



Lewes Neighbourhood Plan

**Sustainability Appraisal**

**Non-Technical Summary**

Prepared on behalf of:

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

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## 1 Introduction

Lewes Town Council ('the Town Council') has commenced preparation of the Lewes Neighbourhood Plan. The plan sets out visions for the town through until 2030 and is supported by a set of planning policies and a series of specific projects. The document summarises the Sustainability Appraisal (SA) of the Neighbourhood Plan. A full SA Report with separate annex documents has also been prepared and further details can be found in these documents which are available on the Lewes Town Council website <http://www.lewes-tc.gov.uk/>.

### 1.1 What is a Sustainability Appraisal?

A SA has been undertaken on the Lewes Town Council Neighbourhood Plan as required by the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). Neighbourhood Groups use SA to evaluate Neighbourhood Plans against a set of objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental, social and economic effects, as well as identifying opportunities to improve the environmental quality of Lewes and the quality of life of residents through the Neighbourhood Plan.

### 1.2 What is Neighbourhood Planning?

Neighbourhood planning is a community-led process introduced by Government which gives communities direct power to develop a shared vision for their neighbourhood and shape future development and growth within their local area. It allows local people to ensure that they get the right types of development for their community, where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider local area. Neighbourhood Plans are produced by community forum groups or parish or town councils and are policy-based, community-led plans which correspond to the area's Local Plan.

### 1.3 Lewes Neighbourhood Plan

The Neighbourhood Plan has been informed by the strategic policies in the South Downs National Park Joint Core Strategy, and the emerging South Downs Local Plan. The Plan Area is the same as the Parish boundary and is shown in Figure NTS1. In accordance with the neighbourhood planning regulations, this plan has been prepared through extensive community consultation. The vision and objectives have been derived from consultation work undertaken as part of the process of drafting the Lewes Neighbourhood Plan.

The Vision for Lewes Neighbourhood Plan is as follows:

*"Lewes will be a place that looks to the future by creating and nurturing **sustainable communities**. It will be a place that embraces **new development opportunities** where they support a living and working town and where they **respond to a changing climate** and **improve access** to the surrounding countryside. The use of effective community planning techniques will be key to the town's success".*

## 1.4 Objectives of the Neighbourhood Plan

The plan objectives cover:

- Sustainable communities;
- Locally affordable homes and workspaces, which will be flexible and provide a good quality of life, now and in the future, for people of all ages;
- Efficient use of land for development which will be both sensitive to the environment and the historic character of the town;
- Providing greater accessibility to the town and wider countryside, by providing more segregated walking and cycling routes and more sustainable public transport, for both residents and tourists;
- Promoting developments which encourage biodiversity; and
- Encouraging development which is resilient to climate change (particularly flooding).

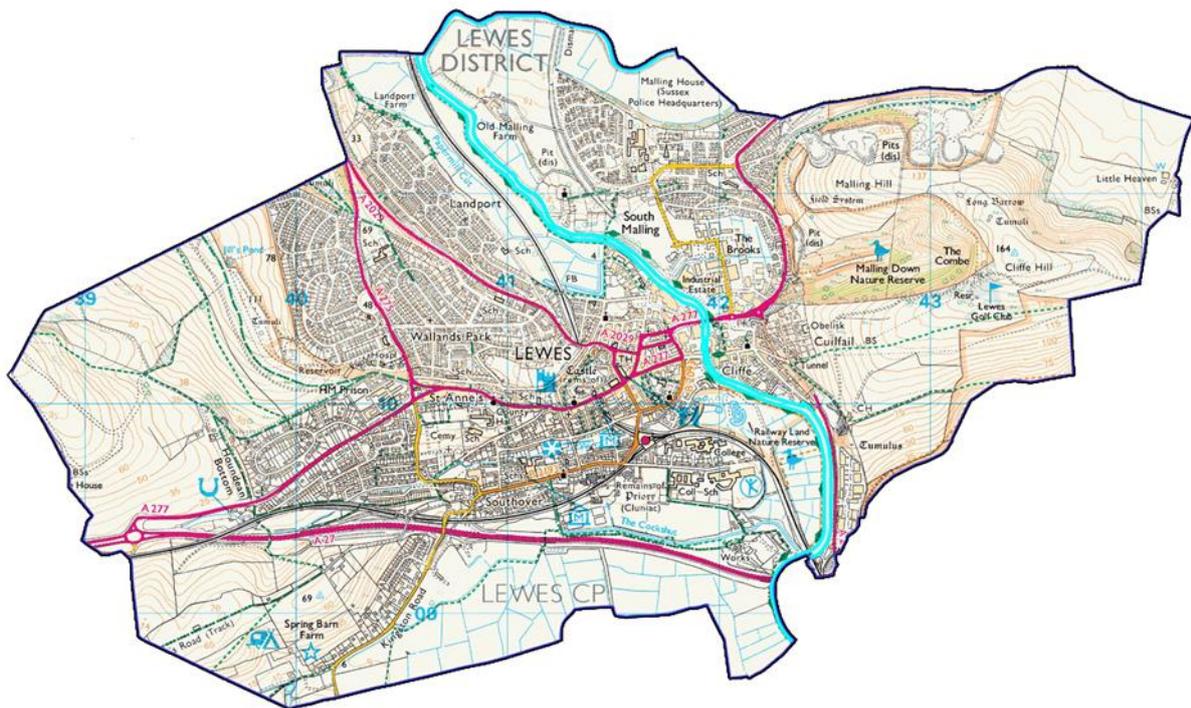


Figure NTS1: Lewes Neighbourhood Plan Area

## **1.5 What is the current situation in the Neighbourhood Plan Area?**

In order to test whether the Neighbourhood Plan will contribute to improving the economic, social and environmental situation in Lewes, we need to understand the how things are currently and how they might change without a Neighbourhood Plan. Table NTS.1 presents this information.

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. Inconsistencies in data collected and availability over time has made identifying trends difficult in some circumstances.

Some baseline data was only available for the Lewes District.

No other difficulties have been encountered in collating the baseline data.

Some assumptions have been made in the assessments of the plan, including in relation to the site allocations assessed. The assumptions are detailed within Annexes E and F of the SA Report.

**Table NTS.1: Characteristic of the Area, Sustainability Issues & Likely Evolution without the Neighbourhood Plan**

Theme	Characteristic of the Area	Sustainability Issues	Likely Evolution without the Neighbourhood Plan
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> <li>The character of the town and surrounding landscape is influenced by the Downs, which border the town to the south, and the</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 surrounding environment in the west of the town.</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 NTS.1: 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>Low Weald landscape character area which extends out to the north.</p> <ul style="list-style-type: none"> <li>The unique landscape in an around Lewes offers an important source for health, leisure and tranquillity.</li> </ul>		
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 kilometres or 150 square miles (38,921 hectares / 96,175 acres).</li> <li>The Lewes District Informal Recreational Space Study identified that many residents felt that the access to the wider countryside was poor.</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> <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>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> <li>Habitats that are less resilient to climate change.</li> <li>Increase threat to the condition of SSSI sites in the town.</li> </ul>

**Table NTS.1: Characteristic of the Area, Sustainability Issues & Likely Evolution without the Neighbourhood Plan**

Theme	Characteristic of the Area	Sustainability Issues	Likely Evolution without the Neighbourhood Plan
	<ul style="list-style-type: none"> <li>The Lewes Railway land is an important local resource for Wildlife, education and recreation.</li> </ul>		
Archaeological & Cultural Heritage	<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>
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> </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> </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> </ul>

<b>Table NTS.1: 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 total cost of the flooding was given as £88 million.</li> </ul>	<ul style="list-style-type: none"> <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 measures in place, levels of pollution could continue to rise.</li> </ul>
<b>Community &amp; Wellbeing</b>	<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, 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>
<b>Economy</b>	<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 destination and potential for economic benefits.</li> <li>Lewes is home to London commuters as well as small craft workers and artisans.</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> <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</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 economy; food and drink and timber and wood.</li> <li>Tourism may become increasingly important in the town as it provides a gateway into the National Park.</li> </ul>

<b>Table NTS.1: 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>
		the recession, causing damage to local economies.	
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>

## 2 How the Plan and its Alternatives Were Assessed

The sustainability issues and the environmental protection objectives of other plans, programmes and policies which are relevant to the Lewes Neighbourhood Plan have been reviewed and used to develop a framework of sustainability objectives and sub-objectives.

The SA Framework is presented in Table NTS.2.

<b>Table NTS.2: Sustainability Appraisal Framework</b>	
<b>Objectives</b>	<b>Sub-Objectives</b>
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.
2. To create and sustain vibrant communities which recognise the needs and contributions of all individuals.	2.1 Support community cohesion
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.
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 4.2 Minimise the impact of vehicles and car parking on the town.

<b>Table NTS.2: Sustainability Appraisal Framework</b>	
<b>Objectives</b>	<b>Sub-Objectives</b>
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.
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
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. 7.3 Improve air quality
8. To conserve and enhance landscape character.	8.1 Conserve and enhance the landscape character ( 8.2 Seek good design which complements and enhances the existing character
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.
10. Protect soil resources and make the most efficient use of land	10.1 Achieve efficient use of land. 10.2 Protect soil resources

<b>Table NTS.2: Sustainability Appraisal Framework</b>	
<b>Objectives</b>	<b>Sub-Objectives</b>
11. To ensure the SDNP communities are prepared for the impacts of climate change.	<p>11.1 Minimise the risk of flooding to new development through application of the sequential and exception tests.</p> <p>11.2 Encourage design which is resilient to climate change including hotter, drier summers and more extreme weather events.</p> <p>11.3 Promote the uptake of sustainable drainage systems.</p> <p>11.4 Support the development of a strategic network of green infrastructure.</p>
12. To conserve and enhance the region's biodiversity.	<p>12.1 Maintain a functioning ecological network and improve the resilience of natural systems, flora, fauna, soils and semi-natural habitat.</p> <p>12.2 Improve biodiversity</p> <p>12.3 Protect and enhance the capacity of ecosystem services.</p> <p>12.4 Conserve, enhance, restore, expand and reconnect areas of priority habitat ('Bigger, better, more and joined').</p>
13. To address the causes of climate change through reducing emissions of greenhouse gases	13.1 Support low carbon / renewable energy generation.
14. Conserve and enhance the historic environment, heritage assets and their settings	<p>14.1 Help the historic environment adapt to changing conditions arising from climate change (warmer, wetter, infestations etc.)</p> <p>14.2 Protect designated and non-designated heritage assets from the potential effects of developments and seek overall enhancements.</p>

<b>Table NTS.2: Sustainability Appraisal Framework</b>	
<b>Objectives</b>	<b>Sub-Objectives</b>
<p>15. To encourage development of the economy in a manner that balances business interests to maintain a vibrant town</p>	<p>15.1 Encourage development of appropriate infrastructure and employment sites to support local businesses, communities &amp; tourism.</p> <p>15.2 Protect and enhance the role of Lewes' heritage assets in the town's economy by making best use of their heritage significance.</p> <p>15.3 Recognise and support core sectors of the South Downs economy such as food &amp; drink, and tourism.</p> <p>15.4 Maintain Lewes' market town functions.</p> <p>15.5 Support improving local skills.</p>

### 3 Assessment of Alternatives and the Reasons for Choosing the Plan

It's important the Plan and any alternatives are assessed to the same level of detail in SA. The options / alternatives considered 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.

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 of the main SA Report.

32 site allocation options have been assessed and the findings are presented in Annex E of the main SA Report. 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 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).

A '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 of the SA Report 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 Strategy 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 PL1.

### 3.1 Reasons for Selecting / Rejecting Alternatives

A form was completed for each potential site allocation based on available information. A blank form is provided in Annex E of the main SA Report.

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 of the main SA Report 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.

## 4 Sustainability of the Neighbourhood Plan

Following the assessment of site options, the draft Neighbourhood Plan policies were assessed for their sustainability effects. The assessment has identified that the Lewes Neighbourhood Plan is likely to result in a number of significant positive effects. The plan should:

- Help to create and sustain vibrant communities which recognise the needs and contributions of all individuals;
- Improve accessibility to all services and facilities;
- 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;
- 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;

- Encourage increased engagement in cultural activity across all sections of the community and promote sustainable tourism;
- Conserve and enhance landscape character;
- Maintain and improve water quality and encourage its conservation, and to achieve sustainable water resources management;
- Protect soil resources and make the most efficient use of land;
- Address the causes of climate change through reducing emissions of greenhouse gases;
- Conserve and enhance the historic environment, heritage assets and their settings; and
- Encourage development of the economy in a manner that balances business interests to maintain a vibrant town.

However, a number of potential significant negative effects have also been identified in the assessment of the plan. These are all resulting from some of the development allocation sites in Policy PL1. The potential significant negative effects of the plan are presented in the following table.

<b>Table NTS.3: Potential Negative Significant Effects of the Lewes Neighbourhood Plan</b>	
<b>SA Objective</b>	<b>Explanation and Mitigation Measures to Minimise or Avoid Effects</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 negative effect has been identified which could result from the combination of a number of potential minor negative effects on air quality from the allocation sites accumulating into a significant effect on 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 PL1 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 PL1 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>Sites 13, 26 and 39 need to pass sequential and exception test. Flood risk assessment required as a part of planning permission to determine if site is located in flood zone 3a or 3b. Site may not pass sequential test if other sites outside of flood zone 3 are available. If 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>

**Table NTS.3: Potential Negative Significant Effects of the Lewes Neighbourhood Plan**

<p>SA12. To conserve and enhance the region's biodiversity.</p>	<p>The majority of the plan performs very positively with regards to this SA Objective. However, although the site allocation policies under Policy PL1 all set out ecosystem services enhancements which could be delivered on the sites, the policies do not address potential negative effects associated with the developments and do not include policy wording requiring ecological assessments and mitigation, in such cases. Significant negative effects are identified in relation to the following sites and these require HRA screening:</p> <ul style="list-style-type: none"> <li>• Site 35 – potential significant effects on Lewes Downs SAC and cumulative effect with sites 39, 44 and 46;</li> <li>• Site 39 – potential significant effects on Lewes Downs SAC and cumulative effect with sites 35, 44 and 46;</li> <li>• Site 44 – potential significant effects on Lewes Downs SAC and cumulative effect with sites 35, 39 and 46; and</li> <li>• Site 46 – potential significant effects on Lewes Down and cumulative effects with sites 35, 39 and 44.</li> </ul>
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Other measures have been suggested within the assessment in order to avoid other potential negative effects from occurring. These measures have been built into the policies of the Neighbourhood Plan and include requiring certain environmental assessments (e.g. ecology, noise, historic, water, flood risk etc) to be undertaken for some of the site allocations at the planning application stage.

## 5 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.

Monitoring the sustainability effects of implementing the Lewes Neighbourhood Plan will be undertaken as part of the overall approach to monitoring undertaken by the South Downs National Park Authority. The proposals set out here will be aligned with the Local Plan monitoring proposals as they emerge.

Table NTS.4 therefore sets out proposed monitoring for the Lewes Neighbourhood Plan which focuses on the significant sustainability effects, the significant effects and where monitoring would enable preventative 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 NTS.4 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.

**Table NTS.4: Proposals for Monitoring the Sustainability Effects of Implementing the Lewes Neighbourhood Plan**

<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, 30, 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 planning applications for sites 8, 30 and 50. Planning obligations requiring landscape mitigation to be incorporated into development designs.
Potential negative effects on water quality	Water quality assessments submitted for sites 50 and 26. Planning obligations requiring water quality mitigation to be incorporated into development designs.
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, 30 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 26, 35, 39, 44, 46 and 50.</p> <p>HRA screening submitted with planning applications for sites 35, 39, 44 and 46.</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>

## 6 Next Steps

The SA Report is currently out to consultation and you can comment using the contact details below.

**How to comment on the SA Report:**

[info@lewes-tc.gov.uk](mailto:info@lewes-tc.gov.uk)

or Town Clerk,  
Lewes Town Council,  
Town Hall,  
High Street,  
Lewes,  
East Sussex, BN7 2QS

**By 21<sup>st</sup> June 2017**

Following the consultation on the draft Lewes Neighbourhood Plan and this SA Report, the consultation responses will be considered and changes made to the plan and SA as necessary.

The revised Neighbourhood Plan will then be formally submitted to the South Downs National Park Authority along with the SA Report, updated if necessary.

The plan will then be published for a further six-week period of consultation, after which an independent Planning Inspector will be appointed to examine the plan in a series of public meetings. Should the independent Planning Inspector find the Neighbourhood Plan to be in conformity with the basic conditions, then it will go forward to be the subject of a referendum, to be voted upon by the residents of the Parish.

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.