



## **Lewes Neighbourhood Plan**

# **Sustainability Appraisal Report**

**Prepared on behalf of:**

**Lewes Town Council and South Downs National Park Authority**



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## Glossary and Definitions

AMR (Authority Monitoring Report)	A document within the LDF that monitors progress in implementing the Local Development Scheme and the effectiveness of the Council's adopted policies.
Cumulative Effects	<p>Cumulative effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect. Includes synergistic effects where interactions produce a total effect greater than the sum of the individual effects.</p> <p>Cumulative effects are also taken to mean 'in-combination effects' under the Habitats Directive, where other plans or projects in combination with a plan might affect European sites.</p>
Development Plan	The statutory framework for planning decisions, comprising the Development Plan Documents prepared by local planning authorities (including the County Council and District Councils).
Direct/ Indirect	Distinguishes between effects that are a direct result of the policy (e.g. land loss) or are secondary, they occur away from the original effect or as a result of a complex pathway.
DPD (Development Plan Document)	A document containing local planning policies or proposals which form part of the Development Plan, which has been subject to independent examination.
Duration	
Short term:	0 – 5 years
Medium term:	5 - 12 years (e.g. up to the end of the plan period)
Long-term:	12+ years (e.g. beyond the end of the plan period)
European sites	<p>Special Areas of Conservation (SACs) - designated under the Habitats Directive (92/43/EEC); and Special Protection Areas (SPAs) - designated under the Wild Birds Directive (2009/147/EC).</p> <p>'Ramsar sites', designated under the Ramsar Convention 1971, are treated by UK Government policy as if they were European sites in terms of the protection and management afforded to them. They should be included in assessment, where relevant.</p>
Frequency	<p>Described in this report as either:</p> <ul style="list-style-type: none"> <li>• Continual; or</li> <li>• Defined by number of occurrences (e.g. per annum); or</li> <li>• Intermittent.</li> </ul>
Habitats Regulations Assessment (HRA)	An assessment in accordance with the Habitats Regulations (the Conservation (Natural Habitats, & c.) Regulations 2010 as amended) to ascertain the significance of potential impacts of a plan on relevant European sites. The assessment determines whether the plan would adversely affect the integrity of the sites in terms of its nature conservation

	objectives. Where negative effects are identified, other options should be examined to avoid any potential for damaging effects.
Irreversible	The receptor would require significant intervention to return to (future) baseline condition, e.g. development of greenfield land for housing developments.
LDD (Local Development Document)	The main group of documents within the LDF, comprising Development Plan Documents and Supplementary Planning Documents.
LDF (Local Development Framework)	A local development framework is the spatial planning strategy introduced in England and Wales by the Planning and Compulsory Purchase Act 2004. The LDF consists of a number of compulsory documents as well as optional documents. The compulsory documents are: <ul style="list-style-type: none"> <li>• Local Development Documents;</li> <li>• Development Plan Documents;</li> <li>• Statements of Community Involvement;</li> <li>• Annual Monitoring Report; and</li> <li>• Local Development Scheme.</li> </ul>
Local Plan	A plan prepared by District, Unitary and National Park authorities but which is being superseded by Development Plan Documents.
Neighbourhood Plan	Communities in England have the option to prepare a Neighbourhood Plan. A Neighbourhood Plan should support the strategic development needs set out in the Local Plan and plan positively to support local development. It must address the development and use of land. If successful at examination and referendum a Neighbourhood Plan will become part of the statutory development plan once it has been made (brought into legal force) by the planning authority.
NPPF (National Planning Policy Framework)	Published in March 2012, the National Planning Policy Framework (NPPF) sets out the Government planning policies for England and how these are expected to be applied. The NPPF consolidates and replaces most previous planning policy guidance from Government. The NPPF is supported by the National Planning Practice Guidance (NPPG).
Magnitude	High 80%+ receptor or environmental capacity affected. Medium 40-80% of receptor or environmental capacity of affected Low 20-40% of receptor or capacity affected
Permanent	Lasting or intended to last or remaining unchanged indefinitely e.g. arising from infrastructure or continual effects from traffic
Probability	Low 20-40% e.g. not likely that a receptor will be affected or effect will occur based on available evidence Medium 40-80% High >80% e.g. highly likely that a receptor will be affected or effect will occur based on available evidence.
Proposals Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted DPDs.

Reversible	The receptor can return to (future) baseline condition without significant intervention, e.g. management or operational measures.
SA (Sustainability Appraisal)	A systematic process incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SCI (Statement of Community Involvement)	A document within the LDF setting out the District Council's proposals for involving the local community and other stakeholders in the preparation of LDDs and the determination of planning applications.
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) and the SEA Regulations (Statutory Instrument No. 1633) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.
Spatial extent	Local – Effects contained to within the Lewes Neighbourhood Plan area; District / South Downs National Park - Effects extend beyond Neighbourhood Plan area into wider area; Regional – effects within the South East; National - Effects within England or the UK but extending beyond region; International / Transboundary - Effects extending beyond the UK
Temporary	Lasting for only a limited period of time; not permanent e.g. during construction.

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## Separate Annexes

Annex B: Review of Relevant Policies, Plans and Programmes

Annex C: Baseline Data

Annex D: Maps

Annex E: Assessment of Site Allocation Options;

Annex F: Assessment of Draft Plan (before mitigation / enhancement) and Final Plan (after mitigation / enhancement)

## 1 Introduction

The Lewes Neighbourhood Plan is being prepared by Lewes Town Council. The South Downs National Park Authority (SDNPA) designated the Lewes Neighbourhood Area on 8 May 2014 following an application from Lewes Town Council.

Strategic Environmental Assessment (SEA) in England is mandated by the SEA Directive (Directive 2001/42/EC: Assessment of the Effects of Certain Plans and Programmes on the Environment) and is regulated by the Environmental Assessment of Plans and Programmes Regulations 2004 Statutory Instrument No.1633 ('the SEA Regulations'). The SEA Directive aims at a high level of protection of the environment, and to integrate the consideration of the environment into the preparation and adoption of plans and with a view to promoting sustainable development.

The SDNPA issued an SEA screening request consultation letter to the SEA statutory consultees<sup>1</sup> on 1<sup>st</sup> December 2016. The responses from the statutory consultees confirm that an SEA of the Lewes Neighbourhood Plan is required because significant environmental effects could arise in relation to:

- Flood risk;
- Heritage assets;
- Designated sites for nature conservation; and
- The allocation of development sites.

The SDNPA would like the SEA of the Lewes Neighbourhood Plan to be incorporated into a wider Sustainability Appraisal (SA). The Planning Practice Guidance<sup>2</sup> confirms that SA of NPs is not a legal requirement. However, Lewes Town Council, as the qualifying body, must demonstrate how its plan will contribute to achieving sustainable development and an SA is a useful approach for doing this.

The Lewes Neighbourhood Plan is therefore being subject to an SA incorporating SEA. Regulatory Requirements.

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<sup>1</sup> Natural England, Historic England, and the Environment Agency

<sup>2</sup> <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-neighbourhood-plans/>



This report presents the potential sustainability effects of the Neighbourhood Plan and meets the requirements of the SEA Regulations (Annex A provides details of how the regulatory requirements have been met).

### 1.1.1 Habitats Regulation Assessment

Article 6 of the Habitats Directive (92/43/EEC) requires all Member States to undertake an 'appropriate assessment' of any plan or project requiring authorisation which would be likely to have a significant effect upon a European site<sup>3</sup> (including Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar wetland sites; this is commonly referred to as a Habitats Regulations Assessment (HRA).

In the UK, the Habitats Directive has been transposed into domestic legislation as the Habitats Regulations 2010 which requires an assessment of any plans which are likely to have a significant effect on any European sites. This requirement includes strategic plans with an impact on land use.

The Habitats Regulations Assessment Screening Statement for the Lewes Neighbourhood Development Plan (South Downs National Park Authority, April 2018) concludes that the Lewes Neighbourhood Development Plan will not result in significant effects on the SAC from, for example, increasing recreational pressure or air quality. Ecological assessment required to ascertain potential for protected species.

## 1.2 Who has carried out this SA?

The SA has been undertaken by independent consultants from ClearLead Consulting Limited who have worked closely with Lewes Town Council, members of the Neighbourhood Plan Steering Group, Feria (consultants preparing the Neighbourhood Plan) and officers from the SDNPA.

## 1.3 The Structure of this document

The remaining sections of this document are structured as follows:

- **Section 2 Methodology** describes the approach to the SA;
- **Section 3 Outline of the Lewes Neighbourhood Plan** describes the Lewes Neighbourhood Plan and sets out its vision and objectives;
- **Section 4 The Scope and Content of the Lewes Neighbourhood Plan** describes the plan which has been assessed;
- **Section 5 Scope of the SA** describes how the scope of the assessment has been determined. This section is supported by Annexes C and D;

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<sup>3</sup> Also known as Natura 2000 sites

- **Section 6 Alternatives Assessed and Reasons for Choosing / Rejecting Alternatives** describes the alternatives identified, the findings of the assessment of alternatives and the reasons for choosing the alternatives which form the draft Neighbourhood Plan. This section is supported by Annexes E and F;
- **Section 7 Results of the Assessment of the Plan** presents the potential significant effects of the Neighbourhood Plan. This section is supported by Annexes G and H;
- **Section 8 Monitoring** presents proposals for monitoring the potential effects of the Neighbourhood Plan; and
- **Section 9 Next Steps** sets out the next activities in the SA.

## 1.4 Consultation on this document

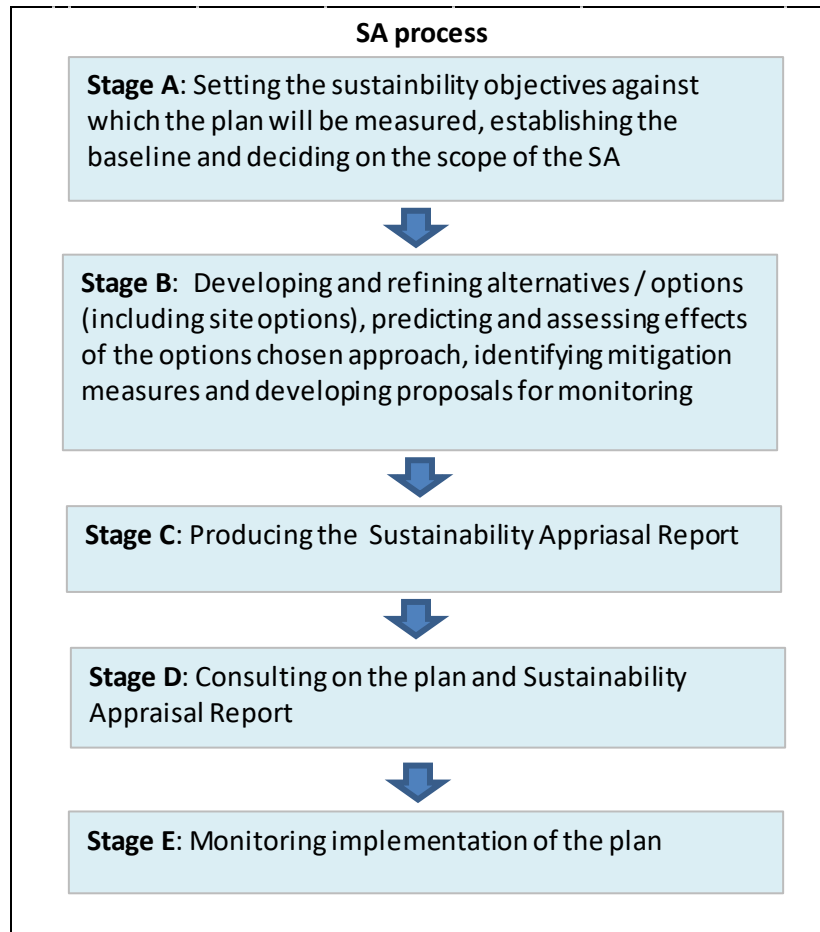
The SA Report was consulted on with the statutory consultees (Environment Agency, Historic England and Natural England) and the public alongside the Pre Submission (Regulation 14) Lewes Neighbourhood Plan (the Plan) between 8<sup>th</sup> May 2017 to 21<sup>st</sup> June 2017. No responses were received specifically about the SA Report. Consultee responses relating to the Neighbourhood Plan have been considered by the plan authors and have led to changes to the Submission version of the Neighbourhood Plan. This SA Report has been updated to reflect the Submission version of the Plan.

## 2 Methodology

### 2.1 Introduction

The SA of the Neighbourhood Plan is being undertaken in accordance with the requirements of the SEA Regulations and following SEA guidance produced by the Department for Communities and Local Government<sup>4</sup>.

An overview of the SA process is set out within Figure 2.1.



**Figure 2.1: SA Process**

The purpose of SA is to appraise the environmental, social and economic effects of plans and programmes. The Neighbourhood Plan policies and site allocations will be subjected to 'testing'

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<sup>4</sup> A practical guide to the Strategic Environmental Assessment; Department for Communities and Local Government, 2005

to determine their sustainability merits, to help develop the most sustainable policies and proposals as an integral part of the plan's development.

## 2.2 Stage A: Scoping

The first step in undertaking the SA is called 'scoping' the assessment. Scoping has been completed, which involved the preparation of a Scoping Report in January 2017. The Scoping Report was consulted on with the statutory consultees<sup>5</sup> between 16<sup>th</sup> January and 20<sup>th</sup> February (a period of 5 weeks). The Scoping Report presented baseline information on the environmental, social and economic characteristics of the plan area, including the likely evolution of the baseline within the plan period. The Scoping Report set out a framework for the assessment of the plan and its alternatives, identifying the significant effects that the assessment will need to focus on. This information is also presented within this report (see Section 4).

## 2.3 Stage B: Developing and Refining Options / Alternatives

The main alternatives to be considered as a part of the Neighbourhood Plan preparation have been the potential allocation sites. The South Downs Local Plan Preferred Options (September 2015) directs 220 new homes to be delivered at Lewes and the Neighbourhood Plan Group identified 32 potential sites in Lewes to be considered for allocation in order to accommodate at least this level of housing development.

All of the potential development allocation sites have been SA and the findings of the assessments are presented within Annex E. The Neighbourhood Plan Group were presented with the findings of the assessments and this information was used to inform the selection of sites to be included within the Neighbourhood Plan.

A 'do nothing' / no Neighbourhood Plan scenario has also been assessed alongside the draft plan policies. The findings of this assessment are presented within Annex E.

Section 5 discusses the consideration of alternatives.

## 2.4 Stage C: Assessing the Draft Plan and Producing the SA Report

This stage involves identifying the significant environmental effects of the draft Neighbourhood Plan including short, medium and long term; permanent and temporary; positive and negative effects and documenting the SA process and presenting the findings within a SA Report.

The draft plan policies have been assessed against the SA Framework of objectives and sub-objectives, in the same way as the potential site allocations. The findings of the draft policies assessment are presented in Annex E.

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<sup>5</sup> Natural England, Historic England, and the Environment Agency

Through the course of the assessment, appropriate mitigation measures have been identified which could be adopted within the Neighbourhood Plan to ameliorate negative effects. Mitigation measures have been identified for any potential negative or uncertain effects. Enhancement measures have also been identified where neutral or positive effects could be enhanced.

Following an initial assessment of the draft Neighbourhood Plan policies, the Neighbourhood Plan Group responded to the mitigation and enhancements measures put forward, resulting in some changes being made to the plan in response. The assessment was then updated to take account of these changes and the residual effects of the Neighbourhood Plan are presented in Section 6 and Annex H.

Section 7 of this report presents a suggested monitoring strategy in order to monitor the potential residual effects of the Lewes Neighbourhood Plan.

The SA Report was consulted on with the statutory consultees (Environment Agency, Historic England and Natural England) and the public alongside the Pre Submission (Regulation 14) Lewes Neighbourhood Plan (the Plan) between 8<sup>th</sup> May 2017 to 21<sup>st</sup> June 2017.

No responses were received specifically about the SA Report. Consultee responses relating to the Neighbourhood Plan have been considered by the plan authors and have led to changes to the Submission version of the Neighbourhood Plan.

This report has been updated to reflect the Submission version of the Plan. The amendments to the Plan have included various editorial changes and the removal of two sites:

- Landport Garages; and
- Spring Barn Farm.

The potential sustainability effects of allocating these sites were included within the previous version of the SA Report but have been removed from this version.

No policies have been added or removed from the Plan between the Pre Submission and the Submission versions.

Amendments to the Plan were made following examination in September 2018 and on receipt Examination Report, which was received in December 2018. The SA Report has therefore been updated following these changes.

## 2.5 Definition of Significance

The following definitions of significance have been used in the assessment of the Neighbourhood Plan and its alternatives.

<b>Table 2.1: Key to Significance</b>	
<b>Significance colour / symbol</b>	<b>Definitions of Significance</b>
++ Significant positive	Policy or option supports the achievement of this objective and all of the sub-objectives and could result in a potentially significant beneficial effect
+ Minor positive	Policy or option supports the achievement of this objective although it may have only a minor beneficial effect
- Minor negative	Policy or option appears to conflict with the achievement of this objective and may result in minor negative effects.
-- Significant negative	Policy or option works against the achievement of this objective and may result in a potentially significant negative effect e.g. loss of all or part of a designated ecological site of national importance.
0 Neutral	Policy or option has no impact or effect and is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant
? Uncertain	Uncertain or insufficient information on which to determine the appraisal at this stage

## 2.6 Assumptions and Limitations

Baseline data is only available for certain parts of the Lewes District including the land which is within the South Downs National Park. Unless it is stated that the data relates to Lewes District, the data presented in Section 4 and Annex C relates to the Lewes Neighbourhood Plan area (which is also the Lewes Parish area).

Inconsistencies in data collected and availability over time has made identifying trends difficult in some circumstances. Where trend information is not available over time or inconsistencies in monitoring have resulted in a lack of recent data, this is indicated within the baseline data in Annex C. The baseline data was gathered over a very short period between mid December 2016 and early January 2017. This short timeframe has limited the baseline data collation and analysis.

The assessment of sites has been undertaken as a desk-based exercise using the baseline information presented in Annex D and the maps in Annex E. No site visits have been undertaken specifically for the purposes of the SA. However, the assessments of sites have been responded to by members of the Neighbourhood Plan Group who have undertaken site visits as a part of the site selection exercise.

During the initial SA of sites, information from the Historic Environment Record was not available. Subsequently, information was obtained from the East Sussex County Archaeologist and integrated into the assessments prior to finalisation of this report. The information was available at the time that the sites were selected as allocations.

The red line boundaries for the potential site allocations have been provided to the assessors based on the best of their knowledge and there may be some inaccuracies in the boundaries assessed.

Some assumptions are noted within the assessments of the sites and draft Neighbourhood Plan in relation to the emerging Local Plan policies. For example, it has been assumed that the Local Plan will include policies which will, in general, control potential environmental impacts from construction. The site assessments have therefore only identified particular cases where construction impacts are notable, due to the sensitivity of the receiving environment.

### 3 The Scope and Content of the Lewes Neighbourhood Plan

#### 3.1 Policy Background

At present the adopted Plan for the town of Lewes is the saved policies from the Lewes District Local Plan (2003), the Lewes District Local Plan Part 1: Joint Core Strategy 2010-2030, adopted by the SDNPA on 23 June 2016 and the East Sussex Minerals and Waste Plan.

The waste and minerals planning strategy for East Sussex is set out in a series of documents collectively known as the Waste and Minerals Local Plan. These documents all cover Lewes Town in its entirety and are:

- The East Sussex, South Downs and Brighton & Hove Waste and Minerals Plan (adopted 19 February 2013);
- The East Sussex, South Downs and Brighton & Hove Waste and Minerals Sites Plan (due to be adopted by the NPA 31-01-17 and by ESCC in February);
- The Waste and Minerals Adopted Policies Map;
- Waste Local Plan (2006) (saved policies only);
- Minerals Local Plan (1999) (saved policies only); and
- Supplementary Planning Document on Construction and Demolition Waste (2005).

The town of Lewes is located entirely within the South Downs National Park and the SDNPA became the Planning Authority for Lewes from April 2011. The SDNPA is preparing a Local Plan which will replace these plans. The South Downs Local Plan: Preferred Options was published in September 2015.

There are two statutory purposes for national parks as specified in the Environment Act 1995:

1. To conserve and enhance the natural beauty, wildlife and cultural heritage of the area; and
2. To promote opportunities for the understanding and enjoyment of the special qualities of the national park by the public

The SDNPA also has a duty when carrying out the purposes to:

*“Seek to foster the economic and social well-being of the local communities within the National Park.”*

In addition, Section 62 of the Environment Act 1995 also requires all relevant authorities, including statutory undertakers and other public bodies, to have regard to these purposes. Where there is an irreconcilable conflict between the statutory purposes, statute requires the Sandford Principle to be applied and the first purpose of the National Park will be given priority.

Paragraph 115 in the NPPF reaffirms this, setting out that:



*“great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads.”*

### **3.2 Description of the Plan**

The SEA Regulations require information on:

*“An outline of the contents and main objectives of the plan or programme.”* (Schedule 2, Paragraph 1).

The Lewes Neighbourhood Plan will form an important part of the statutory development plan for the area. It will guide the way in which development is delivered in the town throughout the plan period. The Neighbourhood Plan will need to be in general conformity with the Lewes District Local Plan Part 1: Joint Core Strategy (adopted June 2016), the Lewes District Local Plan 2003 Saved Policies and the emerging South Downs Local Plan which is under preparation.

Policy SP2 of the Lewes District Joint Core Strategy (2016) requires the allocation of land to provide a minimum of 220 net additional residential units in Lewes.

The Submission Lewes Neighbourhood Plan has been prepared by Lewes Town Council on behalf of those that live and work within the town of Lewes. The plan sets out a vision for the town until 2030 and is supported by a set of planning policies and a series of specific projects. The Neighbourhood Plan has been informed by the strategic policies in the South Downs National Park Joint Core Strategy, against which it needs to be in general conformity. It has also been informed by the emerging South Downs Local Plan: Preferred Options (September 2015). In accordance with the neighbourhood planning regulations, the plan has been prepared through extensive community consultation.

### **3.3 Plan Vision and Objectives**

The vision for the Lewes Neighbourhood Plan is reproduced within Box 2.1 and a set of objectives for the plan are presented within Box 2.2. The vision and objectives have been developed through public consultation exercises undertaken as part of the Lewes Neighbourhood Plan preparation to date.

### **Box 2.1: Vision of the Lewes Neighbourhood Plan**

*“Lewes has a rich and unique historical, geographical and cultural heritage.*

*Development in the town will look to the future by reflecting this heritage and maintaining a thriving town where business and the arts flourish and where the challenges of climate change and the need to create sustainable communities will be met with resilience and imagination.*

*The town will house its residents and their children at an affordable cost for local average incomes. Lewes will be a place where the quality of people’s lives matters most as we engage with future development”*

### **Box 2.2: Objectives of the Lewes Neighbourhood Plan**

#### 1. Sustainable Communities:

Coordinate all new development so that it provides excellent, genuinely affordable housing and work spaces that contribute to the creation of safe, sustainable and mixed communities that can progress into the future with good access to local jobs and essential services for everybody who lives and works in the town, reducing the need for commuting and car travel.

Local community assets will be protected and encouraged to thrive. Bonfire Society fire sites will be designated Local Green Spaces within the plan and be protected from development.

#### 2. Locally Affordable Housing:

Provide a substantial increase in genuinely affordable housing for sale and rent. The Plan will aim for all new developments on sites of 11 or more dwellings, to meet the South Downs National Park Local Plan requirement for all developers to meet a target of 40% affordable housing\* to be provided on all but the smallest housing developments.

*\*according to the present government definition of 80% market value.*

Specific sites will be designated to deliver a variety of dwelling sizes and tenures. Developments will include innovative financing and designs to provide low cost home ownership and rent, including shared ownership.

#### 3. Locally Affordable Workspace

Ensure there is sufficient provision of appropriate work spaces both for light industry and for small modern businesses providing local jobs, including those in the digital economy, small, creative businesses and local start-ups.

Provide opportunities so that fewer residents will have to commute to work, so improving quality of life. For example, increase numbers of smaller scale working spaces as required by creative small businesses and provide more live/work spaces that will encourage home-working. Development that allows a mix of living and working space will be encouraged.

**Box 2.2 Continued: Objectives of the Lewes Neighbourhood Plan****4. Efficient Use of Land**

Ensure the quality of new development through the best appropriate use of brown-field land and the application of good quality durable materials. To meet the demand for new housing and benefit the local economy, new developments will provide imaginative multi-functional solutions e.g. flats built above car parks whose roofs will capture rainwater and reduce flash-flooding.

Sensitive development of individual sites will include increasing density where appropriate, locating housing near services, and providing shared green spaces for play space and allotments, in small housing developments, reducing the need for large gardens. Conversion of large houses, and the temporary use of modular buildings, particularly on sites awaiting development will be encouraged.

**5. Environmental Design**

Encourage development that is well-designed and environmentally sensitive, protects the historic fabric and views of and from the town for future generations and respects its immediate landscape setting within the South Downs National Park.

High quality design, landscaping, architecture, and materials should also embrace the principles of reduce, reuse, recycle. Plans and designs should ensure efficiency of water use and avoidance of light pollution.

**6. Easily Moving Around**

Create positive and convenient alternatives to private, motorised transport by maximising opportunities for walking and cycling. Protect and enhance the historic street patterns including the Twittens, which provide convenient and direct pedestrian routes around town.

All new developments will support safe walking and cycling routes within, into and out of Lewes. New developments will have particular regard for the access and safety needs of the young, the elderly and less able. New routes will be opened up for the health and well-being of residents and visitors, including those that link to nearby villages and give access to the countryside.

**7. Reduced Energy Demand**

New buildings that are built to carbon neutral standards and oriented to provide optimum benefit (e.g. from passive solar heating) will be supported. The Lewes Neighbourhood Plan will seek to ensure there are suitable and appropriate opportunities for renewable energy generation in new and existing developments. Demand for energy will also be reduced by using land efficiently and imaginatively so new developments are close to services and open spaces, reducing the need for car use and car parking.

**8. Built and Natural Environment, Green Spaces & Biodiversity**

Development that encourages biodiversity, promotes the importance of green areas as breathing spaces within the town and provides green corridors that connect to the surrounding countryside will be actively sought. The quality and character of the natural environment will be protected and enhanced, to benefit the health, well-being and long-term economic interests of all in the community. New developments will include safe green open spaces, and where possible green infrastructure such as green roofs, planting, trees, and Sustainable Urban Drainage Systems (SUDS). Biodiversity enhancement will be encouraged

through connections linking the town and the wider natural environment. Practical measures will include urban wildflowers and trees linking to meadows and woodlands on the edge of town. Measures should be taken where necessary to prevent a decline in biodiversity and provide robust habitats and ecosystems for future generations.

The Plan will safeguard and celebrate the rich built heritage of the neighbourhood area. The character and appearance of its conservation areas will be protected through the delivery of the planning process in accordance with national and local policies. The longer-term integrity and effective use of the many listed buildings in the town is a key principle of this Plan. The Plan also recognises that opportunities for sustainable and sensitive economic development and tourism naturally arise from the built heritage of the town.

#### 9. Climate Change

All new development will be resilient to climate change and extreme weather like flooding, high winds, drought and heat waves. New development will manage flood risks from the river, ground water, and flash flooding. Green spaces and Sustainable Urban Drainage Systems (SUDS) will reduce run-off by absorbing rain. Materials and surfaces will help to tackle flood risks by allowing rainwater to be absorbed slowly.

#### 10. Village & Town Connections

Lewes will be better connected to its local environment, enabling people to get out to enjoy the surrounding countryside and landscape. The town will have an improved transport hub, bus station and a variety of good quality transport connections to improve access to and from surrounding villages and towns.

Lewes will be accessible and user-friendly to all who live, work in or visit the town, for example through community transport services and further development of the Egrets Way riverside route and other path links to local villages and towns.

#### 11. Tourism

Tourism is important to the Lewes economy. Tourism will be supported by good public transport and active travel networks, better sign-posting, and facilities for coaches and taxis. Paths along the banks of the river will open up attractive, accessible spaces for enjoyment of the town and surrounding countryside and via the Egrets way link to Newhaven port.

#### 12. Flexible Housing for All Generations and Incomes

New housing will be flexible and provide a good quality of life, now and in the future, for people of all ages. Down-sizing will be encouraged by providing attractive smaller town centre homes.

Shared inter-generational households and co-living can be accommodated through modular housing designs and imaginative, flexible layouts. Genuinely affordable housing will meet the needs of families and young people. We will create lively mixed-use community areas and work / living spaces.

### 3.4 Overview of the Plan Area

The Lewes Neighbourhood Plan area is defined by the Lewes Parish Council boundary and is shown on Figure 2.1. Figures 2.2 and 2.3 also show the geographical and administrative context including how the town now sits entirely within the South Downs National Park and how it was formerly located within Lewes District.

Lewes is the historic market town of East Sussex situated approximately eleven kilometres north-east of Brighton. Once an active port, the town has a history of iron, brewing and ship-building industries and the brewing industry is still present in the town. The town now has a range of contemporary businesses and with strong economic links with Brighton and London. The tourism industry plays a large part in the local economy, due to the town's many cultural assets. The unique historic attractions include Lewes Castle, a 15th Century building now operating as a bookshop and the remains of Lewes Priory, along with vibrant modern events, including the regular local music festival, an annual art event, and hosting one of the country's largest bonfire night celebrations.

Lewes has a rich built and natural environment. High quality examples of regional vernacular architecture can be found throughout the town centre, featuring many different historic construction materials and techniques. A thriving artistic community is present within the town. Sculptures created by local artists are spread about the town, with regular additions dating back from 1964 to the present day.

The River Ouse passes through the town, situated between the rolling chalk hills. Four Sites of Special Scientific Interest (SSSI) can be found in Lewes: Lewes Downs, a biologically rich floodplain; Offham Marshes, an important alluvial grazing marsh; Lewes Brooks, an RSPB reserve; and Southerham Works Pit, a disused chalk pit with fossilised fish remains.

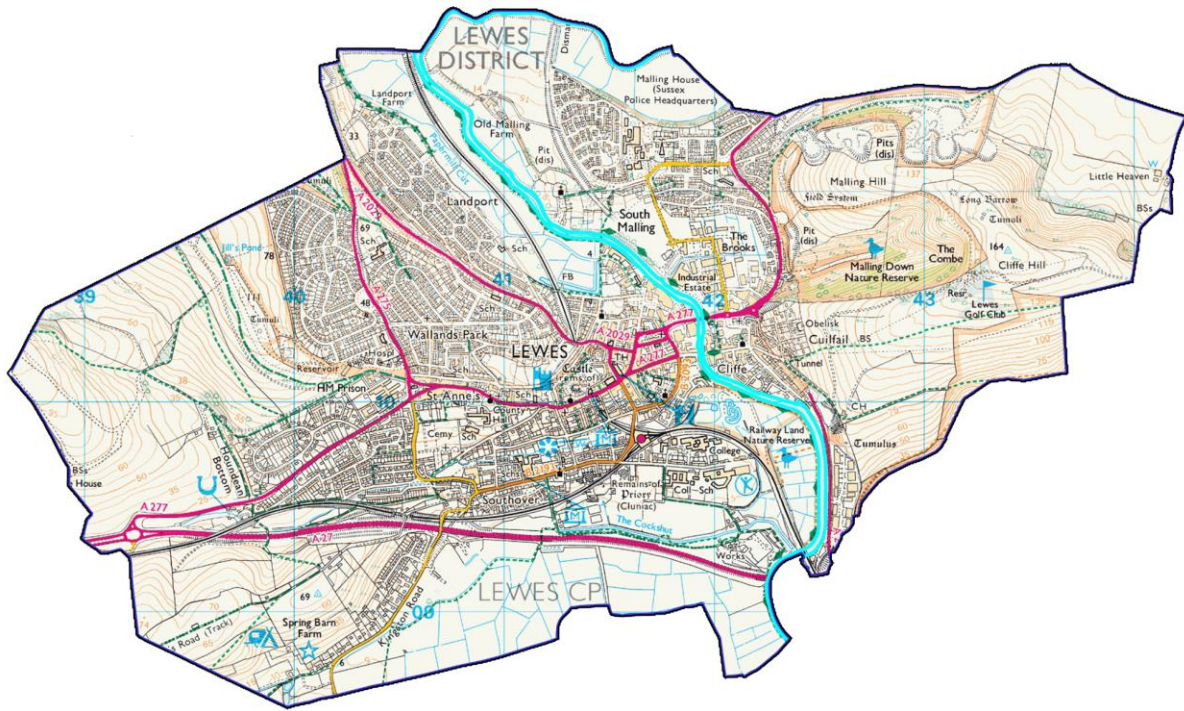


Figure 2.1: Lewes Neighbourhood Plan Area





Figure 2.2: Map of the South Downs National Park

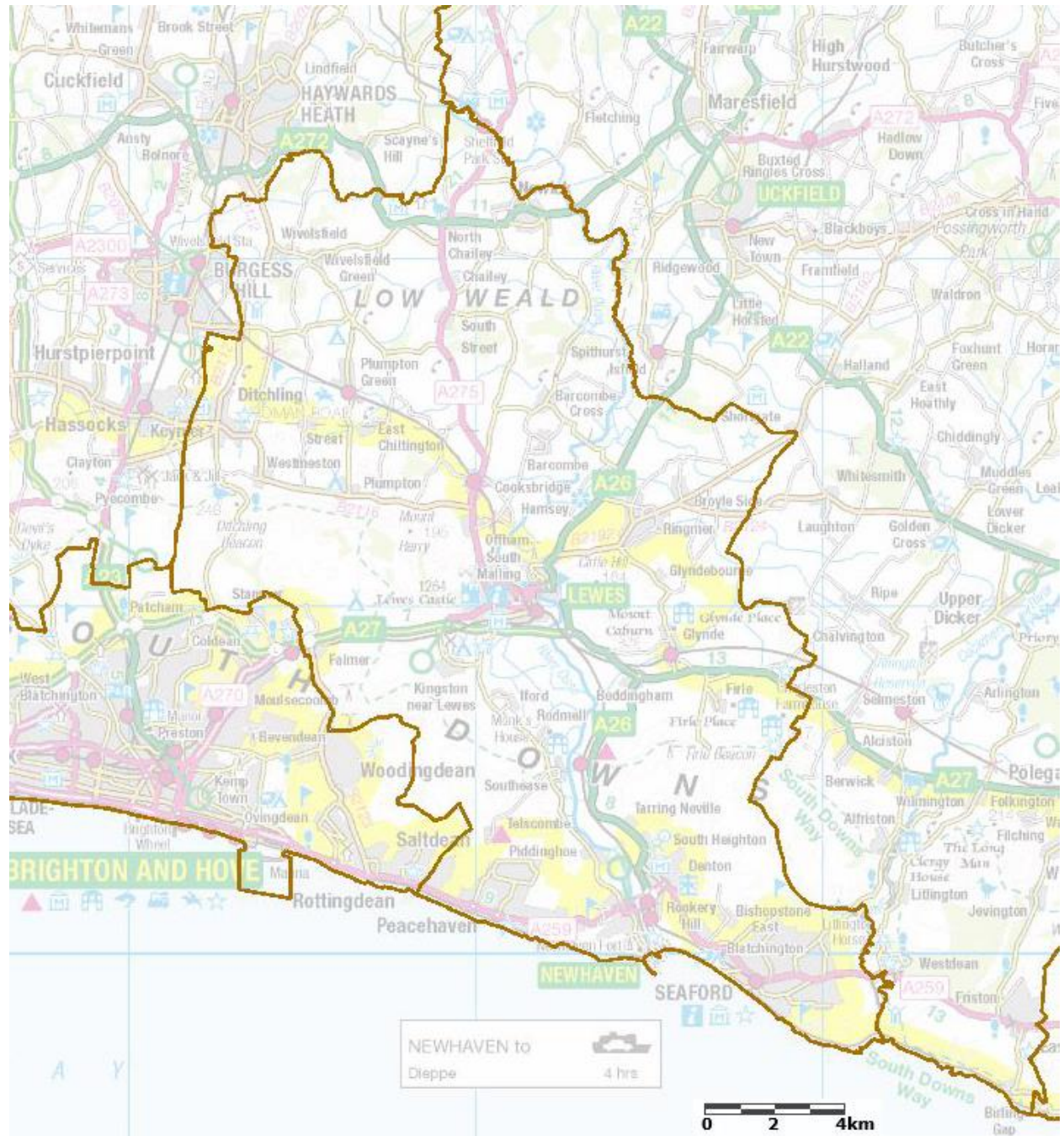


Figure 2.3: Lewes District



## 4 Scope of the SA

### 4.1 Introduction

The first task in undertaking the SA is to scope the assessment. The scope is determined by examining the baseline environmental, social and economic data for the Plan Area; examining other relevant plans, policies and programmes and their environmental protection objectives; identifying key sustainability issues; proposing a framework of Sustainability Appraisal objectives against which to test the Plan and consulting on the proposed scope.

### 4.2 Policy Review

A review of related policies, plans, and programmes (PPP) has been undertaken which ensures that the Lewes Neighbourhood Plan complies with existing PPP at international, national and regional levels of governance and also reinforces and supports local plans and strategies. The process entails identifying and reviewing those PPP and environmental protection objectives that are directly relevant to both the Neighbourhood Plan and the SA.

For practical reasons the scoping task of identifying related plans and programmes cannot yield an exhaustive or definitive list of legislative/non-legislative documents. The review has been focussed to ensure that only policies that are current and of direct relevance to the Neighbourhood Plan are reviewed. A detailed outline of the policy documents, the objectives and the targets reviewed is set out in Annex B. Table 4.1 outlines the key messages of the PPP.

The completed review of policies, plans and programmes provides the context for the SA and helps to inform an SA Framework of objectives and questions which will guide the subsequent appraisal process (see Section 4.4).

#### 4.2.1 Summary of Key Messages from Policy Review

Table 4.1 sets out the key messages drawn from the review of PPP.

<b>Table 4.1: Key Messages from the PPP review</b>	
<b>SA Theme</b>	<b>Key Messages from Review</b>
Air, Noise and Light Pollution	<ul style="list-style-type: none"> <li>• Ensure that air quality is maintained or enhanced and that emissions of air pollutants are kept to a minimum.</li> <li>• Minimise noise pollution.</li> <li>• Protect tranquil areas from noise pollution.</li> <li>• Reduce light pollution, by ensuring that appropriate lighting is installed in order to prevent loss of dark skies for the benefit of both residents, visitors and wildlife.</li> <li>• Promotion of walking and cycling as a healthy and more preferable options to car for local journeys. The introduction of the Ringmer – Lewes Cycleway should help to encourage this and to minimise pollution and other adverse effects on the local and natural environment.</li> </ul>

<b>Table 4.1: Key Messages from the PPP review</b>	
<b>SA Theme</b>	<b>Key Messages from Review</b>
Landscape and Soils	<ul style="list-style-type: none"> <li>• Protect and enhance the quality and distinctiveness of natural landscapes and townscapes, in ways that allow it to continue to evolve and become more resilient to the impacts of climate change and other pressures.</li> <li>• Promote access to the countryside.</li> <li>• Promote high quality design that respects and enhances local character.</li> <li>• Encourage the use of previously developed (brownfield) land.</li> <li>• Promote the re-use of derelict land and buildings.</li> <li>• Remediate land contamination.</li> <li>• Protect soil quality and into account the economic and other benefits of the best and most versatile agricultural land.</li> <li>• There are major economic benefits to be gained from natural capital and that their value should be incorporated into decision-making.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• Protect and enhance biodiversity, including designated sites, priority species, habitats and ecological networks.</li> <li>• Creation of more resilient ecosystems, through better management of habitats by making them bigger and more joined up.</li> <li>• Prevention, control and eradication of invasive non-native species, especially those that will have the most detrimental effects on biodiversity.</li> <li>• Avoid damage to, and protect, geologically important sites.</li> <li>• Identify opportunities for green infrastructure provision, recognising the multiple functions that green infrastructure provides to the area.</li> <li>• Ensure that any new development will not harm nature conservation interests.</li> <li>• Recognise the wider benefits of ecosystem services; protect and enhance the capacity of ecosystem services in the South Downs National Park.</li> </ul>
Archaeological and Cultural Heritage	<ul style="list-style-type: none"> <li>• Conserve and enhance nationally and locally designated cultural and historical assets as well as those which are undesignated.</li> <li>• Maintain and enhance access to cultural heritage assets.</li> <li>• Respect, maintain and strengthen local character and distinctiveness.</li> <li>• Improve the quality of the built environment.</li> <li>• New works, repair and maintenance should utilise the traditional materials used in the town.</li> <li>• Engage residents and visitors with the rich history of Lewes.</li> </ul>
Climatic Factors	<ul style="list-style-type: none"> <li>• Build resilience to climate change and flood risk.</li> <li>• Focus on identifying activation triggers for responding to flood warnings and set out the process for a coordinated response.</li> <li>• Avoid development in areas of flood risk.</li> <li>• Promote the use of Sustainable Drainage Systems (SDS).</li> <li>• Ensure that all residents are informed of the potential risk of flooding and their appropriate flood evacuation route.</li> </ul>
Climate Change Mitigation	<ul style="list-style-type: none"> <li>• Minimise the effects of climate change.</li> <li>• The Implementation of sustainable land management techniques to reduce the impact of extreme weather events</li> <li>• Reduce emissions of greenhouse gases that may cause climate change.</li> <li>• Encourage the provision of renewable energy.</li> <li>• Move towards a low carbon economy.</li> <li>• Increase energy efficiency</li> </ul>

<b>Table 4.1: Key Messages from the PPP review</b>	
<b>SA Theme</b>	<b>Key Messages from Review</b>
Community and Wellbeing	<ul style="list-style-type: none"> <li>• Reduce crime including the fear of crime.</li> <li>• Reduce anti-social behaviour.</li> <li>• Deliver safe and secure networks of green infrastructure and open space.</li> <li>• Promote improvements to health and wellbeing.</li> <li>• Improve public health by strengthening local public health activities which connect people with nature.</li> <li>• Protect important green spaces.</li> <li>• Promote healthier lifestyles.</li> <li>• Ensure that there are appropriate facilities for the disabled and elderly.</li> <li>• Improve participation in sports. Improve access to high quality open spaces and opportunities for sport and recreation in order to contribute to the health and well-being of communities.</li> <li>• Ensure everyone has access to local, good quality health and social care services that meet their needs, especially children, older people and those living in more deprived areas</li> <li>• Focus on providing additional, floor space to meet a qualitative need, together with appropriate leisure facilities, restaurants, offices, arts, culture and tourism facilities in order to diversify the town centre and retain expenditure.</li> <li>• Ensure social equality and prosperity for all.</li> <li>• Tackle rural social exclusion wherever it occurs and providing fair access to services and opportunities for all rural people.</li> <li>• In both more and less prosperous areas, to tackle social exclusion wherever it occurs.</li> <li>• Prevent and reduce homelessness where it occurs</li> <li>• Ensuring that Gypsies and Travellers have fair access to suitable accommodation, education, health and welfare provisions</li> </ul>
Economy	<ul style="list-style-type: none"> <li>• Support the sustainable growth and expansion of all types of business and enterprise.</li> <li>• Support sustainable tourism that benefit businesses, communities and visitors, and which respect the character of Lewes.</li> <li>• Promote the retention and development of local services and community facilities, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.</li> <li>• Ensure that there is an adequate supply of employment land to meet local needs.</li> <li>• Take advantage of the richness and diversity of the town's natural and heritage assets to promote and achieve a sustainable tourism industry in and around the district.</li> <li>• Raise the economic performance of the District by supporting existing businesses, attracting inward investment and encouraging new business start-ups.</li> <li>• Support opportunities for the improvement of the skills and educational attainment levels of the district's labour supply.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Enable housing growth and deliver a mix of high quality housing to meet local needs.</li> <li>• Ensure that housing growth requirements are accommodated in the most sustainable way.</li> </ul>

<b>Table 4.1: Key Messages from the PPP review</b>	
<b>SA Theme</b>	<b>Key Messages from Review</b>
	<ul style="list-style-type: none"> <li>• Priority to address the housing needs of older people and small households, especially in rural communities.</li> </ul>
Transport	<ul style="list-style-type: none"> <li>• Encourage walking and cycling.</li> <li>• Enhance accessibility to key community facilities, services and jobs for all.</li> <li>• Encourage sustainable transport and reduce the need to travel.</li> <li>• Support the expansion of electronic communications networks, including telecommunications and high speed broadband.</li> <li>• Focus on improvements for safe, coherent walking and cycling routes on key corridors from Brighton and Hove to and within both Lewes and the south coast towns;</li> <li>• Focus on transport measures to tackle congestion and address the air quality issues in Lewes town centre</li> <li>• Work with key partners including public transport providers, Job Centres and GP consortia to improve accessibility to key facilities in the area.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Protect and enhance surface and groundwater quality.</li> <li>• Improve water efficiency.</li> <li>• Return watercourses to a more natural state, increasing the biodiversity value and generating Water Framework Directive improvements.</li> <li>• Ensure that water quality is improved or maintained where possible.</li> <li>• Ensure waterways are protected from encroachment and adverse impacts in line with the objectives of the South East River Basin Management Plan.</li> <li>• Focus on controlling soil loss in the Ouse catchment, by aiming to reduce levels of pollutants such as suspended solids, fertiliser and pesticide related chemicals in affected stretches of the river.</li> </ul>

### 4.3 Baseline Data and Key Sustainability Issues

The SEA Regulations require a description of the following to be presented:

- *“The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.”* (Schedule 2, Paragraph 2);
- *“The environmental characteristics of areas likely to be significantly affected.”* (Schedule 2, Paragraph 3); and
- *The likely significant effects on the environment... on issues such as (a) biodiversity;*
  - *(b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape.* (Schedule 2, Paragraph 6)

Gaining an understanding of this information allows the impact of the plan to be assessed and its performance to be monitored after adoption.

The topics set out within the SEA Regulations have been expanded into a number of themes as presented within Table 4.2 to include socio-economic topics as the Neighbourhood Plan is being

subject to an SA which involves assessing socio-economic impacts as well as environmental. The themes for this SA have been based on those used for the SA of the South Downs Local Plan: Preferred Options (2015), with the addition of the 'Soils' theme. This theme has been added in order to better address the SEA Directive topic of 'Soil'.

<b>SEA Regulations Topics</b>	<b>SA Themes</b>
Air	Air, Noise and Light Pollution Transport
Biodiversity, fauna, flora	Biodiversity
Climatic factors	Climatic Change Mitigation Climatic Factors
Human Health	Community and Wellbeing
Population	Community and Wellbeing Economy
Material assets	Economy Transport Housing
Landscape	Landscape
Cultural heritage	Archaeological and Cultural Heritage
Water	Water
Soil	Soils

Table 4.3 presents a summary of the current baseline situation in Lewes and key sustainability issues identified through the scoping process. Detailed baseline data is presented in Annex C (data) and D (maps). For each theme, the likely evolution without the Lewes Neighbourhood Plan is also considered.

<b>Table 4.3: Characteristic of the Area, Sustainability Issues &amp; Likely Evolution without the Neighbourhood Plan</b>			
<b>Theme</b>	<b>Characteristic of the Area</b>	<b>Sustainability Issues</b>	<b>Likely Evolution without the Neighbourhood Plan</b>
Air, Noise & Light Pollution	<ul style="list-style-type: none"> <li>For the majority of the town, the air quality in is considered to be good.</li> <li>In 2005 an Air Quality Management Area (AQMA) was declared in Lewes town centre.</li> <li>The narrow streets, single lane steep hills are often bounded by tall buildings on either side of the road, can limit the dispersion of air pollutants leading to high localised concentrations of pollutants.</li> <li>Lewes demonstrates high levels of light pollution</li> </ul>	<ul style="list-style-type: none"> <li>Air quality is important for health and well-being and the existing general good air quality across the District should be protected;</li> <li>Increased traffic flows could add to overall emissions and pollutants associated with transport (NH<sub>3</sub>, SO<sub>2</sub>, NO<sub>2</sub>), leading to worsening air quality, particularly in areas which are already susceptible to high amounts traffic congestion.</li> <li>Habitats sensitive to air pollution, particularly those designated as SSSIs. These need to be protected from potential increases in air pollution from road traffic and industrial point sources;</li> <li>Significant areas within the town have low levels of tranquility.</li> </ul>	<ul style="list-style-type: none"> <li>Concentrations within and adjacent to the Lewes town AQMA still exceed the annual mean objective for nitrogen dioxide. There is a possibility that increased traffic flows and congestion in and around Lewes will lead to worsening air quality due to pollutants associated with transport.</li> <li>Growth in residential and commercial areas in the town could have significant effects on noise pollution, light pollution and wider effects on people's perceptions of tranquillity.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>The qualities of the landscape surrounding Lewes, as well as the appeal of the town itself, make a significant contribution to the SDNP.</li> <li>The town is located within the South Downs National Park, and has a number of SSSIs, sites of archaeological interest as well as the Lewes Downs SAC.</li> <li>The open valley floor and early enclosure landscapes that run into the historic core of the town from the wider countryside, help to preserve a connection between the town and its rural setting.</li> </ul>	<ul style="list-style-type: none"> <li>It is important to conserve and enhance the natural beauty, wildlife and cultural heritage of the area.</li> <li>Development on greenfield sites should only be considered in exceptional circumstances once appropriate brownfield development is exhausted and where this does not adversely affect biodiversity or the natural environment.</li> <li>Conserving and enhancing the natural beauty, wildlife and cultural heritage of the town.</li> <li>Little capacity for development without having detrimental effects on the</li> </ul>	<ul style="list-style-type: none"> <li>The town has a range of landscape character types which all contribute to the local distinctiveness of the area. Lost of this may detract from the town.</li> <li>Development on greenfield sites or tranquil, unspoilt sites without consideration of biodiversity and the natural environment.</li> </ul>

<b>Table 4.3: Characteristic of the Area, Sustainability Issues &amp; Likely Evolution without the Neighbourhood Plan</b>			
<b>Theme</b>	<b>Characteristic of the Area</b>	<b>Sustainability Issues</b>	<b>Likely Evolution without the Neighbourhood Plan</b>
	<ul style="list-style-type: none"> <li>The character of the town and surrounding landscape is influenced by the Downs, which border the town to the south, and the Low Weald landscape character area which extends out to the north.</li> <li>The unique landscape in an around Lewes offers an important source for health, leisure and tranquillity.</li> </ul>	<p>surrounding environment in the west of the town.</p>	
Soils	<ul style="list-style-type: none"> <li>The Lewes District has a high standard of soil, the majority of which is considered to be "Good to Moderate Quality" (Grade 3) agricultural land</li> <li>The history of heavy industry has led to the contamination of some sites</li> <li>Lewes District Council Contamination Register identified 13 contaminated sites in small area of the town all of which have recently been remediated.</li> <li>Between 1st April 2010 and 31st March 2015 3% of new and converted dwellings were built on previously developed land.</li> </ul>	<ul style="list-style-type: none"> <li>The contamination of soils from heavy industry can present problems to future development and subsequent degradation of soil quality.</li> <li>There is pressure to locate new development on previously developed land, thus avoiding the unnecessary loss of greenfield land and valuable agricultural land; and</li> <li>Decrease in soil quality from incidents of flooding.</li> </ul>	<ul style="list-style-type: none"> <li>Further development in the town may have the potential to lead to a loss of soil productivity and function in some areas.</li> <li>Developments that lack of intelligence design and creation of more hardstanding surfaces, may increase flooding incidents, thus potentially leading to a degradation of soil quality.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>The Lewes District is home to 4 SSSI sites; Offham Marshes, Lewes Downs, Lewes Brooks and Southerham Works.</li> <li>Located in the east of the town is the Lewes Downs SAC.</li> <li>The town has 3 Biodiversity Opportunity areas.</li> <li>Lewes falls within a proposed Biosphere Reserve which covers 389 square</li> </ul>	<ul style="list-style-type: none"> <li>Some areas of the Lewes Brooks and Offham Marshes have been considered as being in an unfavourable but recovering condition.</li> <li>Support is needed to achieve local BAP targets.</li> <li>Effective land-management, to support, protect and enhance biodiversity.</li> </ul>	<ul style="list-style-type: none"> <li>There is potential for loss of valuable habitats which have yet to be designated for nature conservation as a direct result of development.</li> <li>Non-native invasive species and the planting of non-native trees may lead to the decline of some native species as well as the composition of certain woodlands.</li> <li>Less access to the countryside.</li> </ul>

<b>Table 4.3: Characteristic of the Area, Sustainability Issues &amp; Likely Evolution without the Neighbourhood Plan</b>			
<b>Theme</b>	<b>Characteristic of the Area</b>	<b>Sustainability Issues</b>	<b>Likely Evolution without the Neighbourhood Plan</b>
	<p>kilometres or 150 square miles (38,921 hectares / 96,175 acres).</p> <ul style="list-style-type: none"> <li>• The Lewes District Informal Recreational Space Study identified that many residents felt that the access to the wider countryside was poor.</li> <li>• The Lewes Railway land is an important local resource for Wildlife, education and recreation.</li> </ul>	<ul style="list-style-type: none"> <li>• Need for more resilient ecosystems, through better management of habitats by making them bigger and more joined up.</li> <li>• The potential effects from climate change need to be considered.</li> <li>• Lack of access to the wider countryside</li> </ul>	<ul style="list-style-type: none"> <li>• Habitats that are less resilient to climate change.</li> <li>• Increase threat to the condition of SSSI sites in the town.</li> </ul>
<b>Archaeological &amp; Cultural Heritage</b>	<ul style="list-style-type: none"> <li>• Lewes has a rich history and a vibrant arts, cultural and industrial heritage with over 500 listed buildings, including the Castle and Medieval Priory.</li> <li>• Much of the centre of Lewes is a Conservation Area, due to its historical importance, density of scheduled monuments and high number of Grade I and II listed buildings.</li> <li>• The valley floor plays an important role of connecting the town with the countryside, providing intrinsic historic landscape interest and providing a setting for the conservation areas, should be protected and enhanced.</li> </ul>	<ul style="list-style-type: none"> <li>• Multiplying pressures, from ever-increasing car use with its implications for town centre congestion, parking demands and the impacts of cars on historic narrow streets within the centre.</li> <li>• The high quality historic landscape is one of the key reasons why Lewes attracts people to live in the area.</li> <li>• The built heritage of the area plays a vital role in defining its distinctive character and identity and it should be protected for its own sake and for its intrinsic cultural value.</li> <li>• The built heritage can provide the catalyst for a prosperous local economy and an enhanced "quality of life" for those who live, work and visit the area.</li> <li>• The valley floor areas are likely to be highly sensitive to change.</li> </ul>	<ul style="list-style-type: none"> <li>• Development on sites which may damage the built heritage of the town, this could have subsequent impacts on the town's economy.</li> <li>• Lack of adaption from climate change</li> <li>• Loss of character and distinctiveness.</li> <li>• Potential to leave a negative architectural legacy</li> </ul>



<b>Table 4.3: Characteristic of the Area, Sustainability Issues &amp; Likely Evolution without the Neighbourhood Plan</b>			
<b>Theme</b>	<b>Characteristic of the Area</b>	<b>Sustainability Issues</b>	<b>Likely Evolution without the Neighbourhood Plan</b>
Climate Change Mitigation	<ul style="list-style-type: none"> <li>The town has suffered considerably from flooding in the past</li> <li>The last large scale flooding event was back in 2000. Following days of exceptionally high rainfall, the River Ouse busted its banks and broke through flood defences.</li> <li>In total 613 residential and 207 business properties were flooded, along with 16 public buildings .</li> <li>The total cost of the flooding was given as £88 million.</li> </ul>	<ul style="list-style-type: none"> <li>Much of the town is within flood zone 3 and many sites are at risk of flooding.</li> <li>The functional floodplain needs to be protected from development.</li> <li>The use of green corridors in flood risk areas need to be promoted.</li> <li>The largest proportion of CO<sub>2</sub> emissions come from transport.</li> <li>The high number of listed buildings will need to seek imaginative solutions to incorporate renewable energy or efficiency measures.</li> </ul>	<ul style="list-style-type: none"> <li>Without sensitive planning and design, more homes could be subjected to the risks of flooding.</li> <li>Climate change is one of the principal drivers of environmental change for the South Downs National Park in the future. The impact upon some of the key Ecosystem Services of the National Park are also potentially significant.</li> <li>Without measures in place, levels of pollution could continue to rise.</li> </ul>
Community & Wellbeing	<ul style="list-style-type: none"> <li>The population structure of Lewes Parish is largely similar to those of Lewes District, the South East region and England.</li> <li>The proportion of residents who are aged 0-15 and 45 – 59 is larger than the comparators, and the proportions of residents aged 16-24 and 25-29 are smaller than the regional and national profiles.</li> <li>The population is set to grow by ~7% by 2027.</li> </ul>	<ul style="list-style-type: none"> <li>There's a need for more healthcare facilities.</li> <li>The ageing population of Lewes District, which is already high, is likely to increase further.</li> <li>There are current and predicted future shortfalls of football, junior football, equipped and informal children's play space in Lewes town</li> <li>The majority of crimes recorded in Lewes within the last year are anti-social behaviour, violence and sexual offences and criminal damage and arson.</li> </ul>	<ul style="list-style-type: none"> <li>No trend data on crime is easily accessible. It is difficult to determine whether crime rates are therefore improving or declining.</li> <li>The Neighbourhood Plan could influence crime by ensuring that new developments are designed to enhance public safety.</li> </ul>
Economy	<ul style="list-style-type: none"> <li>Lewes has a thriving town centre with a healthy retail economy and a large number of independent shops.</li> <li>It lies entirely within the boundaries of the South Downs National Park which increases its already popular status as a tourist</li> </ul>	<ul style="list-style-type: none"> <li>The Lewes wards contain a high proportion of self-employed people when compared with the Lewes District and national proportions.</li> </ul>	<ul style="list-style-type: none"> <li>The increasing costs of travel, particularly commuting into London by train, may affect the employment base of the town such as residents' places of work.</li> <li>The SDNPA is supporting three key business sectors: tourism and the visitor</li> </ul>

<b>Table 4.3: Characteristic of the Area, Sustainability Issues &amp; Likely Evolution without the Neighbourhood Plan</b>			
<b>Theme</b>	<b>Characteristic of the Area</b>	<b>Sustainability Issues</b>	<b>Likely Evolution without the Neighbourhood Plan</b>
	<p>destination and potential for economic benefits.</p> <ul style="list-style-type: none"> <li>Lewes is home to London commuters as well as small craft workers and artisans.</li> </ul>	<ul style="list-style-type: none"> <li>Lewes town has more part time workers and fewer full time workers than are reflected by the national statistics.</li> <li>The residents of Lewes town are generally well educated. The proportion of residents with level 4 qualifications and above are higher than the proportions reflected across the District and nationally in England and Wales.</li> <li>Industry and business are suffering in parts of Lewes District, partly because of the recession, causing damage to local economies.</li> </ul>	<p>economy; food and drink and timber and wood.</p> <ul style="list-style-type: none"> <li>Tourism may become increasingly important in the town as it provides a gateway into the National Park.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>14.8% of District households currently claim housing benefit to help with housing costs.</li> <li>At least 8% of households needing housing benefit to pay rent are in work.</li> <li>The incomes of the town's inhabitants therefore vary greatly and this is affecting housing affordability of residents on lower incomes.</li> <li>The average property value in Lewes in December 2016 is £517,810.</li> </ul>	<ul style="list-style-type: none"> <li>District residents saw their incomes drop by 1.5% in 2013 while the cost of living has increased.</li> <li>In the five years up to 2011, there has been a 44% increase in the number of households on the LDC housing register, from 1,485 to 2,142 households.</li> <li>High house prices far outstrip incomes. Affordability is a major issue.</li> <li>There is a need to provide suitable and sustainable housing for all parts of the community; and</li> <li>There is a need to address the housing needs of older people and small households, especially in rural communities.</li> </ul>	<ul style="list-style-type: none"> <li>Without the provision of affordable housing, residential property in Lewes will continue to be unaffordable for all low paid households in Lewes.</li> </ul>

## 4.4 Scope of the SA

The SA Framework is the mechanism to appraise the options and policies of the Lewes Neighbourhood Plan and has been distilled from the key sustainability issues identified as applying to the Lewes Neighbourhood Plan area.

The SA Framework has been developed in an iterative manner using the SA Frameworks prepared for the Lewes District Joint Core Strategy (adopted June 2016) and the emerging South Downs Local Plan: Preferred Options (September 2015) as starting points. Both SA Frameworks have been reviewed and the framework developed for the South Downs Local Plan SA is considered to be a better fit for the issues affecting Lewes town (identified in Sections 4.2 and 4.3 of this scoping report).

The key messages identified in the PPP review in Section 4.2 and the issues identified through the baseline data analysis presented within Section 4.3 have been incorporated into the SA Framework and minor adjustments have been made to the SA Framework prepared for the South Downs Local Plan in order to ensure that it reflects the key sustainability issues in the Lewes Neighbourhood Plan area.

Table 4.4 presents the SA framework which contains 15 sustainability objectives; each supported by a number of sub-objectives. The SA Objectives will be used to appraise the sustainability performance of the Neighbourhood Plan and its alternatives. The sub-objectives have been used to guide the assessments and reflect the key sustainability issues which are specifically relevant to the Lewes Neighbourhood Plan area.

Following consultation on the Scoping Report, a number of additional sub-objectives were added to the framework and these are shown in *italics*.

<b>Table 4.4: Sustainability Appraisal Framework</b>		
<b>Theme</b>	<b>Objectives</b>	<b>Sub-Objectives</b>
<b>Social</b>		
Health and wellbeing	1. To improve the health and well-being of the population and reduce inequalities in health and well-being	1.1 Contribute to a reduction in crime through the design of new developments. 1.2 Ensure that new developments improve health and wellbeing through encouraging walking and cycling and provision of open space / recreational facilities. 1.3 Support the identification of need for and the provision of new healthcare facilities.
Vitality of communities	2. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	2.1 Support community cohesion
Accessibility	3. To improve accessibility to all services and facilities.	3.1 Encourage the development of appropriate services and facilities in development schemes. 3.2 Provide sustainable access to the town centre and local centres.
Transport	4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	4.1 Work with other partners to develop a high quality, safe access network and better links between buses and the train station and cycling opportunities (e.g. Promote links between the town and the countryside; improve links from the train and bus stations to the town centre; promote awareness of points of interest and the town centre and provide safe and legible pedestrian and cycle links within the town centre and to surrounding residential areas.)  4.2 <i>Minimise the impact of vehicles and car parking on the town.</i>

<b>Table 4.4: Sustainability Appraisal Framework</b>		
<b>Theme</b>	<b>Objectives</b>	<b>Sub-Objectives</b>
Housing	5. To ensure that everyone has the opportunity to live in a good quality, affordable home, suitable to their need and which optimises the scope for environmental sustainability	5.1 Provide affordable housing for local people which meets the needs of communities now and in the future.  5.2 Make appropriate provision for the accommodation needs of older generations.
Cultural activity	6. To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism	6.1 Support sustainable tourism
<b>Environmental</b>		
Air, Noise and Light Pollution	7. To reduce air, noise and light pollution	7.1 Do not increase light pollution.  7.2 Do not impact on the tranquillity of the area.  <i>7.3 Improve air quality</i>
Landscape	8. To conserve and enhance landscape character.	8.1 Conserve and enhance the landscape character (e.g. Conserve the tranquil, pastoral, undeveloped character of the Lewes floodplain Character Area and to Support opportunities to increase natural floodplain habitats such as grassland, reedbeds, water meadows, and grazing marsh; and conserve the bold chalk landforms, the simple uncluttered landscape pattern and the historic villages which provide a rural setting to Lewes.)  8.2 Seek good design which complements and enhances the existing character  [see sustainable transport theme sub objectives for encouraging links between the town and countryside] [see soils theme sub-objectives for efficient use of land]

<b>Table 4.4: Sustainability Appraisal Framework</b>		
<b>Theme</b>	<b>Objectives</b>	<b>Sub-Objectives</b>
Water	9. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management	9.1 Protect water resources from pollution.  9.2 Encourage efficient use of water in new developments.
Soils	10. Protect soil resources and make the most efficient use of land	10.1 Achieve efficient use of land.  10.2 Protect soil resources
Climatic Factors	11. To ensure the SDNP communities are prepared for the impacts of climate change.	11.1 Minimise the risk of flooding to new development through application of the sequential and exception tests.  11.2 Encourage design which is resilient to climate change including hotter, drier summers and more extreme weather events.  11.3 Promote the uptake of sustainable drainage systems.  11.4 Support the development of a <i>strategic network</i> of green infrastructure.
Biodiversity	12. To conserve and enhance the region's biodiversity.	12.1 Maintain a functioning ecological network and improve the resilience of natural systems, flora, fauna, soils and semi-natural habitat.  <i>12.2 Improve biodiversity</i>  <i>12.3 Protect and enhance the capacity of ecosystem services.</i>  12.4 Conserve, enhance, restore, expand and reconnect areas of priority habitat ('Bigger, better, more and joined').  [see climate change adaptation theme for green infrastructure sub objective]

<b>Table 4.4: Sustainability Appraisal Framework</b>		
<b>Theme</b>	<b>Objectives</b>	<b>Sub-Objectives</b>
Climate Change Mitigation	13. To address the causes of climate change through reducing emissions of greenhouse gases	13.1 Support low carbon / renewable energy generation.
Archaeological and Cultural Heritage	14. Conserve and enhance the historic environment, heritage assets and their settings	14.1 Help the historic environment adapt to changing conditions arising from climate change (warmer, wetter, infestations etc.)  14.2 Protect designated and non-designated heritage assets from the potential effects of developments and seek overall enhancements.
<b>Economic</b>		
Economy	15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town	15.1 Encourage development of appropriate infrastructure and employment sites to support local businesses, communities & tourism.  <i>15.2 Protect and enhance the role of Lewes' heritage assets in the town's economy by making best use of their heritage significance.</i>  15.3 Recognise and support core sectors of the South Downs economy such as food & drink, and tourism.  15.4 Maintain Lewes' market town functions.  15.5 Support improving local skills.

## 5 Alternatives Assessed and Reasons for Choosing / Rejecting Alternatives

### 5.1 Introduction

The options / alternatives considered in the SA have been potential allocation sites and a 'no plan' option. All potential allocation sites identified as reasonable options have been assessed as a part of the SA.

### 5.2 Assessment of the 'no Neighbourhood Plan' Option

The 'no plan' option was considered at the same time that the draft Plan policies were assessed. The assessment of this option is presented in Annex F and is summarised below:

- In most instances the 'no Neighbourhood Plan' option is likely to result in a positive or neutral effect;
- Without the Neighbourhood Plan there is potential for minor negative cumulative effects due to a loss of community facilities / infrastructure over the long term;
- Without the Neighbourhood Plan, Core Strategies and Local Plan policies would be relied upon in order to protect employment uses, skills and land. Manufacturing and the provision of live-work units which could support crafts people might not be specifically supported without the Neighbourhood Plan and this could result in minor negative effects for the economy; and
- In some instances, the 'no plan' alternative assessment identifies uncertainty. Without the Neighbourhood Plan, it is unclear as to whether larger development sites (of 5 dwellings or more) within the town will specifically protect and enhance ecosystem services. Development could potentially come forward on greenfield land without the direction in Neighbourhood Plan Policy PL1a.

### 5.3 Assessment of site allocation options

32 site allocation options have been assessed and the findings are presented in Annex E and summarised below. The Neighbourhood Plan group used the detailed findings to inform the selection of sites for inclusion within the Lewes Neighbourhood Plan as allocations.

In summary, the SA of the potential allocation sites identified the following:

- Sites further away from Lewes town centre do not perform well with regard to accessibility and encouraging greater use of sustainable transport modes (SA objectives 3 and 4);
- Sites within the centre perform more positively with regards to accessibility and sustainable transport (SA objectives 3 and 4);
- All sites, if developed, could potentially increase the use of private vehicles within the centre of Lewes (SA objective 7). However, the sites within or close to the centre could be more



suited to higher density development and present the opportunity to limit car parking provided on site in order to limit an increase in car use. It may not be possible to mitigate for lack of accessibility and lack of sustainable transport options for the sites which further away from the centre;

- Greenfield sites have not performed well with regard to the efficient use of land and protection of soil resources, and potential significant negative effects have been identified, particularly for larger sites (SA objective 10);
- A number of sites do not perform well with regards to flood risk as they are located within high flood zones 2 or 3. Conversely, such sites have tended to perform well with regard to accessibility to facilities and sustainable transport options due to their locations near to the centre of Lewes (SA objective 11);
- The assessments have identified some particular significant negative effects for some sites in relation to potential effects on water resources / watercourses, heritage and landscape/townscape; and
- The assessment identified that all sites could have significant positive effects with regards to the provision of new housing (SA objective 5) and all sites could contribute to water efficiency and limiting contributions to climate change through energy efficiency measures / renewable energy generation (SA objectives 9 and 13).

## 5.4 Reasons for Selecting / Rejecting Alternatives

A pro forma was completed for each potential site allocation based on available information. A blank pro forma is provided in Annex E.

A meeting was held on 29<sup>th</sup> March 2017 between members of the Neighbourhood Plan Group and officers from the South Downs National Park Authority. At the meeting, the completed site pro forma were reviewed and decisions made based on the available information within the site pro forma and the findings of the SA of sites.

Annex E presents the sites which were not selected as site allocations for inclusion within the Neighbourhood Plan and the reasons why they were not selected. The reasons for not choosing sites include that they are greenfield, they could be associated with particular environmental impacts such as that they are located within the AQMA, the site is in a particularly sensitive area, and / or they do not present the benefits that other sites do and the site is constrained in other ways.

Two sites were removed from the Plan following the public consultation on the Pre Submission Neighbourhood Plan between 8<sup>th</sup> May 2017 and 21<sup>st</sup> June 2017.

- Landport Garages; and
- Spring Barn Farm.

Following examination in September 2018, two further sites were removed from the Plan:

- Land at Blois Road, Garage Site North; and
- Land at Blois Road, Garage Site South

## 6 Results of the Assessment of the Neighbourhood Plan

### 6.1 Introduction

A draft of the Lewes Neighbourhood Plan policies was assessed in March 2017. The plan as a whole (excluding the allocation sites because they had not been chosen at the time of the assessment) was assessed against the SA Framework. Mitigation measures were put forward to address any potential negative or uncertain effects identified and enhancement measures were also identified which could help to improve the sustainability of the Neighbourhood Plan.

This initial assessment of the draft site allocation policies is presented in Annex E. The initial assessment of draft plan policies is presented in Annex F. The mitigation and enhancement measures put forward in Annex F were reviewed by the Neighbourhood Plan Group and changes were made to the Neighbourhood Plan as a result. The findings of the SA were then revised during April / May 2017 to produce residual effects of the Pre Submission Neighbourhood Development Plan, including the effects of the allocation site policies. Following the Pre Submission consultation and subsequent amendment to the Neighbourhood Plan, the SA Report was reviewed and updated in April / May 2018 so that it reflects the Submission version of the Plan. Further amendments to the SA Report have been made in January 2019, on receipt of the Examination Report.

The significant residual effects (including cumulative effects) of the Submission Neighbourhood Plan are presented in Annex F and are summarised in Tables 6.1 and 6.2 below. The nature of effects (e.g. duration, magnitude) can be found in the detailed assessments presented in Annex F.

Table 6.1 presents the potential residual significant positive effects of the Neighbourhood Plan.

<b>Table 6.1: Potential Residual Positive Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation</b>
SA2. To create and sustain vibrant communities which recognise the needs	<p>Policy HC1 seeks to retain and enhance 'community facilities' including places where people and meet and "neighbours can get to know each other".</p> <p>Several policies within the plan seek to ensure that developer contributions are received from the strategic development sites to benefit the community, such as</p>

<b>Table 6.1: Potential Residual Positive Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation</b>
and contributions of all individuals.	policy AM1. Policy SS2 seeks to maintain and develop a clear network of well-designed social and civic spaces which will help to support the cultural life of the town and community cohesion.
SA3. To improve accessibility to all services and facilities.	<p>Policy HC1 seeks to retain existing 'community facilities' which are loosely defined within the supporting text. The policy is strong with regards to potential change of use from retail but weaker with regards to other uses, such as a community buildings. Enhancement of existing facilities is encouraged by the policy.</p> <p>Policy HC2 supports new community facilities and again the supporting text loosely defines these to include retail facilities, community buildings, health facilities.</p> <p>Policy AM1 promotes active travel options in the town; protecting and enhancing walking and cycling routes and ensuring new developments have active accessibility to facilities.</p> <p>Policy AM2 seeks to protect and improve public transport services and facilities, including protecting the bus station location, unless it is integrated with the train station.</p>
SA4. To improve the efficiency of transport networks by enhancing the proportion of travel by sustainable modes and by promoting policies which reduce the need to travel.	<p>Policy HC5 Sustainable Tourism seeks to protect and signpost pedestrian and cycle routes to the downs from the railway and bus station. The policy requires large scale tourism developments to submit a travel plan and to encourage visitors to travel by sustainable means.</p> <p>Policy AM2 seeks to protect and improve public transport services and facilities, including protecting the bus station location, unless it is integrated with the train station.</p> <p>Policy AM1 seeks to improve the walking and cycling network in the town and link it to routes in the surrounding countryside. This policy also seeks to make the central streets more pedestrian friendly and as car-free as possible. Policy AM3 supports the rationalisation of car parks in the town to create an easier to understand system. The supporting text of policy AM3 supports the rationalisation of car parks and their redevelopment if appropriate.</p>
SA5. To ensure that everyone has the opportunity to live in a good quality,	Policy PL1a supports the delivery of affordable housing which supports the achievement of this objective. It encourages the provision of 1-3 bed homes to meet local housing need. Policy PL2 requires, where possible, developments should meet the Building Regulations (Part M4 (3)) Accessible and Adaptable

<b>Table 6.1: Potential Residual Positive Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation</b>
affordable home, suitable to their need and which optimises the scope for environmental sustainability	<p>Buildings<sup>6</sup> standards and at least a proportion of larger developments should meet the (Part M4 (3)) Wheelchair User Dwellings<sup>6</sup> for disabled living, or be capable of being readily adapted to residents' changing circumstances. It does not make any other specific provision with regards to the needs of older generations. Some of the housing allocations, such as PL1 (3, 57, 13) could be particularly suitable for older generations with regards to their location, easily accessible to facilities and services on level ground.</p> <p>Policy PL4 actively encourages new and existing homes to incorporate water and energy saving measures and renewable energy generation.</p>
SA6. To encourage increased engagement in cultural activity across all sections of the community in the SDNP and promote sustainable tourism	<p>Policy HC5 supports proposals which can demonstrate that they will have a positive impact on tourism. This policy also sets out a number of measures to better accommodate tourists within the town.</p> <p>Policy HC1 also seeks to protect community facilities, and also includes public WCs, thereby providing facilities for visitors and locals.</p> <p>Policy SS2 seeks to maintain and develop a clear network of well-designed social and civic spaces that can help support the cultural and economic life of the town.</p>
SA8. To conserve and enhance landscape character.	<p>Policy PL2 seeks good design which complements and enhances the Lewesian built environment; with requirements for design to respect and enhance the conservation areas and modern techniques and designs encouraged outside of the Lewes and the Malling Deanery Conservation Areas.</p> <p>Policy HC3 seeks to protect the townscape of Lewes.</p> <p>The Neighbourhood Plan supporting text includes design guidance for proponents of new developments and this is referred to in Policy PL2.</p> <p>Policy SS3 seeks to preserve iconic views from the town to the countryside and the town from the downland; requires sensitivity of landscape quality to be recognised and enhanced.</p> <p>Policy SS4 seeks to preserve the river corridor and maintain cycling and walking access to the riverside. This will contribute to maintaining this important setting to Lewes town, particularly the town's two main conservation areas.</p>

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<sup>6</sup> Building Regulations Part M4, Building Regulations Part M4, 2010

<b>Table 6.1: Potential Residual Positive Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation</b>
	Potential negative effects of some site allocations were identified in the SA and mitigation measures (such as landscape assessment and mitigation) have been built into the requirements of the PL1(a and b) policies.
SA9. To maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management	Policy PL4 actively encourages water efficiency measures in new buildings and when buildings are redesigned, including with regards to fixtures and fittings. Potential negative effects of some site allocations on watercourses were identified in the SA and mitigation measures (such as suitable assessment and mitigation) have been built into the requirements of the PL1 (a and b) policies.
SA10. Protect soil resources and make the most efficient use of land	Policy PL1a directs new housing away from greenfield sites which will make efficient use of land in delivering the 220+ housing target set by the Core Strategy.  Policy PL2 encourages efficient use of land by encouraging the flat roofs of industrial and commercial buildings to be green and to support solar panels.  Policy SS3 seeks to promote community food production.
SA12. To conserve and enhance the region's biodiversity.	The majority of the plan performs very positively with regards to this SA Objective. Mitigation measures have been included within the plan to address potential negative effects of the allocation sites and as a result it is considered that the Plan as a whole will result in significant positive effects with regards to SA12. LNP Policy LE2 expects development proposals to provide a net gain in biodiversity and Policy PL1b also sets out ecosystem design responses for allocation sites.
SA13. To address the causes of climate change through reducing emissions of greenhouse gases	Policy PL4 fully supports and encourages low and zero carbon developments; the installation of low carbon / renewable generation within new developments and encourages retrofitting existing buildings.
SA14. Conserve and enhance the historic environment, heritage assets and their settings	Policy HC3 Heritage Protection seeks to protect townscape, heritage assets not already designed, the conservation areas and historic fabric of Lewes. Policy seeks enhancement as well as protection, particularly in relation to buildings which are currently causing harm to the conservation areas. The supporting text

<b>Table 6.1: Potential Residual Positive Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation</b>
	<p>of Policy HC3 mentions the need for adaptation of historic assets to climate change and that the Neighbourhood Plan monitoring will need to address this.</p> <p>The supporting text of Policy HC3 states that heritage assets also includes archaeology, scheduled monuments and currently unknown assets.</p> <p>Policy SS1 seeks to protect and enhance the network of historic streets and lanes of the conservation areas of the town.</p> <p>Policy SS4 seeks to preserve the river corridor and maintain cycling and walking access to the riverside. This will contribute to maintaining this important setting to Lewes town, particularly within the conservation areas.</p> <p>Policy PL1a stipulates that the development and subdivision of any building must protect listed buildings and/or the character or appearance of a conservation area. The policy seeks to protect the conservation area and heritage assets by ensuring development includes measures to avoid or minimise harm to the heritage asset concerned.</p> <p>The assessments of the site allocation policies (PL1b) have identified a number of potential negative effects and mitigation has been put in place to protect heritage assets, where applicable.</p>
SA15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town	<p>Policy HC4 seeks to protect and enhance the existing employment land and premises across the plan area. It also encourages the enhancement of heritage assets for economic purposes.</p> <p>Policy HC5 supports sustainable tourism. Policies HC1 and HC2 seek to protect and enhance local retail, thereby maintaining the market town functions of Lewes.</p> <p>The Neighbourhood Plan policies do not specifically support the food and drink sector but do support manufacturing, which is a traditional sector in the town, amongst others such as brewing. The Neighbourhood Plan policies support the provision of live work units and the protection of employment land within the town. These will help to support the retention of local skills and the potential for others to gain employment in the town. The supporting text includes a number of projects aimed at supporting the transfer of local traditional skills.</p>

A number of potential residual significant negative effects have been identified in the assessment of the plan. These are all resulting from allocation sites in Policy PL1b. Mitigation measures proposed to address the potential significant negative and uncertain effects are also included within Table 6.2.

<b>Table 6.2: Potential Residual Negative Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation</b>
SA7. To reduce air, noise and light pollution	<p>All of the site allocations have the potential to increase air pollution within Lewes, particularly within the town centre, where there is an Air Quality Management Area. A potential significant cumulative negative effect has therefore been identified in relation to air quality.</p> <p>Mitigation has been built into the Neighbourhood Plan, as far as is considered to be possible. Neighbourhood Plan Policy AM3 requires provision of electric car charging points within town centre car parks and within new developments and this could help to mitigate for a potential negative effect on air quality. For allocation sites which are located within or close to the town centre, with good accessibility to services and facilities by foot and cycle, the relevant PL1b policies include a requirement to limit carparking provision to one space per household, in order to minimise air pollution. However, it is still possible for an overall negative effect to occur.</p>
SA11. To ensure the SDNP communities are prepared for the impacts of climate change.	<p>The majority of the plan performs very positively with regards to this SA Objective; however, some potential negative effects were identified in relation to Policy PL1b associated with some of the site allocations. Site allocations 13, 26 and 39 are located within flood zone 3 or contain some flood zone 3. (Site allocations 3, 36, 48 and 57 are located within flood zone 2.)</p> <p>These sites need to pass sequential and exception test. Flood risk assessment is required as a part of planning permission to determine if the sites are located in flood zones 3a or 3b. The sites may not pass sequential test if other sites outside of flood zone 3 are available. If a site is in flood zone 3a, development may be possible and mitigation would be required to manage flood risk and surface water on site.</p>

## 7 Monitoring

The SEA Regulations require monitoring of the significant environmental effects of implementing the Lewes Neighbourhood Plan. SA monitoring will cover the significant economic and social effects, as well as the environmental ones.

The policies and objectives of the Neighbourhood Plan will be delivered in the context of the South Downs Local Plan and within the wider policy framework that sits alongside the planning system. For this reason, monitoring the sustainability effects of implementing the Lewes Neighbourhood Plan will be undertaken and conducted as part of the overall approach to monitoring undertaken by the South Downs National Park Authority. Accordingly, the proposals set out here will be aligned with the Local Plan monitoring proposals as they emerge.

Table 7.1 therefore sets out proposed monitoring for the Lewes Neighbourhood Plan which focuses on the significant sustainability effects and where monitoring would enable preventative or mitigation measures to be taken.

The provisions on monitoring apply after the Neighbourhood Plan has been adopted, and therefore the monitoring proposals set out in Table 7.1 are a draft framework. The final SA monitoring programme will be included in the SA adoption statement (once the plan is adopted) and this will reflect any changes made to the Neighbourhood Plan and SA prior to adoption.

<b>Table 7.1: Proposals for Monitoring the Sustainability Effects of Implementing the Lewes Neighbourhood Plan</b>	
<b>Significant residual effects and uncertainties</b>	<b>What needs to be monitored?</b>
Potential negative noise effects on some new developments, from railway lines and the A26	Noise assessments are submitted with planning applications for sites 3, 8, 57 and 35. Planning obligations requiring noise mitigation to be incorporated into development designs.
Potential cumulative negative effects on air quality	Air quality in Lewes
Potential negative effects on landscape character	Landscape assessments submitted with a planning application for site 8. Planning obligations requiring landscape mitigation to be incorporated into development designs.
Potential negative effects on water quality	Water quality assessments submitted for site 26. Planning obligations requiring water quality mitigation to be incorporated into development designs.



<b>Table 7.1: Proposals for Monitoring the Sustainability Effects of Implementing the Lewes Neighbourhood Plan</b>	
<b>Significant residual effects and uncertainties</b>	<b>What needs to be monitored?</b>
Potential negative effects relating to flood risk.	<p>Site flood risk assessments submitted with planning applications for sites 3, 13, 36, 39, 48 and 57.</p> <p>Evidence that sequential test completed, particularly for sites 13, 26 and 39 located within flood zone 3 or containing some flood zone 3.</p> <p>Planning obligations requiring incorporation of flood risk mitigation in the designs of these sites.</p>
Potential negative effects on nature conservation sites, habitats and species	<p>Ecological assessments submitted with planning applications for sites 8, 21, 26, 35, 39, 44, 46 and 53.</p> <p>Planning obligations requiring incorporation of ecological mitigation in the designs of these sites.</p>
Potential negative effects on the heritage assets	<p>Archaeological and cultural heritage assessments submitted with planning applications for sites 8, 13 and 46.</p> <p>Planning obligations requiring incorporation of archaeological and cultural heritage mitigation in the designs of these sites.</p>

## 8 Next Steps

The revised referendum version of the Neighbourhood Plan will be formally submitted to the SDNPA along with this SA Report. Following independent examination, it has been concluded that Lewes Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan and will therefore proceed to referendum.

If the referendum is successful, the Neighbourhood Plan will then be 'made' by South Downs National Park Authority and adopted as a part of the statutory Development Plan for the National Park.

## **Annex A:**

### **How have the SEA Regulations been met?**

## Introduction

Table A.1 signposts the relevant sections of the SA Report that represent the required contents of the statutory Environmental Report.

<b>Table A.1: How the Requirements of the SEA Regulations have been met</b>	
<b>SEA Regulations – requirement for an Environmental Report</b>	<b>Where covered in the SA Report</b>
Preparation of an environmental report in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme, are identified, described and evaluated.	The whole SA Report does this.
An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	The contents and main objectives of the plan are presented in Section 3. The plan's relationships to other plans and programmes is addressed in Sections 3, 4 and Annex B.
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme and the environmental characteristics of areas likely to be significantly affected.	Section 4 and Annex C and D
Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	Section 4
The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	Section 4 describes how environmental protection objectives have been taken into account in the SA.
The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Section 6 and Annex E (the definition of significance is addressed in Section 2 Methodology).
The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	Section 5, 6 and Annexes E and F
An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Section 5. Difficulties are addressed in Section 2.6.

<b>Table A.1: How the Requirements of the SEA Regulations have been met</b>	
<b>SEA Regulations – requirement for an Environmental Report</b>	<b>Where covered in the SA Report</b>
A description of measures envisaged concerning monitoring in accordance with Regulation 17.	Section 7
A non-technical summary of the information provided under the above headings.	Separate Non-Technical Summary
The report shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process to avoid duplication of the assessment (Regulation 12(3) and (4))	The whole SA Report does this.
Consultation Authorities with environmental responsibility and the public shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Regulation 13).	The public and environmental authorities have been given the opportunity to comment on this report. The consultation information is provided in Section 1.