 21 of the National Parks and Access to the Countryside Act 1949 and are habitats of local importance. The nearest LNR is located approximately 1km to the east of the Neighbourhood Plan area, specifically: Castle Hill, Newhaven. Designated in April 2003 and covering an area of approximately 16.4 ha, the LNR contains a geologically important cliff formation of chalk overlaid by clay and greensand<sup>53</sup>.

<sup>51</sup> GOV.UK (2016): ‘Marine conservation zone designations in England’, [online] available to access via [this link](#)

<sup>52</sup> Sussex Inshore Fisheries and Conservation Authority (2020): ‘Beachy Head West MCZ’, [online] available to access via [this link](#)

<sup>53</sup> Natural England (no date): ‘Castle Hill, Newhaven LNR’, [online] available to access via [this link](#)

There is a variety of Biodiversity Action Plan (BAP) Priority Habitats located within or within proximity to the Neighbourhood Plan area, predominantly areas of good quality semi-improved grassland, areas of deciduous woodland, and areas of maritime cliff and slope.

The Sussex Biodiversity Records Centre contains records of protected or notable species within the Neighbourhood Plan area<sup>54</sup>. This includes records of several species of birds, mammals, bats, insects, grasses, trees, amphibians and reptiles; many of which are protected under the Wildlife and Countryside Act 1981 (as amended) and under Section 41 of the Natural Environment and Rural Communities Act 2006. In this respect, the BAP Priority Habitats and ecological designations within and surrounding the Neighbourhood Plan area are likely to support populations of protected species.

### Future Baseline

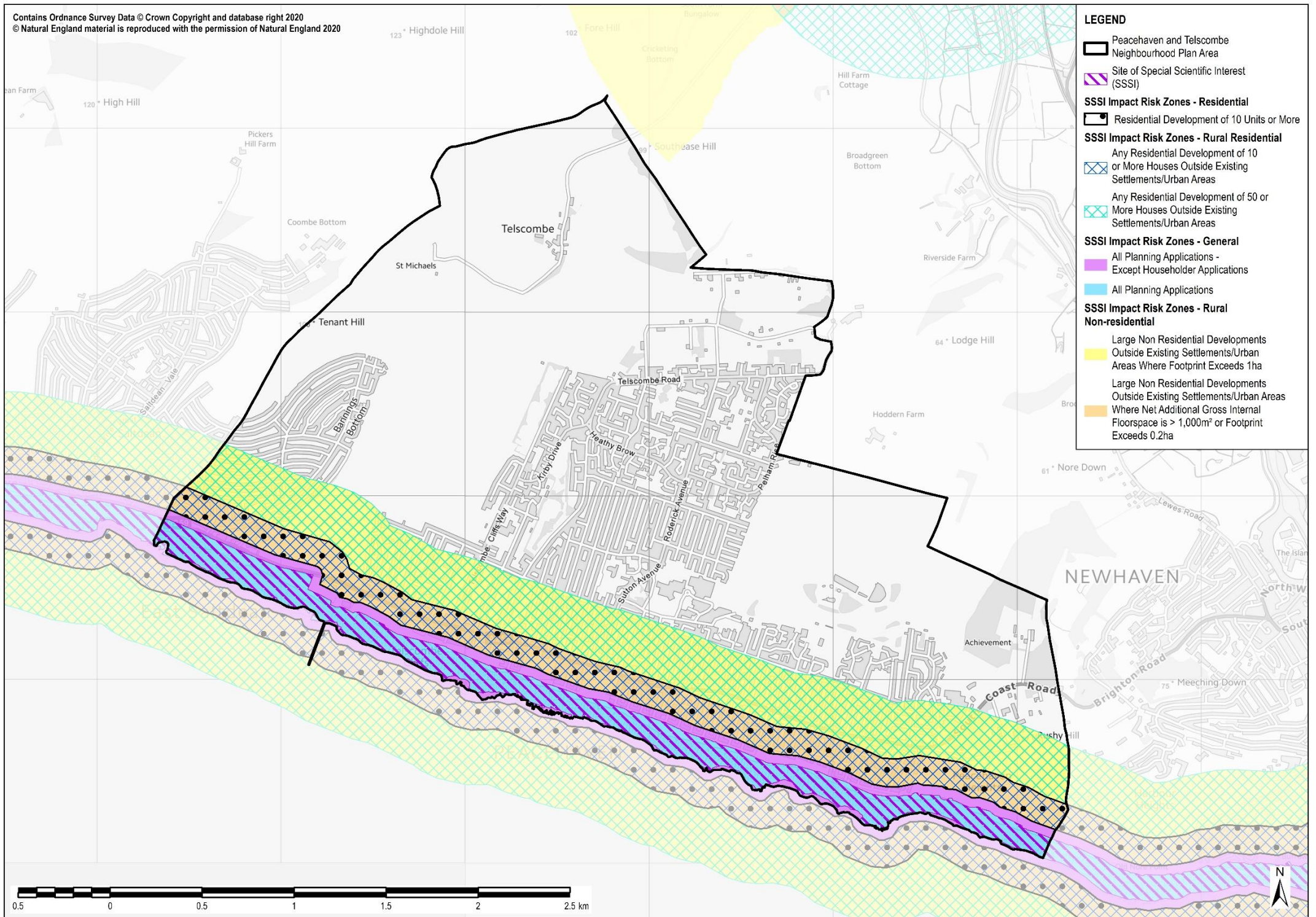
Habitats and species will potentially face increasing pressures from future development within the Neighbourhood Plan area, with the potential for negative impacts on the wider ecological network. This may include a loss of habitats and impacts on biodiversity networks, which may be exacerbated by the effects of climate change. This has the potential to lead to changes in the distribution and abundance of species and changes to the composition of habitats.

The Neighbourhood Plan presents an opportunity to maximise benefits for biodiversity by including consideration of important habitats, species, and designated sites at an early stage of planning for future growth. To maintain and improve the condition of biodiversity in the future, it will be important to not only protect and enhance important habitats but the connections between them. It will be crucial to effectively coordinate the delivery of housing, employment, and infrastructure to ensure that opportunities to improve green infrastructure and ecological corridors are maximised within the Neighbourhood Plan area and in the surrounding areas.

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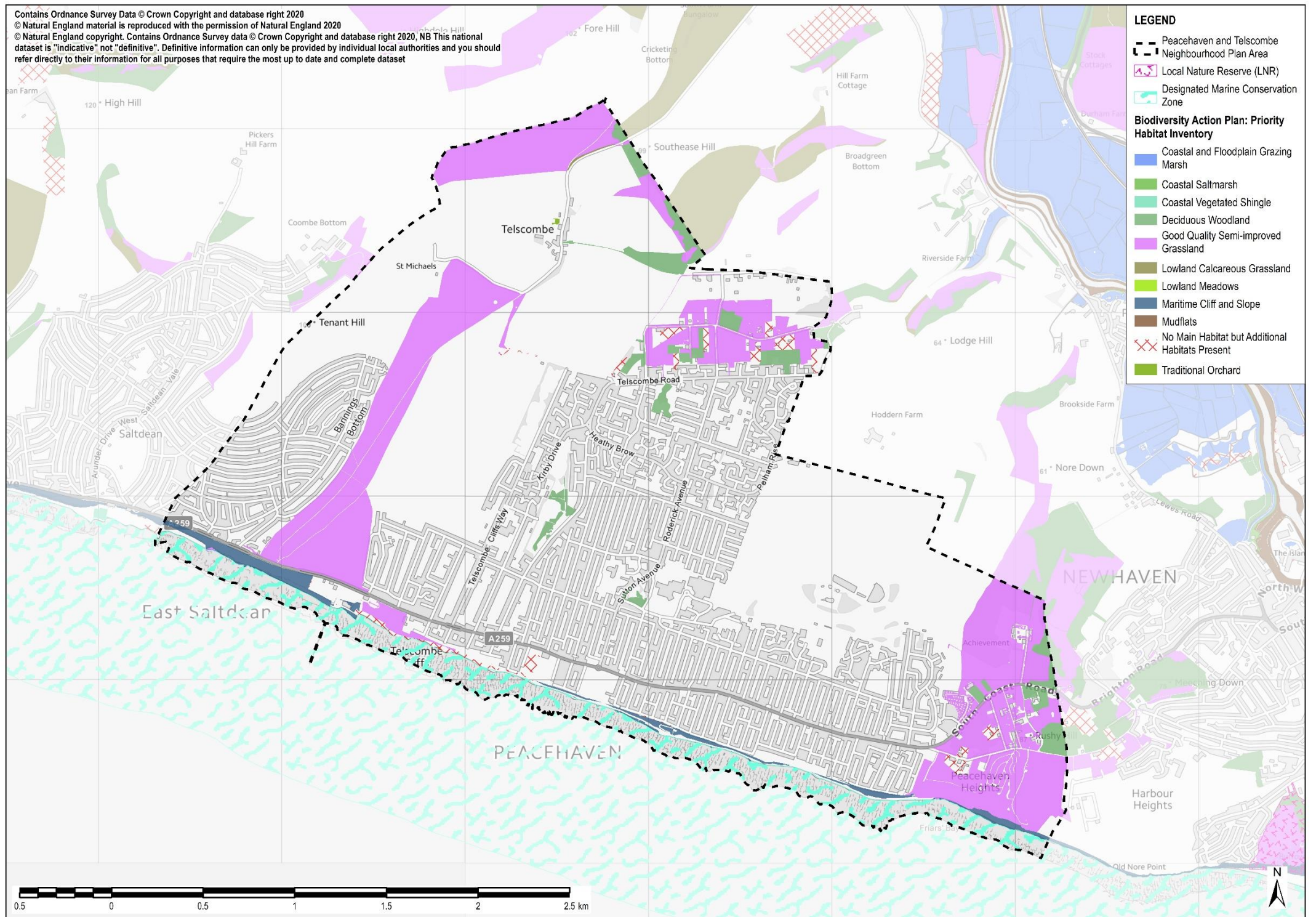
<sup>54</sup> Sussex Biodiversity Record Centre (2020): 'Data Search', [online] available to access via [this link](#)







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## A.3 Climate Change

### Policy Context

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report aiming to understand the current and future climate risks and opportunities. The evidence report contains six priority risk areas requiring additional action in the next five years, see below<sup>55</sup> :

- Flooding and coastal change risks to communities, businesses, and infrastructure.
- Risks to health, wellbeing, and productivity from high temperatures.
- Risk of shortages in the public water supply, and for agriculture, energy generation and industry.
- Risks to natural capital, including terrestrial, coastal, marine, and freshwater ecosystems, soils and biodiversity.
- Risks to domestic and international food production and trade; and
- New and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The UK Climate Change Act<sup>56</sup> was passed in 2008 and established a framework to develop an economically credible emissions reduction path. It also highlighted the role it would take in contributing to collective action to tackle climate change under the Kyoto Protocol, and more recently as part of the UN-led Paris Agreement. The Climate Change Act 2008 (2050 Target Amendment) Order 2019 means that there is now in place a legally binding target of net zero by 2050. The Climate Change Act includes the following:

- Commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels (net zero) by 2050. This includes reducing emissions from the devolved administrations (Scotland, Wales and Northern Ireland), which currently account for about 20% of the UK's emissions. The 100% target was based on advice from the CCC's 2019 report, 'Net Zero – The UK's contribution to stopping global warming' and introduced into law through the Climate Change Act 2008 (2050 Target Amendment) Order 2019.
- The Act requires the Government to set legally binding 'carbon budgets'. A carbon budget is a cap on the amount of greenhouse gases emitted in the UK over a five-year period. The carbon budgets are designed to reflect the cost-effective path to achieving the UK's long-term objectives. The first five carbon budgets have been put into legislation and run up to 2032.

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<sup>55</sup> GOV.UK: 'UK Climate Change Risk Assessment January 2017', [online] available to access via [this link](#)

<sup>56</sup> GOV.UK (2008): 'Climate Change Act 2008', [online] available to access via [this link](#)

- The Committee on Climate Change was set up to advise the Government on emissions targets, and report to Parliament on progress made in reducing greenhouse gas emissions.
- The Act requires the Government to assess the risks and opportunities from climate change for the UK, and to prepare for them. The Committee on Climate Change's Adaptation Sub-Committee advises on these climate change risks and assesses progress towards tackling them. The associated National Adaptation Programme requires the Government to assess the risks to the UK from climate change, prepare a strategy to address them, and encourage key organisations to do the same.

Key messages from the National Planning Policy Framework (NPPF) include:

- *One of the three overarching objectives of the NPPF is an environmental objective to 'contribute to protecting and enhancing our natural, built and historic environment' including by 'mitigating and adapting to climate change' and 'moving to a low carbon economy.' '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. It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'*
- *'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. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.'*
- *'Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.'*
- *Direct development away from areas at highest risk of flooding (whether existing or future). 'Where development is necessary, it should be made safe for its lifetime without increasing flood risk elsewhere.'*

The Clean Air Strategy released in 2019 sets out the Government plans for dealing with all sources of air pollution. The strategy sets out proposals in detail and indicates how devolved administrations intend to make their share of emissions reductions, and complements the Industrial Strategy, Clean Growth Strategy and 25 Year Environment Plan.

In May 2019, the UK Parliament declared a climate emergency, with a view to explicitly acknowledging that human activities are significantly affecting the climate, and actions to mitigate and adapt to climate change should be paramount. This declaration has been mirrored by several local planning authorities across the country. Additionally, the shared vision produced by the Forestry Commission, Natural England and the Environment Agency in January 2020 outlines the use of

nature-based solutions to tackle the climate and ecological emergency<sup>57</sup>. This includes through large-scale woodland planting in the right places, working with nature to manage flood risk, protecting, and restoring peatlands, supporting farmers towards net zero, managing land in a more strategic way, as well as encouraging the use of less carbon intensive materials such as timber in construction.

In the context of the above, Lewes District Council are currently in the process of preparing a Climate Change and Sustainability Strategy<sup>58</sup> to address the causes and impacts of climate change across the district. This is in response to the Council's declaration of a climate emergency in 2019. The Strategy will contain key actions and milestones for the Council and stakeholder groups to deliver to reach a target of net zero carbon by 2030. The seven action areas include: energy and the built environment, sustainable travel and air quality, biodiversity, agriculture, and food, reducing emissions from waste, water, and circular economy and community wealth.

Further context is provided by the recent commitment by environmental law firm Client Earth to request that all local authorities with emerging Local Plans to *"explain how they will set evidence-based carbon reduction targets and ensure these targets are then central to their new planning policy."*<sup>59</sup> Additionally, in response to the COVID-19 pandemic, the Green Alliance's 'Blueprint for a Resilient Economy'<sup>60</sup> report outlines the following five essential building blocks to support new long term employment opportunities, thriving businesses and a healthier, fairer society, whilst protecting against the potentially devastating future impacts of climate change and nature's decline:

- Invest in net zero infrastructure.
- Restore nature.
- Stop wasting valuable resources.
- Ensure clean air and healthy places.
- Make the recovery fair.

The Flood and Water Management Act<sup>61</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings and retrofitting properties at risk (including historic buildings).
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water.
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere.
- Planning to roll back development in coastal areas to avoid damage from flooding or coastal erosion.

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<sup>57</sup> GOV.UK (2020): 'Environmental bodies set joint vision to tackle climate change', [online] available to access via [this link](#)

<sup>58</sup> Lewes District Council (2020): 'The Climate Change and Sustainability Strategy', [online] available to access via [this link](#)

<sup>59</sup> Client Earth (2019) 'Lawyers put local authorities on notice over climate inaction', [online] available to access via [this link](#)

<sup>60</sup> Green Alliance (2020): 'Blueprint for a Resilient Economy', [online] available to access via [this link](#)

<sup>61</sup> Flood and Water Management Act (2010), [online] available to access via [this link](#)

- Creating sustainable drainage systems (SuDS).<sup>62</sup>

Further guidance is provided in the document 'Planning for SuDS'.<sup>63</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

The Local Flood Risk Management Strategy (2016-2026)<sup>64</sup> for East Sussex provides the framework for the management of local flood risk in the county for the ten-year period 2016 – 2026. This strategy is a high level, statutory document that sets out East Sussex County Council's approach to limiting the impacts of local flooding across the county. It also provides a strategic framework for the risk management authorities to work within and goes on to establish new standing advice on drainage issues in the county. The long-term aim of the strategy is to provide a co-ordinated approach to managing local forms of flood risk in East Sussex.

There are several regional strategies that seek to address climate change mitigation and adaptation across Lewes District. This includes: The East Sussex Environment Strategy (2020)<sup>65</sup>, the South2East Energy Strategy (2018)<sup>66</sup>, East Sussex Local Transport Plan (2011)<sup>67</sup> and the South Downs National Park Climate Change Adaptation Plan<sup>68</sup>.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Climate Change theme:

- Core Policy 8: Green Infrastructure.
- Core Policy 10: Natural Environment and Landscape.
- Core Policy 12: Flood Risk, Coastal Erosion & Drainage.
- Core Policy 13: Sustainable Travel.
- Core Policy 14: Renewable and Low Carbon Energy.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Climate Change theme:

- Policy DM14: Multi-Functional Green Infrastructure.

## Current Baseline

### Contribution to climate change

CO2 emissions from the built environment are monitored and recorded at Local Authority level. In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change<sup>69</sup> suggests that Lewes District has recorded lower per capita emissions than the South East of England since 2005.

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<sup>62</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDs.

<sup>63</sup> CIRIA (2010): 'Planning for SuDs – making it happen', [online] available to access via [this link](#)

<sup>64</sup> East Sussex County Council (2016): 'East Sussex Local Flood Risk Management Strategy 2016 - 2026', [online] available to access via [this link](#)

<sup>65</sup> East Sussex Environment Board (2020) 'East Sussex Environment Strategy 2020', [online] available to access via [this link](#)

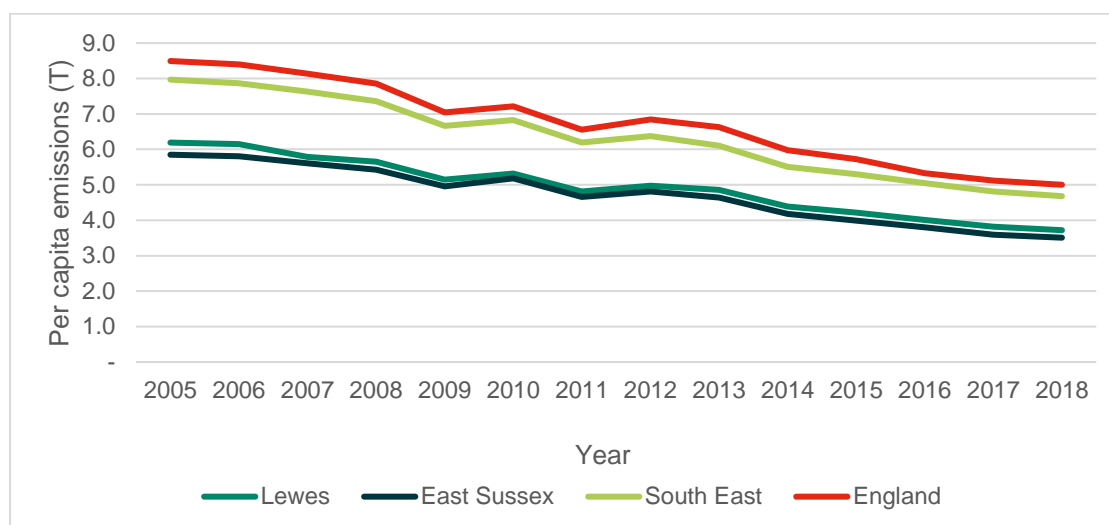
<sup>66</sup> South East Local Enterprise Partnerships (2018) 'South2East Local Energy Strategy', [online] available to access via [this link](#)

<sup>67</sup> East Sussex County Council (2011) 'East Sussex Local Transport Plan 3', [online] available to access via [this link](#)

<sup>68</sup> South Downs National Park (no date) 'SDNPA Climate Change Adaptation Plan', [online] available to access via [this link](#)

<sup>69</sup> UK Gov (2017): 'UK local authority and regional carbon dioxide emissions national statistics: 2005-2017', [online] available to access via [this link](#)

**Figure A3.1** below indicates that the rate of emissions reduction for Lewes is slightly lower than the rate for the East Sussex. In this respect, Lewes District has seen a 39.9% reduction in total emissions per capita since 2005, lower than the totals for East Sussex (40.0%), the South East (41.3%) and England (41.1%).



**Figure A3.1: Carbon dioxide emissions per capita, 2005- 2018**

Road transport is the largest emitter of GHG in the UK, with cars contributing 55% of UK domestic transport emissions (68 Metric tonnes CO<sub>2</sub> equivalent (MtCO<sub>2</sub>e)) in 2018. Lewes District has a high dependency on private vehicles, with a large proportion of the population commuting by car (see **Chapter A.9** of **Appendix A** for more details).

The uptake of Ultra Low Emission Vehicles (ULEVs) will contribute positively towards the reduction of road transport related emissions. In line with assumptions made by the Department for Transport's 'Road to Zero' report (2018), it is assumed that ULEV uptake will increase rapidly in the coming decade and therefore aside from HGVs, all vehicles could be ultra-low emission (powered either by hydrogen or electricity) by 2030.

In 2019, Lewes District Council unanimously agreed to declare a climate emergency and become carbon neutral by 2030, working to reduce the worst impacts of climate change in the area<sup>70</sup>. One of the seven action areas identified was to work toward more sustainable methods of travel. As noted in the Council's Carbon Emissions Analysis and Pathways report<sup>71</sup> transportation is the second largest source of emissions, contributing 37% of the district's total emissions (the largest source of emissions in the district comes from buildings (56%)). The proposed measures to reducing the amount of emissions from transportation include travelling shorter distances, driving less, switching to electric vehicles, and improving freight emissions. Additionally, the East Sussex Environment Strategy (2020)<sup>72</sup> 'aims and actions' seek to develop and implement an electric vehicle strategy for East Sussex, as well as develop a local cycling and walking Infrastructure Plan in order to reduce CO<sub>2</sub> emissions and air pollution.

There is one EV charging station located in the Neighbourhood Plan area. This station, the Esso Peacehaven, is located on the South Coast Road (though the

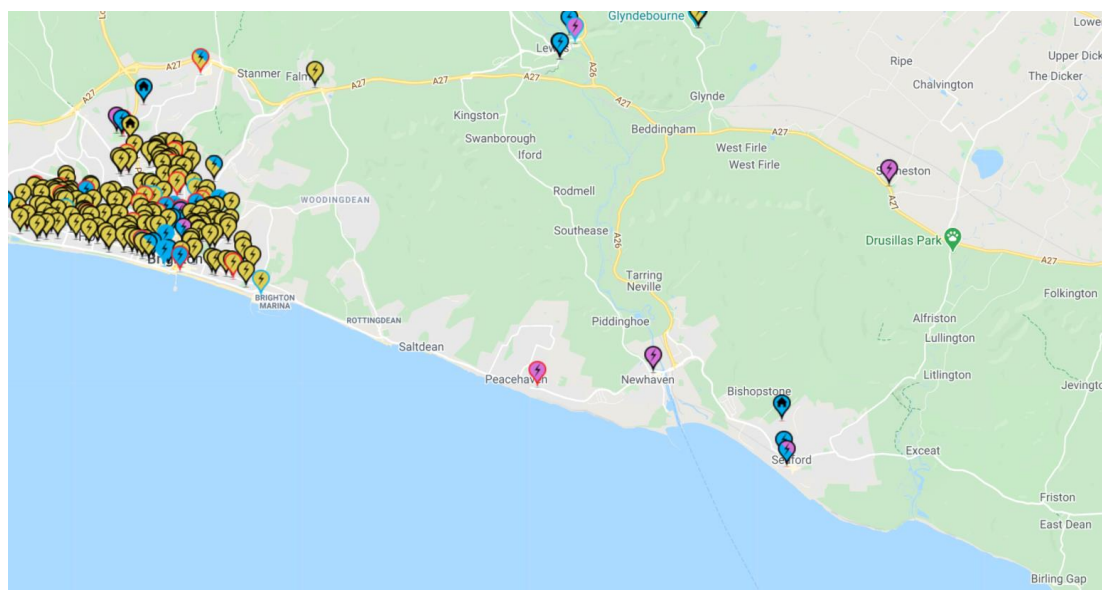
<sup>70</sup>Lewes District Council (no date) 'The Eastbourne Climate Emergency', [online] available to access via [this link](#)

<sup>71</sup> Lewes District Council (2020) 'Carbon Emissions Analysis and Pathways', [online] available to access via [this link](#)

<sup>72</sup> East Sussex Environment Board (2020): 'East Sussex Environment Strategy 2020', [online] available to access via [this link](#)



station is currently out of service)<sup>73</sup>. There are many other charging stations located in neighbouring settlements, with a large concentration of EV stations located in the city of Brighton, as shown below in **Figure A3.2**.



**Figure A3.2 Map of EV charging stations near the Neighbourhood Plan area**

### Effects of climate change

The outcome of research on the probable effects of climate change in the UK was released in 2018 by the UK Climate Projections (UKCP18)<sup>74</sup> team. UKCP18 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change (under medium emissions scenarios 50th percentile and RCP6) for the South East during the period 2020-2039 compared to the period 1981-2000 are likely to be as follows:<sup>75</sup>

- A central estimate of increase in annual mean temperatures of between 1°C and 2°C.
- A central estimate of change in mean precipitation of +10% to +20% in winter and -10% to -20% in summer.

During the period 2040-2059 this is estimated further as:

- A central estimate of increase in annual mean temperatures of between 2°C and 5°C.
- A central estimate of change in annual mean precipitation of +10% to +30% in winter and -10% to -30% in summer.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area, including:

<sup>73</sup> Zap Maps (no date): 'Peacehaven charging points', [online] available to access via [this link](#)

<sup>74</sup> Met Office (no date): 'UK Climate Projections (UKCP18)', [online] available to access via [this link](#)

<sup>75</sup> Met Office (2018): 'Land Projection Maps: Probabilistic Projections', [online map] available to access via [this link](#)

- Effects on water resources from climate change.
- Reduction in availability of groundwater for extraction.
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain.
- Increased risk of flooding, including increased vulnerability to 1:100-year floods.
- A need to increase the capacity of wastewater treatment plants and sewers.
- A need to upgrade flood defences.
- Soil erosion due to flash flooding.
- Loss of species that are at the edge of their southerly distribution.
- Spread of species at the northern edge of their distribution.
- Increased demand for air-conditioning.
- Increased drought and flood related problems such as soil shrinkages and subsidence.
- Risk of road surfaces melting more frequently due to increased temperature.
- Flooding of roads.

Given the coastal location of the Neighbourhood Plan area, several properties within Peacehaven and Telscombe are located within proximity to the Brighton to Newhaven Cliffs. The cliff-edge is particularly vulnerable to erosion, both at the base and at the cliff-face. Climate change impacts have the potential to increase the risk of erosion, with more frequent rainfall events and intense storms speeding the weathering process<sup>76</sup>.

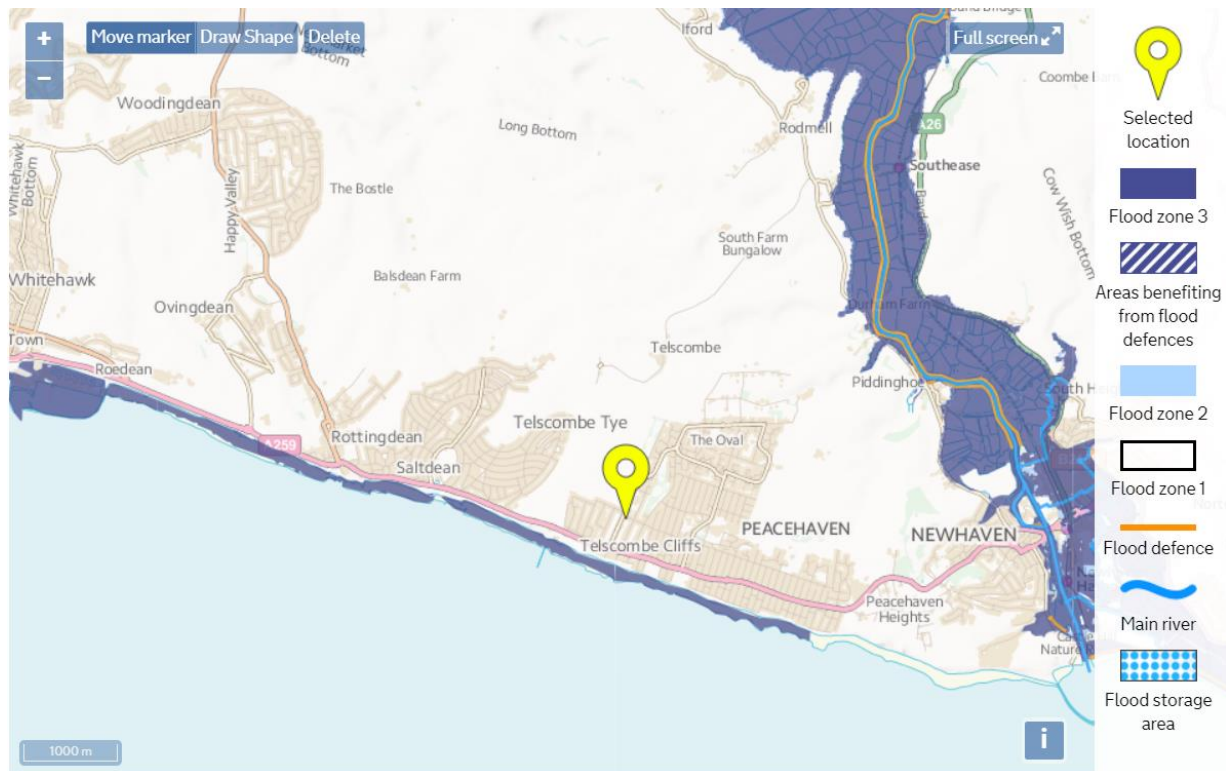
### Flood risk

As shown in **Figure A3.3** below, the main fluvial flood risk in the Neighbourhood Plan area is located along the southern boundary, along the coastline. The elevated setting of the Neighbourhood Plan area at the top of the Brighton to Newhaven Cliffs provides a natural flood defence. Therefore, most of the Neighbourhood Plan area is within Flood Zone 1 and has a low fluvial flood risk. Comparatively, the neighbouring town of Newhaven faces a greater fluvial flood risk from the River Ouse, which travels through the town centre and out to sea.

**Figure A3.4** shows surface water flooding in the Neighbourhood Plan area. There are several areas of Peacehaven and Telscombe which have a medium-high surface water flood risk, primarily impacting the local road network. This includes sections of South Coast Road, Telscombe Cliffs, Saltdean, Banning's Bottom, Buckhurst Road, Cliff Gardens, Ashington Gardens, The Oval, View Road, Firle Road, and at Peacehaven Sewage Treatment Works.

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<sup>76</sup> South East Coastal Group (2006): 'Beachy Head to Selsey Bill Shoreline Management Plan', [online] available to access via [this link](#)



**Figure A3.3: Fluvial flood risk in the Neighbourhood Plan area<sup>77</sup>**



**Figure A3.4: Surface water flood risk within the Neighbourhood Plan area<sup>78</sup>**

<sup>77</sup> GOV UK (2020): 'Flood Map for Planning', [online] available to access via [this link](#)

<sup>78</sup> GOV UK (2020): 'Check the long term flood risk for an area in England', [online] available to access via [this link](#)



Lewes District Council is part of the Sussex Flow Initiative (SFI)<sup>79</sup>, which is “a Natural Flood Management (NFM) project working with and restoring natural processes to reduce flood risk within the River Ouse catchment, in Sussex.” As part of this initiative, the Council has implemented NFM works across the District, including ditch blocking, cross-slope hedge planting, riparian tree planting, and restoring wetland meadows. Peacehaven and Telscombe are part of the River Ouse Catchment (as shown in **Figure A3.5** below) and is likely to benefit from a number of these projects.



**Figure A3.5 River Ouse Catchment area**

### Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Neighbourhood Plan area. This is likely to increase the risks associated with climate change, with an increased need for resilience and adaptation. Specifically, new development areas have the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

Implementation of sustainable urban drainage systems (SuDS) could help reduce the risk from surface water runoff, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding wherever possible.

In terms of climate change contribution, per capita greenhouse gas emissions generated in the Neighbourhood Plan area may continue to decrease with wider adoption of energy efficiency measures, renewable energy production and new technologies, including electric cars. However, increases in the built footprint of the Neighbourhood Plan area would contribute to increases in the absolute levels of greenhouse gas emissions.

<sup>79</sup> Sussex Flow Initiative (no date): 'The River Ouse Catchment', [online] available to access via [this link](#)

## A.4 Landscape

### Policy Context

The European Landscape Convention<sup>80</sup> of the Council of Europe promotes the protection, management and planning of the landscapes and organises international co-operation on landscape issues. The convention was adopted in October 2000 and is the first international treaty to be exclusively concerned with all dimensions of European landscapes.

Key messages from the National Planning Policy Framework (NPPF) include:

- *‘Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty [...]. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within these designated areas should be limited.’*
- *Strategic policies should set out an overall strategy making provision for ‘conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.’*
- *Planning policies and decisions should ensure that developments ‘are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities).’*
- *‘Planning policies and decisions should contribute to and enhance the natural and local environment by:*
- *protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.*
- *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.*
- *remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.’*

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage and engagement with the natural environment’ of the Government’s “A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Landscape SEA theme.

As listed within the South Downs National Park Partnership Management Plan, the general outcomes for conserving and enhancing this nationally protected landscape over the next five years (2020-2025) are as follows:

- Outcome 1: Landscape and Natural Beauty.
- Outcome 2: Increasing Resilience.
- Outcome 3: Habitats and Species.

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<sup>80</sup> Council of Europe (2000): ‘Council of Europe Landscape Convention’, [online] available to access via [this link](#)



- Outcome 4: Arts and Heritage.
- Outcome 5: Outstanding Experiences.
- Outcome 6: Lifelong Learning.
- Outcome 7: Health and Wellbeing.
- Outcome 8: Creating Custodians.
- Outcome 9: Great Places to Live.
- Outcome 10: Great Places to Work.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Landscape theme:

- Core Policy 8: Green Infrastructure.
- Core Policy 10: Natural Environment and Landscape.
- Core Policy 11: Built and Historic Environment & Design.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Landscape theme:

- Policy DM14: Multi-Functional Green Infrastructure.
- Policy DM25: Design.
- Policy DM27: Landscape Design.
- Policy DM34: Areas of Established Character.

## Current Baseline

### Nationally protected landscapes

Most of the western area of the Neighbourhood Plan area (including most of Telscombe Parish) is within the boundaries of the South Downs National Park (SDNP). A small area of land within the north western section of Peacehaven Parish is also within the SDNP.

Designated in 2009, the SDNP is one of England's newest national parks, and covers an area of approximately 1,653 km<sup>2</sup>. The park contains a "rich mosaic of habitats", including ancient woodland, heathland ridges, river valleys, chalk cliffs and farmland<sup>81</sup>.

The South Downs National Park Authority highlights the following as the defined special qualities of the National Park:

- Diverse, inspirational landscapes and breath-taking views.
- A rich variety of wildlife and habitats including rare and internationally important species.
- Tranquil and un-spoilt places.
- An environment shaped by centuries of farming and embracing new enterprise.

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<sup>81</sup> South Downs National Park (2020) 'Partnership Management Plan', [online] available to access via [this link](#)

- Great opportunities for recreational activities and learning experiences.
- Well-conserved historical features and a rich cultural heritage.
- Distinctive towns and villages, and communities with real pride in their area.

The Neighbourhood Plan area is not within or within proximity to an Area of Outstanding Natural Beauty (AONB) or any Green Belt land.

### National Character Areas

National Character Areas (NCAs) are landscape areas which share similar characteristics, following natural lines in the landscape rather than administrative boundaries. Developed by Natural England, NCA profiles describe the natural and cultural features that shape each of these landscapes, providing a broad context to their character. In this respect, the Neighbourhood Plan area is within the 'South Downs' NCA, defined by a prominent ridge of chalk that stretches from Winchester in the west to Eastbourne and the East Sussex coastline in the east. The NCA meets the sea in the distinctive chalk cliffs of Beachy Head and the Seven Sisters, and 90% of the NCA falls within the South Downs National Park. Completed by Natural England in March 2015, the NCA profile<sup>82</sup> contains four Statements of Environmental Opportunity (SEO) for the South Downs along with one additional opportunity, as follows:

- SEO 1: Plan for an expansion of species-rich chalk grassland and other semi-natural habitats and manage and enhance other existing chalk habitats for wildlife connectivity, reinforcement of the distinctive landscape character, and improvement to water resource management.
- SEO 2: Manage, expand where appropriate and enhance the downland farmed landscape, the arable mixed farmed landscape of the dip slope and the broadleaved woodland cover, conserving wildlife habitats, contributing to food provision, maintaining a distinct yet evolving landscape pattern, improving water quality and providing local sources of renewable fuels.
- SEO 3: Conserve and promote the South Downs' rich historic environment, its unique geodiversity and national and local geological sites for the contribution they make to cultural heritage, biodiversity and landscape. Maintain and enhance quality of access, including via the South Downs Way National Trail, providing interpretation to enhance educational and recreational opportunities.
- SEO 4: Manage, enhance and integrate recreational opportunities and public enjoyment with conservation of the natural and historic environment, a productive landscape and tranquillity, reflecting the ambitions of the South Downs National Park.
- Additional Opportunity 1: Plan for the creation of a green infrastructure framework outside the South Downs National Park that could provide a setting for the major urban areas along the south coast while protecting the tranquillity and openness of the adjacent downs that fall within the National Park itself.

### Landscape, townscape and villagescape character

Landscape, townscape and villagescape character play an important part in understanding the relationship between people and place, identifying recognisable and distinct patterns in the landscape which make one area different from another.

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<sup>82</sup> Natural England (2015): 'NCA Profile: 125: South Downs (NE432)', [online] available to access via [this link](#)

Landscape, townscape and villagescape character can assist in the assessment of the likely significance of effects of change resulting from development and the value of the local area, both in visual and amenity terms. In this respect, the Design Code for the emerging Peacehaven and Telscombe Neighbourhood Plan classifies the Neighbourhood Plan area into eight local character areas, shown in Figure A4.1 (overleaf). A description of each local character area is provided below:

### Coastal Plotlands

- Grid layout with perimeter blocks and permeable streets.
- Plots and grid orientated to run parallel and perpendicular to the coastline.
- Dwellings along the cliff edge face the south allowing maximum sea views.
- Consists of predominantly traditional one-storey bungalows.

### Coastal Road

- The A259 acts as a gateway to Peacehaven and a through route to Brighton and Newhaven.
- Along this road is where the highest concentration of taller buildings can be found.
- Some dwellings are embedded in the landscape with entrances lower than ground level.
- There is a mix of residential housing, flats, and apartments for elderly people, as well as some scattered commercial units.

### Plotlands

- Grid layout with perimeter blocks.
- Vehicular access restricted as not all roads are connected to the A259 but there is pedestrian access.
- Mixture of bungalows and two-storey houses, many standing on a large plot that would have been sub-divided over time.
- Mixture of materials and no uniform style owing to the historical self-build nature of the buildings.

### Meridian Centre

- The Meridian Centre and surrounding buildings make up the town centre, providing retail and community facilities.
- Highly accessible for vehicles with plenty of ground level car parking.
- The area is less legible for pedestrians due to the dominance of the car and inward-looking nature of the Meridian Centre.

### North Peacehaven

- The layout is made up of multiple cul-de-sacs leading off distributor roads.
- This area has predominantly two-storey houses.
- There is some new development in this area which varies in style, materials and in the quality of the finishing details.

### South Downs Fringe

- This area provides a more rural setting and is surrounded on three sides by the South Downs National Park.
- This is a low-density area with few scattered houses along two roads.
- The dwellings vary in form and massing but are generally set quite far back from the road allowing greater privacy.

### East Saltdean

- East Saltdean consists of long curved streets which form a permeable structure.
- Similar to The Plotlands, this area consists of bungalows and two-storey houses.

### Telscombe Village

- Telscombe Village is the oldest section within the Neighbourhood Plan area and consists of a range of historic buildings.
- The village is remoted and not very accessible, with only one road in and out.
- The houses are clustered together along the main road with some of the building lines flush against the road.

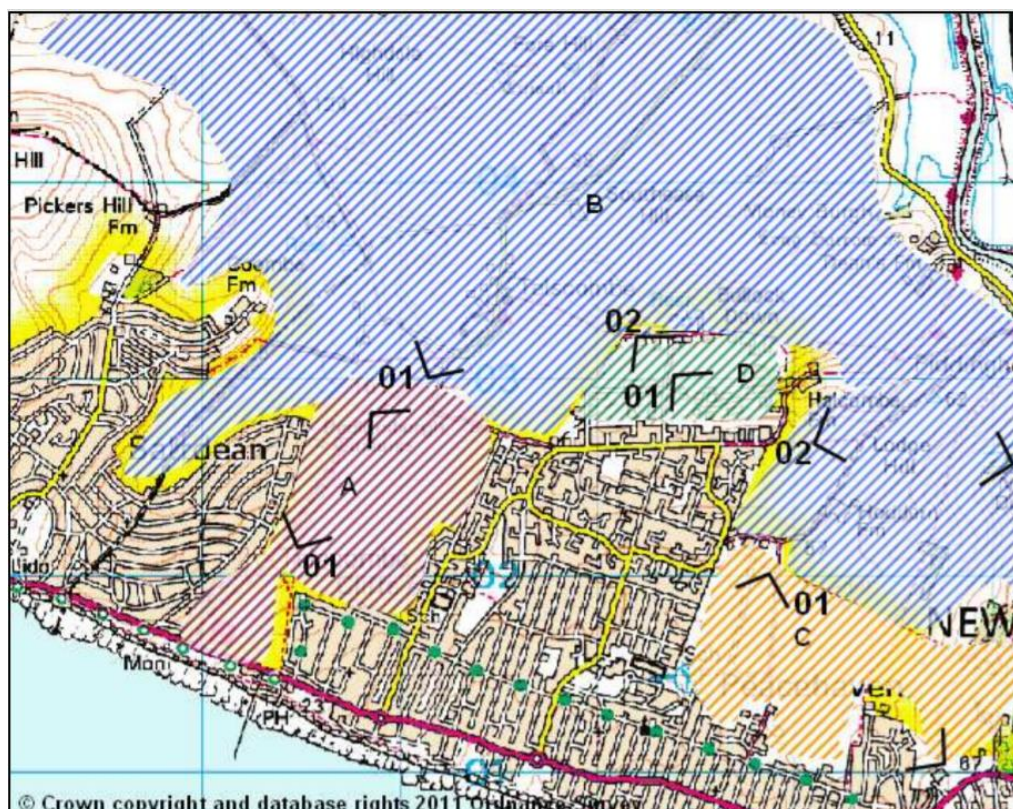


**Figure A4.1: Local character areas within Peacehaven and Telscombe**



## Landscape capacity

Completed to contribute to the evidence base for the Lewes Local Plan, the aim of the Landscape Capacity Study (LCS)<sup>83</sup> was to consider the capacity of settlements across the district with a view to informing decision making. For the purposes of the LCS, the areas surrounding the existing built-up areas within Peacehaven and Telscombe were classified into six landscape character areas, shown below in **Figure A4.2**. The LCS findings are summarised in **Table A4.1**.



**Figure A4.2: Defined landscape character areas for the purposes of the LCS**

**Table A4.1: Summary of LCS findings for Peacehaven and Telscombe**

| Character Area                               | Landscape Value | Sensitivity to Change | Visual Sensitivity | Landscape capacity      |
|--|-----------------|-----------------------|--------------------|-------------------------|
| A01: Telscombe Tye                           | Medium / High   | High                  | High               | <b>NONE</b>             |
| B01: Telscombe Village and land to the south | High            | High                  | High               | <b>NONE</b>             |
| B02: Downland east of Peacehaven             | High            | High                  | High               | <b>NONE</b>             |
| C01: Area around Lower Hoddern Farm          | Low / Medium    | High                  | High               | <b>LOW / MEDIUM</b>     |
| D01: Valley Road area                        | Medium          | Moderate              | High               | <b>LOW / MEDIUM</b>     |
| D02: Land north west of Valley Road          | High            | High                  | High               | <b>NEGLIGIBLE / LOW</b> |

<sup>83</sup> Lewes District Council (2012): 'Landscape Capacity Study', [online] available to access via [this link](#)



Based on the results of the LCS, most of the undeveloped areas surrounding Peacehaven and Telscombe have limited capacity to accommodate new development areas. However, character areas C01 'Area around Lower Hoddern Farm' and D01 'Valley Road area' have a low / medium capacity. These two areas are located within the northern and eastern sections of Peacehaven Parish.

### Tree preservation orders

Implemented by local planning authorities, Tree Preservation Orders (TPOs) are designated to protect specific trees, groups of trees or woodlands in the interests of their amenity value. When considering 'amenity'; the local planning authority will likely take into consideration the following criteria<sup>84</sup>:

- Visibility: the extent to which the trees or woodlands can be seen by the public.
- Individual, collective and wider impact: considering the importance of the trees or woodlands in relation to their cultural or historic value, contribution to and relationship with the landscape and/or their contribution to the character or appearance of a conservation area.

In this context, Lewes District Council have designated numerous TPOs in the interest of their amenity value, including within Telscombe village.

### Visual amenity

It is useful to note that the views across the parish are also an important consideration in the planning process as the scale, height and mass of development can ultimately impact important views if they are not considered and assessed through the process. Changes, such as development and landscape change, can see these views degraded overtime.

This includes locally important views of the Brighton to Newhaven chalk cliffs which stretch along the coastline of the Neighbourhood Plan area. Approximately 3km to the east, the cliffs between Seaford and Eastbourne are within the boundaries of the Seven Sisters Country Park and part of the Sussex Heritage Coast<sup>85</sup>. There are also some longer views to the South Downs National Park to the north east and to the north west of the Neighbourhood Plan area.

### Future Baseline

New development has the potential to lead to incremental but small changes in landscape, townscape and villagescape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and areas with an important visual amenity value.

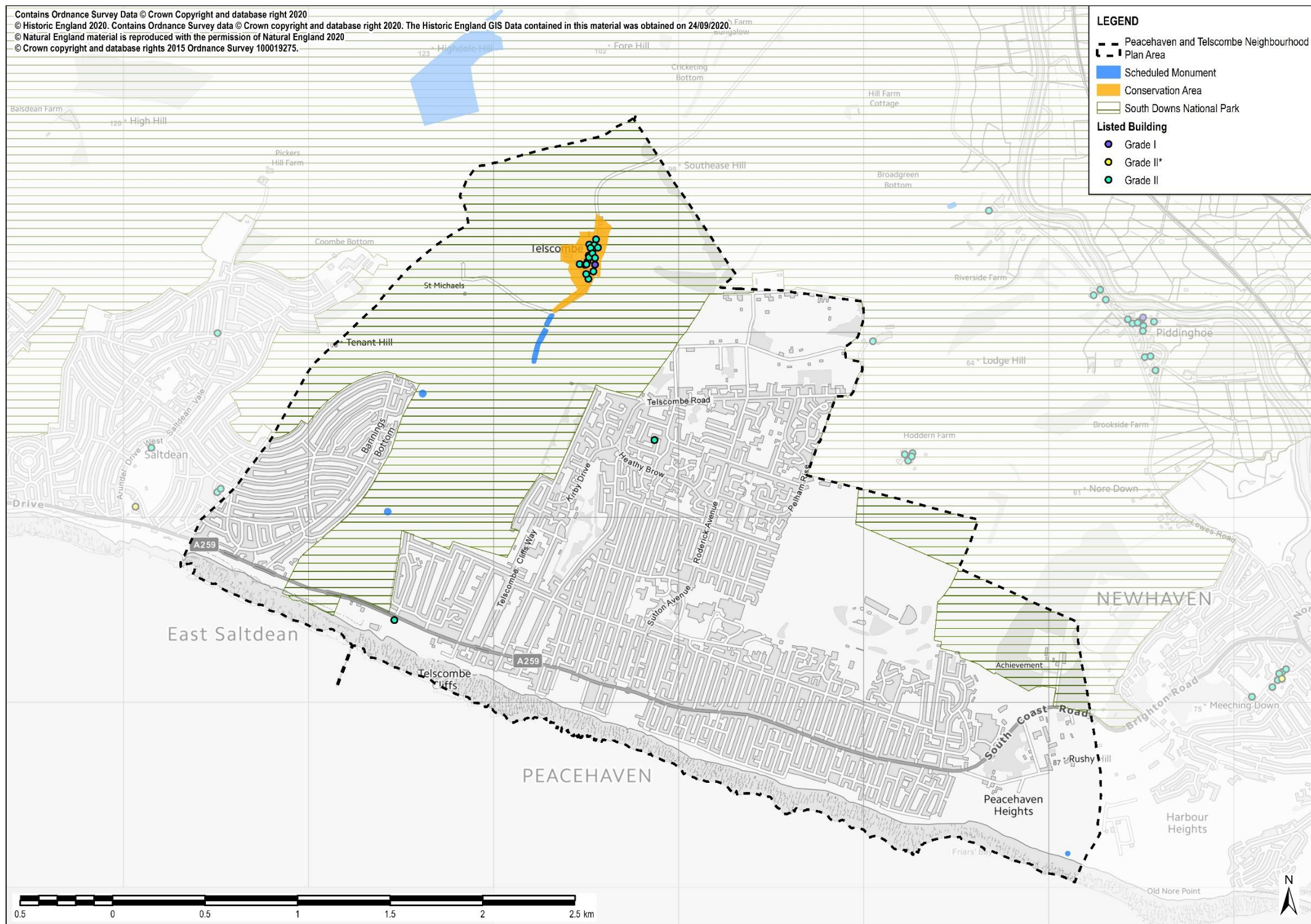
In the absence of the Neighbourhood Plan, inappropriate levels of development within the open countryside could negatively impact upon the landscape features which contribute to the distinctive character and setting of the South Downs National Park and the Neighbourhood Plan area.

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<sup>84</sup> GOV.UK (2014): 'Tree Preservation Orders – general', [online] available to access via [this link](#)

<sup>85</sup> South Downs National Park (2020): 'Visit Seven Sisters Country Park', [online] available to access via [this link](#)

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## A.5 Historic Environment

### Policy Context

Key messages from the National Planning Policy Framework (NPPF) include:

- Heritage assets should be recognised as an *‘irreplaceable resource’* that should be conserved in a *‘manner appropriate to their significance’*, taking account of *‘the wider social, cultural, economic and environmental benefits’* of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Plans should set out a *‘positive strategy’* for the *‘conservation and enjoyment of the historic environment’*, including those heritage assets that are most at risk.
- *‘When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss of less than substantial harm to its significance.’*

The policies contained within Chapter 2 ‘Recovering nature and enhancing the beauty of landscapes’ and Goal 6 ‘Enhanced beauty, heritage, and engagement with the natural environment’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Historic Environment SEA theme.

The Government’s Statement on the Historic Environment for England<sup>86</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

Historic England is the statutory body that helps people care for, enjoy and celebrate England’s spectacular historic environment. Guidance and advice notes provide essential information for local planning authorities, neighbourhood groups, developers, consultants, landowners and other interested parties on historic environment considerations, and are regularly reviewed and updated in light of legislative changes. The following guidance and advice notes are particularly relevant and should be read in conjunction with the others.

Conservation Area Designation, Appraisal and Management: Historic England Advice Note 1 – Second Edition (February 2019)<sup>87</sup> outlines ways to manage change that conserves and enhances historic areas in order to positively contribute to sustainable development. Principally, the advice note emphasises the importance of:

- Understanding the different types of special architectural and historic interest which underpin the designations.
- Recognising the value of implementing controls through the appraisal and/or management plan which positively contribute to the significance and value of conservation areas.

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<sup>86</sup> HM Government (2010): ‘The Government’s Statement on the Historic Environment for England’, [online] available to access via [this link](#)

<sup>87</sup> Historic England (2019): ‘Conservation Area Designation, Appraisal and Management: Advice Note 1’, [online] available to access via [this link](#)



Sustainability Appraisal (SA) and Strategic Environment Assessment (SEA): Historic England Advice Note 8 (December 2016)<sup>88</sup> provides support to all stakeholders involved in assessing the effects of certain plans and programmes on the historic environment. It offers advice on heritage considerations during each stage of the SA/SEA process and helps to establish the basis for robust and comprehensive assessments.

Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2nd Edition) (December 2017)<sup>89</sup> provides general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views can contribute to setting. Specifically, Part 2 of the advice note outlines a five stepped approach to conducting a broad assessment of setting:

- Step 1: Identify which heritage assets and their settings are affected.
- Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
- Step 5: Make and document the decision and monitor outcomes.

Neighbourhood Planning and the Historic Environment: Historic England Advice Note 11 (October 2018)<sup>90</sup> outlines the importance of considering the historic environment whilst preparing the plan (section 1), which culminates in a checklist of relevant issues to consider, followed by an overview of what this means in terms of evidence gathering (section 2). Sections 3 to 5 of the advice note focus on how to translate evidence into policy, understand the SEA process and Historic England's role in neighbourhood planning.

Historic England Advice Note 7 'Local Heritage Listing'<sup>91</sup> supports local authorities and communities to introduce a local list in their area, encouraging a more consistent approach to the identification and management of local heritage assets across England. Local lists play an essential role in building and reinforcing a sense of local character and distinctiveness in the historic environment. They enable the significance of any building or site on the list (in its own right and as a contributor to the local planning authority's wider strategic planning objectives), to be better taken into account in planning applications affecting the building or site or its setting.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Historic Environment theme:

- Core Policy 4: Economic Development & Regeneration.
- Core Policy 10: Natural Environment and Landscape.
- Core Policy 11: Built and Historic Environment & Design.

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<sup>88</sup> Historic England (2016): 'Sustainability Appraisal and Strategic Environmental Assessment: Advice Note 8', [online] available to access via [this link](#)

<sup>89</sup> Historic England (2017): 'The Setting of Heritage Assets', [online] available to access via [this link](#)

<sup>90</sup> Historic England (2018): 'Neighbourhood Planning and the Historic Environment', [online] available to access via [this link](#)

<sup>91</sup> Historic England (2016): 'Local Heritage Listing: Identifying and Conserving Local Heritage: Advice Note 7', [online] available to access via [this link](#)

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Historic Environment theme:

- Policy DM25: Design.
- Policy DM33: Heritage Assets.

## Current Baseline

### Historic evolution of Peacehaven and Telscombe

#### *Peacehaven*

The town has been established north and south of the pre-existing and slightly sinuous South Coast Road from Newhaven to Brighton (A259). Until the development of the Meridian Centre to the north in 1979, nearly all commercial activity was concentrated on this road. The town lies at the southern (cliff) edge of the South Downs, so that the entire area is underlain by the relatively pure limestones of, from youngest to oldest, the Tarrant and Newhaven Chalk Formations (Upper Cretaceous). The uppermost solid geology of much of the northern part of the town, however, is the sandstone and mudstone (commonly clay) of the Lambeth Group, being Tertiary (Palaeocene) irregular beds laid down on the eroded chalk.

The development of Peacehaven on agricultural land followed precedents for speculative seaside resorts all along the south coast and, more specifically, immediately west of the site at Telscombe Cliffs. Here, the Cavendish Land Company had begun to develop a seaside resort from 1901. This had not advanced beyond a handful of houses in 1914-15. However, Charles Neville began to purchase land for what was to become Peacehaven, and in due course he acquired Telscombe Cliffs too. Today the junction of the two cliff-top developments is marked only by the sudden end of Peacehaven's gridded street plan.

The advent of the First World War prevented any significant work at Peacehaven. The pylons of 1916 that mark the eastern and western limits of the Peacehaven estate are the only survivors of this period: two survive at the east end of South Coast Road, just east of Cornwall Avenue, and one survives at the west end, just west of Lincoln Avenue South.

Amongst the scattered houses of pre-war Peacehaven, there were attempts to create public and commercial features more consistent with the burgeoning seaside resort of Neville's imagination. There was little substantial about many of these more public buildings. However, most are now long gone, like the corrugated-iron school and swimming pool, and many, such as the surviving Roman Catholic church, are extremely modest and impermanent construction.

During the controversial inter-war decades of the initial colonization of Peacehaven, the local authority had been reluctant to do its duty with regard to public health (mains drainage for such a new widespread and low-density settlement was evidently going to be a huge draw on public funding) and was frustrated by its lack of powers. Following the introduction of the Town and Country Planning Act, action thereafter was more rapid. This included the compulsory purchase of vacant plots that had been used for agriculture during the Second World War, and implementation of a strategy for consolidation of the scattered township through phased release of blocks of land for development. In the course of this regulated consolidation, the



mass of vacant plots of that existed throughout Peacehaven at the outbreak of the Second World War has now gone<sup>92</sup>.

### *Telscombe*

Telscombe village is set unobtrusively in a valley within stunning downland. The small village remains surprisingly remote and isolated given its proximity to the urban coastal development at Saltdean, Telscombe Cliffs and Peacehaven. The settlement is linear in form running north-south and is accessible along a narrow country lane which passes through the village. The buildings are tightly arranged around the road, which gives the village a compact feel.

The presence of the farm and proliferation of barns throughout the village are evidence of the key role agriculture played in shaping the settlement. However, the prevalence of barrows and tumuli on the surrounding Downland bear witness to man's occupation of this area for centuries. The network of paths across the Downs focus on the village of Telscombe, which is likely to have provided shelter on the route from the coast to inland settlements.

The church of St Laurence is the oldest surviving building in the village and would have formed its focus and the reason for the additional development of a rectory and other buildings. However, it would have been the erection of the Manor House and its ancillary and associated buildings which would have represented the principal phase of new building in the settlement. A rectory, several worker's cottages and a small classroom followed later when a sufficient population existed in the village. There was a later phase of building centred on Stud Farm in the late 1800s when Ambrose Gorham (trainer of the 1902 Grand National winner 'Shannon Lass') became the local squire. With the exception of Stud Farm, Ambrose Gorham forbade any significant new development to take place, instead concentrating on consolidating the village's facilities, bringing mains water to the village in 1909, electricity in 1930 and building the Village Hall in 1924.

Due to the location of the settlement in chalk downland, one of the most common building materials used in the settlement is flint, which is found in surrounding fields. This has in some places been stuccoed (such as at the Manor House) or incorporated with stone dressings (such as in the Church of St. Laurence and the Village Hall), but commonly the flint is used in conjunction with brick dressings (Stud House, the barns and stables, Bank Cottages etc).<sup>93</sup>

### *Designated heritage assets and areas*

The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent.

An overview of the designated historic environment assets present in the Neighbourhood Plan area is provided below.

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<sup>92</sup> Sussex Extensive Urban Survey (2004): 'Peacehaven Historic Character Assessment Report', [online] available to access via [this link](#)

<sup>93</sup> Lewes District Council (2009): 'Telscombe Conservation Area Appraisal', [online] available to access via [this link](#)

## Listed buildings

Listed buildings are nationally designated buildings which are protected through the Listed Buildings and Conservation Areas Act 1990.<sup>94</sup> The Neighbourhood Plan area contains 18 Grade II listed buildings, one Grade I listed building, namely: 'The Parish Church of St Lawrence' (located in Telscombe)<sup>95</sup>. There are no Grade II\* listed buildings within the Neighbourhood Plan area. Notably, 17 out of the 18 Grade II listed buildings are within Telscombe, with most overlapping with the boundaries of the Telscombe Conservation Area.

## Scheduled monuments

The Ancient Monuments and Archaeological Areas Act (1979)<sup>96</sup> allows the investigation, presentation and recording of matters of archaeological or historical interest and makes provision for the regulation of operations or activities which may affect ancient monuments and archaeological areas. Scheduled monuments are nationally designated sites which are protected under the Act. In this regard, there are four scheduled monuments within the Neighbourhood Plan area, including:

- Bowl barrow on Peacehaven Heights, 242m south-west of Warren Court.
- Bowl barrow on Telscombe Tye, 650m south-west of Pedlersburgh.
- Cross dyke on Telscombe Tye.
- Pedlersburgh: a bowl barrow on Telscombe Tye.

## Registered historic parks and gardens, and historic battlefields

Historic England's 'Register of Parks and Gardens of Special Historic Interest in England', established in 1983, currently identifies over 1,600 sites assessed to be of significance. No historic parks and gardens are present in the Neighbourhood Plan area.

Historic England's Register of Historic Battlefields identifies important English battlefields. Its purpose is to offer them protection through the planning system, and to promote a better understanding of their significance and public enjoyment. No historic battlefields are present in the Neighbourhood Plan area.

## Conservation areas

Conservation areas are designated because of their special architectural and historic interest. Conservation area appraisals are a tool to demonstrate the area's special interest, explaining the reasons for designation and providing a greater understanding and articulation of its character - mentioned within the 'Conservation Area Designation, Appraisal and Management' advice note by Historic England<sup>97</sup>.

In this respect, Telscombe Conservation Area was designated in August 1973 and encompasses the village of Telscombe. Completed in 2009, the Telscombe Conservation Area Appraisal details many features of interest. For example, many of the buildings in the village of Telscombe were erected in the seventeenth and eighteenth centuries, with several later examples from the early nineteenth century. There has been no significant development since that time, hence the village is

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<sup>94</sup> Planning (Listed Buildings and Conservation Areas) Act (1990), [online] available to access via [this link](#)

<sup>95</sup> Historic England (2020): 'National Heritage List for England', [online] available to access via [this link](#)

<sup>96</sup> Ancient Monuments and Archaeological Areas Act (1979), [online] available to access via [this link](#)

<sup>97</sup> Historic England (2016): 'Conservation Area Appraisal, Designation and Management: Advice Note 1', [online] available to access via [this link](#)

largely unspoilt, and retains much of its original historic character and appearance. Buildings of character include: Manor House, The Old Rectory, Telscombe Village Club, The Old School House, Stud House and Farm, and the Parish Church of St Laurence (which is the oldest building in the village with Norman origins, and Grade I listed).

In between these more imposing buildings are many modest attractive cottages, including Manor Cottage, Oak Cottage, Box Tree Cottage, Bank Cottages and White Cottages. The village unit is tied together by the fine flint walls that run throughout. The mature trees, flint walls and open spaces that surround and thread through the village help to identify the settlement and are in marked contrast to the surrounding open downland.

The Telscombe Conservation Area Appraisal notes that that the village does not contain a great number of features which actively detract from its overall character. Several more recent developments, such as the modern farm buildings at Stud Farm or the houses at Hillview, are either set back from the road and well-screened or are of an appearance that, whilst not actively contributing to the character of the Conservation Area, do not detract from it. However, the northernmost 90 metres of kerbstones around Hillview are concrete, and their replacement with more appropriate materials is encouraged.

### Locally important heritage features

It should be noted that not all the area's historic environment features are subject to statutory designations, and non-designated features comprise a large part of what people have contact with as part of daily life – whether at home, work, or leisure. Although not designated, many buildings and areas are of historic interest and are important by local communities. For example, open spaces and key distinctive buildings are likely to have a local historic value.

Accessed via the Heritage Gateway<sup>98</sup>, the East Sussex Historic Environmental Record (HER) identifies the important distinctive structures or features that positively contribute to the local distinctiveness and sense of place of the Neighbourhood Plan area. Following a high-level review of the HER, there are 99 records within Peacehaven and 37 records within Telscombe.

During the subsequent stages of the SEA process, the East Sussex HER will be reviewed in greater detail to determine which heritage features are likely to be impacted by the preferred development strategy within the Neighbourhood Plan (and reasonable alternatives). These heritage considerations (alongside any suggested mitigation measures or recommendations) will be presented in the Environmental Report accompanying the Neighbourhood Plan at submission.

### Heritage at risk

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, scheduled monuments, historic parks and gardens, registered battlefields, wreck sites and conservation areas deemed to be 'at risk'. According to the 2020 Heritage at Risk Register for South East England<sup>99</sup>, there are two heritage assets at risk within

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<sup>98</sup> Heritage Gateway (2020): 'Detailed Search', [online database] available to access via [this link](#)

<sup>99</sup> Historic England (2020): 'Heritage at Risk Register 2020: London and South East' [online] available to access via [this link](#)

Lewes District, neither of which are within the boundaries of the Neighbourhood Plan area.

It is important to recognise that the Heritage at Risk Registers for areas outside of London do not contain information about the status of Grade II listed buildings. As such, it is currently not possible to determine whether any of the Grade II listed buildings within the Neighbourhood Plan area are at risk.

### Future Baseline

New development areas in the Neighbourhood Plan area have the potential to impact on the fabric and setting of heritage assets; for example, through inappropriate design and layout, and increasing the impacts of traffic within conservation areas. It should be noted, however, that existing historic environment designations offer a degree of protection to heritage assets and their settings.

Alongside, new development need not be harmful to the significance of a heritage asset, and in the context of the Neighbourhood Plan area there may be opportunity for new development to enhance the historic setting of the parish's settlements, support historic landscape character and better reveal assets' heritage significance.

## A.6 Land, Soil, and Water Resources

### Policy Context

The EU's Soil Thematic Strategy<sup>100</sup> presents a strategy for protecting soil resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

Adopted in October 2000, the purpose of the EU Water Framework Directive (WFD) is to establish a framework for the protection of inland surface waters, transitional waters, coastal waters and groundwater, driving a catchment-based approach to water management. In England and Wales there are 100 water catchments, and it is Defra's intention is to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems.
- Promote the sustainable use of water.
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances.
- Ensure the progressive reduction of groundwater pollution.
- Contribute to achieving 'good' water quality status for as many waterbodies as possible by 2027.

Key messages from the NPPF include:

- 'Planning policies and decisions should contribute to and enhance the natural and local environment by:

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<sup>100</sup> European Commission (2006): 'Soil Thematic Strategy', [online] available to access via [this link](#)



- i. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.
  - ii. 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.’
- Prevent new or existing development from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.
  - ‘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. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land.’
  - ‘Encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains.’
  - Planning policies and decisions should ‘give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs’, and ‘promote and support the development of under-utilised land and buildings.’
  - Taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply.
  - Prevent new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
  - The government has produced a separate plan that specifically deals with planning policy in relation to waste management; this should be read in conjunction with the NPPF.

Along with the policies contained within Chapter 1 ‘Using and managing land sustainably’ and Chapter 4 ‘Increasing resource efficiency, and reducing pollution and waste’, Goal 2 ‘Clean and plentiful water’, Goal 5 ‘Using resources from nature more sustainably and efficiently’ and Goal 8 ‘Minimising waste’ of the Government’s ‘A Green Future: Our 25 Year Plan to Improve the Environment’ directly relates to the Land, Soil and Water Resources SEA theme.

Other key documents at the national level include Safeguarding our Soils: A Strategy for England<sup>101</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>102</sup>, which sets out the Government’s vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources.

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<sup>101</sup> Defra (2009): ‘Safeguarding our soils: A strategy for England’, [online] available to access via [this link](#)

<sup>102</sup> Defra (2011): ‘Water for life (The Water White Paper)’, [online] available to access via [this link](#)

In terms of waste management, the Government Review of Waste Policy in England<sup>103</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials. The National Waste Management Plan<sup>104</sup> provides an analysis of the current waste management situation in England and evaluates how it will support the implementation of the objectives and provisions of the revised Waste Framework Directive<sup>105</sup>. This includes an assessment of the need for new collection schemes, additional waste infrastructure and investment channels, as well as providing general or strategic waste management policies.

River Basin Management Plans (RBMPs) set out a framework for how all river basin stakeholders, including water companies and local communities, can help improve the quality of the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021 and are reviewed every five years. Peacehaven and Telscombe fall within the South East River Basin District and the December 2015 Management Plan provides a framework for protecting and enhancing the benefits provided by the water environment<sup>106</sup>.

The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. These documents are<sup>107</sup>:

- The Waste and Minerals Plan (adopted February 2013).
- The Waste and Minerals Sites Plan (adopted February 2017).

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Land, Soil and Water Resources theme:

- Core Policy 10: Natural Environment and Landscape.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Land, Soil and Water Resources theme:

- Policy DM3: Accommodation for Agricultural and Other Rural Workers.
- Policy DM4: Residential Conversions in the Countryside.
- Policy DM5: Replacement Dwellings in the Countryside.
- Policy DM9: Farm Diversification.
- Policy DM19: Protection of Agricultural Land.
- Policy DM20: Pollution Management.
- Policy DM21: Land Contamination.
- Policy DM22: Water Resources and Water Quality.

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<sup>103</sup> Defra (2011): 'Government Review of Waste Policy in England 2011', [online] available to access via [this link](#)

<sup>104</sup> DEFRA (2013): 'Waste Management Plan for England', [online] available to access via [this link](#)

<sup>105</sup> Directive 2008/98/EC

<sup>106</sup> Environment Agency (2015): 'South East river basin district river basin management plan', [online] available to access via [this link](#)

<sup>107</sup> East Sussex County Council (2020) 'Waste and Minerals Local Plan for East Sussex', [online] available to access via [this link](#)

## Current Baseline

### Soil resources

The Agricultural Land Classification (ALC) classifies land into six grades (plus 'non-agricultural land' and 'urban'), where Grades 1 to 3a are recognised as being the 'best and most versatile' (BMV) land and Grades 3b to 5 of poorer quality. In this context, there is a need to avoid loss of higher quality 'best and most versatile' agricultural land.

In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for most of the areas of undeveloped land in the Neighbourhood Plan area. The provisional ALC dataset provided by Natural England indicates that the undeveloped areas surrounding Peacehaven and Telscombe are predominantly underlain by areas of Grade 2 and Grade 3 agricultural land. The Neighbourhood Plan area therefore has the potential to contain some of the best and most versatile land for agricultural purposes<sup>108</sup>.

However, in the absence of a detailed ALC assessment it is currently not possible to determine whether the Grade 3 areas can be classified as Grade 3a (i.e., best and most versatile land) or Grade 3b land.

The results of the 'Predictive Best and Most Versatile (BMV) Land Assessment' for South East England<sup>109</sup> provided by Natural England indicates that most of the undeveloped areas of land in surrounding Peacehaven has a greater than 60% chance of being underlain by BMV agricultural land. There are also some areas of land within Telscombe Parish that have a 20-60% chance of being underlain by BMV agricultural land.

### Water resources and quality

The Neighbourhood Plan area is located within the South East River Basin District, overlapping with the 'Ouse Upper' Operational Catchment. The Environment Agency confirms that 26 waterbodies pass through the catchment area, none of which pass through the Neighbourhood Plan area. The water resources located within and within proximity to the Neighbourhood Plan area are limited to a few isolated dew ponds. The River Ouse passes through the neighbouring settlement of Newhaven (approximately 1km to the east of Peacehaven).

As shown on the Environment Agency's Catchment Data Explorer, the most recently completed water quality assessments undertaken in 2019 classifies the 26 waterbodies within the Ouse Upper Operational Catchment as follows<sup>110</sup>:

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<sup>108</sup> Natural England (2011): 'Agricultural Land Classification map London and the South East (ALC007)', [online] available to access via [this link](#)

<sup>109</sup> Natural England (2017): 'Likelihood of Best and Most Versatile (BMV) Agricultural Land – Strategic scale map London and the South East (ALC019)', [online] available to access via [this link](#)

<sup>110</sup> Environment Agency (2020): 'Catchment Data Explorer: Ouse Upper Operational Catchment', [online] available to access via [this link](#)

**Table A6.1: Quality of the waterbodies within the Ouse Upper Operational Catchment**

|                        | Ecological status or potential |      |          |      |      | Chemical status |      |
|------------------------|--------------------------------|------|----------|------|------|-----------------|------|
| Number of water bodies | Bad                            | Poor | Moderate | Good | High | Fail            | Good |
| 26                     | 3                              | 5    | 18       | 0    | 0    | 26              | 0    |

Reflecting the results in **Table A6.1**, none of the waterbodies within the Ouse Upper Operational Catchment are classified as ‘good’. The reasons for not achieving good status (RNAG) for these watercourses are primarily attributed to the water industry sector and the agriculture and rural land management sector.

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwater have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwater are designated as Nitrate Vulnerable Zones (NVZs) within which, Member States are required to establish Action Programmes to reduce and prevent further nitrate contamination. In this regard, the whole of the Neighbourhood Plan area is within the Sussex Chalk Groundwater NVZ. It is useful to note that as the Neighbourhood Plan is likely to allocate land for residential development and potential employment areas, such uses are not considered to significantly increase the risk of pollution to NVZs.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. In this respect, the north western section of Telscombe Parish is within a Zone III – Total Catchment SPZ.

### Mineral resources

Mineral resources are defined as natural concentrations of minerals or, in the case of aggregates, bodies of rock that are, or may become, of potential economic interest due to their inherent properties. They make an essential contribution to the country’s prosperity and quality of life. Since minerals are a non-renewable resource, minerals safeguarding is the process of ensuring that non-minerals development does not needlessly prevent the future extraction of mineral resources, of local and national importance<sup>111</sup>.

The East Sussex Minerals and Waste Plan outlines areas of mineral sensitivity within the county. In this regard, there are no Mineral Safeguarding Areas or Mineral Consultation Zones within or within proximity to the Neighbourhood Plan area. Regarding waste management, Hoyle Road in Peacehaven is identified as a potential area of opportunity<sup>112</sup>.

<sup>111</sup> GOV.UK (2014): ‘Minerals Guidance’, [online] available to access via [this link](#)

<sup>112</sup> East Sussex County Council (2017): ‘The Waste and Minerals Sites Plan’, [online] available to access via [this link](#)



## Future Baseline

Future development has the potential to affect water quality through diffuse pollution, wastewater discharges, water run-off, and modification. However, water companies are likely to maintain adequate water supply and wastewater management over the plan period, and the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality within the Neighbourhood Plan area and wider area.

Due to the likely prevalence of BMV agricultural land within sections of the undeveloped areas of the Neighbourhood Plan area, new developments which are located outside of the settlements will likely lead to losses of higher quality (best and most versatile) agricultural land.

## A.7 Population and Community

### Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; *'support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing.'*
- To support the Government's objective of significantly boosting the supply of housing, strategic policies *'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*
- The size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site where possible.
- Recognise the important contribution of small and medium sized development sites in meeting housing needs. Local Plans should identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare, and neighbourhood planning groups should also consider the opportunities for allocating small and medium-sized sites.
- In rural areas, planning policies and decisions should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.

- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high-quality public spaces, which encourage the active and continual use of public areas.
- Ensuring that there is a *‘sufficient choice of school places’ and taking a ‘proactive, positive and collaborative approach’ to bringing forward ‘development that will widen choice in education’.*

The ‘Ready for Ageing?’ report, published by the Select Committee on Public Service and Demographic Change<sup>113</sup> warns that society is underprepared for an ageing population. The report states that ‘longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises’. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Population and Community theme:

- Core Policy 1: Affordable Housing.
- Core Policy 2: Housing Type, Mix and Density.
- Core Policy 3: Gypsy and Traveller Accommodation.
- Core Policy 4: Economic Development & Regeneration.
- Core Policy 6: Retail and Town Centres.
- Core Policy 7: Infrastructure.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Population and Community theme:

- Policy DM1: Planning Boundary.
- Policy DM2: Rural Exception Sites.
- Policy DM8: Residential Sub-Divisions and Shared Housing.
- Policy DM10: Employment Development in the Countryside.
- Policy DM28: Residential Extensions.
- Policy DM32: Telecommunications Infrastructure.

## Current Baseline

### Population

**Table A7.1** overleaf shows the change in population between the period of 2001 and 2011. The Neighbourhood Plan area saw an increase in population of approximately

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<sup>113</sup> Select Committee on Public Service and Demographic Change (2013): ‘Ready for Ageing?’, [online] available to access via [this link](#)

5.9% between this period, broadly in line with growth at the District level (approximately 5.8%), but lower than the South East and England rates of change (both at approximately 7.9%).

**Table A7.1: Population change between 2001 and 2011<sup>114</sup>**

| Population change between 2001 and 2011 | Peacehaven and Telscombe | Lewes  | South East | England    |
|---|--------------------------|--------|------------|------------|
| 2001                                    | 20,350                   | 92,177 | 8,000,645  | 49,138,831 |
| 2011                                    | 21,544                   | 97,502 | 8,634,750  | 53,012,456 |
| % Population change                     | 5.87%                    | 5.78%  | 7.93%      | 7.88%      |

Based on mid-2018 population estimates, the total population of the Neighbourhood Plan area has grown to 23,273 residents, a further increase of approximately 8% since 2011 levels.

### Age structure

**Table A7.2** shows the distribution of residents within the Neighbourhood Plan area in line with age. The largest group of residents in the Neighbourhood Plan area are in the 60+ age category (29.5%), higher than comparative figures for the South East (23.4%) and England as a whole (22.3%) and slightly lower in comparison to Lewes District (30.1%).

**Table A7.2: Age Band (% of total)<sup>115</sup>**

| Age Band (% of total) | Peacehaven and Telscombe | Lewes  | South East | England    |
|-----------------------|--------------------------|--------|------------|------------|
| 0-15                  | 16.84%                   | 17.40% | 19.02%     | 18.90%     |
| 16-24                 | 9.65%                    | 9.36%  | 11.22%     | 11.90%     |
| 25-44                 | 23.32%                   | 22.05% | 26.51%     | 27.50%     |
| 45-59                 | 20.66%                   | 21.07% | 19.88%     | 19.40%     |
| 60+                   | 29.53%                   | 30.12% | 23.36%     | 22.30%     |
| Total population      | 21,544                   | 97,502 | 8,634,750  | 53,012,456 |

### Household deprivation

Household deprivation in the Neighbourhood Plan area (presented in **Table A7.3** overleaf) is high. A total of 37.4% of households in Peacehaven and Telscombe are not deprived in any dimension, which is a lower percentage of households when compared to Lewes District (44.4%), the South East (47.7%) and England as a whole (42.5%). For those households which demonstrate deprivation in the Neighbourhood Plan area, most are deprived in one dimension (35.2%), and this is similar compared to the figures for Lewes District (33.7%), the South East (32.2%) and England (32.7%). Notably however, there is a higher percentage of households deprived in two dimensions when compared to Lewes District, the South East, and England.

<sup>114</sup> ONS (2011) Tables KS001 (2001) and KS101EW (2011)

<sup>115</sup> ONS (2011) Table KS102EW

**Table A7.3: Household Deprivation<sup>116</sup>**

| Household Deprivation (% of total)      | Peacehaven and Telscombe | Lewes  | South East | England |
|---|--------------------------|--------|------------|---------|
| Household not deprived in any dimension | 37.41%                   | 44.36% | 47.70%     | 42.50%  |
| Deprived in 1 dimension                 | 35.21%                   | 33.65% | 32.23%     | 32.70%  |
| Deprived in 2 dimensions                | 22.37%                   | 17.95% | 16.02%     | 19.10%  |
| Deprived in 3 dimensions                | 4.62%                    | 3.69%  | 3.65%      | 5.10%   |
| Deprived in 4 dimensions                | 0.39%                    | 0.36%  | 0.39%      | 0.50%   |

### Index of Multiple Deprivation

The Index of Multiple Deprivation 2019 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability, and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  - 'Geographical Barriers': relating to the physical proximity of local services
  - 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  - 'Indoors Living Environment' measures the quality of housing.
  - 'Outdoors Living Environment' measures air quality and road traffic accidents.
- Two supplementary indices (subsets of the Income deprivation domains), are also included:

<sup>116</sup> ONS (2011) Table QS119EW



- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) <sup>117</sup> are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2019, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales. Within the Lewes local authority district, five of the 62 LSOAs (8%) are classified as in the most deprived 40% nationally.

In this respect, the highest overall levels of deprivation are within the north eastern section of the Neighbourhood Plan area, in Peacehaven Parish. In terms of Barriers to Housing and Services Domain, which measures the physical and financial accessibility of housing and local services, six of the 62 LSOAs within Lewes District are within the 10% most deprived range. In this respect, higher concentrations of deprivation are also observed in Peacehaven Parish.

### Housing tenure

**Figure A7.1** shows household tenure in the Neighbourhood Plan area. The majority of residents in the Neighbourhood Plan area own their own homes (75.7%), slightly higher than figures for Lewes District (72.7%) and notably higher than the figures for the South East (67.6%) and England overall (63.3%). Further, a smaller portion of residents socially rent their accommodation in the Neighbourhood Plan area (8.3%) in comparison to Lewes District (10.9%), the South East (13.7%) and England (17.7%).



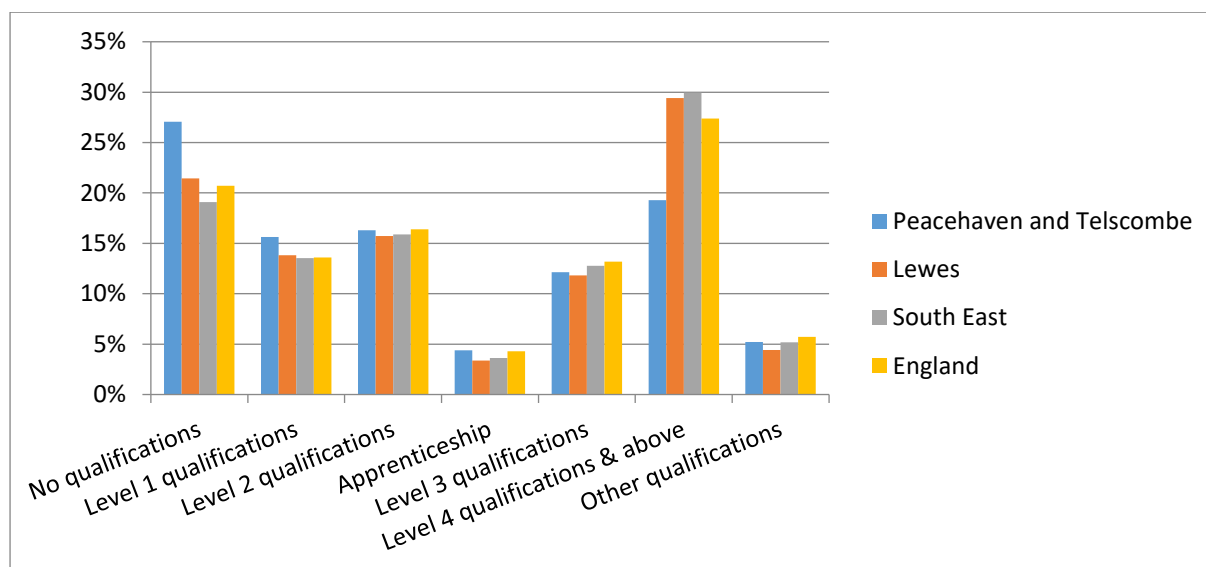
**Figure A7.1: Household tenure<sup>118</sup>**

<sup>117</sup> DCLG (2019): Indices of Deprivation Explorer', [online] available to access via [this link](#)

<sup>118</sup> ONS (2011) Table QS405EW

## Education

**Figure A7.2** presents the highest level of qualification for residents in the Neighbourhood Plan area. The majority of residents (72.9%) hold qualifications, broadly in line with figures for Lewes (78.6%), and slightly less than the South East (80.9%) and England as a whole (80.6%). Of those with qualifications, 19.3% have at least level 4 qualifications and above, lower than comparative figures for Lewes District (29.4%), the South East (29.9%) and England (27.4%).



**Figure A7.2: Highest level of qualification<sup>119</sup>**

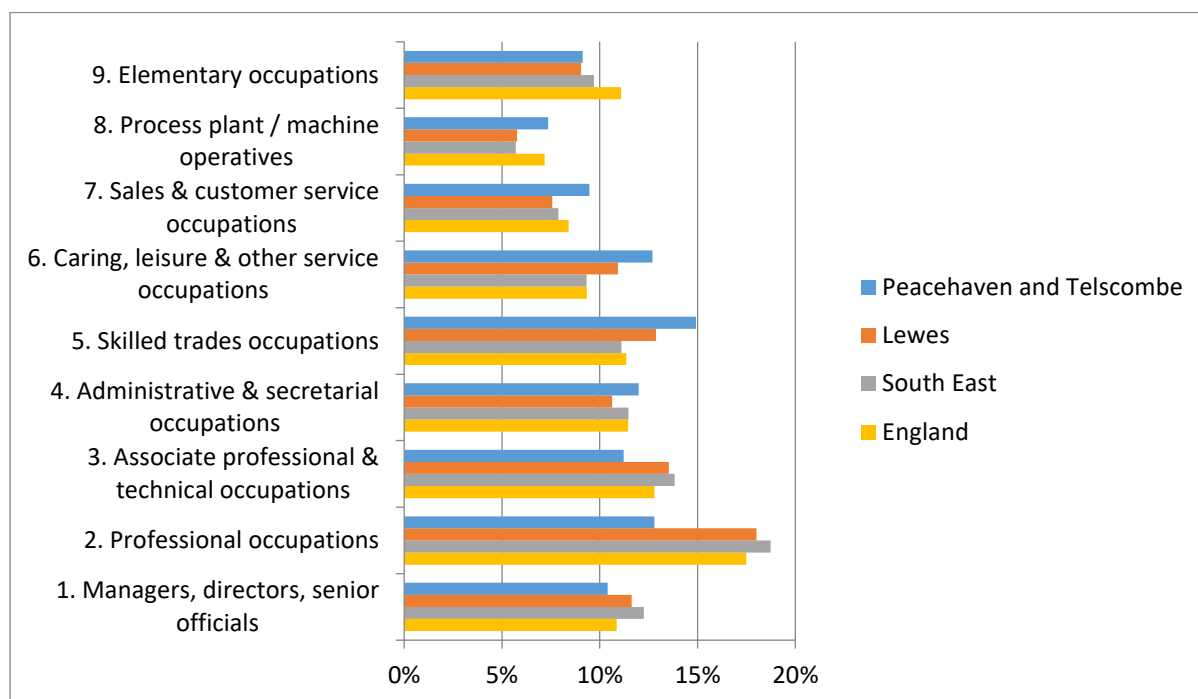
## Employment

**Figure A7.3** below shows occupations within the Neighbourhood Plan area as a percentage of those employed. The most representative occupational bands of residents in Peacehaven and Telscombe are:

- Skilled trades occupations (14.9%).
- Professional occupations (12.8%).
- Caring, leisure and other service occupations (12.7%).

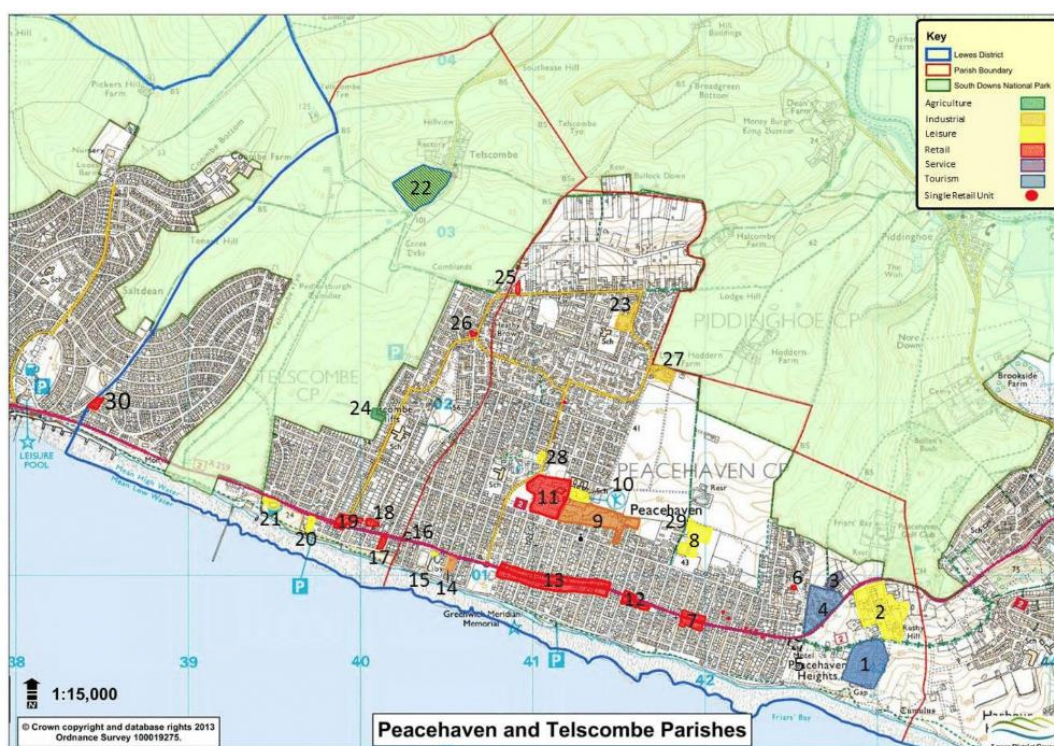
The percentage of working residents in the Neighbourhood Plan area in professional occupations (12.8%) is lower than comparative figures for Lewes District (18%), the South East (18.7%) and England (17.5%). The opposite trend is observed for skilled trades occupations and managers, caring, leisure and other service occupations as well as sales and customer service occupations. Given the coastal location of the Neighbourhood Plan area, tourism is a key economic sector.

<sup>119</sup> ONS (2011) Table QS501EW



**Figure A7.3: Occupations in the Neighbourhood Plan area<sup>120</sup>**

Completed by the Red Group in June 2020 on behalf of the Neighbourhood Plan Steering Group, the 'Peacehaven and Telscombe Economic Area Survey' outlines the existing economic offer within the Neighbourhood Plan area, categorised by the following sectors: agricultural, industrial, leisure, retail, service, and tourism. The distribution of the economic offer within Peacehaven and Telscombe is shown below in **Figure A7.4**.



**Figure A7.4: Economic offer within the Neighbourhood Plan area**

<sup>120</sup> ONS (2011) Tables KS608EW and KS610EW

## Community assets and infrastructure

There are several community assets and facilities within the Neighbourhood Plan area, including:<sup>121</sup>

- The Centenary Park.
- The Community Hub (which includes the Main Hall, the Anzac Room, the Copper Room and the Charles Neville room all available for rent).
- Meridian Centre (which includes the Meridian Surgery, Peacehaven Children's Centre, Peacehaven Community School, Peacehaven Leisure Centre, a parking and shopping centre, green space, and the Meridian Industrial Estate).
- The Peacehaven Community Garden on Glynn Road West.
- A collection of small parks (including Shephard Down, the Dell, Oval, Howards Park, and Epina Park).
- The Peacehaven cinema.

Within Telscombe, there is one main park, Chatsworth Park, which has large open grassed spaces, lovely wooded areas, two children's playgrounds and a memory garden. The memory garden is a small central mound where residents are encouraged to plant anything of their choice, including benches where visitors can sit and reflect. The Robert Kingan playground is a small playground at the northern end of Bannings Vale in East Saltdean. Other amenities and assets within Telscombe include St Laurence Church, various cliff top views of the sea, the Telscombe Village Club and the Telscombe Tye.

The Telscombe Tye is a registered common, owned by Telscombe Town Council and managed on behalf of the residents<sup>122</sup>. The Stud Farm grazes over 200 sheep on the Tye grassland and a community flock is also present on the land. There are running trails, wildflowers and local residents regularly walk their dogs on the grassy fields of the Tye. Skylarks are also known to nest in the tall grasses<sup>123</sup>. The site is also home to a number of dew ponds, which attract insects, amphibians and feeding birds.

The East Saltdean and Telscombe Cliffs are located on the south eastern border of the Neighbourhood Plan area (and form part of the Brighton to Newhaven Cliffs SSSI). There is a walk along the top of the cliffs but following a collapse of part of the chalk cliffs, the path was moved inland.<sup>124</sup> Beach walks allow for impressive views of the cliffs and there are a number of clifftop pubs and restaurants serving the area.

Additional services and facilities include a Post Office in Peacehaven located in 1 Meridian Centre, in the centre of the Parish. There is also a Post Office in Telscombe located on 3 Central Court, Central Avenue. There is one library within the Neighbourhood Plan area, the Peacehaven Library, located in the centre of the Peacehaven Parish, next to the Peacehaven Community School and the Town Council building.

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<sup>121</sup> Peacehaven Town Council (no date) 'Amenity Hire', [online] available to access via [this link](#)

<sup>122</sup> Telscombe Town Council (2019) 'Parks, open spaces and Telscombe Tye', [online] available to access via [this link](#)

<sup>123</sup> South Downs National Park (no date) 'Walking near Telscombe and Mill Hill', [online] available to access via [this link](#)

<sup>124</sup> Beautiful England (no date) 'Telscombe Cliffs, Peacehaven, Sussex' [online] available to access via [this link](#)



## Future Baseline

As the population of the Neighbourhood Plan area continues to age, this could potentially negatively impact upon the future vitality of the local community in certain parts of the Neighbourhood Plan area, whilst also placing additional pressures to existing services and facilities.

The suitability (e.g., size and design) and affordability of housing for local requirements depends on the implementation of appropriate housing policies through the Local Plan and Neighbourhood Plan. Unplanned development may have wider implications in terms of transport and access to infrastructure, or the natural environment.

## A.8 Health and Wellbeing

### Policy Context

Key messages from the NPPF include:

- One of the three overarching objectives of the NPPF is a social objective to; ‘support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing.’
- ‘Planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lifestyles, especially where this would address identified local health and wellbeing 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.’
- Policies and decisions should take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and wellbeing of communities. Development should avoid building on existing open space, sports and recreational buildings and land, including playing fields.
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>125</sup> (‘The Marmot Review’) investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: “overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities”.

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<sup>125</sup> The Marmot Review (2011): ‘The Marmot Review: Implications for Spatial Planning’, [online] available to access via [this link](#)

Health Equity in England: The Marmot Review 10 Years On (2020) has been produced by the Institute of Health Equity and commissioned by the Health Foundation to mark 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review).<sup>126</sup>

The report highlights that:

- people can expect to spend more of their lives in poor health.
- improvements to life expectancy have stalled and declined for the poorest 10% of women.
- the health gap has grown between wealthy and deprived areas.
- place matters – for example living in a deprived area of the North East is worse for your health than living in a similarly deprived area in London, to the extent that life expectancy is nearly five years less.

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Health and Wellbeing theme:

- Core Policy 4: Economic Development & Regeneration.
- Core Policy 6: Retail and Town Centres.
- Core Policy 8: Green Infrastructure.
- Core Policy 9: Air Quality.
- Core Policy 10: Natural Environment and Landscape.
- Core Policy 13: Sustainable Travel.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Health and Wellbeing theme:

- Policy DM14: Multi-Functional Green Infrastructure.
- Policy DM15: Provision for Outdoor Playing Space.
- Policy DM16: Children's Play Space in New Housing Development.
- Policy DM18: Recreation and Rivers.

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<sup>126</sup> The Health Foundation (2020): 'Health Equity in England: The Marmot Review 10 Years on', [online] available to access via [this link](#)

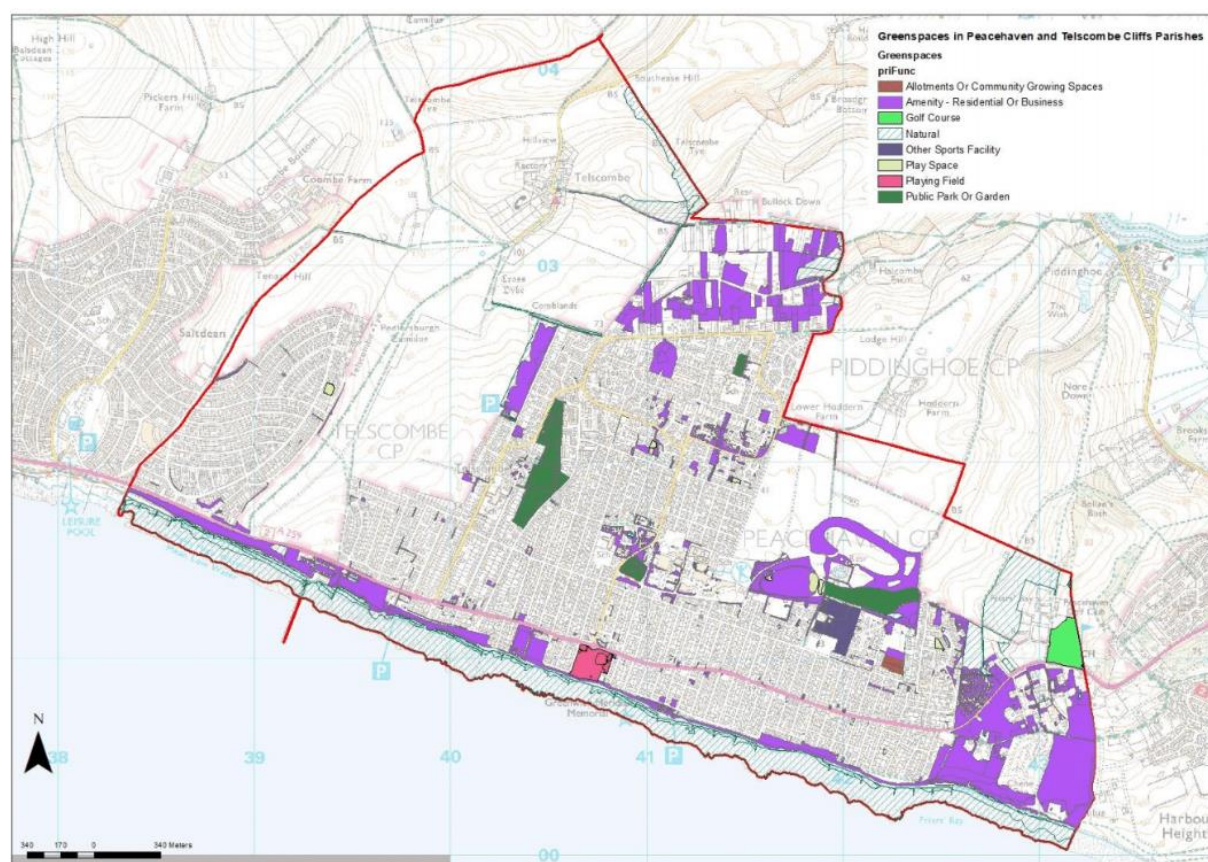
## Current Baseline

### Green Infrastructure Networks

Health is a cross-cutting topic and there are natural synergies with other SEA themes including climate change, population and communities and transport. This is particularly the case in relation to green infrastructure, which is a key aspect of all these themes thanks to its multi-functionality.

The Lewes District Informal Recreational Space Study<sup>127</sup> recognises that large areas of Peacehaven have been planned as a grid of streets, with few areas of amenity greenspace or semi-natural urban greenspace. However, the Greenhaven's Network, currently representing over 92 community groups, is a collaboration of people who work to protect and improve their local green spaces, stretching from Telscombe to Seaford<sup>128</sup>.

Important open spaces include Telscombe Cliffs, which provide coastal walking trail and beach front walks for the Telscombe Village<sup>129</sup>. The Cliffs are located just south of the Telscombe Tye, a large greenspace with trails and open grasslands for visitors to enjoy. Combined, these two spaces provide the Neighbourhood Plan area with substantial recreational green space. Green spaces within the Neighbourhood Plan area are shown in **Figure A8.1** below and include Epinay Park, Firlie Road West Play Area, Mitcheldean, Howards Park, Shepherds Down, The Dell, The Oval, and Sports Park / Big Park (in addition to those listed above).



**Figure A8.1: Green spaces within the Neighbourhood Plan area**

<sup>127</sup>East Sussex County Council (2005): 'Lewes District Informal Recreational Space Study', [online] available via [this link](#)

<sup>128</sup>Peacehaven Town Council (no date): 'Greenhavens Network', [online] available to access via [this link](#)

<sup>129</sup>Mapit: UK (no date): 'East Saltdean and Telscombe Cliffs', [online] available to access via [this link](#)

## Public Health Profile

The Lewes District Local Authority Health Profile 2018<sup>130</sup> provides a picture of people's health in the district and is designed to help local government and health services understand their community's needs and work together to improve the local population's health and reduce health inequalities. According to the Lewes Health Profile:

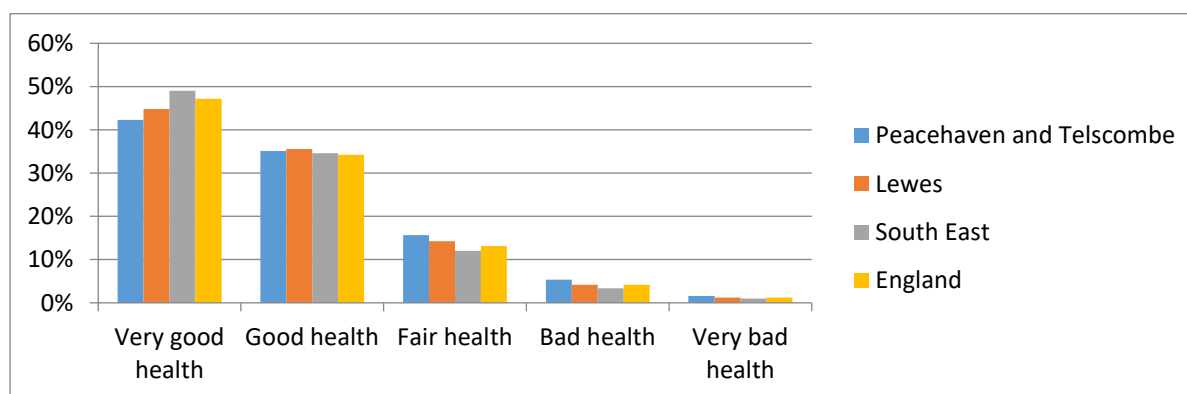
- The health of people in Lewes is generally better than the England average.
- About 13% of children live in low-income families.
- Life expectancy for both men and women is higher than the England average.
- In Year 6, 12.6% of children are classified as obese, better than the average for England.
- The rate of alcohol-specific hospital stays among those under 18 is 54 per 100,000, worse than the average for England.

The areas where the East Sussex county health profile is performing worse than region trends and England overall include suicide rates, killed or seriously injured casualties on England's roads, and diabetes diagnosis rate (at the time of delivery)<sup>131</sup>.

## Indicators of health and wellbeing

**Figure A8.2** shows general health within the Neighbourhood Plan area. Around 77.4% of residents in the Neighbourhood Plan area demonstrate at least 'good health', lower than figures for Lewes (80.4%), the South East (83.7%) and England (81.4%). The percentage of residents that have 'bad' health or worse in the Neighbourhood Plan area (6.9%), is slightly above that of Lewes District (5.4%) and higher than comparative statistics of the region (4.3%) and the country as a whole (5.4%).

Most residents in the Neighbourhood Plan area with long term health conditions do not state that their activities as limited (78.3%), lower than comparative figures for Lewes District (80.5%), the South East (84.3%) and England (82.4%). Approximately 22% of residents in the Neighbourhood Plan area report that their daily activities are limited in some way.



**Figure A8.2: General health**<sup>132</sup>

<sup>130</sup> Public Health England (2018): 'Lewes District: Local Authority Health Profile 2018', [online] available to access via [this link](#)

<sup>131</sup> Public Health England (2020) 'Local authority Health Profiles', [online] available to access via [this link](#)

<sup>132</sup> ONS (2011) Table KS301EW



## Health services

Within the Neighbourhood Plan area there are a total of eight care homes, including: Haven Care Home, Crowborough Lodge Residential Care Home, The Maples, Roclyns, Fairlight Manor Care Home, Cliff Court, The Seagulls, and The Haven. The care homes provide support for a total of 162 residents. Additionally, the Meridian GP Surgery is accessible within the Meridian Centre, in Peacehaven Parish.

The closest hospitals to the Neighbourhood Plan area are located in Brighton and Hove, and include: Royal Alexandra Children's Hospital, Royal Sussex County Hospital, Brighton General Hospital and The Montefiore Hospital<sup>133</sup>.

## Future Baseline

Health and wellbeing levels within the Neighbourhood Plan area are generally good, with a high percentage of residents reporting 'good' or 'very good' health, and a low percentage of residents reporting that their activities are limited in some way.

However, an ageing population within the Neighbourhood Plan area may increase the reported cases of disability, reduce the levels of good health, and place future pressures on health services in the wider area. Similarly, ongoing cuts to community services have the potential to lead to effects on health and wellbeing to key population groups (i.e., elderly population).

Obesity is also seen as an increasing issue by health professionals, and one that will contribute to significant health impacts on individuals, including increasing the risk of a range of diseases, including heart disease, diabetes, and some forms of cancer.

Poor mental health is associated with low long-term life quality, a larger number of hospitalisations and deaths. Experts indicate that problems surrounding the worsening of mental health, including secondary dependencies such as alcoholism are likely to worsen over time without suitable changes within communities.

# A.9 Transportation

## Policy Context

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

Key messages from the NPPF include:

- *'Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
- *The potential impacts of development on transport networks can be addressed.*
- *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised.*
- *Opportunities to promote walking, cycling and public transport use are identified and pursued.*

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<sup>133</sup>The Argus (no date): 'Hospitals in Peacehaven, East Sussex', [online] available to access via [this link](#)

- *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account.*
- *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes and contribute to making high quality places.'*
- *'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.'*

Each Local Transport Authority in England and Wales has a statutory duty to produce and adopt a Local Transport Plan through the Local Transport Act 2000, as amended by the Local Transport Act 2008. In this regard, the East Sussex Local Transport Plan (2011)<sup>134</sup> sets out the future direction for planning and providing the transport infrastructure and services needed to deliver sustainable economic growth and support additional housing in the county up to 2026.

At the local level, the following policies within the Lewes Core Strategy: Local Plan Part 1 directly relate to the Transportation theme:

- Core Policy 5: The Visitor Economy.
- Core Policy 8: Green Infrastructure.
- Core Policy 9: Air Quality.
- Core Policy 13: Sustainable Travel.

Additionally, the following policies within the Lewes Local Plan Part 2: Site Allocations and Development Management Policies directly relate to the Transportation theme:

- Policy DM35: Footpath, Cycle and Bridleway Network.

## Current Baseline

### Rail network

There is no train station located in the Neighbourhood Plan area. The closest train station is located to the east of the Neighbourhood Plan area, the Newhaven Town Railway station, which is one of two stations serving Newhaven, the other being Newhaven Harbour. The station is operated by Southern and is part of the Seaford Branch connecting the area to Newhaven and Seaford. The other major train station is located in the city of Brighton, the Brighton Railway Station<sup>135</sup>. The Brighton Railway Station is managed by Southern Rail and connects the area to Shoreham-by-Sea, London, and the county town of Lewes to the east.

### Bus network

The Brighton and Hove bus company operates both in Peacehaven and Telscombe, connecting the area to Brighton, Eastbourne, Newhaven and Rottingdean<sup>136</sup>. Services include the 12, 12X, 12A, 13X, 14, 14A, 14B, 14C. There are also three

<sup>134</sup> East Sussex County Council (2011): 'Local Transport Plan 3 (2011-2026)', [online] available to access via [this link](#)

<sup>135</sup> Southern Railway (no date): 'Brighton', [online] available to access via [this link](#)

<sup>136</sup> Brighton and Hove (no date): 'Routes and maps', [online] available to access via [this link](#)

school bus services in Peacehaven: 76A, 92 and 494. The school bus 92 also services Telscombe.

## Road network and congestion

The major road that passes within the Neighbourhood Plan area is the A259, or the South Coast Road. The A259 is located on the south coast of England passing through Hampshire, West Sussex, East Sussex and Kent; the main part of the road connects Brighton, Eastbourne, Hastings, Rye and Folkestone. The A259 is a busy two-lane road that is known to be both congested and hazardous, with numerous accidents reported each year<sup>137</sup>. The A259 carries traffic from Maidstone to Tunbridge Wells to Newhaven, which is located just east of the Neighbourhood Plan area. There are also concerns that the A259 cannot accommodate any further increases in demand<sup>138</sup>.

The local road system in Peacehaven and Telscombe is, for the main part, a grid network centring around Roderick Avenue which runs north / south and meet the A259. Some roads in the grid have been blocked, creating dead-ends for road users. The A259 is the most significant pinch point. Journey times can significantly increase during rush-hour in both directions. Other pinch points include the roundabout between Sutton Avenue and Greenwich Way, traffic merging into Roderick Avenue from side streets, and Kirby Drive which becomes Telscombe Road.

Parking is also a key issue for the community. However, there is free parking for up to two hours in several areas across the town, including at the Meridian Centre.

## Public Rights of Way network

The network of public rights of way in East Sussex is approximately 3,558 km, including public footpaths, public bridleways, restricted byways, and byways open to all traffic<sup>139</sup>. Peacehaven Town Council (along with residents) have set up a working group to try and secure a public right of way<sup>140</sup>. The proposed route is near the Peacehaven Wastewater Treatment Works and evidence is being gathered in support of a claim that the path meets the conditions required to be recognised as a right of way.

There are two National Trails located within the Neighbourhood Plan area, passing through the South Downs National Park<sup>141</sup>. The first trail is around 6.5 km in length, beginning in Saltdean and ending near to Longridge Avenue, past a dew pond and the St. Lawrence Telscombe Church. The second trail (Mill Hill) is a circular route approximately 8.8 km in distance, beginning on Telscombe road before heading northwards, passing a church and dew ponds.

There is one National Cycle Network Route that passes through the Neighbourhood Plan area<sup>142</sup>. Route 2 is a long-distance cycle route which links Dover in Kent with St. Austell in Cornwall via the south coast of England. The closest Regional Cycle

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<sup>137</sup> East Sussex County Council (no date): 'The Big Petition – A259 South Coast Road Congestion', [online] available to access via [this link](#)

<sup>138</sup> Lewes District Council and South Downs National Park Authority (2016) 'Lewes District Local Plan: Part 1 Joint Core Strategy 2010-2030', [online] available to access via [this link](#)

<sup>139</sup> East Sussex County Council (no date): 'The Rights of Way Network in East Sussex', [online] available to access via [this link](#)

<sup>140</sup> Peacehaven Town Council (2020): 'Public Right of Way', [online] available to access via [this link](#)

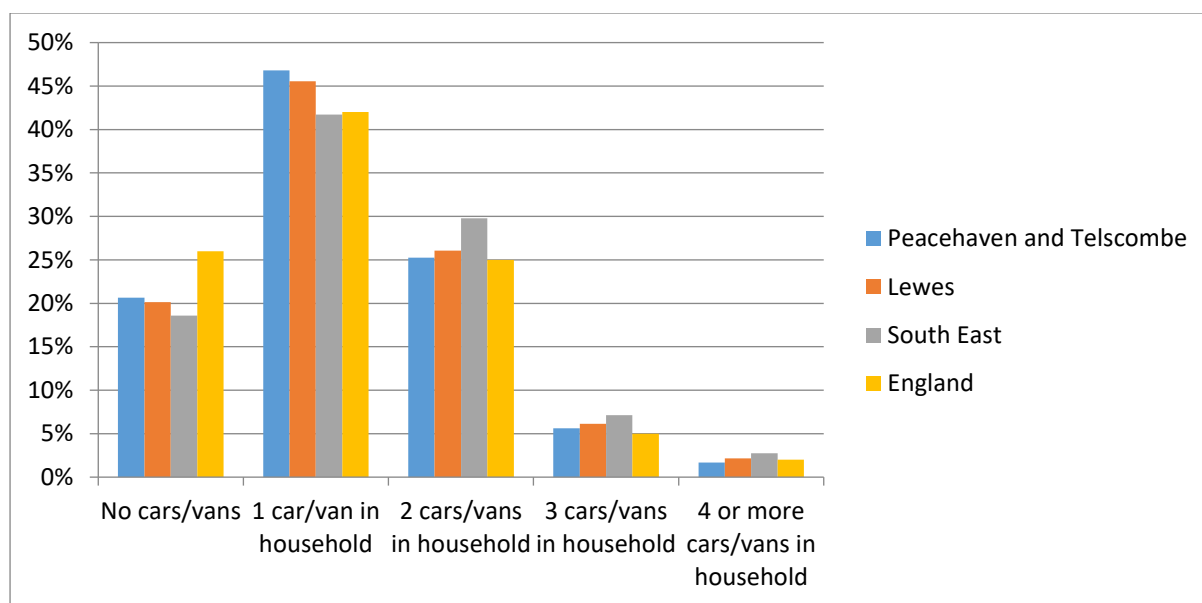
<sup>141</sup> South Downs National Park (no date): 'Walking near Telscombe and Mill Hill', [online] available to access via [this link](#)

<sup>142</sup> Sustrans (no date): 'Map of the National Cycle Network', [online] available to access via [this link](#)

Network Route (90) is located north of the Neighbourhood Plan area, passing through Lewes city centre.

## Access to cars and vans

**Figure A9.1** shows car and van ownership within the Neighbourhood Plan area. A smaller proportion of residents in the Neighbourhood Plan area have access to a car or van (79.4%) in comparison to the South East (81.4%). However, the Neighbourhood Plan area has a greater portion of residents who own a car or van than compared to England as a whole (74.0%).



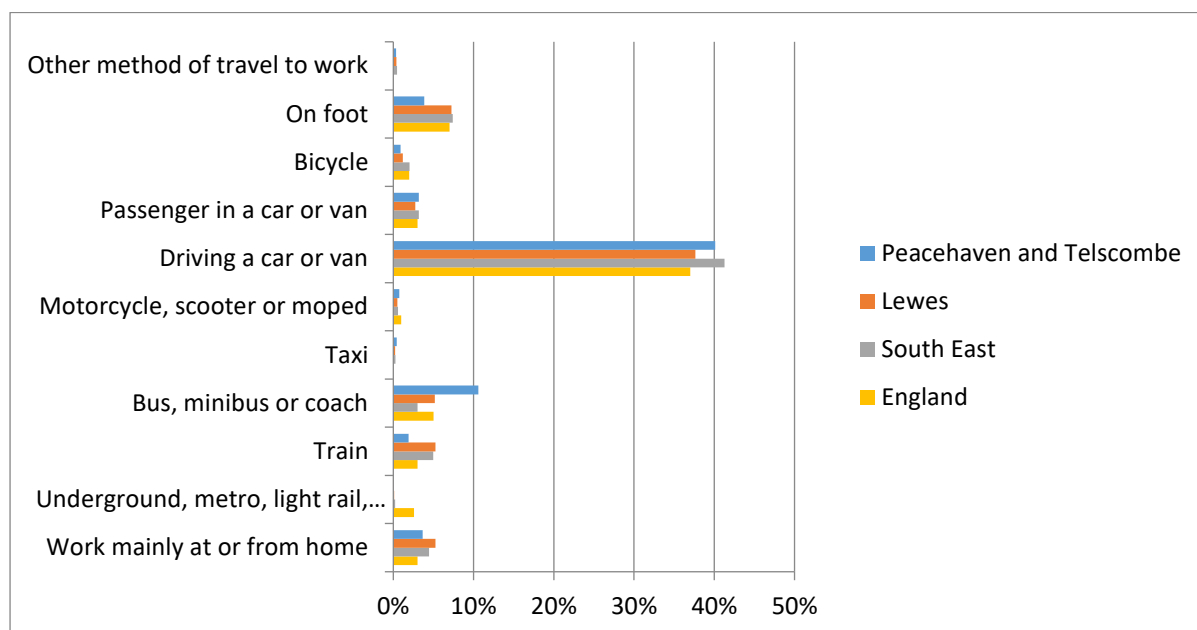
**Figure A9.1: Car and Van ownership in the Neighbourhood Plan area<sup>143</sup>**

## Method of travel to work

The most common form of travel to work for Peacehaven and Telscombe residents is via car or van (40.1%), higher than averages for Lewes District (37.6%), and England (37.0%) and slightly lower when compared to the South East (41.3%). Further, a comparatively high proportion of residents take the bus, minibuss or coach in Peacehaven and Telscombe (10.6%) in comparison to the regional and national trends. This is shown overleaf in **Figure A9.2**.

<sup>143</sup> ONS (2011): Table KS404EW





**Figure A9.2: Method of travel to work<sup>144</sup>**

### Future Baseline

New development has the potential to increase traffic and cause congestion within the Neighbourhood Plan area, principally at junctions on key routes. This is likely to continue to be more pronounced during peak times (i.e., rush hours). This is significant in the local context, due to the pressures from the local road network along the A259.

However, development within the Neighbourhood Plan area has the potential to lead to enhancements to the transport network in order to promote more sustainable modes of travel, such as the existing pedestrian and cycle network.

Additionally, there are opportunities to improve public transport networks within the Neighbourhood Plan area in order to facilitate for more sustainable modes of transport whilst alleviating pressures on main road networks. Similarly, the provision of infrastructure to promote at home (i.e., remote) working is likely to positively contribute towards these aims.

Whilst negative effects of new development on the transport network are likely to be mitigated in part by new infrastructure, there will be a continuing need for development to be situated in accessible locations.

<sup>144</sup> ONS (2011) Table QS701EW

