



Lewes District Local Plan

Part 1 - Joint Core Strategy - Proposed Main Modifications

Addendum to the Sustainability Appraisal

(Including consideration of reasonable alternatives to Core Policy 10 Part 3 concerning the protection of the Ashdown Forest SPA/SAC)

August 2015

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1. Introduction

- 1.1 The Lewes District Core Strategy was submitted for examination in September 2014 by Lewes District Council and the South Downs National Park Authority (SDNPA). The Core Strategy, once adopted, will set out the strategic planning policies covering the district. Hearing Sessions took place in January 2015 as part of the examination. An 'Interim Findings' letter [ID-05] was subsequently received from the Inspector setting out his initial conclusions and inviting the Councils to submit main modifications in light of the discussions during the Hearing Sessions and the recommendations set out in the Interim Findings.
- 1.2 In accordance with European and national legislation, planning documents such as the Core Strategy must be subject to Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA). This report satisfies that requirement by considering the appraisal of the Main Modifications proposed by the Councils. It builds on the sustainability appraisal work carried out earlier (listed below) and forms an addendum to the Sustainability Appraisal/Strategic Environmental Assessment (hereon referred to as the "Sustainability Appraisal") submitted alongside the Core strategy for examination.
- Lewes District Submission Sustainability Appraisal (September 2014)
 - Sustainability Appraisal of the Schedule of Recommended Modifications (September 2014)

Structure of the Report

Section	Title	Relationship to Submission SA Report
2	Background and Context	Update to Section 3
3	Methodology	
4	Sustainability Framework	
5	Identification of the Options	Update to Section 10
6	Options Appraisal for Core Policy 10, Part 3	
7	Sustainability Appraisal of Main Modifications	Update to Section 11
8	Consideration of Minor Modifications	

2. Background and Context

The Joint Core Strategy

- 2.1 Lewes District Council, in partnership with the South Downs National Park Authority, has prepared a plan that, once adopted, will provide the strategic planning policy framework to guide development in the district up to 2030. This document is known as the Joint Core Strategy and will form Part 1 of the Lewes District Local Plan.
- 2.2 There have been several stages in preparing the Joint Core Strategy. The table below sets out the main stages and also indicates the accompanying stage of the Sustainability Appraisal process which has been prepared to inform it.

Table 1 – Core Strategy/SA Production Process

Joint Core Strategy Production Stage	Sustainability Appraisal Production Stage	When Completed
Issues and Emerging Options	Scoping Report	May 2010
Emerging Core Strategy	Emerging Core Strategy SA Report	September 2011
Proposed Submission Core Strategy	Proposed Submission SA Report	Autumn 2012
Proposed Submission Core Strategy - Focussed Amendments	Proposed Submission Document Focussed Amendments SA Report	March 2014
Submission Core Strategy and accompanying addendum (Core Strategy Schedule of Recommended Modifications)	Submission Document Sustainability Appraisal and accompanying addendum (Sustainability Appraisal of Recommended Modifications)	September 2014
Schedule of Main Modifications to the Core Strategy	SA of Main Modifications of the Core Strategy (This Report)	August 2015
Adoption	Monitoring of the Core Strategy	Early 2016

Core Strategy Examination

- 2.3 The Core Strategy was submitted to the Secretary of State for examination in September 2014. Hearings took place in January 2015 which gave the Inspector an opportunity to discuss issues in greater depth with invited consultees and the planning authorities. Following the hearing sessions, the Inspector published his Interim Findings letter¹ which recommended an increased housing target and the allocation of additional strategic sites in order to strike a better balance of sustainable development.
- 2.4 The Inspector invited the Councils to prepare a list of Main Modifications, in addition to those already published, to address the above points. Importantly, the Inspector also recommended that the Main Modifications were subject to a sustainability appraisal and public consultation in order for the Core Strategy to be found sound.
- 2.5 Four Schedules have been published by the planning authorities that set out the modifications to the Core Strategy since submitted in September 2014.
- Schedule 1 - Proposed Modifications – September 2014
 - Schedule 2 - Proposed Modifications – January 2015
 - Schedule 3 - Proposed Main Modifications – July 2015
 - Schedule 4 - Proposed Additional Modifications – July 2015
- 2.6 This Sustainability Appraisal focusses on Schedule 3 which sets out amendments to the policy wording. Consideration has been given to the other schedules although generally these are minor contextual updates and amendments which do not require re-appraisal.

The Sustainability Appraisal

- 2.7 The need to carry out a Sustainability Appraisal and Strategic Environmental Assessment of the Core Strategy is required by both European and UK law.
- 2.8 A Sustainability Appraisal (SA) aims to predict and assess the economic, social and environmental effects that are likely to arise from plans, such as a Core Strategy. It is a process for understanding whether policies, strategies or plans promote sustainable development and for improving them to deliver more sustainable outcomes. The SEA process has been incorporated into the SA process. Therefore, where this report refers to the SA it can be assumed that this also means the SEA.

Progress so far

¹ http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf

- 2.9 In May 2010, an SA Scoping Report was produced alongside the Issues and Emerging Options Topic Papers (hereafter known as the Topic Papers). Like the Topic Papers, the Scoping Report went out for consultation between May 21 and July 16, 2010.
- 2.10 Amongst other things, the SA Scoping Report had sections that:
- Collated baseline information, presenting the current picture of Lewes District in terms of economic, environmental and social aspects.
 - Identified plans, programmes and policies of relevance to the formation of the Core Strategy.
 - Developed a draft sustainability framework, comprising of a set of sustainability objectives and indicators to be used to assess the Core Strategy's policies.
- 2.11 The SA that accompanied the Emerging Core Strategy built upon the Scoping Report, making changes to the above sections to reflect comments received during consultation, updates to datasets and statistics as well as the release of additional plans, programmes and policies. Like the Emerging Core Strategy, it went out for consultation between September 30 and December 2, 2011 and invited comments from any interested body including English Heritage, Natural England and the Environment Agency – the statutory bodies in relation to the SA.
- 2.12 In addition to updating the sections which the SA Scoping Report covered, the Emerging Core Strategy SA Report had sections that:
- Appraised various options for the emerging policy areas against the sustainability framework.
 - Set out a draft monitoring framework to monitor the effectiveness of the final version of the Core Strategy post adoption.
- 2.13 The SA Report for the Proposed Submission document (January 2013) updated sections of the SA that accompanied the Emerging Core Strategy to reflect recent up-to-date information and changes to planning policy, which included sections that:
- Re-appraised the various policy options for the policy areas against the sustainability framework.
 - Appraised the draft wording of policies against the sustainability framework and refined policies to increase their sustainability.
 - Set out the monitoring framework to monitor the effectiveness of the Core Strategy.
- 2.14 An SA Report was also prepared to appraise the changes in the Proposed Submission Focussed Amendments document that were consulted on as a

track changed document. The changes were subsequently incorporated into the Submission SA report. The changes included:

- Appraisal of new options for the housing strategy against the sustainability framework.
- Appraisal of amended draft wording for policies where appropriate.
- Updated baseline situation and monitoring framework.

2.15 A Sustainability Appraisal for the Schedule of Recommended Modifications was published alongside the Submission Core Strategy, September 2014, which appraised the modifications identified by the planning authorities following the publication of the Proposed Submission Focussed Amendments document.

What this SA includes

2.16 This SA Addendum will appraise the Main Modifications proposed by the planning authorities in Schedule 3 (Proposed Main Modifications) as well as the modifications set out in the other Schedules where appropriate. This section (7), and the accompanying appraisal tables, essentially replace Section 11 of the Submission Sustainability Appraisal and Appendix 4 [CD/002].

2.17 There will also be consideration given in this Addendum to the identification and assessment of reasonable alternatives to Core Policy 10, Natural Environment and Landscape Character, Part 3 concerning the protection of Ashdown Forest. This section (6) forms an update to Section 10 of the Submission SA (Core Policy 10 policy options).

2.18 The Court of Appeal quashed the policy wording relating to 400m-7km zone (and the specific mitigation mentioned i.e. SANGS and on-site visitor access management) in Wealden's Core Strategy Policy WCS12 Biodiversity. The conclusion provided in the 9th July 2015 judgement was arrived at with a degree of reluctance and the removal of policy wording is due to a matter of process. It was not concluded that the 7km zone of influence, the evidence supporting it, or the requirement for specific mitigation measures is incorrect. It was concluded that Wealden District Council did not explicitly meet its duty under Regulation 12 of the Strategic Environmental Assessment (SEA) Regulations relating to the assessment of reasonable alternatives.

2.19 Core Policy 10 part 3 relies upon the evidence of the Habitat Regulations Assessment 2013 [CD/072] that concluded that in-combination with development in neighbouring authorities the planned Core Strategy development within 7km of the Ashdown Forest could have a significant adverse effect unless mitigated. An Addendum to the HRA (March 2014) [CD/017] was produced to support the policy approach taken. At the time

there were not considered any reasonable alternatives to this policy approach, which is supported by Natural England and is consistent across the affected authorities within 7km of the Forest.

- 2.20 Being mindful of the Court of Appeal ruling and in light of the opportunity to consult at this stage, it was agreed with the Inspector that the Councils would consider the implications of the judgement for Core Policy 10, if any. In particular this SA Addendum, accompanying the Main Modifications, considers whether there are any reasonable alternatives to Core Policy 10 Part 3. Therefore in this report, in a standalone chapter, there is a discussion of potential alternatives with those considered reasonable expanded upon in discussion and duly appraised. This work has been carried out by experienced SEA consultants with input from ecological experts with knowledge of the Ashdown Forest and Habitat Regulations Assessment. The reason for the external input is two-fold; firstly to achieve objective expertise that will provide robustness to the SA in this matter; and secondly due to the tight turnaround time required in meeting the consultation timetable within the examination schedule. The SA appraisal relating to Core Policy 10 part 3 can be found in Section 6.

3. Methodology

- 3.1 The approach to carrying out the sustainability appraisal of the Main Modifications is the same as for previous iterations of the SA and a detailed methodology can be found in Section 4 of the Submission SA² [CD/002].
- 3.2 This approach meets the requirements of the SEA Directive and SEA Regulations which transpose the Directive into English law. Table 5 of the Submission SA sets out the requirements of this legislation has been met.

The tables below show how policy approaches have been appraised.

Table 2 – Example of Appraisal Table

Objectives	Option A			
	S	M	L	Explanation
1.Housing	-	+?	++	In this example, the approach would have a likely negative effect on the short-term, a possible positive effect in the medium term and would likely have a significant positive effect by the end of the plan period
2.Deprivation etc.	0	0	0	The approach would be appraised for the remaining 16 objectives

Table 3 – Appraisal Key

Appraisal Key			
Symbol	Meaning	Symbol	Meaning
++	Likely Significant positive effect	--	Likely significant negative effect
+	Likely positive effect	S	Short term impact (approximately 2013 - 2018)
0	No effect likely	M	Medium term impact (approximately 2019 - 2024)
?	Uncertain effect	L	Long term impact (approximately 2025 - 2030)
-	Likely negative effect		

² http://www.lewes.gov.uk/Files/plan_SA_Submission.pdf

4. Sustainability Framework

- 4.1 During the preparation of the Sustainability Appraisal, a set of objectives and indicators have been developed which have formed a sustainability framework. This framework has been used to test the Core Strategy's policy options and policies.
- 4.2 Further details can be found in Chapter 8 of the Submission SA and the Sustainability Framework can be found in Table 14.

5. Identification of the Options

- 5.1 Throughout the Sustainability Appraisal process, various policy options have been considered and appraised which fed into the Submission Core Strategy [CD/001]. This included various options for the level of growth set in the Core Strategy and individual strategic site options for allocation in the early part of the plan period.
- 5.2 Following the Hearings, the Inspector stated in his Interim Findings letter that he was essentially satisfied that all of the statutory requirements had been met, reinforcing the planning authorities belief that a thorough and robust SA had been undertaken.
- 5.3 In his letter, the Inspector also made it clear that the authorities needed to strike a better balance between social, economic and environmental considerations when setting levels of growth (for the district and individual settlements). In seeking to do so, the authorities have proposed a number of modifications that have resulted in an increased housing target and identified further strategic allocations. The Inspector was clear as to what he considered an appropriate housing target to plan for, as well as specific sites that he felt were the most sustainable options for allocation as strategic sites to meet this target in the early part of the plan period. The proposed modifications are in line with the Inspector's recommendations and are options that have been considered through the Sustainability Appraisal process. Consequently, the authorities are of the belief that no additional options that haven't already been considered through the SA process are required, as at this stage they could not be considered reasonable.
- 5.4 The consideration of alternatives to CP10 part 3 however is a slightly different matter due to the Court of Appeal ruling discussed in the background and context section. Therefore the following section is a standalone insert into this SA Addendum specifically dealing with CP10 part 3 and reasonable alternatives to it and their appraisal.

6. Consideration of Reasonable Alternatives to Core Policy 10, part 3

- 6.1 The following report by AECOM is the Interim SA Report presented to the Councils to inform the preparation of the proposed Modifications to the Submission Core Strategy. It has been inserted in entirety into this SA Addendum. Below, the Councils will make clear any actions they have taken in respect of the findings provided.
- 6.2 The starting point for the following consultants was the assessment of reasonable alternatives to the policy approach. It was not considered necessary to re-visit earlier work³ which looked at alternative types of access management projects that would sit within the Strategic Access Management and Monitoring Strategy (SAMMS). This is because the SAMMS policy approach has been in progress for several years during which time the neighbouring authorities have cooperatively entrusted the consideration and design of the SAMMS to Wealden District Council as the 'Lead Authority' and sole point of contact with the Conservators of the Forest (Ashdown Forest lies wholly within Wealden district). This agreement has enabled Wealden DC, working with Natural England as advisors, to efficiently explore and negotiate with the Conservators deliverable projects capable of mitigating the effects of visitor pressure on the Forest. It would not be appropriate at this stage to undermine that established and cooperative approach by re-visiting potential SAMMS projects and in doing so further delay the Lewes District Joint Core Strategy. Such an approach would also be disproportionate for the 100 planned new dwellings in Lewes district (out of well over 3,000 in total between the authorities) that contribute to the current SAMMS.
- 6.3 The following report by AECOM therefore relies upon the SAMMS approach that has been developed jointly by the authorities in consultation with Natural England. The SAMMS will evolve and operate as a living document because monitoring work will continually feed back into and direct the Strategy, which is designed as a 100 year project.

³ Earlier work carried out by Wealden in the HRA of their Core Strategy and the HRA of their recently withdrawn Strategic Sites HRA and also earlier work carried out by Mid-Sussex and Wealden Councils on behalf of the affected authorities within the 7km zone in relation to the production of the SAMMS.

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	July 2015	Interim SA Report presented to Lewes District Council to inform preparation of Proposed Modifications to the Lewes Local Plan Part 1 as previously submitted	James Riley Associate Director Mark Fessey Principal Consultant	Steve Smith Technical Director	James Riley Technical Director

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1 INTRODUCTION

1.1 The Lewes Local Plan Part 1

- 1.1.1 The Lewes District Local Plan Part 1, which once adopted will be the main document that guides development in the district until 2030, was submitted for examination on 16 September 2014. At the current time the Council is in the process of drafting Main Modifications to the submitted plan.
- 1.1.2 A key consideration is the need to react to the recent Court of Appeal Judgement regarding Wealden District Council's Core Strategy Local Plan policy WCS12 (Biodiversity). The Court has quashed policy wording relating to a 7km zone around the Ashdown Forest SPA/SAC within which development can only come forward alongside delivery of specified mitigation measures.⁴
- 1.1.3 This has implications for the Lewes Local Plan Part 1, as the submitted version of Core Policy 10 (Natural Environment and Landscape Character) references the 7km zone. The relevant part of Policy 10 is presented in **Box 1**.

Box 1: Extract from Core Policy 10 of the Lewes Local Plan Part 1 (as submitted)

To ensure that the Ashdown Forest (SAC and SPA) is protected from recreational pressure, residential development that results in a net increase of one or more dwellings within 7km of the Ashdown Forest will be required to contribute to:

- i. The provision of Suitable Alternative Natural Greenspaces (SANGs) at the ratio of 8 hectares per additional 1,000 residents;
- ii. The implementation of an Ashdown Forest Management Strategy;
- iii. A programme of monitoring and research at Ashdown Forest

Until such a time that appropriate mitigation is delivered, development that results in a net increase of one or more dwellings within 7km of Ashdown Forest will be resisted.

Applicants may consider mitigation solutions other than SANGs in order to bring forward residential development. Such solutions would need to be agreed with the District Council and Natural England.

- 1.1.4 At the current time, therefore, there is a need to consider alternative policy approaches to avoiding/mitigating recreational pressure on Ashdown Forest, with a view to enabling the Council to go ahead and finalise Proposed Main Modifications for publication.

1.2 Sustainability Appraisal (SA)

- 1.2.1 The Local Plan is being developed alongside a process of Sustainability Appraisal (SA), a legally required process that aims to ensure that the significant effects of an emerging draft plan, and alternatives, are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.⁵

⁴ The Court Order is available at:

http://www.wealden.gov.uk/Wealden/Residents/Planning_and_Building_Control/Planning_Policy/CoreStrategy/Planning_Core_Strategy_Local_Plan.aspx

⁵ Directive 2001/42/EC

1.3 This Interim SA Report

1.3.1 The aim of this Interim SA Report is essentially to present an appraisal of alternative policy approaches to planning for Ashdown Forest in a timely fashion, i.e. in time to inform finalisation of Proposed Main Modifications for publication. An SA Report⁶ will then be prepared and published alongside that essentially presents: 1) the appraisal of alternatives; 2) the Council's reasons for developing the preferred approach in-light of the assessment of alternatives; and 3) an appraisal of the Proposed Main Modifications.

Structure of this Interim SA Report

1.3.2 This Interim SA Report sets out to answer three questions:

1. What has plan-making / SA involved up to this point?
i.e. how / why have alternatives been selected
2. What are the SA findings at this stage?
i.e. in relation to the alternatives selected
3. What happens next?

⁶ The document published alongside Proposed Main Modifications might best be labelled an SA Report 'Addendum' on the basis that it sets out to inform consultation on Proposed Main Modifications only (as opposed to 'the plan as modified').

2 WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

2.1 Introduction

2.1.1 The aim of this chapter is to explain the work undertaken in July 2015 that led to the identification of the 'reasonable alternatives' that are a focus of appraisal at the current time (see Chapter 3). Essentially, work was undertaken to identify a shortlist of alternative approaches that might be taken, and then reduce this to a list of 'reasonable alternatives' that should be a focus of detailed appraisal. The SEA Regulations are clear that only 'reasonable alternatives' should be the focus of detailed appraisal, although any other ('unreasonable') options should also be discussed (as part of a discussion of 'outline reasons for selecting the alternatives dealt with')

2.2 Establishing reasonable alternatives

Background

2.2.1 Important context is provided by paragraph 36 of the recent Court of Appeal Judgement, where Lord Justice Richards comments that:

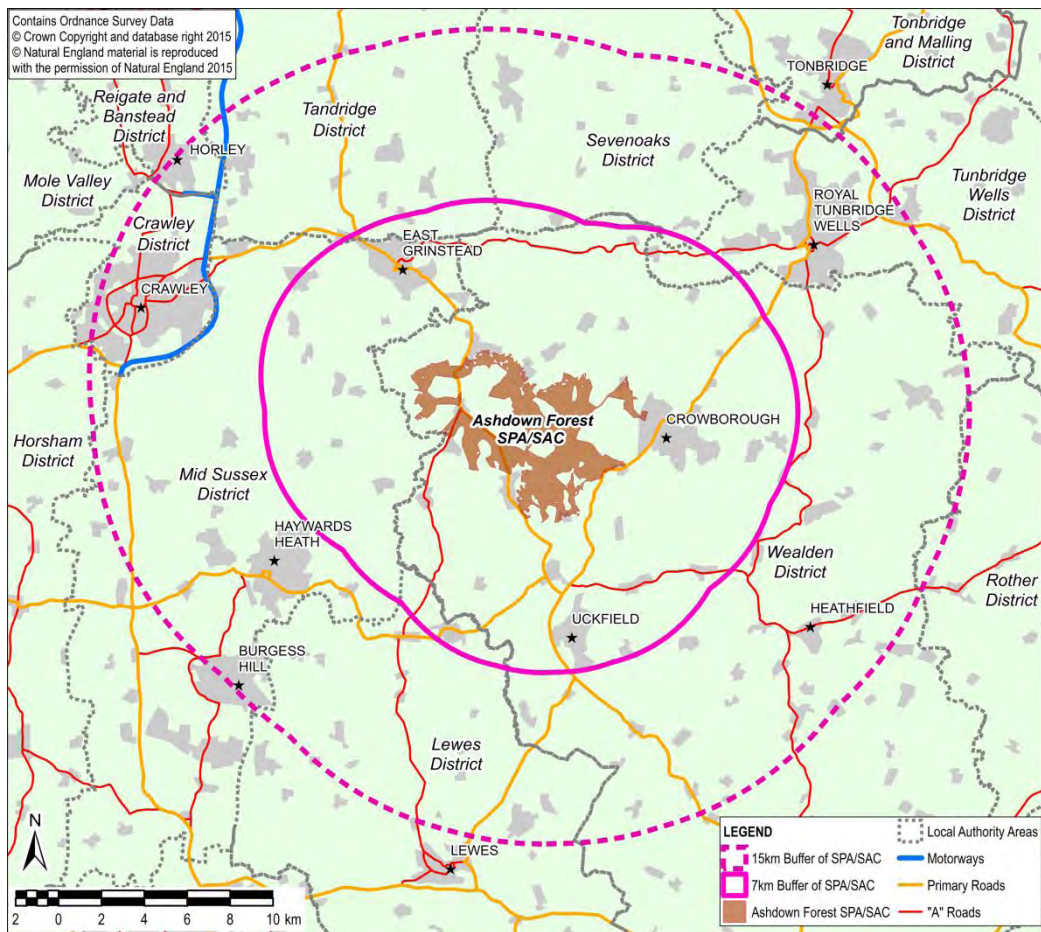
“As to alternatives that might have been considered, Mr Elvin [for the appellant] referred to two types of possibility. One involved variants on the approach based on the Thames Basin Heaths precedent, producing a different radius from the 7 km adopted. The other avoided a zonal approach and involved alternative means of mitigating the additional recreational pressure arising from new development. He submitted that the fact that such alternatives were not raised at the time by the appellant or other objectors was immaterial, since the duty was on the Council to consider reasonable alternatives and to consult on them.”

The option of specifying a different radius

2.2.2 The first possibility raised in paragraph 36 of the Judgement is the option of setting a policy with a different radius. However, this is **not a reasonable option** in practice. This is on the basis that the 7km zone is firmly evidenced, including through consultation with Natural England,⁷ who has specifically confirmed in writing to Lewes District Council (and other affected Councils) that they still view the 7km zone as the relevant catchment on which to base mitigation. The 7km zone is the area within which 83% of regular visitors to the Forest originate, according to visitor survey data as interpreted in the Mid Sussex HRA (March 2015). Natural England supports this HRA, which using its interpretation of the visitor survey concludes that capturing this proportion of visitors will achieve sufficient protection to avoid an adverse effect. Increasing the zone to 15km would capture the remaining 17% of regular visitors, but would almost double the size of the area to be covered (increasing it from 3.92km² to 7.91km² - see **Figure 2.1**) and lead to almost half of Lewes District being captured. This seems disproportionate given that, according to the 2008 visitor survey, only c.1% of visitors to the SPA originates from Lewes District. It is also important to note that a 7km (83% of visitors) zone goes beyond what was used in the Thames Basin Heaths, where a 5km zone was used to capture 75% of visitors.

⁷ The Government's nature conservation advisor in England and the statutory consultee for Habitat Regulations Assessment-related matters

Figure 2.1: Ashdown Forest SAC/SPA buffered by 7km and 15km



The option of specifying a different approach to mitigation

2.2.3 The second possibility raised in paragraph 36 of the Judgement is the option of setting a policy with a different approach to the delivery of mitigation within the 7km zone. This would involve either:

- A) Requiring Suitable Alternative Natural Greenspace (SANG) but not requiring financial contributions to fund access management; or
- B) Requiring financial contributions to fund access management, but not requiring the provision of SANG.

2.2.4 Approach (A) can be dismissed out of hand as an ‘obvious non-starter’. This is because the provision of such spaces may not be enough to mitigate all adverse effects arising from new housing. People may still be attracted to the sheer expanse and particular environment of the Forest. The Inspector for the Draft South East Plan⁸ assessing the approach to the mitigation for the Thames Basin Heaths SPA, reports: “I am not satisfied that it has been demonstrated on an objective basis that the provision of SANGs would in principle avoid any likely significant effect on the SPA.” ...“the provision of such spaces may not be enough to mitigate all adverse effects arising from new housing on its own but if it was combined with habitat and access management I am satisfied that overall it would be likely to have a positive impact in limiting the growth of visitor pressure on the SPA.” Therefore financial contributions to access management will be a key element of mitigating visitor impact on the SAC/SPA, as they are in

⁸ Report to the Panel for the Draft South East Plan Examination in Public on The Thames Basin Heaths Special Protection Area and Natural England’s Draft Delivery Plan 19th February 2007

the Thames Basin Heaths area via the 'Strategic Access Management and Monitoring' (SAMM) tariff and associated projects. Flexibility in the provision of SANG or SANG-type mitigation as reflected in Policy 10 as submitted, which states that: "*Applicants may consider mitigation solutions other than SANGs in order to bring forward residential development*" may allow for creative solutions to providing alternative recreational experiences to the Forest, but this still cannot operate as standalone mitigation without on-site management and monitoring.

- 2.2.5 Whilst approach (B) is an option, it is deemed to be an unreasonable option that need not be subjected to detailed appraisal. This is because there is uncertainty, at this pre-implementation stage, as to whether access management would, by itself, be able to fully address the impact of increased visitor pressure on the SAC/SPA, particularly since it would not be legally permissible to actively restrict access. In order to comply with the requirements of the Conservation of Habitats & Species Regulations 2010 (as amended) the local authority requires a high degree of certainty that mitigation will be effective.

The reasonable alternatives

- 2.2.6 In light of the discussion above, it is clear that the reasonable alternatives are as follows:

1) No policy

- Under this option it would be incumbent on individual applicants/developers to devise appropriate mitigation (or justify that mitigation was not required), in liaison with the local authority development management team. The difficulty with such an approach is that no strategic coordination of the need for mitigation, or the type of mitigation required, would be in place. Whilst the necessary project level work is potentially feasible for very large developments (i.e. hundreds of dwellings) it would be very difficult for smaller developments to identify their 'in combination' effects and demonstrate to the local authority that the proposed mitigation would adequately mitigate their project's contribution to the overall effect. It would also render the delivery of mitigation on the ground more difficult because there would be no way to credibly predict the future availability of funds for implementing any strategic mitigation measures. Under this option it would be difficult to demonstrate that the plan would not have an in combination effect, and the deliverability of the Local Plan's housing policy might be called into question; however, difficulties are not necessarily insurmountable given that a relatively small part of Lewes District falls within the 7km zone (which it can be assumed would still be taken into account through project level work).

2) Retain the current policy

- The current policy wording stipulates a zone (7km) within which mitigation is required and identifies the nature of the expected mitigation. This therefore provides clarity for both applicants and development management officers regarding the geographic area in question and the type of mitigation most likely to be acceptable. This enables not only consistency but a strategic approach to be taken to the coordination and delivery of mitigation and a degree of certainty as to the likely financial resources available to achieve mitigation where it needs to be delivered centrally (e.g. access management within the SAC/SPA). The policy does, however, also permit other solutions besides the primary expected mitigation (SANG and access management) to be proposed on a case-by-case basis. As such, there would be no need to remove or alter the policy if a decision was taken in the future to alter the strategic mitigation approach, or if an applicant was in a position to propose an effective alternative. It is also noted that the policy would not preclude HRA screening of development situated further from the SAC/SPA than 7km.

3) Specify a 7km mitigation zone but do not specify mitigation measures

- This approach would simply note the zone within which mitigation would be required, sufficient to enable a conclusion of no adverse effect on integrity of the SPA alone or in combination. This would give applicants maximum flexibility to propose mitigation

solutions. However, it would carry with it many of the risks of the 'no policy' option, given uncertainty as to what mitigation will be acceptable and an inability to deliver or manage any mitigation solution strategically.

3 WHAT ARE APPRAISAL FINDINGS AT THIS STAGE?

3.1 Introduction

3.1.1 The aim of this Chapter is to present appraisal findings in relation to the alternative policy approaches (to planning for Ashdown Forest) introduced in Chapter 2.

3.2 Methodology

3.2.1 The assessment identifies and evaluates 'likely significant effects' of each option on the baseline, drawing on the sustainability objectives identified through scoping as a methodological framework.⁹

3.2.2 Effects are predicted taking into account the criteria presented within Regulations.¹⁰ So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Effects are described in terms of these criteria within the assessment as appropriate. The potential for 'cumulative' effects (e.g. the effect of a particular policy option being implemented alongside the rest of the Local Plan Part 1) is also a consideration.

3.2.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the alternatives. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no intervention' scenario). In light of this, there is a need to make considerable assumptions regarding how the alternatives would be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

3.2.3 In many instances, given reasonable assumptions, it is not possible differentiate between the alternatives in terms of significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference.

3.3 Appraisal findings

3.3.1 **Table 3.1** presents appraisal findings. The table ranks the options in terms of each of the sustainability objectives and uses **red** / **green** to indicate 'significant' effects where appropriate. A summary of the appraisal findings is then presented in **Table 3.2**.


N.B. **Option 1 ('no policy') is effectively 'the baseline'** and hence cannot result in an effect.

⁹ Scoping work was undertaken in 2010, with a Scoping Report published for consultation in May 2010. Subsequently, adjustments have been made to the SA scope (i.e. the understanding of specific 'context' and 'baseline' issues that should be taken into account through SA), but the 'framework' of objectives that was established through the 2010 scoping consultation has remained unchanged.

¹⁰ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Table 3.1: Appraisal of alternative approaches to planning for Ashdown Forest

1) No policy 2) Retain the current policy 3) Specify a 7km mitigation zone but do not specify mitigation measures				
Objective	Alternatives			Discussion
	Opt 1	Opt 2	Opt 3	
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home .	3	★ 1	2	<p>The alternatives will have differing implications for housing delivery in Newick (a location for 100 new homes within the submitted Lewes Local Plan Part 1) and its surrounding area, i.e. the villages in the district located within the 7km zone. There is also the potential for cumulative effects, as nearby Uckfield lies within Wealden District, where the policy framework in relation to Ashdown Forest is currently not fixed (in light of the recent Court of Appeal Judgement) and there are plans for strategic scale growth (with the Wealden Core Strategy establishing a broad location for 1,000 homes as well as plans for employment and retail growth).</p> <p>Option 2 provides greatest clarity to developers and other stakeholders because it defines the zone in which mitigation is required and the nature of the mitigation measures required. This clarity will support housing delivery, especially given that recent work has enabled a 'Strategic Access Management and Monitoring' (SAMM) tariff to be established, and this tariff is now ready to be implemented. Significant positive effects are predicted; however, it is recognised that there will still be a degree of uncertainty, which might act as a barrier to housing delivery to some extent. This is on the basis that there is no suitable SANG location identified, and no developer thus far has been able to offer SANG as suitable mitigation (or suitable alternative mitigation). Developers will be wary, given that SANG delivery is potentially very costly.</p> <p>Options 1 and 3 provide less clarity as they do not define the type of mitigation required, and in the case of option 1 a policy 'zone' would not be defined. Option 3 would be an improvement on the baseline (option 1), but there would still be a risk that project specific work at the planning application stage will establish that negative effects of development (including in combination effects) on the SPA/SAC cannot be mitigated. Option 3 also performs better than option 1 in that it would lead to certainty for housing beyond the Newick area (within Lewes). Under option 1 (the baseline) a zone, within which mitigation is required, would not be defined meaning that applicants for development in more distant locations of the district would not know for certain if they would be affected by mitigation requirements.</p>
2. To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of Lewes.	n/a	n/a	n/a	Newick and the surrounding area is one of the most affluent parts of Lewes District, and so it is not thought likely that any option would have implications in terms of this objective.

Objective	Alternatives			Discussion
	Opt 1	Opt 2	Opt 3	
3. To increase travel choice and accessibility to all services / facilities.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective (although through delivery of SANG option 2 could increase access to green space).
4. To create and sustain vibrant, safe and distinctive communities .	3		2	<p>As discussed above, the alternatives will have varying implications for housing delivery. On this basis, there could be 'communities' effects; however, effects would be indirect and would likely be 'minor'.</p> <p>It is important to note that, whilst options 2 and 3 would support the delivery of housing alongside Ashdown Forest mitigation, measures (SANG and SAMMS) will be delivered through S106 (as opposed to delivery via the Community Infrastructure Levy, CIL) and so it will not be the case that mitigation measures result in funding for community infrastructure being diverted. It is also noted that Newick has a Neighbourhood Plan in place, and so the Parish Council will receive 25% of CIL revenue resulting from housing development locally.</p>
5. To improve the health of the District's population.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective (although through delivery of SANG option 2 could increase access to green space, and more generally maintenance of a high quality environment is important for health and wellbeing).
6. To improve the employability of the population, to increase levels of educational attainment and to improve access to educational services.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective. There are no specific issues at Newick (e.g. it is not the case that development is necessitated to fund a new school).
7. To improve efficiency in land use through the reuse of previously developed land and existing buildings and minimising the loss of valuable greenfield land.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective. There are no specific issues at Newick (e.g. it is not the case that there is a brownfield land resource that needs to be 'unlocked' for development).

Objective	Alternatives			Discussion
	Opt 1	Opt 2	Opt 3	
8. To conserve and enhance the District's biodiversity .	3	★ 1	2	<p>Ashdown Forest is designated an SPA and SAC indicating its exceptional importance in respect of rare, endangered or vulnerable natural habitats and species. Consequently it receives a high level of nature conservation protection, most notably under the Habitats Regulations. The Lewes Local Plan Part 1 Habitat Regulations Assessment (HRA)¹¹ indicates that the combination of residential development in multiple authorities around Ashdown Forest would cause harm, unless mitigated against, due to disturbance to protected ground nesting birds caused by visitors to the forest.</p> <p>Option 2 would perform best against this objective and would be likely to have a significant positive effect relative to the baseline of 'no policy'. It would retain the identification of a zone (7km) within which mitigation of impacts on the SPA/SAC is required and would identify the nature of the expected mitigation, providing clarity for developers and other stakeholders regarding the geographic area in question and the type of mitigation most likely to be acceptable. This enables a strategic approach to be taken to the coordination and delivery of mitigation and a degree of certainty as to the likely financial resources available to achieve mitigation where it needs to be delivered centrally (e.g. access management within the SPA/SAC).</p> <p>Option 3 specifies a 7km mitigation zone within which mitigation is required (to avoid adverse impact on the integrity of the SPA/SAC), but does not specify the types of mitigation measures. This option would therefore create uncertainty for developers as to what mitigation will be acceptable and undermine the potential for strategic coordination of mitigation (as the future availability of funds for implementing any strategic mitigation measures would be uncertain).</p> <p>Option 1 (the baseline) performs worst as it leaves everything open for resolution at planning application stage, thereby creating maximum uncertainty in terms of future funding flows for mitigation measures and totally preventing any strategic coordination of mitigation delivery.</p>
9. To protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective. There is currently good access to high quality countryside / historic landscapes, and this would not be affected under any option. Even an option supportive of access management would not restrict access.
10. To reduce waste generation and disposal, and achieve the sustainable management of waste .	n/a	n/a	n/a	The alternatives will not lead to implications in terms of this objective.





¹¹ <http://www.lewes.gov.uk/planning/20408.asp>

Objective	Alternatives			Discussion
	Opt 1	Opt 2	Opt 3	
11. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective.
12. To reduce the emissions of greenhouse gases , to reduce energy consumption and increase the proportion of energy generated from renewable sources.	n/a	n/a	n/a	Option 2 could have an indirect minor positive effect if provision of Suitable Alternative Natural Green Spaces (SANG) is secured through implementation of the policy, leading to reduced car travel (and associated greenhouse gas emissions) to access green space, but this effect is uncertain and likely to be small (relative to total per capita greenhouse gas emissions and a baseline of no policy).
13. To improve the District's air quality .	n/a	n/a	n/a	As above, option 2 could have an indirect minor positive effect if provision of SANG is secured through implementation of the policy, leading to reduced car travel (and associated air pollution) to access green space, but this effect is uncertain and likely to be small relative to a baseline of no policy, and given that there are no particular air quality issues (i.e. designated Air Quality Management Areas) locally. With regards to the Ashdown Forest, the HRA found that the Local Plan Part 1 would not have a significant negative effect in relation to air pollution resulting from additional traffic generated by new development in the district.
14. To reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment.	n/a	n/a	n/a	The alternatives are unlikely to have direct implications in terms of this objective (though there is a possible indirect effect on flooding through sustaining a forested area that soaks up rainfall and releases it slowly, thereby contributing to reduced flood risk).
15. To ensure that the District is prepared for the impacts of coastal erosion and tidal flooding.	n/a	n/a	n/a	The area in question is not adjacent to the coast.

Objective	Alternatives			Discussion
	Opt 1	Opt 2	Opt 3	
16. To promote and sustain economic growth in successful areas, and to revive the economies of the most deprived areas.	n/a	n/a	n/a	<p>The alternatives might have varying implications, in terms of this objective; however, effects would be very minor and hence on balance it is appropriate to conclude that this objective is 'not applicable' to the alternatives appraisal.</p> <p>The discussion under 'housing' above explains the potential implications for housing delivery, and it is the case that housing delivery can support the achievement of local economic objectives. This is set to be the case in nearby Uckfield (in Wealden District); however, it is not thought that this will be the case in Newick (the location that will be affected by the alternatives to the greatest extent). The submitted Lewes Local Plan Part 1 identifies Newick as a location for 100 homes only, and whilst there might be arguments for additional housing growth in the future through the Lewes Local Plan Part 2, this is not the vision of the adopted Newick Neighbourhood Plan.</p>
17. To encourage the growth of a buoyant and sustainable tourism sector.	3		2	<p>The high quality environment of Ashdown Forest attracts visitors to the area and employment related to tourism. By providing clarity for developers and other stakeholders about mitigation requirements and facilitating a strategic approach to be taken to the coordination and delivery of mitigation and a degree of certainty as to the likely financial resources available to achieve mitigation where it needs to be delivered centrally (i.e. through access management within the SPA), option 2 is considered to have a positive effect on this objective through providing greatest potential to sustain this high quality environment. Significant effects are unlikely, however.</p>

Appraisal summary

Table 3.2: A summary of the alternatives appraisal

Objective	Alternatives		
	Opt 1	Opt 2	Opt 3
1. Ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home .	3		2
2. Reduce poverty and social exclusion and close the gap between the most deprived areas and the rest of the district.	n/a	n/a	n/a
3. Increase travel choice and accessibility to all services and facilities.	n/a	n/a	n/a
4. Create and sustain vibrant, safe and distinctive communities .	3		2
5. Improve the health of the District's population.	n/a	n/a	n/a
6. Improve the employability of the population, to increase levels of educational attainment and to improve access to educational services.	n/a	n/a	n/a
7. Improve efficiency in land use through reuse of previously developed land and existing buildings and minimising the loss of valuable greenfield land.	n/a	n/a	n/a
8. Conserve and enhance the District's biodiversity .	3		2
9. Protect, enhance and make accessible the District's countryside, historic environment and the South Downs National Park.	n/a	n/a	n/a
10. Reduce waste generation and disposal, and achieve the sustainable management of waste .	n/a	n/a	n/a
11. Maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management.	n/a	n/a	n/a
12. Reduce the emissions of greenhouse gases , reducing energy consumption and increasing energy generated from renewable sources.	n/a	n/a	n/a
13. Improve the District's air quality .	n/a	n/a	n/a
14. Reduce the risk of flooding and the resulting detriment to public wellbeing, the economy and the environment.	n/a	n/a	n/a
15. Ensure that the District is prepared for the impacts of coastal erosion and tidal flooding.	n/a	n/a	n/a
16. Promote and sustain economic growth in successful areas, and to revive the economies of the most deprived areas.	n/a	n/a	n/a
17. Encourage the growth of a buoyant and sustainable tourism sector.	3		2
<p>In conclusion, the appraisal finds that Option 2 - which would involve maintaining Core Policy 10 as submitted - would result in a 'win-win' situation. As well as performing best in terms of biodiversity objectives, the policy would create the 'certainty' necessary for housing delivery, with secondary benefits in terms of community objectives. Option 1 - which would involve a continuation of the baseline situation - performs least well. In practice it would likely result in a continuation of the current situation whereby housing growth is 'frustrated' to a significant extent. Option 3 would result in an improvement on the baseline situation, but there would remain some potential for housing delivery to be frustrated and/or a risk that mitigation measures (to address the increased recreational pressure on Ashdown Forest) would be implemented without the strategic oversight and coordination that will help to ensure its effectiveness.</p>			

4 WHAT HAPPENS NEXT?

4.1 Introduction

4.1.1 This Part of the report explains next steps that will be taken as part of plan-making / SA.

4.2 Plan finalisation

4.2.1 In-light of the appraisal findings presented in this Interim SA Report, the Council will consider alternatives before finalising Proposed Modifications for publication.

4.2.2 Proposed Modifications will then be published, with an SA Report¹² published alongside. The SA Report will present: 1) the appraisal of alternatives and the reasons for selecting alternatives, as set out in Chapters 2 and 3 of this report; 2) the Council's reasons for developing the preferred approach in-light of the assessment of alternatives; and 3) an appraisal of the preferred approach (i.e. the Proposed Main Modifications). The SA Report will also present 'measures envisaged concerning monitoring', as part of which consideration will be given to the matter of monitoring the mitigation of recreational impacts to Ashdown Forest SAC/SPA.

4.2.3 In-light of representations received on the Proposed Main Modifications, the Inspector will determine whether there is a need to hold further Examination Hearings, or whether it is possible to reach a conclusion on the soundness of the plan (with Main Modifications applied as necessary, in the view of the Inspector).

4.3 Adoption and monitoring

4.3.1 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

Reasons for Selecting the Preferred Approach

6.4 On the basis of the findings above it is clear that Core Strategy Policy 10 part 3 (Option 2) provides the best policy approach in terms of biodiversity objectives. Having a strategic and coordinated approach will provide more certainty in terms of future funding flows for mitigation measures. Moreover this policy approach is supported by Natural England as shown in this excerpt from an email, in response to the Court of Appeal ruling, from the Planning Casework Manager for the Sussex and Kent Team:

"Natural England does not consider that the ruling undermines the evidence base underpinning the 7km zone. I am writing therefore to confirm therefore that Natural England continues to support the 7km zone of influence around Ashdown Forest and its use by Wealden district's neighbouring local authorities, and in particular the adoption of this zone as policy in the emerging Lewes and Mid Sussex districts' local plans. We will continue to work closely with Wealden District Council as it develops new policy with regard to Ashdown Forest, and support the establishment of strategic access management measures currently being developed by Wealden district in partnership with the local authorities surrounding the Forest". (Email 03/08/2015)

¹² The document published alongside Main Modifications might best be labelled an SA Report 'Addendum' on the basis that it sets out to inform consultation on Modifications only (as opposed to 'the ADMP as modified'). The ADMP 'SA Report' was published for consultation alongside the ADMP in 2013.

- 6.5 The combined approach of SANG and SAMMS within the 7km zone provides a strategic and coordinated approach to providing alleviation for the visitor pressure on the Forest. Through the SAMMS a new visitor survey will be undertaken in 2016 and the results of bird monitoring will be available in the next couple of years. This information will feed back into the mitigation strategy approaches and ensure the Forest remains protected to adequate levels in respect of visitor pressure and active management. Providing adequate alternative greenspaces for recreation and in particular dog walking that can intercept some of the regular visits to the Forest will be a valuable part of our strategic mitigation approach. There will be secondary community and health benefits from the provision of more accessible countryside through SANG or SANG-type infrastructure. Due to our approach to collecting developer contributions to this environmental mitigation via S106, money collected through the Community Infrastructure Levy will not be diverted to pay for this mitigation.
- 6.6 The current policy approach also performs best of the options appraised in terms of housing delivery, providing clarity to developers of what mitigation is required. Whilst there is no SANG identified at the present time there is firm commitment to identify a SANG in Local Plan Part 2, due for pre-submission consultation next year, and we are undertaking ongoing work and negotiations to that end. The SAMM tariff has now been agreed (£1,710 per dwelling) across the affected authorities in the 7km zone and so whilst the full Strategy is not published the tariff may be used for the purposes of agreeing the S106 particulars. Option 1 could be a very arduous process for developers and carries a risk that project specific work at the planning application stage will establish that negative effects of development (including in combination effects) on the SPA/SAC cannot be mitigated. Thus the delivery of development could become frustrated as no coordinated approach to mitigation is proposed; Option 3 may suffer similarly in respect of a lack of coordinated approach to mitigation and risk of harm to the integrity of the Ashdown Forest SPA/SAC.
- 6.7 With Natural England support for CP10 part 3, coupled with the robust SA interim report produced by AECOM, the Councils can feel confident in our existing policy approach for the protection of the Forest, including the 7km zone of influence. Therefore there is no further need for action in relation to the SA process as the policy remains as previously appraised in the Submission SA (and Addendum) [CD/002 and CD/005].

7. Sustainability Appraisal of the Proposed Main Modifications

Spatial Policy 1 – Provision of Housing and Employment Land

Related Recommended Modifications – MM01

- 7.1 Spatial Policy 1 has been appraised in Chapter 11 of the Submission SA (paragraph 11.7 and Appraisal Table 2 of Appendix 4). Since then, modifications to the policy wording have been proposed which require a re-appraisal.
- 7.2 National Planning Policy (NPPF) requires local authorities to positively seek to meet development needs in their area unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. Lewes District Council and the South Downs National Park Authority proposed housing and employment land targets in Spatial Policy 1 of the Submission Core Strategy that were deemed appropriate given the various constraints to development in the district.
- 7.3 During the Hearing Sessions at the Core Strategy Examination in Public (EiP), the Inspector led a thorough discussion into the ability of the planning authorities to meet the district's identified housing and economic needs. The Inspector concluded by agreeing that the district's identified housing need cannot be met in full over the plan period. However, in his Interim Findings Letter¹³, the Inspector indicated that further effort was required to reduce the gap between the housing target set in Spatial Policy 1 and the identified housing need, striking a fairer balance between social, economic and environmental considerations.
- 7.4 In light of the above, the Inspector recommended the allocation of additional strategic sites and an increased housing target of approximately 6,900. An option equivalent to this figure was appraised in the Submission SA as Option E – the Zero Employment Growth Scenario (paragraph 10.9 and SA Table 2b in Appendix 3). This option has been re-appraised in light of the Inspector's comments that the significance of the district's affordable housing need had not been sufficiently considered through the Core Strategy and supporting evidence base.

Changes to Submission SA Appraisal

- 7.5 The appraisal table for Spatial Policy 1 has been updated in line with the proposed modification MM01. The appraisal table for Option E of the Submission SA formed the basis of the appraisal, although it has been

¹³ http://www.lewes.gov.uk/Files/plan_ID-05_Letter_to_Councils_10_Feb_2015.pdf

reassessed in line with the Inspector's comments during the Hearing Sessions and Interim Findings Letter.

- 7.6 This re-appraisal resulted in a significant positive impact being identified against the housing objective due to the substantial number of affordable homes that would be provided as well as the associated social benefits. There is a high affordable housing need evident in Lewes District which is exacerbated by an acute housing affordability problem. The level of development set out in this policy will help to alleviate these issues. This also resulted in a significant positive effect being identified against the deprivation objective due to the benefits that could be felt in the most deprived areas of the district.
- 7.7 There is, however, a degree of uncertainty with regard to this scoring as a result of the requirement for the identification of transport mitigation measures to resolve capacity constraints along the A259 in order to enable development in Peacehaven/Telscombe. A review of spatial policies 1, 2 and 8 will be triggered in 2022 if these measures have not been identified to the satisfaction of the local highway authority, although ESCC has confirmed that there are reasonable prospects that these measures are deliverable over the plan period. Also, a review of spatial policies 1 and 2 will be triggered subject to the outcomes of cross-authority work examining housing potential within the Sussex Coast HMA and adjoining areas.
- 7.8 In light of the discussion at the Hearing Sessions into the transport implications of a higher housing target, the appraisal found that there would be no negative impact on the transport objective. Potentially, the level of development proposed in the policy could almost entirely be met through sites identified as suitable in the 2014 Strategic Housing Land Availability Assessment (SHLAA) and transport measures would be required to mitigate any adverse effects on the highway network in areas where there are significant constraints. ESCC confirmed their satisfaction that the level of development set in the proposed modifications can be accommodated subject to suitable mitigation measures being identified and agreed. It has also been confirmed that there are reasonable prospects that these measures are deliverable over the plan period.
- 7.9 The appraisal also identified a neutral impact on the biodiversity objective. A negative impact had been identified when this level of development was previously appraised (Option E). The previous appraisal relied upon the online Air Pollution Information System (APIS) software for calculating potential exceedances of critical loads for air pollutants on particular habitat types. This software does not allow for specific fine-grained testing, rather presents an indication where further work/testing might be required as a result of a possible exceedance. Hence at the option stage appraisal the

biodiversity objective, in the assessment of Option E, received a ‘negative?’ score. Since then we commissioned consultant ecologists using input from air quality specialists to undertake a more detailed study of the potential impact on the Lewes Downs SAC of an increase in traffic as a result of the greater housing numbers. An addendum to the HRA (July 2015) has been prepared which specifically considers the impact of the new housing target on the Lewes Downs SAC. The study found that there are unlikely to be any significant effects on the European protected site as a result of the level of development set in the policy, a conclusion which was agreed by Natural England.

Conclusion

7.10 When undertaking this appraisal, a more appropriate balance between the social, environmental and economic considerations has been sought. Whilst it is evident that the level of development set in this policy could potentially result in adverse environmental and economic impacts, more of an emphasis has been placed on the social benefits of a higher housing target (in particular the pressing need for additional affordable housing), which has outweighed the potential negative impacts.

Mitigation

7.11 There are no significant negative effects that necessitate mitigation. The appraisal however did note negative impacts against some of the objectives. This includes the land efficiency objective due to the loss of greenfield land. This cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone.

7.12 Despite the proposed modifications to the Core Strategy, and in particular with regard to the spatial policies, it is still the belief that the Core Strategy will direct development in a sustainable manner. Therefore, despite the potential adverse impacts that the sustainability appraisal has highlighted, it is likely that other policies within the Core Strategy will reduce, or potentially negate altogether, these adverse impacts. For example, the policy wording for Spatial Policy 4 requires the development brief for the Old Malling Farm site to be approved by the SDNPA before planning permission is granted which reduced a potentially significant negative impact on the landscape objective. Also, Core Policy 10 introduces a number of measures that could potentially offset any adverse impacts.

7.13 It is not possible to make any further changes to the policy at this stage.

Table4: Provision of Housing and Employment Land Summary Table

Policy	Objectives
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	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP1	++?	++	0?	-?	0	0?	-	0	-?	0?	0	0	0	0	0	-?	0

Spatial Policy 2 – Distribution of Housing

Related Recommended Modifications – MM02, MM03

7.14 Spatial Policy 2 has been appraised in Chapter 11 of the Submission SA (paragraph 11.10 and Appraisal Table 3 of Appendix 4). Since then modifications to the policy wording have been proposed which require a re-appraisal.

7.15 In his Interim Findings Letter following the conclusion of the Hearing Sessions, the Inspector recommended an increase to the district housing target and the allocation of further strategic sites to help bring forward additional new housing delivery on the scale required. This included additional strategic allocations in Lewes and Peacehaven, as well as formally allocating other sites to ensure early delivery. The Inspector also clarified that he did not see any need to materially alter the planned levels of growth for the settlements, as expressed as minimums, in light of his other recommendations.

Changes to Submission SA Appraisal

7.16 The appraisal table for Spatial Policy 2 has been updated in line with the proposed modifications MM02 and MM03.

7.17 The increased district housing target and additional strategic allocations proposed through this policy are likely to bring about significant positive impacts against the social objectives due to the significant increase in housing (particularly affordable) over the plan period and particularly in sustainable areas where housing need is most apparent. However, a degree of uncertainty against the housing objective remains as a result of the requirement for the identification of transport mitigation measures to resolve capacity constraints along the A259 in order to enable development in Peacehaven/Telscombe. A review of spatial policies 1, 2 and 8 will be triggered in 2022 if these measures have not been identified to the satisfaction of the local highway authority. Also, a review of spatial policies 1 and 2 will be triggered subject to the outcomes of cross-authority work examining housing potential within the Sussex Coast HMA and adjoining areas.

7.18 With the allocation of additional strategic sites on greenfield land in environmentally sensitive locations, a negative impact on the environmental and land efficiency objectives is likely. Also, despite the potential increase to the district’s workforce and customer base resulting from this policy, it could

also potentially lead to the irreversible loss of existing employment sites which may harm the district's economic growth.

7.19 However, the significant social benefits resulting from this strategic policy were seen to outweigh these potential negative environmental and economic impacts.

Conclusion

7.20 When undertaking this appraisal, a more appropriate balance between the social, environmental and economic considerations has been sought. Whilst it is evident that the level of development set in this policy could potentially result in adverse environmental and economic impacts, more of an emphasis has been placed on the social benefits of a higher housing target (in particular the pressing need for additional affordable housing), which has outweighed the potential negative impacts

Mitigation

7.21 There are no significant negative effects that necessitate mitigation. The appraisal however did note negative impacts against some of the objectives. This includes the land efficiency objective due to the loss of greenfield land. This cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone.

7.22 Despite the proposed modifications to the Core Strategy, and in particular with regard to the spatial policies, it is still the belief that the Core Strategy will direct development in a sustainable manner. Therefore, despite the potential adverse impacts that the sustainability appraisal has highlighted, it is likely that other policies within the Core Strategy will reduce, or potentially negate altogether, these adverse impacts. For example, the policy wording for Spatial Policy 4 requires the development brief for the Old Malling Farm site to be approved by the SDNPA before planning permission is granted which reduced a potentially significant negative impact on the landscape objective. Also, Core Policy 10 introduces a number of measures that could potentially offset any adverse impacts.

Table 5: Distribution of Housing Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP2	++?	++	+	+	0	0	-	0	-	0	0	0	0?	0?	0	-?	0

Spatial Policy 3 – North Street Quarter and Adjacent Eastgate Area, Lewes

Related Recommended Modifications – MM04

7.23 Spatial Policy 3 has been appraised in Chapter 11 of the Submission SA (paragraph 11.13 and Appraisal Table 4 of Appendix 4). Since then modifications to the policy wording have been proposed which require a re-appraisal. These modifications have been made in response to the discussion at the EiP Hearing Sessions, updated circumstances surrounding the site and to aid in the clarity of the policy for decision makers.

Changes to Submission SA Appraisal

7.24 A number of modifications have been proposed to the wording of Spatial Policy 3. The appraisal table for this policy has been updated to reflect these changes. The tourism objective changed from a positive to a neutral scoring due to the reduced certainty of additional hotel provision. Otherwise, there were no major changes to the appraisal scoring, although some of the proposed amendments resulted in a greater degree of certainty in the scoring for example against the environment and waste objectives.

Conclusion

7.25 Overall, the policy appraised highly positively scoring well against a number of objectives. In addition, the proposed modifications to the policy have brought about some changes to the scoring by giving greater certainty to the impacts against specific objectives.

Mitigation

7.26 There are no significant negative effects that necessitate mitigation.

Table 6: North Street Quarter and adjacent Eastgate Area Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP3	++	+	+	++	?	0	++	0	+	0	+	0	?	++	0	+	0?

Spatial Policy 4 - Land at Old Malling Farm Strategic Site

Related Recommended Modifications – MM05

7.27 Various options for strategic development sites were appraised through previous versions of the SA (paragraphs 10.48 – 10.80 of Submission SA). Old Malling Farm, Lewes (Option A), was one such option considered. The site was not taken forward in the Submission Core Strategy due to the potential significant negative environmental effects resulting from the very high landscape sensitivity within the National Park.

7.28 Following a thorough discussion during the Hearing Sessions, the Inspector made it clear in his Interim Findings Letter that Old Malling Farm should be allocated as a strategic allocation. Whilst acknowledging the primary purposes of the National Park in protecting the landscape character and assets, the Inspector also stated that an appropriate balance between social, environmental and economic considerations had not been struck in finding an appropriate level of development for the town of Lewes, which is considered the district's most sustainable settlement. It was considered that the social benefits of a further strategic allocation in the town, recognising the significant local affordable housing need, could potentially balance the adverse landscape impacts in this instance. It was therefore decided to re-appraise the site, giving careful consideration to the balance between social, environmental and economic impacts.

Appraisal Summary

7.29 An appraisal of Spatial Policy 4 has been undertaken and the proposed policy wording in has also been appraised. The appraisal found that the policy was likely to have positive social impacts as a result of the substantial number of dwellings, and in particular the number of affordable dwellings, that will be delivered in light of the town's significant housing register waiting list. This resulted in a significant positive impact against the housing objective, and to a slightly lesser extent, the deprivation objective.

7.30 In his Interim Findings Letter, the Inspector cited the location of Old Malling Farm in the district's most sustainable settlement as a key reason for this proposed modification due to the significant social benefits that development would bring forward. This has reasoning been reflected in the re-appraisal of the site which has resulted in a significant positive impact against the transport objective. Also, the policy would require off-site contributions to junctions that suffer from traffic congestion. These mitigation measures could therefore have far-reaching transport benefits for the district. It is also likely that this policy would have a positive impact on the economy objective due to the increased customer base for the town's shops and services.

7.31 A negative impact is likely against some of the environmental objectives including the land efficiency objective as Old Malling Farm is a greenfield site located (partially) on Grade 2 agricultural land. Grade 2 is considered within 'best and most versatile agricultural land' under the agricultural land classification (ALC). The site is located within close proximity to sensitive biodiversity designations which may be adversely impacted upon. Also, a negative impact is likely on the environmental objective due to the site's sensitive built and natural setting. The proposed policy wording introduces numerous criteria which seek to reduce or remove the adverse impacts of development. This includes detailed criteria ensuring that development on the

site is appropriately designed and located with regard to its landscape setting, including the adjacent conservation area, listed buildings and views to/from the South Downs National Park.

Changes to Submission SA Appraisal

- 7.32 A number of changes to the appraisal scoring were evident in comparison to the previous appraisal of the site as a strategic site option in the Submission SA (10.48 – 10.80 of Submission SA). These are mainly due to the introduction of the detailed policy criteria which have assisted with mitigating the adverse environmental impacts that could potentially result from inappropriate development of the site.
- 7.33 Spatial Policy 4 sets a requirement of 50% affordable housing on the site which not only reaffirms the significant positive impact on the housing objective, but also led to a positive impact against the deprivation objective as it is felt that additional affordable housing would benefit lower income families, including those on the housing register, in accessing suitable and affordable accommodation.
- 7.34 The previous assessment of the site against the sustainability framework gave a significant negative scoring against the land efficiency objective. Whilst greenfield development on high quality agricultural land is avoided in the first instance, during the re-appraisal it was determined that the impact on this objective may have been given too much weight in the appraisal and it was not felt that this should be a showstopper considering it is not possible for the authorities to meet the planned level of growth set in Spatial Policy 1 on brownfield sites alone.

Conclusion

- 7.35 When undertaking this appraisal, a more appropriate balance between the social, environmental and economic considerations has been sought. Whilst it is evident that the level of development set in this policy could potentially result in adverse environmental and economic impacts, more of an emphasis has been placed on the social benefits of additional housing provision (in particular the pressing need for additional affordable housing) in the early part of the plan period, which has outweighed the potential negative impacts

Mitigation

- 7.36 There are no significant negative effects that necessitate mitigation. Whilst the appraisal noted a negative impact against the land efficiency objective, due to the loss of greenfield land, this cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone. The appraisal also noted an adverse impact against the environmental and biodiversity objectives. A number of mitigation measures are proposed

through the policy wording that could potentially offset these adverse impact altogether, although the environmental sensitivity of the site is not being questioned. No further changes can be made to the policy to reduce these impacts.

Table 7: Old Malling Farm, Lewes Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP4	++	+	++	?	0?	0	-	-	-?	0	0	0	?	0	0	+	0

Spatial Policy 5 – Land at Greenhill Way/Ridge Way (Previously SP4)

Related Recommended Modifications – MM07 – MM09

7.37 Land at Greenhill Way is allocated as a strategic allocation in the Submission Core Strategy. Spatial Policy 5 (formerly Spatial Policy 4) has been appraised in Chapter 11 of the Submission SA (paragraph 11.16 and Appraisal Table 5 of Appendix 4). Some amendments to the policy have since been proposed to reflect comments raised during consultation and the discussion at the Hearing Sessions.

Changes to Submission SA Appraisal

7.38 The updated policy wording has been appraised. Some minor amendments were made to the appraisal wording for accuracy, however they did not impact on the appraisal scoring, which remained unchanged.

Conclusion

7.39 Overall, the policy appraised positively against the sustainability framework, although a negative impact against the land efficiency objective is likely.

Mitigation

7.40 There are no significant negative effects that necessitate mitigation. Whilst the appraisal noted a negative impact against the land efficiency objective, due to the loss of greenfield land, this cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone. Whilst uncertainties were also noted, the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be improved to remove the uncertainties. As such no changes to the policy have been made.

Table 8: Land at Greenhill Way Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP5	+	0	+	?	?	0	-?	0	0	0	0	0	?	+	0	+	0

Spatial Policy 6 – Land North of Bishops Lane (Previously SP5)

Related Recommended Modifications – MM06, MM10 - MM12

7.41 Land North of Bishops Lane was allocated as a contingency strategic allocation in the Submission Core Strategy and was appraised in Chapter 11 of the Submission SA (para 11.19 and Appraisal Table 6 of Appendix 4). The Inspector made it clear in his Interim Findings Letter that the site should be allocated in full (thus removing the contingency caveat). This specific modification did not result in any changes to the policy wording, however some amendments to the policy wording have been proposed to reflect comments raised during consultation and discussion at the Hearing Sessions.

Changes to Submission SA Appraisal

7.42 The updated policy wording has been re-appraised against the sustainability framework. As a result of the introduction of proposed modification MM10, more certainty could be given to the positive impact against the biodiversity objective. Also, due to proposed modification MM12, it is unlikely that there will be a positive impact on the water objective as increased capacity at the Waste Water Treatment Works is no longer a requirement prior to development of the site. Some minor amendments to the appraisal wording were also made to reflect the updated wording of the policy.

Conclusion

7.43 Overall the policy scored well, having a positive effect on a number of different objectives, although a negative impact is possible due to the loss of greenfield land, which may be of high agricultural quality.

Mitigation

7.44 There are no significant negative effects that necessitate mitigation. Whilst the appraised noted a negative impact against the land efficiency objective, due to the loss of greenfield land, this cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone. Uncertainties were also noted but the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be

improved to remove such certainties. The full impact on biodiversity and the environment cannot be known until work, highlighted in the policy, is completed in advance of development taking place and therefore there is no need to amend the policy in light of the appraisal.

Table 9: Land North of Bishops Lane Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP6	+	0	+	?	?	0	-?	+	0?	0	0	0	?	+	0	+	0

Spatial Policy 7 – Land at Harbour Heights (Previously SP6)

Related Recommended Modifications – MM13

7.45 Land at Harbour Heights was allocated as a Broad Location for Growth in the Submission Core Strategy and was appraised in Chapter 11 of the Submission SA (para 11.22 and Appraisal Table 7 of Appendix 4). Following a thorough discussion at the Hearing Sessions, the Inspector made it clear in his Interim Findings Letter that the site should be allocated in full. This has resulted in changes to the policy wording being proposed which require further assessment through the SA.

Changes to Submission SA Appraisal

7.46 The updated policy wording has been re-appraised against the sustainability framework. Now that the site is a full strategic allocation it is expected to be delivered in the early part of the plan period. This change in circumstance has been reflected in the appraisal scoring. However, there is a degree of uncertainty as to whether the market could deliver such a significant number of dwellings in the short-term due to the number of sites in the town that currently have planning permission. It must also be mentioned that the policy allows for individual applications relating to only part of the site.

7.47 Also, the Broad Location for Growth allocation in the Submission Core Strategy did not specify the precise development area or number of units. These details have been included in the proposed modification MM13 along with refined policy criteria. This has been reflected in the appraisal wording, although has not resulted in any further changes to the appraisal scoring.

Conclusion

7.48 Overall, the policy was appraised positively in respect of a number of different objectives, albeit a negative consequence of the policy would be the loss of greenfield land. A number of the uncertainties evident in the previous wording

of this policy have been negated as a result of the detailed policy wording following its change to a full strategic allocation.

Mitigation

7.49 There are no significant negative effects that necessitate mitigation. Whilst the appraised noted a negative impact against the land efficiency objective, due to the loss of greenfield land, this cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone. Also, uncertainties were noted in respect of the community and service provision but the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be improved to remove such certainties. As such no changes to the policy have been made.

Table 10: Land at Harbour Heights Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP7	++	+	+	?	?	0	-	0	0	0	0	0	0	0	0	+	0

Spatial Policy 8 – Land at Lower Hoddern Farm, Peacehaven

Related Recommended Modifications – MM14

7.50 Various options for strategic development sites were appraised through previous versions of the SA (paragraphs 10.48 – 10.80 of Submission SA). Lower Hoddern Farm (Option F) was one such option considered. The site was not taken forward in the Submission Core Strategy due to the potential landscape impact, concerns surrounding deliverability of the site in the early part of the plan period and concerns over the ability of the market to deliver the site.

7.51 Following a thorough discussion during the January 2015 Hearing Sessions, the Inspector made it clear in his Interim Findings Letter that an appropriate balance between social, environmental and economic considerations had not been struck in finding an appropriate level of housing for the district when recognising the significant affordable housing need. He also stated that he considered Lower Hoddern Farm to be a sustainable and deliverable site that should be allocated as a strategic allocation, subject to the necessary transport measures along the A259. It was therefore decided to re-appraise the site, giving careful consideration to the balance between social, environmental and economic impacts.

Appraisal Summary

- 7.52 An appraisal of Spatial Policy 8 has been undertaken and found that the policy was likely to have positive social impacts as a result of the substantial number of dwellings, including affordable houses. This resulted in a significant positive impact against the housing objective, and to a slightly lesser extent, the deprivation objective.
- 7.53 A positive impact against the travel objective was also identified. Input from the Highway Authority (ESCC) was crucial in determining an appropriate level of housing for the Peacehaven and Telscombe area due to the transport capacity constraints along the A259. This input has included the requirement for the delivery of a co-ordinated package of multi-modal transport measures in Spatial Policy 2 which has been repeated in the policy wording for Spatial Policy 8. These measures and junction improvements are likely to lead to improved public transport provision and increased capacity along the A259 coastal road which would have benefits for the town and wider area.
- 7.54 It must be noted however that, as these measures are yet to be identified or agreed by the local highway authority, there is a degree of uncertainty with regard to the scoring of these objectives – although these are considered achievable by ESCC.
- 7.55 A significant positive impact is also likely to be felt against the economy objective due to the increased customer base for town services which could promote growth in the local economy.
- 7.56 A negative impact is predicted (albeit with a degree of uncertainty) against the land efficiency objective as Lower Hoddern Farm is a greenfield site located on Grade 2 agricultural land. Grade 2 is considered within the best and most versatile agricultural land.

Changes to Submission SA Appraisal

- 7.57 The detailed policy wording has resulted in changes to the appraisal of Option F of the Submission Core Strategy. Despite the uncertainties mentioned above, development of the site would be contingent on a package of multi-modal transport measures being identified and approved by the local highway authority in which case development of the site will deliver key infrastructure improvements to the A259, including public transport provision along this route, which are likely to lead to benefits for the town and wider area. Consequently, the travel objective scoring has changed from a neutral to positive impact.
- 7.58 Also, the previous assessment of the site against the sustainability framework gave a significant negative scoring against the land efficiency objective. Whilst greenfield development on high quality agricultural land is avoided in the first

instance, during the re-appraisal it was determined that the impact on this objective may have been given too much weight and it was not felt that this should be a showstopper considering it is not possible for the authorities to meet the planned level of growth set in Spatial Policy 1 on brownfield sites alone. Therefore, the scoring against this objective is now a negative impact.

Conclusion

7.59 Overall, the policy scores positively against a number of the objectives of the sustainability framework, in particular the social and economic objectives, although a negative impact on the land efficiency objective resulting from the loss of greenfield land is likely.

Mitigation

7.60 There are no significant negative effects that necessitate mitigation. Whilst the appraisal noted a negative impact against the land efficiency objective, due to the loss of greenfield land, this cannot be mitigated as it is not possible to meet the planned level of growth set in the Core Strategy on brownfield land alone. Uncertainties are evident in the appraisal scoring of this policy. A review of this policy has been incorporated into Appendix 3 – Monitoring and Delivery Framework which alleviates some of this uncertainty.

7.61 Also, uncertainties were noted in respect of the community and service provision but the policy does as much as it can to aid in the delivery of facilities and services that the development would rely on through the collection of contributions and it is not felt that it could be improved to remove such certainties. As such no changes to the policy have been made.

Table 11: Land Lower Hoddern Farm, Peacehaven Summary Table

Policy	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
SP8	++?	+?	+?	?	?	0	-?	0	0?	0	0	0	0	0	0	0	0	0

Core Policy 1 – Affordable Housing

Related Recommended Modifications – MM15

7.62 Core Policy 1 has been appraised in Chapter 11 of the Submission SA (paragraph 11.25 and Appraisal Table 8 of Appendix 4). Since then, modifications to the policy wording have been made to reflect recent ministerial guidance.

Changes to Submission SA Appraisal

7.63 The updated policy wording has been appraised against the sustainability framework which found that there were no changes to the scoring as a result of the proposed modifications proposed. A significant number of affordable units will still be provided across the district as a result of this policy despite the modifications proposed and so a change to the scoring was not felt necessary.

Conclusion

7.64 By increasing the amount of affordable housing being delivered without impacting on overall housing delivery in the district, the policy was appraised positively in respect of the housing objective. In addition, maximising affordable housing delivery should help those who are currently unable to access the housing market.

Mitigation

7.65 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Table 12: Affordable Housing Summary Table

Policy	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
CP1	++	++	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0

Core Policy 2 – Housing Type, Mix and Density

Related Recommended Modifications – MM16

7.66 Core Policy 2 has been appraised in Chapter 11 of the Submission SA (paragraph 11.29 and Appraisal Table 9 of Appendix 4). Following a discussion at the Hearing Sessions, modifications have been proposed to the policy wording.

Changes to Submission SA Appraisal

7.67 The updated policy wording has been appraised against the sustainability framework which found that the modifications proposed through MM16 were likely to bring about additional positive impacts. The requirement for the provision of units incorporating Lifetime Homes Standards will ensure that accommodation appropriate for ageing and disabled residents is provided. This added security (as opposed to encouraging provision as previously worded) resulted in a significant positive impact against the communities

objective and positive benefits being recognised in respect of the health objective.

Conclusion

7.68 As the appraisal demonstrates, the proposed policy is likely to have a positive effect on various objectives set out in the sustainability framework. The policy will provide a range of different dwelling types at different densities, which relate well to the local environment and the needs of the communities across the district. The flexible nature of the policy is seen as a positive as it will encourage development that is appropriate to the needs of the community whilst being able to react to economic conditions. The proposed amendments have also resulted in a further positive impact on the health objective, as stated above.

Mitigation

7.69 There are no significant negative effects of the policy that necessitate mitigation. As a result, no changes to the policy have been made.

Table 13: Housing Type, Mix and Density Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP2	+	+	0	++	+	0	++	0	++	0	0	0	0	0	0	0	0

Core Policy 3 – Gypsy and Traveller Accommodation

Related Recommended Modifications – MM17, MM18

7.70 Core Policy 3 has been appraised in Chapter 11 of the Submission SA (paragraph 11.32 and Appraisal Table 10 of Appendix 4). Since then, modifications have been proposed to the policy wording which require a re-appraisal.

Changes to Submission SA Appraisal

7.71 The updated policy wording has been appraised against the sustainability framework. The proposed modification reflects the findings of the GTAA Update which has calculated a need for 13 additional permanent pitches for Gypsy and Travellers in Lewes District up until 2030. Having identified the long term need for Gypsy and Traveller sites, the uncertainty that was evident in the appraisal for this policy in the Submission SA has been removed. Otherwise, the proposed modifications did not result in any changes to the appraisal.

7.72 Of these 13 additional permanent pitches, the policy has identified a requirement of 8 pitches in the South Downs National Park. The policy ensures that protection is given to valued landscape and the special features of the National Park and so it is expected that sites identified through the SDNPA Local Plan will be located in appropriate areas. Therefore, no negative impacts are expected as a result of this proposed modification.

Conclusion

7.73 Overall, the policy performed well against the sustainability framework as it was likely to bring benefits to a number of the social objectives. Proposed amendments have also reduced uncertainties in the scoring for a number of objectives as the long-term need for additional permanent pitches over the plan period has been quantified.

Mitigation

7.74 There are no significant negative effects of the policy that necessitate mitigation. As a result, no changes to the policy have been made.

Table 14: Gypsy and Traveller Accommodation Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP3	+	+	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0

Core Policy 4 – Encouraging Economic Development and Regeneration

Related Recommended Modifications – MM19

7.75 Core Policy 4 has been appraised in Chapter 11 of the Submission SA (paragraph 11.35 and Appraisal Table 11 of Appendix 4). Following a discussion at the Hearing Sessions, modifications have been proposed to the policy wording which require a re-appraisal.

Changes to Submission SA Appraisal

7.76 The updated policy wording has been re-appraised against the sustainability framework. The appraisal has been updated to reflect the policy’s flexible approach that allows the appropriate change of use of existing employment sites (particularly in regard to the housing objective), although this did not result in any changes to the scoring of the appraisal.

Conclusion

7.77 Overall, the policy appraised well against the sustainability framework, performing well in relation to a number of the economic and social objectives of the framework. In addition, the policy is positive in relation to some of the environmental objectives by encouraging e-communication and homeworking which will reduce the need for travel, having a positive effect on air pollution.

Mitigation

7.78 There are no significant negative effects that necessitate mitigation.

Table15: Encouraging Economic Development and Regeneration Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP4	0	++	+	0	0	+	+	0	0	0	0	++	+	0	0	++	+

Core Policy 5 – The Visitor Economy

7.79 Core Policy 5 has been appraised in Chapter 11 of the Submission SA (paragraph 11.38 and Appraisal Table 12 of Appendix 4). No changes to this policy have been recommended and so no further appraisal is required.

Conclusion

7.80 Overall, the policy was appraised positively in relation to a number of objectives. The policy will most likely support the long-term growth of the sustainable tourism sector, and consequently the local economy, by promoting new visitor attractions, upgrading existing ones and providing new hotel accommodation. The wording of the policy ensures that tourism related development will be appropriate to the important local rural and urban environments in the district. There is uncertainty however of the effect of the policy on local communities.

Mitigation

7.81 There are no significant negative effects that necessitate mitigation.

Table16: The Visitor Economy Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP5	0	0	++	?	0	0	0	0	+	0	0	0	0	0	0	++	++

Core Policy 6 – Retail and Town Centres

Related Recommended Modifications – MM20, MM21, MM22, MM23

7.82 Core Policy 6 has been appraised in Chapter 11 of the Submission SA (paragraph 11.41 and Appraisal Table 13 of Appendix 4). Following a discussion at the Hearing Sessions, modifications have been proposed to the policy wording which require a re-appraisal.

Changes to Submission SA Appraisal

- 7.83 The updated policy wording has been appraised against the sustainability framework. The policy has been strengthened through the addition of proposed wording to resist the loss of retail units in defined Primary Shopping Areas and Primary Shopping frontages. Also, additional wording has been added to clarify instances where the loss of local and rural shops and community facilities may be appropriate (although this intent was included in the Submission Core Strategy version of the policy). These modifications have resulted in an update to the appraisal wording, and importantly, a change to the Economy objective where a significant positive has now been identified, albeit with a degree of uncertainty resulting from the potential (although in all likelihood infrequent) loss of services in areas not identified in the retail hierarchy.
- 7.84 As mentioned above, the flexible approach to criteria 4 of the policy may result in the loss of local shops (potentially to residential use), albeit in circumstances where evidence suggests this may be appropriate. This has resulted in a degree of uncertainty with regard to the housing, travel and communities objectives which has been reflected in the appraisal table. This may, for example, lead to additional housing in such areas and residents having to travel further to access services. This modification has not resulted in a significant change to the scoring against these objectives.

Conclusion

7.85 As can be seen from the summary table, the policy appraised positively in respect to a number of different objectives, in particular the social objectives. The policy offers flexibility and support for areas such as Newhaven, which currently has an underperforming retail sector, which should increase the town centre's vitality and viability by bringing people and businesses back into the area, whilst offering protection from the loss of retail within defined areas and frontages

Mitigation

7.86 There are no significant negative effects that necessitate mitigation nor is it felt there is a need to modify the policy to improve positive outcomes. As such no changes to the policy wording have been made.

Table 17: Retail and Town Centre Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP6	+	+	+	+	0	0	++	0	0	0	0	0	0	0	0	++?	0

Core Policy 7 - Infrastructure

7.87 Core Policy 7 has been appraised in Chapter 11 of the Submission SA (paragraph 11.44 and Appraisal Table 14 of Appendix 4). No changes to this policy have been recommended and so no further appraisal is required.

Conclusion

7.88 The policy for infrastructure is likely to have a positive impact on a number of the sustainability appraisal objectives. It is likely to improve accessibility to a number of services, resulting in a positive impact on objectives such as housing, travel and education. A coordinated approach to infrastructure in the form of the Infrastructure Delivery Plan may also benefit the local economy and housing delivery.

Mitigation

7.89 There are no significant negative effects that necessitate mitigation. As such no changes to the policy have been made.

Table 18: Infrastructure Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP7	+	?	+	+	+	+	0	0	?	0	0	0	0	0	0	++	0

Core Policy 8 – Green Infrastructure

7.90 Core Policy 8 has been appraised in Chapter 11 of the Submission SA (paragraph 11.47 and Appraisal Table 15 of Appendix 4). No changes to this policy have been recommended and so no further appraisal is required.

Conclusion

7.91 This policy appraised well against the sustainability framework, having a positive impact on environmental objectives due to the protection and enhancement of existing greenspace and identification of new greenspace. It is also likely to have a positive impact on social objectives as the policies

should provide more recreation space for local residents, therefore having community health benefits. No adverse effects to this policy were identified.

Mitigation

7.92 There are no significant negative effects that necessitate mitigation. As such no changes to the policy wording have been made.

Table 19: Green Infrastructure Summary Table

Policy	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
CP8	0	0	+	+	+	0	+	+	++	0	0	0	0	0	0	0	0	+

Core Policy 9 – Air Quality

7.93 Core Policy 9 has been appraised in Chapter 11 of the Submission SA (paragraph 11.50 and Appraisal Table 16 of Appendix 4). No changes to this policy have been recommended and so no further appraisal is required.

Conclusion

7.94 The policy appraised positively against the sustainability framework and is likely to improve air quality conditions within the district, especially in areas in and around designated AQMAs. It is also likely to have far reaching effects ranging from environmental and health benefits to encouraging the sustainable transport agenda. It is probable that these will be more apparent as the plan period progresses.

Mitigation

7.95 There are no significant negative effects that necessitate mitigation. As such no further changes have been made to the policy wording.

Table 20: Air Quality Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP9	0	0	+	+	+	0	0	+	+	0	0	0	++	0	0	0	0

Core Policy 10 – Natural Environment and Landscape Character

Related Recommended Modifications – MM24, MM25, MM26

7.96 Core Policy 10 has been appraised in Chapter 11 of the Submission SA (paragraph 11.53 and Appraisal Table 17 of Appendix 4). Since then, modifications have been proposed to the policy wording which require a re-appraisal.

Changes to Submission SA Appraisal

7.97 The updated policy wording has been appraised against the sustainability framework which did not result in any changes to the appraisal scoring. The appraisal table has been updated with regard to the impact of criteria 3 of the policy against the housing objective, although this is not a result of the specific changes proposed through MM25, but in the interest of clarity.

7.98 A degree of short-term uncertainty has been recognised with regard to the housing objective and the wording for this objective has been updated to reflect criteria 3 which will ensure that appropriate mitigation measures are in place to protect the Ashdown Forest SAC/SPA from recreational pressure. Until such mitigation is agreed with the District Council and Natural England, development will be restricted within this zone which includes the majority of the village of Newick. Of further relevance, SANGs provision will be identified in a timely manner through the Local Plan Part 2 and so this is not a long-term issue. It is not thought that the significance of this short-term impact would result in adverse effects against this objective over the plan period.

7.99 Modifications MM24 and MM26 did not result in any changes to the appraisal scoring although some amendments to the appraisal wording have been made for clarity.

Conclusion

7.100 Overall the policy was seen positive in a number of environmental objectives, whilst it was also felt that it could have a positive impact on tourism by preserving and enhancing the natural environment.

Mitigation

7.101 There are no significant negative effects that necessitate mitigation. As such no changes to the policy wording have been made.

Table 21: Natural Environment and Landscape Character Summary Table

Policy	Objectives																	
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	
CP10	0	0	0	0	0	0	0	++	++	0	++	0	0	0	0	0	0	+

Core Policy 11 - Built and Historic Environment and High Quality Design

Related Recommended Modifications – MM27

7.102 Core Policy 11 has been appraised in Chapter 11 of the Submission SA (paragraph 11.56 and Appraisal Table 18 of Appendix 4). Since then, modifications have been proposed to the policy wording which require re-appraisal.

Changes to Submission SA Appraisal

7.103 The updated policy wording has been appraised against the sustainability framework and did not result in any changes to the appraisal scoring. The appraisal wording was updated to reflect the proposed modification MM27 which seeks to address the need to reduce resource and energy consumption in a manner that would not prove overly-burdensome on developers. A positive impact on the energy objective is still expected.

Conclusion

7.104 Overall, the policy performed well against the objectives of the sustainability appraisal. In setting good design standards, the policy is likely to have a positive impact on environmental objectives such as waste, water, energy and flooding. Also, it is likely that this policy will have a positive effect on housing standards, without being overly-burdensome on developers, and on local communities.

Mitigation

7.105 There are no significant negative effects that necessitate mitigation. As such no changes to the policy wording have been made.

Table 22: Built and Historic Environment and High Quality Design Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP11	+	0	0	+	0	0	+	0	++	+	+	+	0	+	0	0	0

Core Policy 12 – Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

7.106 Core Policy 12 has been appraised in Chapter 11 of the Submission SA (paragraph 11.59 and Appraisal Table 19 of Appendix 4). No changes to this policy have been recommended and so no further appraisal is required.

Conclusion

7.107 This policy appraised well against the majority of objectives in the sustainability framework. It would have benefits in terms of reducing the risk of flooding and coastal erosion by directing development away from at risk areas, recreating the River Ouse corridor and requiring flood protection/mitigation/resistance measures. The implications of this policy shouldn't have an undue burden on the local economy or the realisation of development as it is not altogether prohibited in areas of flood risk.

Mitigation

7.108 There are no significant negative effects that necessitate mitigation. As such no changes have been made to the policy wording.

Table 23: Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP12	0	0	0	0	+	0	0	+	+	0	+	0	0	++	++	+	0

Core Policy 13 – Sustainable Travel

Related Recommended Modifications – MM28

7.109 Core Policy 13 has been appraised in Chapter 11 of the Submission SA (paragraph 11.62 and Appraisal Table 20 of Appendix 4). Since then, modifications have been proposed to the policy wording which require a re-appraisal.

Changes to Submission SA Appraisal

7.110 The updated policy wording has been appraised against the sustainability framework. No changes to the appraisal were made in light of proposed modification MM28.

Conclusion

7.111 This policy is likely to encourage the uptake of sustainable modes of transport and so will impact positively on a number of objectives including travel, health and communities. It is also expected that the policy will improve accessibility within the district and so would have a desirable impact again on the travel objective and the deprivation objective.

Mitigation

7.112 There are no significant negative effects that necessitate mitigation. As such no changes have been made to the policy wording.

Table 24: Sustainable Travel Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP13	0	+	++	+	+	0	0	0	0	0	0	0	+	0	0	0	0

Core Policy 14 – Renewable and Low Carbon Energy and Sustainable Use of Resources

Related Recommended Modifications – MM29, MM30, MM31, MM23

7.113 Core Policy 14 has been appraised in Chapter 11 of the Submission SA (paragraph 11.65 and Appraisal Table 21 of Appendix 4). Since then, modifications have been proposed to the policy wording which require re-appraisal.

Changes to Submission SA Appraisal

7.114 The updated policy wording has been appraised against the sustainability framework which resulted in a number of changes to the policy appraisal. The appraisal for Core Policy 10 in the Submission SA attributed significant positive benefits to the water and energy objectives on the basis that the requirement to meet Code for Sustainable Homes level 3/4 would result in significant positive benefits in the long term as Code requirements become more stringent over time. Proposed modification MM32 removed the Code for Sustainable Homes requirement and so the increased positive impact over the course of the plan period on these objectives is no longer accurate. Regardless, there will still be a clear positive impact on these objectives.

7.115 The appraisal in the Submission SA attributed a positive score against the flood objective. This was also a result of the requirement for Code for Sustainable Homes level 3/4 and so this impact is no longer evident. However, it must be mentioned that Core Policy 12 seeks to reduce the impact and extent of flood risk and criteria 5 specifically aims to ensure there is no increased surface water run-off from new developments and so there is a policy framework in place with regard to this issue.

7.116 Proposed modifications MM29, MM31 and MM32 have introduced more certainty for developers that the measures proposed through the policy will not impact on development viability. This has been reflected in the appraisal scoring for the housing objective and reflected in the wording of the energy and water objectives.

7.117 No other changes to the appraisal resulted from the other proposed modifications. However, proposed modification MM30 has strengthened the

policy with regard to ensuring protection of the National Park from inappropriately located renewable and low carbon energy installations which has been reflected in the appraisal wording for the environment objective.

Conclusion

7.118 Overall, the policy is likely to have a positive impact on a number of the objectives set out in the sustainability appraisal table, especially the environmental objectives. The proposed modifications have brought about reduced positive impacts against some objectives, although it is felt that other core policies within the Core Strategy will mitigate any adverse impacts. The policy would also lead to an increase in sustainably constructed homes without impacting on housing developer costs and housing delivery.

Mitigation

7.119 There are no significant negative effects that necessitate mitigation.

Table 25: Renewable and Low Carbon Energy and Sustainable Use of Resources Summary Table

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CP14	+	0	0	0	0	0	0?	0	+	0	+	+	0	0	0	0	0

Secondary, Cumulative and Synergistic Effect

7.120 The SEA Directive requires that the secondary, cumulative and synergistic effects of the plan are considered to ensure sustainable outcomes. These effects are defined as follows¹⁴:

- Secondary effects – ‘effects that are not the direct result of the plan, but occur away from the original effect or as a result of a complex pathway’
- Cumulative effects – ‘arise, for instance, where several developments each have insignificant effects but altogether have a significant effect, or where several individual effects of the plan...have a combined effect’
- Synergistic effects – ‘interact to produce a total effect greater than the sum of the individual effects’

7.121 The summary tables for the individual policy appraisals have been brought together into a single table (Table 26). This allows an overview of the impact of the plan’s policies on the sustainability objectives.

7.122 It is evident from the table that on the whole the policies set out in the Core Strategy have a neutral or positive impact on all of the sustainability objectives, although there are likely to be adverse impacts against some of

¹⁴ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive (Appendix 8).

the environmental objectives, primarily the land use objective. This is predominantly as a result of allocating greenfield land and due to land use constraints within the district this impact cannot be mitigated as there is not a sufficient supply of brownfield land to meet the required housing need.

Table 26 - Summary of Core Strategy Policy Appraisals

Policy	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
SP1	++	++	0?	-?	0	0?	-	0	-?	0	0	0	0	0	0	-?	0
SP2	++	++	+	+	0	0	-	0	-	0	0	0	0?	0?	0	-?	0
SP3	++	+	+	+	?	0	++	0	+	0	+	0	?	++	0	+	0?
SP4	++	+	++	?	0?	0	-	-	-?	0	0	0	?	0	0	+	0
SP5	+	0	+	?	?	0	-?	0	0	0	0	0	0	+	0	+	0
SP6	+	0	+	?	?	0	-?	+	0?	0	0	0	0	+	0	+	0
SP7	++	+	+	?	?	0	-	0	0	0	0	0	0	0	0	+	0
SP8	+++?	+	+	?	?	0	-	0	0?	0	0	0	0	0	0	++	0
CP1	++	++	0	?	0	0	0	0	0	0	0	0	0	0	0	+	0
CP2	+	+	0	++	+	0	++	0	++	0	0	0	0	0	0	0	0
CP3	+	+	+	0	+	+	0	0	0	0	0	0	0	0	0	0	0
CP4	0	++	+	0	0	+	+	0	0	0	0	++	+	0	0	++	+
CP5	0	0	++	?	0	0	0	0	+	0	0	0	0	0	0	++	++
CP6	+	+	+	+	0	0	++	0	0	0	0	0	0	0	0	++?	0
CP7	+	?	+	+	+	+	0	0	?	0	0	0	0	0	0	++	0
CP8	0	0	+	+	+	0	+	+	++	0	0	0	0	0	0	0	+
CP9	0	0	+	+	+	0	0	+	+	0	0	0	++	0	0	0	0
CP10	0	0	0	0	0	0	0	++	++	0	++	0	0	0	0	0	+
CP11	+	0	0	+	0	0	+	0	++	+	+	+	0	+	0	0	0
CP12	0	0	0	0	+	0	0	+	+	0	+	0	0	++	++	+	0
CP13	0	+	++	+	+	0	0	0	0	0	0	0	+	0	0	0	0
CP14	+	0	0	0	0	0	0?	0	+	0?	+	+	0	0	0	0	0

7.123 The table above has subsequently been used to inform the appraisal of the Core Strategy which appraises the policies of the plan, taken as a whole, against the sustainability framework.

Appraisal

7.124 The full appraisal of the Core Strategy can be found in Appendix 1, Appraisal Table 22 and is summarised in the table below. Overall, the plan performed well against the sustainability framework having clear benefits for the vast majority of objectives, although there were some uncertainties noted against some of the social objectives (communities, health and education). The pressing need to meet development targets may also impact on some of the environmental objectives, most notably the land efficiency objective where a potential negative impact was identified, primarily due to the expected loss of greenfield land.

7.125 When compared against the likely effect of the district without the plan (Appendix 1, Appraisal Table 23), which is likely to have negative impacts on the period up until 2030, it is clear that the Core Strategy can be viewed as sustainable.

Mitigation

7.125 There are no significant negative effects that necessitate mitigation.

Table 1: Secondary, Cumulative and Synergistic Effect Summary Table

Plan	Objectives																
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
CS	++	++	++	+?	+?	+?	-	+	0	+	++	++	+?	++	++	++	+

8. Consideration of the Proposed Minor Modifications

- 8.1 Section 7 appraised the proposed Main Modifications set out in Schedule 3 which collated the modifications to the policies since the Core Strategy was submitted in September 2014.
- 8.2 This section considers Schedules 1, 2 and 4
- Schedule 1 – Proposed Modifications - September 2014
 - Schedule 2 – Proposed Modifications – January 2015
 - Schedule 4 – Additional Modifications – July 2015
- 8.3 The Main Modifications in Schedules 1 and 2 have either been incorporated into or superseded by the Main Modifications in Schedule 3. This section considers the remaining minor modifications (non-policy modifications) in these sections as well as those in Schedule 4.

Schedule 1

- 8.4 The main modifications to the policies have either been incorporated into or superseded by those in Schedule 3 and so have been appraised in Section 7. The remaining modifications in this schedule are minor updates to supporting text and the correction of drafting errors.
- 8.5 No further appraisal required.

Schedule 2

- 8.6 The main modifications to the policies have either been incorporated into or superseded by those in Schedule 3 and so have been appraised in Section 7. The remaining modifications in this schedule are minor updates to supporting text and the correction of drafting errors.
- 8.7 No further appraisal required.

Schedule 4

- 8.8 The majority of the additional modifications are updates to supporting text in light of the Main Modifications proposed in Schedule 3. However, a small number of the modifications resulted in amendments to the appraisal of policies within the Joint Core Strategy. These have been listed in the table below.

Additional Modification	Joint Core Strategy Reference/Location	Amendments proposed to SA
AM32	Core Delivery Policies Paragraph 7.31	<p>The appraisal wording for the housing objective of Core Policy 3 has been amended to reflect the additional text that this modification proposes – see Table 10 Appendix 1</p> <p>This has not resulted in a change to the appraisal scoring.</p>
AM41	Core Policy 10, p 102	<p>The appraisal wording for the biodiversity objective of Core Policy 10 has been amended to reflect the amended text that this modification proposes – see Table 17 Appendix 1</p> <p>This has not resulted in a change to the appraisal scoring.</p>
AM43	Core Policy 10, p 102	Same as above
AM45	Core Policy 12, p108	<p>The appraisal wording for the flooding objective of Core Policy 12 has been amended to reflect the amended text that this modification proposes – see Table 19 Appendix 1</p> <p>This has not resulted in a change to the appraisal scoring.</p>
AM55	Appendix 3 – Monitoring and Delivery Framework	<p>The appraisal wording for the housing, deprivation, land efficiency and economic objectives of Spatial Policy 8 has been amended to reflect the review mechanism that this modification proposes – see Table 9 Appendix 1</p> <p>This has resulted in a degree of uncertainty to the scoring of the objectives.</p> <p>The appraisal wording for the housing objective of Core Policy 1 has been amended to reflect the review mechanism that this modification proposes – see Table 9 Appendix 1</p> <p>This has not resulted in a change to the appraisal scoring.</p>

Appendices

Appendix 1 – Appraisal Tables (policies)

Appraisal Table 1: Presumption in Favour of Sustainable Development

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	The policy will mean that development (such as housing development) will come forward without delay at the application stage, helping to deliver homes (including affordable homes) throughout the plan period – a positive for this objective.
2.Deprivation	+	+	+	The policy calls on development that delivers improvement in social and environmental conditions, which will positively impact deprived areas.
3.Travel	+	+	+	The policy commits the planning authorities to work with applicants to find solutions to improve conditions in an area. The improvement of sustainable transport options is thus supported by this policy, a positive for this objective.
4.Communities	++	++	++	The policy commits the planning authorities to work to secure development that improves the economic, social and environmental conditions of an area, impacting positively on this objective.
5.Health	+	+	+	The policy commits the planning authorities to work with applicants to find solutions to improve conditions in an area. The improvement of health in the district is thus supported by this policy, a positive for this objective
6.Education	+	+	+	The policy commits the planning authorities to work with applicants to find solutions to improve conditions in an area. The improvement of education in the district is thus supported by this policy, a positive for this objective
7.Land Efficiency	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as those included within the land efficiency objective, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
8.Biodiversity	+	+	+	The policy adds clarity where applications that could have significant adverse impact on issues, such as biodiversity, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
9.Environment	+	+	+	The policy adds clarity where applications that could have significant adverse impact on issues, such as those included within the environment objective, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
10.Waste	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as waste, need not be

Objectives				Explanation
	S	M	L	
				granted unless they can be overcome (which the local planning authorities will work to achieve).
11.Water	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as water, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
12.Energy	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as energy, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
13.Air Quality	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as air quality, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
14.Flooding	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as flooding, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
15.Coastal Erosion	+	+	+	The policy adds clarity that applications that could have significant adverse impact on issues, such as coastal erosion, need not be granted unless they can be overcome (which the local planning authorities will work to achieve).
16.Economy	++	++	++	The policy will mean that development (such as economic development) will come forward without delay at the application stage, helping to deliver development that improves economic conditions throughout the district, impacting positively on this objective.
17.Tourism	+	+	+	This policy encourages the planning authorities to help secure development that improves economic conditions, including in the tourism sector.

Appraisal Table 2: Provision of Housing and Employment Land (Updated Option E in Submission SA)

Option E

Objectives	S	M	L	Explanation
1.Housing	++	++	++?	This option was determined using figures from the Duty to Cooperate Housing Study, based on zero employment growth. Development at this rate would increase the amount of housing significantly above the current rate. Importantly, this option would provide a significant amount of affordable housing in a district which has a high affordable housing need which is exacerbated by an acute housing affordability problem. The level of development set out in this policy would help to alleviate these issues. A review of spatial policies 1, 2 and 8 will be triggered in 2022 if measures to resolve transport capacity constraints along the A259 have not been identified. Also a review of patial policies 1 and 2 will be triggered subject to the outcomes of cross-authority work examining housing potential within the Sussex Coast HMA and adjoining areas. In light of these review mechanisms there is a degree of uncertainty with this scoring.
2.Deprivation	++	++	++	This option doesn't identify where housing will be distributed, and so it is difficult to accurately predict the impact on this objective. However, it is likely that development would come forward in deprived parts of the district. High house prices throughout the district prevent those with low incomes accessing the housing market. This approach would likely make it easier to access the housing market by increasing supply and potentially reducing the affordability gap. Therefore, it would have a positive impact.
3.Travel	0?	0?	0?	It is likely that the level of housing and economic land set in Spatial Policy 1 would not require a significant amount of development in unsustainable locations as it is possible that the target could be met almost entirely through sites identified as suitable for development in the 2014 SHLAA. There may be development in more remote locations that encourages private transportation, however, development will be focussed in the most sustainable towns and villages and so there is unlikely to be a negative impact on this objective. Transport mitigation measures, including at the sub-regional level, will be required to prevent any negative impact on this objective. East Sussex County Council has confirmed that the level of development set in this policy can be accommodated subject to the mitigation measures proposed through other policies.
4.Communities	0?	-?	-?	It is possible that development at such a scale would involve significant change to both urban and rural settlements. It could put a strain on existing services, and maybe even the loss of community space/facilities, albeit it is seen as probable that new services would be provided to meet an increase in population. Significant changes such as these could have a negative impact on the happiness of the existing residents.
5.Health	0	0	0	It is unlikely that a significant amount of open space or community facilities would be lost to development in line with the target set in this policy. Therefore, it is not felt that there would be any consequential negative health impacts.
6.Education	0?	0?	0?	A number of the district's schools are near to capacity. Development on this scale would bring a large number of new families to the district and so could place a strain on schools. It is possible that even with mitigation

Option E				
Objectives	S	M	L	Explanation
				measures, (for example school expansions) a negative impact would be evident in the long term, however it is unclear.
7.Land Efficiency	-?	-	-	Brownfield land is extremely limited in the district. The housing target set out in this option is likely to require the development of greenfield land (even if brownfield land is intensively developed) to deliver housing, particularly towards the back end of the plan period.
8.Biodiversity	0	0	0	This objective will be more influenced by the distribution of housing rather than the overall housing delivery target. An addendum to the HRA (July 2015) has been prepared which confirms that, despite the increases in traffic flow on certain roads exceeding the threshold of 1000 AADT set out in DMRB, there are unlikely to be any significant effects on European protected sites as a result of the levels of development indicated in the policy.. Other policies in the Core Strategy (Core Policy 10) will ensure that development does not come forward in advance of suitable SANG being identified or mitigation measures being agreed and so there will not be a harmful impact on the Ashdown Forest SAC/SPA as a result of increased recreational pressure. This option could potentially affect nationally designated sites and Ancient Woodland as a number of the district's settlements are surrounded by such designations, however it is not felt that this policy would negatively impact on this objective.
9.Environment	0?	-?	-?	This objective will be influenced by the distribution of housing rather than the overall housing delivery target. It is possible that a certain amount of the district's valued landscape could be lost. There will also be some greenfield encroachment into the National Park as a result of this option. It remains uncertain as to whether this option would impact significantly on the district's historic environment.
10.Waste	0	0	0	Development on this scale would generate additional waste, although it is thought that the District Council's waste and recycling services will help to mitigate against this impact. Also it is likely that new development would promote more recycling.
11.Water	0	0	0	It is likely that the net increase in additional homes, and the resultant increase in water consumption, would place further pressure on a region of water stress. However, it is thought that water efficiency improvements would mitigate this.
12.Energy	0	0	0	This option is likely to increase energy consumption throughout the district due to the number of additional units. However, it is likely that new housing will be more energy efficient which would result in the offsetting of some of

Option E				
Objectives	S	M	L	Explanation
				the previously mentioned negative effect.
13.Air Quality	0	0	0	A negative impact on this objective is unlikely although there may be an increase in congestion.
14.Flooding	0	0	0	This objective is more influenced by housing distribution than overall housing numbers. Nonetheless, due to the number of additional units, it is possible that development may be pushed into areas at a higher risk of flooding, which would impact negatively on this objective, unless mitigated against.
15.Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.
16.Economy	0?	-?	-?	The target set out in this option is based on evidence from the LHNA which stated that a housing target close to this figure would maintain an indigenous labour force to support existing jobs, although it is possible that it may result in some loss of employment space and associated jobs. This is especially pertinent considering the high proportion of the district that lies within the National Park, consequently placing additional pressure on employment sites located outside of the Park. Such a consequence, coupled with the likely increase in congestion that this approach would generate, would not be a positive in respect of this objective and possibly discourage economic investment in the district throughout the plan period.
17.Tourism	0	0	0	The district attracts tourists due, in large part, to the attractiveness of its natural environment. Building at such a scale could potentially lead to a loss of natural assets and a detrimental impact on the tourism industry.

Appraisal Table 3: Distribution of Housing

Objectives				Explanation
	S	M	L	
1.Housing	++?	++ ?	++?	Development at this rate would increase the amount of housing significantly above the current rate. Importantly, this option would provide a significant amount of affordable housing in a district which has a high affordable housing need which is exacerbated by an acute housing affordability problem. The distribution of development set out in this policy would help to alleviate these issues. This policy seeks to distribute housing in the areas with the highest housing demands and needs

Objectives				Explanation
	S	M	L	
				over the plan period and therefore is seen positively with respect to this objective. A review of spatial policies 1, 2 and 8 will be triggered in 2022 if measures to resolve transport capacity constraints along the A259 have not been identified and a review of spatial policies 1 and 2 will be triggered subject to the outcomes of cross-authority work examining housing potential within the Sussex Coast HMA and adjoining areas. In light of these review mechanisms there is a degree of uncertainty with this scoring.
2.Deprivation	++	++	++	The policy seeks to focus development in the most deprived areas of the district and areas with the greatest housing need, therefore, it would particularly benefit those on low incomes who may be struggling to access housing in the district. This is likely to result in a positive impact on this objective.
3.Travel	+	+	+	It is possible that the provision of housing at this scale could increase congestion and place strain on transport infrastructure. However, this policy seeks to focus development in the most sustainable locations, ensuring that development is not reliant on private transportation. Also, the policy, in combination with other spatial and core policies, will deliver improvements to various junctions and roads which are at/nearing capacity and so is likely to have far-reaching benefits. This includes Peacehaven and Telscombe, an area particularly affected by transport capacity constraints, where the housing target is contingent upon transport mitigation measures to offset any negative impacts. East Sussex County Council has confirmed that the level of development set in this policy can be accommodated subject to the proposed mitigation measures.
4.Communities	+	+	+	The policy focuses most development in the district's towns, the communities who are most able to accommodate additional homes and residents.
5.Health	0	0	0	It is not clear from the policy what the impact on health services would be, it could strain services but equally development at this level could bring forward new facilities.
6.Education	0	0	0	It is not clear from the policy what the impact on education services would be, it could strain services but equally development at this level could bring forward new facilities and extensions to schools.
7.Land Efficiency	-	-	-	The policy has been developed by considering constraints to development, including on land. However, this policy would include some development on greenfield land, although this is a necessity in order to provide the housing to help meet the district's need.
8.Biodiversity	0	0	0	An addendum to the HRA (July 2015) has been prepared which confirms that, despite the increases in traffic flow on certain roads exceeding the threshold of 1000 AADT set out in DMRB, there are unlikely to be any significant effects on

Objectives				Explanation
	S	M	L	
				European protected sites as a result of the levels and distribution of development set out in this policy. Other policies in the Core Strategy (Core Policy 10) will ensure that development does not come forward in advance of suitable SANG being identified or mitigation measures being agreed and so there will not be a harmful impact on the Ashdown Forest as a result of increased recreational pressure. This option could potentially affect nationally designated sites and Ancient Woodland as a number of the district's settlements are surrounded by such designations, however it is not felt that this policy would negatively impact on this objective.
9.Environment	-	-	-	The policy has been developed taking into consideration environmental constraints, however development on this scale will impact upon areas of valued landscape, notably the Old Malling Farm site in the National Park.
10.Waste	0	0	0	Although it is considered that this policy would result in a level of development that would lead to an increased generation of waste, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
11.Water	0	0	0	Although it is considered that this policy would result in a level of development that would lead to an increase in water usage, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
12.Energy	0	0	0	Although it is considered that this policy would result in a level of development that would lead to increased energy consumption, it is also believed that improved sustainability standards would negate some of this impact. The effect on this objective depends largely on the types and specification of new development rather than the wording of the policy. Such issues are considered by other policies and so this objective cannot be fully appraised.
13.Air Quality	0?	0?	0?	Development at this scale could impact on the AQMAs designated at Lewes and Newhaven although this is likely to be mitigated by other policies.
14.Flooding	0?	0?	0?	This policy does allocate land for development in areas at risk of flooding, in particular the North Street development in Lewes. However, adverse effects will be mitigated through other policies.
15.Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.
16.Economy	0	-?	-?	The policy will significantly increase the customer base throughout the district, including in the economies of the most deprived areas, which would score positively against this objective. However, the level and distribution of development set

Objectives				Explanation
	S	M	L	
				in this policy may also increase the pressure on existing employment sites (particularly in the medium-long term) and result in the loss of valued landscape and other land uses including community and recreation facilities which help to attract businesses and workers to the area.
17.Tourism	0	0	0	It is not thought that this option would impact on this objective.

Appraisal Table 4: North Street Quarter and adjacent Eastgate area

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	This option is likely to provide a significant amount of housing, including affordable housing, in a location where a significant housing need exists. Development at this site would be deliverable in the short term and therefore have a significant positive impact throughout the period of the plan.
2.Deprivation	+	+	+	The North Street site is located in Lewes Castle Ward, which does contain some of the most deprived lower super output areas in the district, and therefore it is probable that this option would have a positive impact in terms of improving access to affordable housing, as well as providing associated infrastructure and jobs that could reduce deprivation.
3.Travel	+	+	+	The policy seeks to improve pedestrian and cycling links and would result in on and off-site access and highway improvements to the benefit of the wider town. The policy would either retain the bus station or relocate it, so there are no negative impacts.
4.Communities	+?	+?	+?	The reaction of the local community to development on the site is not known at this point, although a number of new community facilities will be provided alongside the redevelopment of the site. In addition, this policy offers the opportunity to improve linkages with wider town centre and improve the townscape of this former industrial area. This could result in improving people's satisfaction in the place in which they live.
5.Health	?	?	?	With measures to encourage sustainable transport (walking/cycling), in addition to the possibility of leisure space being provided as part of the development, there are likely to be health benefits to the community as a result of the

Objectives				Explanation
	S	M	L	
				implementation of this policy. The policy would also bring forward various healthcare facilities, including nursing/care homes for elderly residents.
6.Education	0	0	0	The policy framework makes provision for the development to bring about improvements to existing education facilities, or provide additional facilities, to ensure that the needs of new/existing residents are met.
7.Land Efficiency	++	++	++	The North Street site is currently developed, as well as including a number of vacant and derelict units, and so this option would make good use of brownfield land.
8.Biodiversity	0	0	0	The site is not located within, or adjacent to, any international, national or local biodiversity designations.
9.Environment	+	+	+	The policy presents opportunities to improve the townscape of this part of Lewes. In turn, this has the potential to improve the setting for listed buildings that are either on, or within the vicinity of the site, as well as the Lewes Conservation Area. The improved riverside access, as proposed with this option, may have a positive effect by increasing access to parts of the National Park by sustainable means.
10.Waste	0	0	0	It is not possible to know the effects on this objective. It is likely that the additional homes would lead to an increase in domestic waste being produced on site, although industrial waste is likely to be reduced as employment land is lost. It may also be the case that the current recycling centre on site is relocated as part of the redevelopment of the area, and so the effects are uncertain. The policy also ensures that a connection to sewerage and water supply systems at the nearest point of adequate access is provided and maintained.
11.Water	+	+	+	It is not known whether there would be a net increase in water usage should the site be developed in line with this option. Also, any redevelopment of the site offers the opportunity to remediate known contaminated sites. Contaminated sites run the risk of polluting both ground and surface waters, hence remediating the sites could have a positive impact upon water quality.
12.Energy	0	0	0	It is not possible to specify whether development at this site will increase/decrease energy consumption. Any increase in energy generation is likely to be offset as new homes and employment units will be built to high energy efficiency standards.
13.Air Quality	?	?	?	Although not in an AQMA, most private travel to the site will pass through the AQMA in Lewes Town. As the designation of the AQMA is largely as a result of traffic emissions, the impact of this option could impact upon this objective. Any negative impacts would be expected to be mitigated through the AQMA's Action Plan. It must also be mentioned that the site is sustainably located near to various forms of public transport and the policy framework seeks to bring about improvements

Objectives				Explanation
	S	M	L	
				to sustainable travel through the site and linking to the wider town.
14.Flooding	++	++	++	This option would include upgraded flood defences within a flood zone 3A area, as such it would reduce this part of the towns susceptibility to flood risk.
15.Coastal Erosion	0	0	0	It is not thought that this option would impact on this objective.
16.Economy	+	+	+	The Employment and Economic Land Assessment identified that Lewes town has a qualitative shortfall in employment space, particularly office accommodation. This option will provide some new employment space (particularly office units) that is likely to be of a higher quality and more suited to modern business needs than existing units, thereby helping to address the aforementioned shortfall. However overall, the quantity of employment space could be reduced, maybe causing some existing businesses to be relocated. The option is also likely to deliver other uses such as retail and cafes, restaurants etc, as well as increasing the customer base for these shops and services.
17.Tourism	0?	0?	0?	The policy framework for this site could bring forward a new hotel that could help to accommodate any growth of the district's tourism industry which was identified in the Hotel and Visitor Accommodation Futures Study.

Appraisal Table 5: Old Malling Farm, Lewes

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	This site has the potential to deliver approximately 200 dwellings in an area of need as Lewes Town has a relatively large proportion of households on the housing register in comparison to other towns within the district. The policy wording sets a requirement of 50% affordable housing which would go a long way to meeting the town's affordable housing needs.
2.Deprivation	+	+	+	Although the lower super output area (LSOA) in which this site lies is not considered to be located in an area of relative deprivation, as measured through the Indices of Multiple Deprivation (IMD), development on this site would provide a significant

Objectives				Explanation
	S	M	L	
				amount of affordable housing to the benefit of lower income residents and those on the housing register which would score positively against this objective.
3.Travel	++	++	++	The site is well situated in the district's most sustainable town, within walking distance to numerous services and facilities. Access to the site would be achieved from Monks Way. The policy framework requires contributions to off-site infrastructure contributions to improve the capacity of various nearby junctions which suffer from traffic congestion and so could have far-reaching benefits. The policy will also facilitate improved access to the town centre by non-car modes.
4.Communities	?	?	?	The policy will ensure that development of the site complements and integrates into the surrounding local character and respects the amenity of the existing dwellings that adjoin the site, however the effect that development would have on the existing community is unknown at this point. The policy would facilitate additional community facilities in the form of a Local Nature Reserve, Local Green Space, equipped children's playspace and a multi-functional network of green infrastructure.
5.Health	0?	0?	0?	Measures to encourage sustainable transport (walking/cycling) as well as the inclusion of open space and children's playspace could potentially bring about health benefits to the local community.
6.Education	0	0	0	Site proponents would be required to make contributions to off-site infrastructure improvements, which may include educational facilities, although any negative/positive impacts would only be apparent some years after contributions have been made.
7.Land Efficiency	-	-	-	The site is a greenfield site that includes some high quality (grade 2) agricultural land.
8.Biodiversity	-	-	-	The 2015 HRA Addendum confirmed that, although there are unlikely to be significant negative effects on the Lewes Downs SAC as a result of the proposed levels of development set in this policy, the forecast increases in traffic flow on certain roads may exceed the threshold of 1000 AADT set out in DMRB .Therefore, development at this site is likely to contribute to cumulative air quality impacts on the site. This site is located in the vicinity of a Site of Nature Conservation Importance (SNCI) and the Offham Marshes SSSI is also located nearby. However, the policy framework includes measures (including ecological surveys) to ensure that adverse impacts on these designations are mitigated
9.Environment	-?	-?	-?	This site is located in a sensitive area with regard to its built and natural landscape context, being located adjacent to a conservation area, listed buildings and within the SDNP. Landscape assessments have suggested that the site (particularly the north field) is visible from significant parts of the National Park. The policy framework for the development of this site includes various detailed measures that seek to offset the adverse environmental impacts on the surrounding built and natural landscape, including the SDNP.

Objectives				Explanation
	S	M	L	
10.Waste	0	0	0	Development at Old Malling Farm, as at other sites, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact. The policy also ensures that a connection to sewerage and water supply systems at the nearest point of adequate access is provided and maintained.
11.Water	0	0	0	Development at Old Malling Farm, as at other sites, will increase water use. However, as new homes will likely be built to high water conservation standards and have water meters installed, the negative impact of development at this site would be offset.
12.Energy	0	0	0	Development at Old Malling Farm, as at other sites, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	?	?	?	It is not thought that development at this site would impact significantly on the Lewes town AQMA. Due to its location, traffic from the site would likely use the Cuilfail tunnel access point as opposed to driving through the town centre (where the AQMA lies).
14.Flooding	0	0	0	A small section of this site lies within an area of flood risk. The policy framework set out in the policy includes a site specific flood risk assessment and measures that ensure that development is located away from areas at risk of flooding.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	Development at this site does not have an impact on this objective.

Appraisal Table 6: Land at Greenhill Way

Objectives				Explanation
	S	M	L	

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	Development at this site would provide 175 dwellings, which would include affordable housing. This would be delivered in the early part of the plan period and so offers the possibility of reducing the affordable housing need in the short term.
2.Deprivation	0	0	0	This policy does not have an impact on this objective.
3.Travel	+	+	+	Development at the site would be contingent on the completion of the Haywards Heath Relief Road and so increased car numbers could be accommodated by the local transport network and would not lead to extra congestion. A Travel Plan would be required for any development at the site. This would be required to improve linkages and provide sustainable transport provision to the town centre and the nearest railway station (approx 2 miles away). Therefore it would have a positive effect on this objective.
4.Communities	?	?	?	The policy sets out requirements to include open space/sports fields and/or play areas which will be of benefit to the local community. All effort will be made to integrate the development into the existing dwellings which adjoin the site, but ultimately it is unknown what effect it would have on the community until it becomes operational.
5.Health	?	?	?	With measures to encourage sustainable transport (walking/cycling), in addition to the possibility of recreational land being included as part of the development, there may be health benefits felt by the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	0	0	0	Site proponents would be required to make contributions to off-site infrastructure improvements, such as schools, although any negative/positive impacts would only be apparent some years after contributions have been made. It is likely that residents of development at Greenhill Way would use the educational facilities in the Mid/West Sussex area.
7.Land Efficiency	-?	-?	-?	The site is located on greenfield land and thus development on it is seen negatively in respect of this objective. Due to land constraints within the district, greenfield strategic sites will be required to meet local housing need and it is this, along with the economic benefits, which balance the loss of greenfield land. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land. However, it must be mentioned that agricultural land is of a lower quality than other options for strategic sites, assessed in the earlier stages of the sustainability appraisal process.
8.Biodiversity	0	0	0	Mitigation measures would be integrated into development proposals regarding the nearby ancient woodland in the form of buffer zones and it is not thought that there would be any significant negative impacts on the ecological potential of the area.
9.Environment	0	0	0	Development on the site would be in keeping with the nearby Lewes Road conservation area. The site is designated as having a med-high capacity for change in the Landscape Capacity Study and is well contained by woodland and existing development and

Objectives				Explanation
	S	M	L	
				so should not cause any adverse effects.
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective. The policy also ensures that a connection to sewerage and water supply systems at the nearest point of adequate access is provided and maintained.
11.Water	0	0	0	This policy does not have an impact on this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	This policy does not have an impact on this objective.
14.Flooding	+	+	+	Although the site is not within a designated Flood Zone 2 or 3, any application would need to include a Site Specific Flood Risk Assessment and a surface water drainage strategy agreed with the Environment Agency which would mitigate any risk of surface water flooding which has been apparent at the site in the past. Therefore, it is likely that these mitigations, for example incorporating SUDS, will have a positive impact on this objective.
15.Coastal Erosion	0	0	0	This policy does not have an impact on this objective.
16.Economy	+	+	+	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	This policy does not have an impact on this objective.

Appraisal Table 7: Land North of Bishops Lane

Objectives				Explanation
	S	M	L	

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	Development at this site would deliver approximately 110 dwellings, which would include affordable housing provision. Ringmer does contain a relatively large number of households on the housing needs register and so development at the site would help to ease this pressure, as well as at the district level.
2.Deprivation	0	0	0	This policy does not have an impact on this objective.
3.Travel	+	+	+	Development is contingent upon infrastructure improvements to key junctions in the immediate vicinity and other critical pinch points such as Earwig Corner. The policy framework requires development to contribute to necessary mitigation measures which would have benefits in the local and wider area.
4.Communities	?	?	?	Any development at the site would be required to respect the existing adjacent dwellings and so the impact on the existing community would be kept to a minimum. However, the reaction of the local community to development on the site is not known at this point. The policy requires development to incorporate play spaces and sports pitches, which Ringmer currently has a shortage of.
5.Health	?	?	?	There are likely to be health benefits felt by the local community as a result of the policy requirement for contributions towards the provision of equipped play space and sports pitches as well as towards off-site infrastructure improvements which may include healthcare facilities. However, any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	0	0	0	This policy requires developers to make contributions to off-site infrastructure improvements, in particular primary school provision, hence mitigating the shortfall in primary education facilities that currently exists in Ringmer.
7.Land Efficiency	-?	-?	-?	The North of Bishops Lane site is located on greenfield land and thus development on it is seen negatively in respect of this objective. The site is classified as Grade 3 Agricultural Land. It is not known if this is high quality land as the available data does not distinguish between 3a (good) and 3b (moderate) agricultural land. Due to land constraints within the district, greenfield strategic sites will be required to meet local housing need and it is this, along with the economic benefits, which balance the loss of greenfield land.
8.Biodiversity	+	+	+	The site is not located within, or adjacent to, any international, national or local biodiversity designations. It is thought that the removal of the culverted ditches may have a positive impact on this objective by creating a biodiversity corridor. Also, the policy framework requires the retention of important hedgerows which serve as an important biological asset.
9.Environment	0?	0?	0?	Any development would be required to carry out a geological and a trial trench survey at the site due to the archaeological potential in the area. Mitigation measures would be implemented as required. This site is categorised as having a medium

Objectives				Explanation
	S	M	L	
				capacity for change in the Landscape Capacity Study meaning that the principle of development should be acceptable in landscape terms.
10.Waste	0	0	0	It is not thought that this policy would have a direct effect on this objective. The policy also ensures that a connection to sewerage and water supply systems at the nearest point of adequate access is provided and maintained.
11.Water	0	0	0	This policy does not have an impact on this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	This policy does not have an impact on this objective.
14.Flooding	+	+	+	This site is not located within an area at risk of flooding, as identified in the District Council's Strategic Flood Risk Assessment. The policy does however ensure that an appropriate Surface Water Drainage Strategy is implemented with the Environment Agency to mitigate any instances of surface water flooding.
15.Coastal Erosion	0	0	0	This policy does not have an impact on this objective.
16.Economy	+	+	+	It is likely that the village of Ringmer (which would be the local service centre for the site) would benefit from an increased customer base. This could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	It is not thought that this policy would have a direct effect on this objective.

Appraisal Table 8: Land at Harbour Heights Table

Objectives				Explanation
	S	M	L	
1.Housing	++ ?	++	++	Development at this site would deliver approximately 400 dwellings, which would include a significant amount of affordable housing provision, in a town that contains a relatively large number of households on the housing needs register. Therefore,

Objectives				Explanation
	S	M	L	
				development at the site would help to ease this local and district affordable housing need.
2.Deprivation	+?	+	+	When considering overall deprivation levels, the site is located in the second most deprived LSOA in the district and so developing this site may have wider benefits, such as attracting people to the area, increasing the tax base and encouraging further development and investment.
3.Travel	+?	+	+	The policy requires contributions towards off-site infrastructure improvements arising from and related to the development. This will help to mitigate any adverse impacts on the highway network resulting from the development, but is also likely to have wider benefits to transport capacity along the A259. The policy also includes measures to improve sustainable transport options from the site. Therefore this policy is seen positively with respect to this objective.
4.Communities	?	?	?	The reaction of the local community to development on the site is not known at this point, although any development would be required to respect neighbouring dwellings. Development at the site would also be required to incorporate, or make a contribution to, the provision of equipped play space and sports pitches and an area of informal open space would be provided along the coastline.
5.Health	?	?	?	The policy requires improvements to sustainable transport (walking/cycling) and the provision of recreational space which is likely to result in health benefits to the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	0	0	0	It is likely that site proponents would be required to make contributions to off-site infrastructure improvements, such as schools, although any negative/positive impacts would only be apparent some years after contributions have been made.
7.Land Efficiency	-?	-	-	The site is predominantly located on greenfield land of a low agricultural value, although there is a section of brownfield land as well. Due to land constraints within the district, greenfield strategic sites will be required to meet local housing need and it is this, along with the economic benefits, which balance the loss of greenfield land.
8.Biodiversity	0	0	0	An ecological impact assessment is required through this policy, although there are no biodiversity designations within the site and so this objective should not be impacted.
9.Environment	0	0	0	The site is designated as having a low/medium capacity for change. The policy framework requires robust landscaping to mitigate the impacts of the site on the surrounding landscape, having particular regard to views to and from the SDNP.

Objectives				Explanation
	S	M	L	
10.Waste	0	0	0	This policy does not have an impact on this objective. The policy also ensures that a connection to sewerage and water supply systems at the nearest point of adequate access is provided and maintained.
11.Water	0	0	0	This policy does not have an impact on this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	Development on this site is likely to impact on the Newhaven AQMA, although it is expected that the mitigation measures required through Core Policy 9 will ensure that there are no adverse impacts on this objective.
14.Flooding	0	0	0	The site is located in a Flood Zone 1 area which is the lowest level of risk and thus development should not impact upon this objective.
15.Coastal Erosion	0	0	0	The policy will maintain the undeveloped nature of the cliff-top coastline and avoids exposing new development to coastal erosion risk and so it is unlikely that there will be an impact on this objective.
16.Economy	+	+	+	The policy framework will ensure that any loss of employment units will be compensated for by the provision of modern business units, subject to proven need and viability considerations. Therefore, it is likely that the old existing units at Meeching Quarry Industrial Estate (B2 and B8) will be replaced by improved units fit for modern business needs which would be more beneficial to the local economy. Also it is probable that the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs.
17.Tourism	0	0	0	This policy does not have an impact on this objective.

Appraisal Table 9: Land at Lower Hoddern Farm Summary Table

Objectives

	S	M	L	Explanation
1.Housing	+++	+++	+++	The Lower Hoddern site has the potential to deliver 450 dwellings, which would include a significant proportion of affordable housing units, thus helping to reduce the high number on the housing needs register in Peacehaven. An essential requirement of the delivery of this strategic allocation is the identification of a co-ordinated package of multi-modal transport measures. A review of Spatial Policy 8 will be triggered in 2022 if these measures have not been identified to solve the capacity constraints on the A259. Whilst ESCC consider this package of measures achievable, there is a small degree of uncertainty due to this requirement.
2.Deprivation	+?	+?	+?	This site is located in an area of relative deprivation, as measured through the Indices of Multiple Deprivation (IMD) and so development would provide a significant amount of affordable housing to the benefit of lower income residents and those on the housing register which would score positively against this objective. It is also likely that development will also facilitate investment in the area which may provide jobs and have regenerative benefits for the area. There is a degree of uncertainty with the scoring against this objective due to the requirement of multi-modal transport measures.
3.Travel	+?	+?	+?	The policy for this site requires the identification and delivery of a co-ordinated package multi-modal transport measures, to the satisfaction of the local highway authority, to mitigate the potential impacts of development on the A259. These transport measures, facilitated by development of the site, will improve public transport provision and increase capacity along the A259 as well as delivering improvements to various junctions along the A259 (in Newhaven as well as Peacehaven) which will be of benefit to the town and wider area. The site is sustainably located near to the trunk-road network, public transport links (although not near to a rail station) and local services at the Meridian Centre. The policy will also result in improvements to sustainable transport access in the area.
4.Communities	?	?	?	The reaction of the local community to development on the site is not known at this point, although any development would be required to respect neighbouring dwellings. Development at the site would also be required to provide equipped play space and public amenity space to the south east of the site, allowing the expansion of the Peacehaven Centenary Park.
5.Health	?	?	?	The policy requires improvements to sustainable transport (walking/cycling) and the provision of recreational space which is likely to result in health benefits to the local community. Site proponents would be required to make contributions to off-site infrastructure improvements, such as for healthcare, although any negative/positive impacts would only be apparent some years after contributions have been made
6.Education	0	0	0	It is likely that site proponents would be required to make contributions to off-site infrastructure improvements, such as schools, although any negative/positive impacts would only be apparent some years after contributions have been made.
7.Land Efficiency	-?	-?	-?	The site is a greenfield site and located on high quality (Grade 2) agricultural land. There is a degree of uncertainty with the scoring against this objective due to the requirement of multi-modal transport measures.

Objectives				Explanation
	S	M	L	
8.Biodiversity	0	0	0	It is not thought that development at this site would impact on this objective.
9.Environment	0?	0?	0?	The Landscape Capacity Study characterises this site as having a low-medium capacity for change. The policy requires a comprehensive landscaping scheme and a significant tree belt along the eastern boundary to offset any adverse impacts. A well-designed scheme is likely to improve the urban edge to the town which is highly visible from the SDNP.
10.Waste	0	0	0	Development at this site, as with the other sites appraised, will generate additional waste. Wider initiatives, including those undertaken through the District Council's waste and recycling services, will help mitigate this impact. The policy also ensures that a connection to sewerage and water supply systems at the nearest point of adequate access is provided and maintained.
11.Water	0	0	0	It is not thought that development at this location would impact this objective.
12.Energy	0	0	0	Development at this site, as with the other sites appraised, will increase energy generation. However, as new homes will likely be more energy efficient than existing housing this negative impact would be offset.
13.Air Quality	0	0	0	It is not thought that development at this location would impact this objective.
14.Flooding	0	0	0	This site is not located within an area at risk of flood and so does not impact on this objective.
15.Coastal Erosion	0	0	0	Development at this site does not have an impact on this objective
16.Economy	++?	++?	++?	It is probable that the additional homes and the resulting increase in population will increase the customer base for shops and services; which could have the knock on effect of supporting the retention/creation of shops, services and jobs. It is possible that development could have significant benefits to Peacehaven in this respect and could help to promote growth in the local economy. There is a degree of uncertainty with the scoring against this objective due to the requirement of multi-modal transport measures.
17.Tourism	0	0	0	It is not thought that development at this location would impact on this objective.

Appraisal Table 9: Core Policy 1 – Affordable Housing

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	The draft policy sets out a flexible district-wide target of 40% on schemes of 11 or more units. It is no longer possible to seek affordable housing contributions on developments of 10 units or less (this excludes designated rural areas such as National Parks which is reflected in the policy). This will undoubtedly impact on affordable housing delivery, however, significant benefits will still be brought about by this policy. This approach is likely to maximise affordable housing delivery, increasing the amount of affordable housing currently delivered, without impacting on overall housing delivery. The flexibility that this policy affords, including a review of the policy in the event of specific circumstances (as set out in Appendix 3 of the Joint Core Strategy), means that it will be able to respond to changes in the economy, resulting in a positive impact over the course of the plan period.
2.Deprivation	++	++	++	This approach is likely to maximise the amount of affordable housing delivered across the district. The benefits will be felt most strongly in the district's town, and in particular, the areas which are recognised as most deprived. This policy is also likely to increase affordable housing delivery in rural areas which the SHMA recognises is home to high prices and high home ownership which prevents those from lower incomes accessing these parts of the district.
3.Travel	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the option
4.Communities	?	?	?	It is unknown whether the draft policy would have an impact on the indicators for this objective. To some communities, affordable housing is very much in need, whereas other communities are not as receptive to the idea of affordable housing in their areas.
5.Health	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
6.Education	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
7.Land Efficiency	0	0	0	The effect of this policy on this objective cannot be fully quantified as it depends on the ultimate location of affordable housing delivery and not directly on different threshold and/or target levels.
8.Biodiversity	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy.
9.Environment	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy.
10.Waste	0	0	0	It is not thought that that this policy would have a direct impact on this objective.

Objectives				Explanation
	S	M	L	
11. Water	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
12. Energy	0	0	0	It is not thought that that this policy would have a direct impact on this objective.
13. Air Quality	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy.
14. Flooding	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy.
15. Coastal Erosion	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy.
16. Economy	+	+	+	It is possible that an increase in affordable housing may help to support the local economy as people on lower incomes can afford to live and work in the district. This would provide a customer base for certain businesses which would also have less of a difficulty in recruiting and retaining staff.
17. Tourism	0	0	0	It is not thought that that this policy would have a direct impact on this objective.

Appraisal Table 5: Core Policy 2 - Housing Type, Mix and Density

Objectives				Explanation
	S	M	L	
1. Housing	+	+	+	<p>The policy will have a positive impact as it would allow the flexibility to respond to market driven forces as well as the needs of the local community as they change throughout the plan period. This should ensure that development comes forward that is appropriate for the different parts of the district.</p> <p>This approach imposes few barriers to development (for example added requirements/costs for developers) meaning that build rate should not be negatively impacted.</p>
2. Deprivation	+	+	+	As the SHMA details, it is important to avoid creating concentrations of disadvantage by allowing a certain type of home to dominate an area that encourages a singular socio-economic group to locate. Thus the flexible policy is seen positively as it encourages a range of homes to be provided over the plan period. The policy also requires Lifetime Homes Standards for a minimum of 10% of homes in new build developments of 11 units or more. This will ensure that accommodation appropriate for

Objectives				Explanation
	S	M	L	
				ageing and disabled residents is provided.
3.Travel	0	0	0	The effect of this objective depends on the location of new housing development rather than the effect of the policy.
4.Communities	++	++	++	The policy is likely to meet the needs of the community by providing a range of dwelling type and size that fit with the local character of the area, therefore improving community satisfaction. The flexibility of the policy will enable local communities, should they choose to produce a neighbourhood plan, to have locally set policies on this issue if desired. The policy also requires Lifetime Homes Standards for a minimum of 10% of homes in new build developments of 11 units or more. This will ensure that accommodation appropriate for ageing and disabled residents is provided.
5.Health	+	+	+	The approach requires development to meet Lifetime Homes standards which would help to meet the needs of older people and those with physical impairment.
6.Education	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
7.Land Efficiency	++	++	++	The flexible approach set out in the policy will allow for the land to be developed efficiently while still respecting the local environment
8.Biodiversity	0	0	0	The effect of this objective depends on the location of new housing development rather than the types of homes being delivered.
9.Environment	++	++	++	The flexibility of the policy ensures that development will come forward at a density appropriate to a site's environment.
10.Waste	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
11.Water	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
12.Energy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
13.Air Quality	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy options.
14.Flooding	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy options.
15.Coastal Erosion	0	0	0	The effect on this objective depends on the location of new housing development rather than the effect of the policy options.

Objectives				Explanation
	S	M	L	
16.Economy	0	0	0	It is not thought that the options would have a noticeable impact on this objective.
17.Tourism	0	0	0	It is not thought that the options would have a noticeable impact on this objective.

Appraisal Table 6: Core Policy 3 - Gypsy and Traveller Accommodation

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	The policy, although not allocating specific sites, sets out provision for 13 additional Gypsy Traveller pitches for the period up until 2030 as identified in the GTAA Update. Therefore, this helps to meet a key consideration of this objective: meeting the needs of all members of the community. The GTAA also separates the provision between the areas within and outside of the National Park to ensure sites are provided in the most appropriate locations. Provision of transit pitches may also be made through joint-working with other East Sussex authorities.
2.Deprivation	+	+	+	Allocating Gypsy Traveller sites in the Site Allocations DPD, and as a result meeting the identified need as outlined above, would help to support social inclusion.
3.Travel	+	+	+	The policy stresses the need for reasonable access as well as locating development near to local services, which would encourage sustainable modes of transport. This policy is unlikely to impact on congestion within the district.
4.Communities	0	0	0	Specific sites have not yet been allocated; it may be the case that as sites are identified in the Local Plan Part 2, some communities raise concerns. On the contrary, allocating specific accommodation for travellers should reduce conflict with the settled community and reduce instances of unauthorised

Objectives				Explanation
	S	M	L	
				encampments. Community and play facilities are a requirement for Gypsy and Traveller sites and so would be included in development proposals which would have a positive impact on this objective.
5.Health	+	+	+	Identifying the needs and allocation of specific permanent sites in the Local Plan Part 2 will help to improve access to health facilities, tackling known issues such as life expectancy, currently 10 years below the national average, and long term illnesses.
6.Education	+	+	+	Provision of permanent accommodation will improve the opportunities of Gypsy and Traveller children, and adults, to attend school/ further education.
7.Land Efficiency	0	0	0	The specific location of sites will not be known until the Local Plan Part 2 is published and so this objective cannot be assessed yet.
8.Biodiversity	0	0	0	This policy approach does offer protection for biodiversity designations when determining Gypsy Traveller site applications. As a result it is not considered that the policy will impact on the objective.
9.Environment	0	0	0	In line with identified needs, this policy requires 8 pitches to be provided in the National Park. However, the policy ensures that protection is given to areas of valuable landscape and so should ensure that sites are located in appropriate areas. Therefore, no negative impact is expected against this objective.
10.Waste	0	0	0	It is not thought that the policy would have an effect on this objective.
11.Water	0	0	0	It is not thought that the policy would have an effect on this objective.
12.Energy	0	0	0	It is not thought that the policy would have an effect on this objective.
13.Air Quality	0	0	0	It is not thought that the policy would have an effect on this objective.
14.Flooding	0	0	0	Although the specific location of sites is not identified in the policy wording, the policy aims to direct

Objectives				Explanation
	S	M	L	
				development away from areas at risk of flooding.
15.Coastal Erosion	0	0	0	It is not thought that the policy would have an effect on this objective.
16.Economy	0	0	0	It is not thought that the policy would have an effect on this objective.
17.Tourism	0	0	0	It is not thought that the policy would have an effect on this objective.

Appraisal Table 7: Core Policy 4 – Encouraging Economic Development and Regeneration

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	The flexibility within the policy will allow a change of use of employment sites in appropriate circumstances although it is not thought this policy would have an impact on this objective.
2.Deprivation	+	++	++	Many parts of the policy (such as parts 2, 7 and 10) are designed to have a positive impact on the most deprived areas of the district. Over time, the benefit for the deprived areas should increase.
3.Travel	+	+	+	This policy should have a positive impact on this objective by promoting e-communications and homeworking which will likely reduce the need for travel for business.
4.Communities	0	0	0	It is not thought this policy would have an impact on this objective.

Objectives				Explanation
	S	M	L	
5.Health	0	0	0	It is not thought this policy would have an impact on this objective.
6.Education	0	+	+	Part 10 of the policy aims to support the up-skilling of the District's labour supply which should, by the end of the plan period, have a positive impact on the employability of the population, levels of educational attainment and access to educational services.
7.Land Efficiency	+	+	+	By safeguarding against the loss of employment sites in most circumstances (part 2) and by encouraging the intensification of existing employment sites (part 3), the policy should be positive in terms of this objective, directing development to brownfield land. However, development to support the rural economy is likely to be on greenfield sites. In addition, the promotion of good IT infrastructure and homeworking (parts 8 and 9) should further ensure that land is used efficiently.
8.Biodiversity	0	0	0	It is not thought this policy would have an impact on this objective.
9.Environment	0	0	0	It is not thought this policy would have an impact on this objective.
10.Waste	0	0	0	It is not thought this policy would have an impact on this objective.
11.Water	0	0	0	It is not thought this policy would have an impact on this objective.
12.Energy	++	++	++	Modern employment units are likely to be more energy efficient than older, existing units. Thus, the approach to provide new employment accommodation and to upgrade existing space is likely to be positive in terms of this objective.
13.Air Quality	+	+	+	The promotion of homeworking and improved e-communications should help reduce air pollution, by decreasing the need to travel for business.
14.Flooding	0	0	0	It is not thought this policy would have an impact on this objective.

Objectives				Explanation
	S	M	L	
15.Coastal Erosion	0	0	0	It is not thought this policy would have an impact on this objective.
16.Economy	++	++	++	The measures set out in the policy would benefit the District's economy by protecting existing employment space (albeit in a flexible manner to compensate) as well as providing additional employment space to meet current and future needs when and where appropriate. Economic growth would be encouraged by supporting a number of areas which have been identified as areas of underperformance for the District. For example, by encouraging new business start-ups and supporting growth in rural areas (including farm diversification).
17.Tourism	+	+	+	The policy promotes the sustainable tourism economy, which has been identified as having potential for modest growth.

Appraisal Table 8: Core Policy 5 - The Visitor Economy

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought that this policy would have an impact on this objective.
2.Deprivation	0	0	0	It is not thought that this policy would have an impact on this objective.
3.Travel	++	++	++	The policy encourages sustainable modes of transport which should negate any harmful effects caused by an increase in visitor numbers and reduce the impact of current visitors, such as increased pressure on the highway network.
4.Communities	?	?	?	Developing the tourism sector and providing the infrastructure such as new hotel accommodation may well lead to increased visitor numbers which may have an impact on local communities. However, whether this is a positive or negative impact is unknown.

Objectives				Explanation
	S	M	L	
5.Health	0	0	0	It is not thought that this policy would have an impact on this objective.
6.Education	0	0	0	It is not thought that this policy would have an impact on this objective.
7.Land Efficiency	0	0	0	It is not thought that this policy would have an impact on this objective.
8.Biodiversity	0	0	0	The policy does stress the need to conserve and enhance the natural beauty and the wildlife of the District and so would protect against development that may impact on biodiversity.
9.Environment	+	+	+	In order to develop the tourism sector, new development such as accommodation facilities and visitor attractions, may be provided in areas of valued landscape. Also, growth of the tourism sector would lead to increased visitor numbers. This could put pressure on the natural environment in the long term in terms of tranquillity, appearance and by physical erosion if not properly managed. However, the policy stresses the need to conserve and enhance the natural beauty of the area which meets the twin purposes that govern the National Park as set out in the Environment Act 1995, which will ensure that development only comes forward that will relate well to the National Park. Furthermore, the approach will aid in making the National Park more accessible.
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective.
11.Water	0	0	0	It is not thought that this policy would have an impact on this objective.
12.Energy	0	0	0	It is not thought that this policy would have an impact on this objective.
13.Air Quality	0	0	0	It is not thought that this policy would have an impact on this objective.
14.Flooding	0	0	0	It is not thought that this policy would have an impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an impact on this objective.
16.Economy	+	++	++	The policy is likely to have a positive impact on the local economy, importantly on a year-wide basis, whereas current seasonal restrictions exist that reduce the sector's economic benefits. Providing facilities for tourists, such as hotel accommodation, may lead to longer stays which would retain visitor spend within the local economy. The Hotel and Visitor Accommodation Futures Study suggested a shortfall in accommodation and so the policy will satisfy such needs, benefitting the local economy. The policy is also likely to create jobs in the local vicinity through new visitor attractions and facilities. These are benefits which would be more apparent in the medium to long-term. Supporting local businesses and farm diversification would also benefit

Objectives				Explanation
	S	M	L	
				the local economy.
17.Tourism	+	++	++	Providing new and upgraded visitor attractions, conserving the natural beauty of the District as well as identifying restraints to growth such as meeting the need for accommodation and sustainable transport provision should encourage a buoyant and sustainable tourism sector and an increase in visitor numbers, particularly over the medium to long-term. Promoting a year-wide tourism industry and supporting the provision of new and upgraded visitor attractions should increase the amount of jobs in the tourism sector. The flexibility of the policy should ensure it is able to respond to changes to visitor trends over the course of the plan period.

Appraisal Table 9: Core Policy 6 - Retail and Sustainable Town and Local Centres

Objectives				Explanation
	S	M	L	
1.Housing	+?	+?	+?	A flexible approach to local centres such as Newhaven Town Centre, that will allow non-retail uses, may lead to some housing coming forward in such areas. This is also the case for locations not identified in the retail hierarchy which should allow the loss of local shops in appropriate circumstances.
2.Deprivation	+	+	+	It is likely that retaining existing retail units, revitalising and diversifying retail centres, encouraging investment and improving pedestrian linkages will be of benefit to the deprived areas of the district.
3.Travel	+?	+?	+?	The sequential approach outlined within the policy will seek to resist the loss of existing services in retail and town centres, direct new development to central locations, and where this is not possible, to areas well served by public transport. This will have the benefit of reducing congestion as well as encouraging sustainable modes of transport. The flexible approach to the policy may result in the loss of local shops, albeit in circumstances where evidence suggests this may be appropriate. Where this is the case, residents in such areas may have to travel further to access services, although it is not felt this would

Objectives				Explanation
	S	M	L	
				impact significantly on this objective.
4.Communities	+?	+?	+?	The policy should have a positive impact on this objective by seeking to resist the loss of retail units, encouraging growth in town and local centres which should benefit local communities with additional shops, jobs and services. Additionally, the policy should reduce vacancy rates in areas where they are high, which should reinforce community pride. The flexible approach to the policy may result in the loss of local shops, albeit in circumstances where evidence suggests this may be appropriate, although it is not felt this would impact significantly on this objective.
5.Health	0	0	0	It is not thought that this policy would have an impact on this objective
6.Education	0	0	0	It is not thought that this policy would have an impact on this objective
7.Land Efficiency	++	++	++	The policy aims to improve the vitality and viability of retail centres which would include a flexible approach to the consideration of alternative uses in areas which are found to be unviable. This approach is likely to bring vacant properties back into use and promote the development of brownfield land. This should reduce pressures to develop on greenfield land.
8.Biodiversity	0	0	0	It is not thought that this policy would have an impact on this objective
9.Environment	0	0	0	It is not thought that this policy would have an impact on this objective
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective
11.Water	0	0	0	It is not thought that this policy would have an impact on this objective
12.Energy	0	0	0	It is not thought that this policy would have an impact on this objective
13.Air Quality	0	0	0	It is not thought that this policy would have an impact on this objective

Objectives				Explanation
	S	M	L	
14.Flooding	0	0	0	It is not thought that this policy would have an impact on this objective
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an impact on this objective
16.Economy	++?	++?	++?	Whilst this policy does advocate a flexible approach to non-retail uses, the policy ensures that the loss of retail units will be resisted in defined shopping areas. This approach should therefore benefit the vitality and the local economy by encouraging people into the area, thus supporting local shops and facilities, whilst resisting the inappropriate loss of retail units which may be difficult to regain for this use in the long term. A flexible approach is also proposed in areas not identified in the retail hierarchy which could result in the loss of local shops, albeit in circumstances where evidence suggests this may be appropriate.
17.Tourism	0	0	0	It is not thought that this policy would have an impact on this objective

Appraisal Table 10: Core Policy 7 - Infrastructure

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	It is likely that this policy would have a positive impact on housing delivery, as large residential developments in particular are often delayed pending infrastructure improvements and so if the infrastructure is already provided this should help unblock such developments.
2.Deprivation	?	?	?	This policy does attempt to provide the infrastructure necessary for a high quality of life, and so this policy may help to bridge the gap between the district's most deprived and affluent communities.

Objectives				Explanation
	S	M	L	
3.Travel	+	+	+	Investment in new and existing travel infrastructure should lead to improved accessibility to services and facilities.
4.Communities	+	+	+	The policy aims to safeguard and enhance existing community facilities as well as providing new facilities in the most appropriate areas to benefit the local community. This should also lead to positive outcomes in terms of community satisfaction and happiness. Also, the introduction of CIL charging should bring about investment in community facilities.
5.Health	+	+	+	This policy should safeguard and provide the facilities required by the district's elderly population, while also ensuring that adequate health services are available in the district.
6.Education	+	+	+	The Infrastructure Delivery Plan should identify where further provision is needed to improve accessibility to services such as educational establishments throughout the plan period.
7.Land Efficiency	0	0	0	The policy does not have an impact on this objective.
8.Biodiversity	0	0	0	The policy does not have an impact on this objective.
9.Environment	?	?	?	There is a possibility that new infrastructure in certain areas may have a negative impact on the natural environment, although this factor is more concerned with the location of development. Conversely, access to the countryside may be improved.
10.Waste	0	0	0	The policy does not have an impact on this objective.
11.Water	0	0	0	The policy does not have an impact on this objective.
12.Energy	0	0	0	The policy does not have an impact on this objective.
13.Air Quality	0	0	0	The policy does not have an impact on this objective.
14.Flooding	0	0	0	The policy does not have an impact on this objective.
15.Coastal Erosion	0	0	0	The policy does not have an impact on this objective.
16.Economy	+	+	++	Providing the necessary infrastructure for the district, as set out in the Infrastructure Delivery Plan, should benefit the local economy and attract new investment. This should benefit this objective positively, particularly by the end of the plan period.

Objectives				Explanation
	S	M	L	
17.Tourism	0	0	0	The policy does not have an impact on this objective.

Appraisal Table 11: Core Policy 8 - Green Infrastructure

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	The policy does not have an impact on this objective.
2.Deprivation	0	0	0	The policy does not have an impact on this objective.
3.Travel	+	+	+	It is likely that this policy would lead to increased sustainable transport provision, a positive for this objective.
4.Communities	+	+	+	This policy would protect and enhance existing greenspace as well as identify opportunities for the provision of new greenspace/community facilities, which could lead to improvements in community happiness.
5.Health	+	+	+	Protecting and enhancing existing greenspace, as well as identifying new greenspace, would provide more opportunities for recreation, exercise and relaxation and consequently benefit the district's health.
6.Education	0	0	0	The policy does not have an impact on this objective.
7.Land Efficiency	+	+	+	The policy looks to protect undeveloped land and thus is seen positively in respect of this objective.
8.Biodiversity	+	+	+	The protection and enhancement of existing greenspace, as well as the creation of new greenspace, will have a positive impact on this objective.
9.Environment	++	++	++	This policy aims to protect and enhance valued landscape, as well as improve accessibility, and so would impact positively on this objective.
10.Waste	0	0	0	The policy does not have an impact on this objective.
11.Water	0	0	0	The policy does not have an impact on this objective.

Objectives				Explanation
	S	M	L	
12.Energy	0	0	0	The policy does not have an impact on this objective.
13.Air Quality	0	0	0	The policy does not have an impact on this objective.
14.Flooding	0	0	0	The policy does not have an impact on this objective.
15.Coastal Erosion	0	0	0	The policy does not have an impact on this objective.
16.Economy	0	0	0	The policy does not have an impact on this objective.
17.Tourism	+	+	+	Conserving, enhancing and providing new greenspace could result in an even more desirable natural environment and consequently an increase in visitor numbers.

Appraisal Table 12: Core Policy 9 – Air Quality

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought that this policy will impact on this objective.
2.Deprivation	0	0	0	It is not thought that this policy will impact on this objective.
3.Travel	+	+	+	It is likely that the policy would have a positive impact on travel by promoting sustainable transport methods such as walking and cycling. This would help to realise the aim of reducing congestion in areas of low air quality.
4.Communities	+	+	+	Although the intention of the policy is to improve air quality, the traffic reducing aim of the policy would likely improve community safety as a secondary benefit by the end of the plan period.
5.Health	0	+	+	The policy seeks to reduce air quality from reaching unsafe levels, which would have a positive impact by the end of the plan period to community health.
6.Education	0	0	0	It is not thought that this policy will impact on this objective.

Objectives				Explanation
	S	M	L	
7.Land Efficiency	0	0	0	It is not thought that this policy will impact on this objective.
8.Biodiversity	0	+	+	The measures to improve the air quality set out in the draft policy are likely to have a positive impact in terms of conserving the district's biodiversity. Point 2 in particular highlights the importance of limiting the impact of development on the natural environment. The benefits are likely to be noticed towards the end of the plan period as the policy takes effect.
9.Environment	0	+	+	The measures to improve the air quality set out in the draft policy are likely to have a positive impact in terms of conserving the district's natural environment. Point 2 in particular highlights the importance of limiting the impact of development on the natural environment. The benefits are likely to be noticed towards the end of the plan period as the policy takes effect.
10.Waste	0	0	0	It is not thought that this policy will impact on this objective.
11.Water	0	0	0	It is not thought that this policy will impact on this objective.
12.Energy	0	0	0	It is not thought that this policy will impact on this objective.
13.Air Quality	+	++	++	The policy sets out a number of measures to manage development, to mitigate against the negative impacts of development and reduce traffic levels. These measures would improve air quality within the District, which is likely to improve and be more apparent in the long term.
14.Flooding	0	0	0	It is not thought that this policy will impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought that this policy will impact on this objective.
16.Economy	0	0	0	It is not thought that this policy will impact on this objective.
17.Tourism	0	0	0	It is not thought that this policy will impact on this objective.

Appraisal Table 13: Core Policy 10 - Natural Environment and Landscape Character

Objectives

	S	M	L	Explanation
1.Housing	0?	0	0	This policy ensures that appropriate mitigation measures are in place to protect the Ashdown Forest SAC/SPA from recreational pressure. Until such mitigation is agreed with the District Council and Natural England, development will be restricted within this zone which includes the majority of the village of Newick. However, it is not thought that the significance of this short-term impact would result in adverse effects against this objective.
2.Deprivation	0	0	0	This option does not have an impact on this objective.
3.Travel	0	0	0	This option does not have an impact on this objective.
4.Communities	0	0	0	This option does not have an impact on this objective.
5.Health	0	0	0	This option does not have an impact on this objective.
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	++	++	++	The policy gives the highest priority to maintaining and where possible enhancing international biodiversity designations within and surrounding the district. The policy also aims to conserve, enhance and contribute to the net gain of national and local biodiversity designations. Overall the policy is seen very positive in respect to this objective.
9.Environment	++	++	++	The policy ensures that all development will comply with the National Park purposes. It aims to conserve and appropriately enhance the Park's landscape and historic character while also protecting other parts of the district's built and natural landscape that would be sensitive to the impacts of new development.
10.Waste	0	0	0	This option does not have an impact on this objective.
11.Water	++	++	++	The policy has a positive impact on this objective by seeking to maintain water quality where appropriate and improve where necessary.

Objectives				Explanation
	S	M	L	
12.Energy	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	0	0	This option does not have an impact on this objective.
14.Flooding	0	0	0	This option does not have an impact on this objective.
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.
17.Tourism	+	+	+	The conservation and enhancement of the district's natural environment is likely to ensure that the district remains attractive to visitors, a positive for the tourism sector. Furthermore mitigation measures such as SANGS are likely to ensure that the tourist destination that is the Ashdown Forest is suitably managed and able to cope with additional residential development in the district.

Appraisal Table 14: Core Policy 11 - Built and Historic Environment and High Quality Design

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	This policy encourages housing of a high quality design that complements the locality, and also should result in more sustainably constructed homes due to the high sustainable construction standards. There is the possibility that setting high quality design standards may result in housing development viability issues, however, buildings regulations and national policy do require such standards.
2.Deprivation	0	0	0	It is not thought that this policy would have an effect on this objective.
3.Travel	0	0	0	It is not thought that this policy would have an effect on this objective.

Objectives				Explanation
	S	M	L	
4.Communities	+	+	+	The policy promotes housing and street design that incorporates crime reduction measures and so should impact positively on this objective. Also, well designed housing that complements the district's heritage is also likely to have a positive impact on community happiness.
5.Health	0	0	0	It is not thought that this policy would have an effect on this objective.
6.Education	0	0	0	It is not thought that this policy would have an effect on this objective.
7.Land Efficiency	+	+	+	The policy proposes efficient and effective use of land and so may impact positively on this objective.
8.Biodiversity	0	0	0	It is not thought that this policy would have an effect on this objective.
9.Environment	++	++	++	This policy will both ensure that the heritage assets are protected and that new development responds well to its environment through high quality design.
10.Waste	+	+	+	The policy encourages development that incorporates measures to reduce resource use and so should deliver housing that contributes positively to this objective.
11.Water	+	+	+	The policy encourages development that incorporates measures to reduce resource use and so should deliver housing that contributes positively to this objective.
12.Energy	+	+	+	The policy seeks to address the need to reduce resource and energy consumption in a manner that would not prove overly burdensome on developers. As a consequence, this should deliver housing that contributes positively to this objective.
13.Air Quality	0	0	0	It is not thought that this policy would have an effect on this objective.
14.Flooding	+	+	+	This policy, in aiming to minimize flood risk, does reference Core Policy 12 (Flood Risk, Coastal Erosion and Sustainable Drainage) and so recognizes the need to develop in sustainable locations

Objectives				Explanation
	S	M	L	
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an effect on this objective.
16.Economy	0	0	0	It is not thought that this policy would have an effect on this objective.
17.Tourism	0	0	0	It is not thought that this policy would have an effect on this objective.

Appraisal Table 15: Core Policy 12 - Flood Risk, Coastal Erosion, Sustainable Drainage and Slope Stability

Objectives				Explanation
	S	M	L	
1.Housing	0	0	0	It is not thought that this policy will have a direct impact on this objective.
2.Deprivation	0	0	0	It is not thought that this policy will have a direct impact on this objective.
3.Travel	0	0	0	It is not thought that this policy will have a direct impact on this objective.
4.Communities	0	0	0	It is not thought that this policy will have a direct impact on this objective.
5.Health	+	+	+	Indirectly, this policy is likely to have a positive impact on this objective. Large-scale flood events can impact on human health by negatively affecting water quality. Therefore, an approach which reduces the likelihood of such events can be seen as positive.
6.Education	0	0	0	It is not thought that this policy will have a direct impact on this objective.
7.Land Efficiency	0	0	0	It is not thought that this policy will have a direct impact on this objective.
8.Biodiversity	0	0	+	Protecting and re-creating the River Ouse Corridor would certainly help support the biodiversity of the area, especially in the long-term. Also, the policy stresses the importance of protecting biodiversity assets from flood mitigation measures and so

Objectives				Explanation
	S	M	L	
				should not negatively impact on this objective.
9.Environment	+	+	+	The policy does mention that due weight should be given to the natural environment of the site and its surroundings when considering flood mitigation measures. Furthermore, flood events can have a negative impact on both the natural and historic environments in the district. Thus, having an approach that reduces the likelihood of such events can be seen as positive.
10.Waste	0	0	0	It is not thought that this policy will have a direct impact on this objective.
11.Water	+	+	+	The combined parts of the approach seek to reduce flooding and water run-off and thus is unlikely to have a negative impact on this objective. Indeed, as large scale flood events can have a negative impact on water quality, an approach that reduces the likelihood of such events can be seen as positive.
12.Energy	0	0	0	It is not thought that this policy will have a direct impact on this objective.
13.Air Quality	0	0	0	It is not thought that this policy will have a direct impact on this objective.
14.Flooding	++	++	++	The policy approach would certainly reduce the risk of flooding (fluvial, surface water and groundwater flooding) by directing development away from at-risk areas, ensuring development proposals demonstrate how they will manage surface water drainage and incorporate the use of flood protection measures. Also, working towards the protection and re-creation of the River Ouse corridor would have a positive impact in respect to this objective, one that is likely to increase over the plan period.
15.Coastal Erosion	++	++	++	The policy would certainly have a positive impact as development (where possible) is directed away from areas at risk from erosion as well as seeking to enhance coastal defences in line with other plans and projects.
16.Economy	+	+	+	The policy would seek to increase flood protection, which is likely to have a positive impact on this objective by protecting businesses from flooding and promoting confidence in vulnerable areas.
17.Tourism	0	0	0	It is not thought that this policy will have a direct impact on this objective.

Appraisal Table 16: Core Policy 13 - Sustainable Travel

Objectives

	S	M	L	Explanation
1.Housing	0	0	0	This option does not have an impact on this objective.
2.Deprivation	+	+	+	The policy proposes to improve public transport provision and improve accessibility within the district which could support social inclusion and benefit the most deprived communities.
3.Travel	++	++	++	The overriding aim of the policy is to encourage sustainable modes of travel and reduce the proportion of journeys made by car. Therefore, by making sustainable travel options safer and more accessible (for example by influencing design and layout standards and providing cycle parking) it would encourage the uptake of such modes of transport and impact positively on this objective.
4.Communities	+	+	+	A number of the measures set out in the policy are likely to improve community safety by reducing car use and creating safer roads.
5.Health	+	+	+	It is likely that this policy will benefit the district's health and encourage healthier lifestyles by promoting active modes of transport such as walking and cycling. Also, the policy proposes design and layout measures that would make it safer and easier to carry out walking and cycling, which in turn may encourage the uptake of such travel.
6.Education	0	0	0	This option does not have an impact on this objective.
7.Land Efficiency	0	0	0	This option does not have an impact on this objective.
8.Biodiversity	0	0	0	This option does not have an impact on this objective.
9.Environment	0	0	0	Although the policy is unlikely to bring about improvements to this objective; whereas previously large scale developments might have had significant negative effects, this policy now aims to ensure the environmental impacts are reduced.
10.Waste	0	0	0	This option does not have an impact on this objective.
11.Water	0	0	0	This option does not have an impact on this objective.
12.Energy	0	0	0	This option does not have an impact on this objective.
13.Air Quality	0	+	+	In the long term the district should see air quality improvements as a result of a reduction in car journeys.
14.Flooding	0	0	0	This option does not have an impact on this objective.

Objectives				Explanation
	S	M	L	
15.Coastal Erosion	0	0	0	This option does not have an impact on this objective.
16.Economy	0	0	0	This option does not have an impact on this objective.
17.Tourism	0	0	0	This option does not have an impact on this objective.

Appraisal Table 17: Core Policy 14 - Renewable and Low Carbon Energy and Sustainable Use of Resources

Objectives				Explanation
	S	M	L	
1.Housing	+	+	+	This policy will encourage renewable and low carbon energy within new development and lead to improvements in water efficiency standards and so should bring forward more sustainably constructed homes without impacting on developer viability.
2.Deprivation	0	0	0	It is not thought that this policy would have an impact on this objective.
3.Travel	0	0	0	It is not thought that this policy would have an impact on this objective.
4.Communities	0	0	0	It is not thought that this policy would have an impact on this objective.
5.Health	0	0	0	It is not thought that this policy would have an impact on this objective.
6.Education	0	0	0	It is not thought that this policy would have an impact on this objective.
7.Land Efficiency	0?	0?	0?	It is not thought that this policy would have an impact on this objective.
8.Biodiversity	0	0	0	It is not thought that this policy would have an impact on this objective.
9.Environment	+	+	+	There may well be a negative visual impact of renewable energy sources i.e. wind turbines, however, the policy also mentions that issues such as this will be fully taken into account when determining

Objectives				Explanation
	S	M	L	
				applications. The policy offers a high level of protection from low carbon and renewable energy installations that may impact on the National Park and its setting. The wider environmental impact of the measures set out in the policy would certainly have a positive impact on this objective.
10.Waste	0	0	0	It is not thought that this policy would have an impact on this objective.
11.Water	+	+	+	This policy requires measures to reduce water consumption to a maximum of 110 litres per person per day. This is a much lower level than is achieved currently in the region.
12.Energy	+	+	+	This policy encourages renewable and low carbon energy, other allowable solutions to mitigate carbon emissions, measures to reduce water consumption and BREEAM standards. The policy will therefore help to ensure that improvements to energy efficiency are made.
13.Air Quality	0	0	0	It is not thought that this policy would have an impact on this objective.
14.Flooding	0	0	0	It is not thought that this policy would have an impact on this objective.
15.Coastal Erosion	0	0	0	It is not thought that this policy would have an impact on this objective.
16.Economy	0	0	0	It is not thought that this policy would have an impact on this objective.
17.Tourism	0	0	0	It is not thought that this policy would have an impact on this objective.

Appraisal Table 18: Cumulative and Synergistic Impacts

Objectives				Explanation
	S	M	L	

Objectives				Explanation
	S	M	L	
1.Housing	++	++	++	Overall, the plan is seen highly positively with respect to this objective by substantially adding to the housing stock and by delivering an increase in affordable housing over the course of the plan period. The plan directs housing to areas in need and identifies a target for the Gypsy and Traveller Community. The plan promotes sustainably constructed homes another positive for this objective.
2.Deprivation	+	+	++	Overall, the plan should have a positive effect on this objective by directing development to deprived areas of the district. In addition the plan promotes social inclusion, for example, by looking to increase sustainable transport options. The greatest effect on this objective should be noted by the end of the plan period
3.Travel	++	++	++	Generally, the plan directs development to sustainable locations that will reduce the need for new residents to travel by private means. There are also measures in place to ensure that new development will be preceded by transport infrastructure measures that are likely to have wider district benefits. In addition the Sustainable Travel policy looks to encourage the increased usage of sustainable modes of transport. As a result the effect of the plan on the policy is highly positive.
4.Communities	+?	+?	+?	The plan, as a whole, should have a positive impact on this objective by both safeguarding or enhancing community facilities and services. Whilst the plan aims to ensure that new development will relate well to the existing communities, it cannot be known what the reaction of a community will be to strategic development. It is likely that low crime rates will continue.
5.Health	+?	+?	+?	The plan as a whole should have a positive impact on this objective by, for example, promoting healthier transport choices and reducing the risk of flooding and associated risk to life. The plan should help to deliver health infrastructure suitable for the needs of the population although at this stage it is not known if development at the rate proposed in the Core Strategy, particularly in areas of strategic development, will strain existing services or support new or enhanced services.
6.Education	+?	+?	+?	The plan as a whole should have a positive impact on this objective by, for example, promoting the up-skilling of the district's labour supply. The plan should help to deliver the infrastructure suitable for the educational needs of the district, although at this stage it is not known if development at the rate proposed in the Core Strategy, particularly in areas of strategic development, will strain existing schools or support the building of new schools or extensions to schools.
7.Land Efficiency	-	-	-	Whilst the plan generally seeks to prevent development on greenfield land and promote the use of brownfield sites, it is acknowledged that the development of greenfield land will be required to meet the district's development needs over the plan period,
8.Biodiversity	+	+	+	As a whole, the plan should have a positive impact on this objective by protecting and enhancing biodiversity of value in the district, including designated sites.

Objectives				Explanation
	S	M	L	
9.Environment	0	0	0	The plan aims to protect and enhance the district's natural and historic environment by bringing forward development in keeping with the purposes of the Park However, in order to meet development targets set in the Core Strategy, it must be acknowledged that sites located in sensitive natural and built environmental settings may be impacted upon, although mitigation measures introduced through policy wording should offset these impacts.
10.Waste	+	+	+	The plan should minimise, on a per capita basis, the amount of waste generated in the district. Recycling rates are also likely to rise.
11.Water	++	++	++	The plan as a whole should have a positive impact on this objective by minimising water use on a per capita basis and ensuring that water quality is not adversely affected and improved where possible,
12.Energy	+	++	++	The plan as a whole looks to reduce energy use throughout the district, particularly towards by the later stages of the plan, by bringing forward modern employment units and energy efficient development incorporating low carbon and renewable sources of energy.
13.Air Quality	+?	+?	+?	The plan should have a positive impact on this objective, requiring development to consider its impact on air quality (including in AQMAs) and to mitigate against its effect. It is not clear what impact strategic developments in Lewes and Newhaven will have on the AQMAs however.
14.Flooding	++	++	++	As a whole, the plan directs development away from areas of flood risk or ensures that development brings about adequate flood defences and should deliver SuDS to reduce any surface water problem
15.Coastal Erosion	++	++	++	The plan directs development away from undefended areas of the district's coastline and seeks to enhance coastal defences where possible.
16.Economy	+	+	+	The plan may not result in economic growth over the plan period although is likely to benefit areas particularly in need of economic revival and bring about the required infrastructure and economic environment to meet the needs of the modern business. Development should increase the customer base for shops and services and add to the attractiveness of the retail sector.
17.Tourism	+	+	+	The plan should have a positive impact on this objective by supporting the development of the tourism sector. Efforts to protect, enhance and increase the accessibility of the South Downs National Park, should enable the district to continue to attract tourists.

Appraisal Table 19: Predicted future without Core Strategy

Objectives				Explanation
	S	M	L	
1.Housing	-	-	-	The current district-wide policy sets the threshold at 15 dwellings with a 25% affordable housing requirement. This policy has helped the District to (at times) exceed the South East Plan housing requirements; however this has not provided enough affordable housing. Since the Local Plan was adopted in 2003, the number of households on the register has increased and affordable housing targets set in the Sustainable Community Strategy have not been met. Therefore, maintaining the current policy would have detrimental impacts. Average house price and the house prices to earning ratio are relatively high within the district.
2.Deprivation	-?	-?	-?	Overall, levels of deprivation across the district are low, although there are disparities with pockets of deprivation (mainly in the coastal towns) that fall within the worst 30% nationally. Between 2007 and 2010, Lewes District's IMD ranking worsened and the number of Super Output Areas (SOAs) in the district considered to be in the worst 30% nationally increased from 5 to 8. It is possible that this trend will continue without a Core Strategy.
3.Travel	-?	-?	-?	The district has access to a good trunk road network, although congestion is an issue on key A roads at peak times. Access to services is considered to be relatively good. Without the plan, it is considered unlikely that traffic improvements to Earwig Corner would come about. In addition, large amounts of development may come forward in unsustainable locations away from public transport.
4.Communities	0	0	0	Without a plan in place, there is no guarantee that community services will be enhanced or safeguarded. The planning authorities would not be as able to ensure that development would relate well to existing communities. Crime has reduced in recent years and access to recreational facilities is good in comparison to the national average. It is considered that the trends will likely persist.
5.Health	0	0	0	Compared to national and county averages, health is good and this is likely to remain without a plan. However, without a plan healthier transport choices wouldn't be encouraged.
6.Education	0	0	0	Attainment at schools has been steadily improving, although a high proportion of residents in the coastal towns have no skill qualifications. It is likely that such trends would continue without a plan.
7.Land Efficiency	-	-	-	To meet the housing target, it is inevitable that greenfield land will be developed. Without a plan in place, it could mean the loss of more valuable greenfield sites than under a planned approach.
8.Biodiversity	0	0	0	Even without a plan in place, there is enough protection afforded to sites designated due to their biodiversity status.
9.Environment	+	+	+	The National Park Purposes should ensure that the area in the Park is preserved and enhanced even without the Core Strategy and similar protected will exist for listed buildings. Without a plan however, proposals that may affect landscape would be more

Objectives				Explanation
	S	M	L	
				likely to be approved – a negative for this objective.
10.Waste	0	0	0	Recycling rates should rise, regardless of the Core Strategy, as the Newhaven Incinerator is operational. Without a plan, there is likely to be little change in waste generation
11.Water	-	0	0	Water consumption is likely to remain high, particularly in the short term. Over time, changes to building regulations may begin to rectify the situation. Without the Core Strategy there is unlikely to be efforts to improve water quality.
12.Energy	+	+	+	Trends indicate that energy consumption is decreasing and thus, without the plan, it is likely that improvements will continue. Albeit, Lewes won't benefit from the encouragement of renewable energy that is a feature of the Core Strategy.
13.Air Quality	0?	0?	0?	It is likely that air quality will remain as existing and thus the AQMAs will remain. It is unknown what effect new development will have on AQMAs as without a plan in place – locations will be unknown.
14.Flooding	-?	-?	-?	The district is prone to flooding and will be in further risk as climate change increases flood risk. Without a plan a place, the district would be unable to ask for and thus less likely to get development that reduces such risk (flood defences/ SuDS etc.), which is likely to make the current situation worse.
15.Coastal Erosion	+	+	+	Even without a plan in place, it is seen as unlikely that development will come forward in areas prone to coastal erosion.
16.Economy	-	-	-	Without a plan in place, it is unlikely that there will be much encouragement for the economy, which will be particularly detrimental to the most deprived areas of the district.
17.Tourism	0?	0?	0?	The designation of the National Park may increase tourism in the district, albeit there would be no explicit encouragement of tourism without the plan.