A copy of the Wealden Local Plan Sustainability Appraisal and associated documents can be downloaded from the Planning Policy pages of the Wealden website, www.wealden.gov.uk/planningpolicy or scan the QR code below with your smart phone.
PART A

1.0 Introduction

1.1 This Sustainability Appraisal (SA) Report has been prepared to accompany the Wealden Local Plan Issues, Options and Recommendations Consultation Paper which is out for consultation from 19th October to 30th November 2015. It provides a sustainability appraisal (incorporating Strategic Environmental Assessment), using best available information, of the reasonable options/alternatives considered as a part of the development of the Wealden Local Plan, presented in the Consultation paper.

1.2 Comments are invited on this SA Report as part of the consultation. The information contained in the SA will be used to help inform the Council’s decision on which strategy (or combination of strategies) will be taken forward in preparing the Proposed Submission Wealden Local Plan.

1.3 Prior to setting out the appraisal of the options/alternatives, this report also updates some of the information that was set out in the SA Scoping Report that was consulted upon during May/June 2015. These include minor amendments to text within the document as well as minor amendments to some baseline data.

Background

1.4 A Local Plan can comprise either a single or multiple documents which together guide the future of development in the District and provide the planning framework within which this will be delivered.

1.5 The Wealden Local Plan is a document which will contain the overarching strategic policies, site allocations and development management policies which will influence development in the District until 2037. It will eventually supersede the adopted Core Strategy (2013) and the Wealden Local Plan adopted in 1998. Further information regarding the timescales of the plan and other Local Plan documents can be found in the Council’s Local Development Scheme (LDS).

1.6 The greatest challenge facing the Council is the need to plan for new housing and economic growth whilst ensuring the unique and special environment of the District is protected. In order to test different options/alternatives the Council has published a Wealden Local Plan Issues, Options and Recommendations Consultation Paper (October 2015) for consultation.

1.7 Determining the most appropriate development strategy for the District is a complex and sometimes controversial matter. The Wealden Local Plan Consultation Paper allows the public to be involved in the process at an early
stage, when it is possible to influence and help shape the spatial strategy for the District.

1.8 SA is a mechanism for considering and communicating the likely significant effects of a draft plan, and alternatives, in terms of sustainability issues. The purpose of the SA is to establish where these effects exist in order that they may be avoided altogether or mitigated against and so that decisions can be made to maximise the positive sustainability effects which can be achieved by the plan.

1.9 The purpose of this SA Report is to identify reasonable alternatives and detail the sustainability effects of all the reasonable options/alternatives considered by the Council for the spatial strategy of the District. The formal SA process is an iterative part of plan preparation and considers a wide range of issues, including employment provision (amount and locations), new retail provision (if required) and the sustainability of policies proposed for inclusion within the plan, in addition to the quantum, delivery, spatial distribution and specific locations of housing sites once they are identified.

Sustainable Development

1.10 In developing the plan, the National Planning Policy Framework (NPPF) requires the Council to contribute to the achievement of sustainable development. For planning policy this means seeking to achieve economic, social and environmental benefits for the District. Because these benefits are mutually dependant, they should not be sought in isolation and sustainability appraisal is one way of considering these issues together.

1.11 This SA incorporates the requirements of the Strategic Environmental Assessment Directive. It tests the sustainability of the spatial approach and planning policies contained within the Wealden Local Plan Issues, Option and Recommendations Consultation document as well as the reasonable alternatives/considered as a part of the plan process.

Stages of the SA Process

1.12 There are several statutory stages to the SA process. Table 1 sets out these stages and indicates how they relate to the different stages of Local Plan preparation. Stage 1 of the SA process (for which the output is the SA Scoping Report) has already been undertaken. The responses from the SA Scoping Report consultation process have been reviewed and associated minor changes made.

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1 NPPF paragraphs 6 & 7
2 NPPF paragraph 165
## Local Plan Stage 1: Pre-production (evidence gathering)

<table>
<thead>
<tr>
<th>SA/SEA Stages and Tasks</th>
<th>Output</th>
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<tbody>
<tr>
<td><strong>Stage A: Setting the context and objectives, establishing the baseline and deciding on the scope</strong>&lt;br&gt;A1: Identifying other relevant policies, plans and programmes, and sustainability objectives&lt;br&gt;A2: Collecting baseline information&lt;br&gt;A3: Identifying sustainability issues and problems&lt;br&gt;A4: Developing the SA framework&lt;br&gt;A5: Consulting on the scope of the SA</td>
<td>SA Scoping Report</td>
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</tbody>
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## Local Plan Stage 2: Production

<table>
<thead>
<tr>
<th>SA/SEA Stages and Tasks</th>
<th>Output</th>
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<tbody>
<tr>
<td><strong>Stage B: Developing and refining options and assessing effects</strong>&lt;br&gt;B1: Testing the Local Plan objectives against the SA framework&lt;br&gt;B2: Developing and refining the Local Plan options&lt;br&gt;B3: Predicting the effects of the Local Plan&lt;br&gt;B4: Evaluating the effects of the Local Plan&lt;br&gt;B5: Considering ways of mitigating adverse effects and maximising beneficial effects&lt;br&gt;B6: Proposing measures to monitor the significant effects of implementing the Local Plan</td>
<td>This SA Report accompanying Wealden Local Plan Issues, Options and Recommendations Consultation Paper</td>
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Consideration will also be given to preparation of the Proposed Submission Local Plan and the associated SA Report for consultation at Stage C.

| Stage C: Preparing the Sustainability Appraisal Report | |
| C1: Preparing the SA Report | |

| Stage D: Consulting on the Local Plan and SA Report | |
| D1: Consultation on the Pre-Submission Local Plan and accompanying SA Report | |

| | |
| SA Report accompanying Proposed -Submission Local Plan | |
Local Plan Stage 3: Examination

<table>
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<tr>
<th>SA/SEA Stages and Tasks</th>
<th>Output</th>
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<tbody>
<tr>
<td><strong>D2</strong>: Appraising significant changes resulting from representations</td>
<td>Report on any significant changes</td>
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</tbody>
</table>

Local Plan Stage 4: Adoption and Monitoring

<table>
<thead>
<tr>
<th>SA/SEA Stages and Tasks</th>
<th>Output</th>
</tr>
</thead>
</table>
| **Stage E**: Monitoring the significant effects of implementing the Local Plan  
E1: Finalising aims and methods for monitoring  
E2: Responding to adverse effects | Monitoring Reports |

1.13 With regard to the stages of SA identified above, this SA Report has sought to address Stage B tasks in response to the Wealden Local Plan Issues, Options and Recommendations Consultation Paper.

1.14 Whilst not statutorily required, an SA of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper is considered beneficial for a number of reasons. Firstly, it can help inform those who might wish to make representations on the current consultation on the comparable sustainability aspects of each of the options. Secondly, its findings (along with the emerging evidence base and responses from the public consultation) will also help inform important plan-making decisions, such as which option (or combination of options) should be selected when moving towards a draft plan.

1.15 Consideration of the ‘alternatives’ is a particularly important part of the SA process. In selecting a development strategy for the District, it is therefore important that the reasonable alternatives have been appraised, which is the purpose of this report. Future SA Reports will outline the reasons given for rejecting any of the current or additional alternatives considered, and the reasons for selecting the chosen strategy. This approach will help to aid transparency in the process, whilst also demonstrating how the SA has played an integral part in the plan making process.

**Structure of this SA Report**

1.16 The structure of this SA Report is as follows:

- Chapter 2 details the evidence base and the SA Framework itself including updates to the evidence base and presentation of the finalised SA Objectives (the SA Framework).
• Chapter 3 sets out the methodology behind identifying and assessing what is a significant effect

• Chapters 4 – 21 are substantial and set out and appraise the reasonable alternatives/options for all the topic areas to be covered by the Local Plan including details of the likely impacts, both positive and negative. These Chapters start at the Strategic level followed by the more specific policy level.
2.0 The SA Framework and Evidence Base

2.1 A Sustainability Appraisal Scoping Report was published for consultation between 18th May 2015 and the 22nd June 2015. This documented the key sustainability issues and problems, the baseline conditions, relevant policies, plans and programmes and the draft SA Framework against which the emerging plan is to be appraised.


2.2 A total of 9 representations were received and analysed. The representations provided useful feedback which has since been used to strengthen the SA process.

2.3 Comments made included:

- Most of the subject matter of the Scoping Report is too technical/specialist in nature for the ‘ordinary’ person to comment on;
- No reference to the reinstatement of the Uckfield/Lewes train line;
- Target of Code Level 6 by 2016 is not realistic, a target of Level 4 by 2016 is more appropriate;
- No District data for average density of new buildings;
- The current ‘presumption in favour of sustainable development’ will lead to a massive programme of housebuilding at the expense of the District’s green fields;
- Concern over long term care provision for an ageing population;
- More areas should be designated for protection from development;
- Water quality and flooding are mentioned but not rainfall;
- Greater emphasis needed on the increased pressure on water resources in the District;
- The document appears to deal reasonably with the natural environment and should ensure that the plan leads the protection and enhancement of designated and important landscapes and habitats;
- Some links to documents are missing/not working;
- A similar assessment to Habitat Regulations Assessment (HRA) should be undertaken for Sites of Special Scientific Interest (SSSIs);
- Some focus on the Biodiversity Opportunity Areas (BOA) in respect of baseline data on their current state and their potential would be helpful;
- Welcome the commitment to considering air quality issues on Ashdown Forest;
- Would be helpful to understand the direction of travel in terms of Water Framework Directive (WFD) Status in Table 3.3;
- SA Objective 9 – Column 2. Some reference to the value of brownfield sites in terms of amenity, landscape, habitat, biodiversity and protected species, would be helpful;
- The plan and the SA need to refine criteria for site selection and for considering the merits of windfalls;
- Pevensey Levels must be given utmost protection;
• In order to bring the community into the process of development housing design & layout should have an emphasis in any consultation process;
• Robust protection for "affordable" housing to enable local residents to start on the housing ladder;
• Should be mention of the fact that the contract to maintain the coastal defences at Pevensey Bay ends in 2025 with no provision made for after that;
• Should add in issues of sea water/bathing water quality, increased traffic flows and risk from the sea in Pevensey Bay; and
• Need to include data on private versus public sector jobs and numbers of people in part time work.

2.4 Through the SA Scoping Report and the consultation comments the SA Framework, against which the reasonable alternatives; subsequent draft and proposed submission Wealden Local Plan will be assessed, is as follows:

<table>
<thead>
<tr>
<th>Environmental</th>
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<tbody>
<tr>
<td>SA1 To protect and enhance biodiversity and geodiversity within the District</td>
</tr>
<tr>
<td>SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets</td>
</tr>
<tr>
<td>SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors</td>
</tr>
<tr>
<td>SA4 Improve the quality of the built environment</td>
</tr>
<tr>
<td>SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management</td>
</tr>
<tr>
<td>SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting</td>
</tr>
<tr>
<td>SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.</td>
</tr>
<tr>
<td>SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy</td>
</tr>
<tr>
<td>SA9 Ensure the best use of previously developed land and existing buildings</td>
</tr>
<tr>
<td>SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)</td>
</tr>
<tr>
<td>SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Social</th>
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<tbody>
<tr>
<td>SA12 Improve access to services; facilities; the countryside and open spaces</td>
</tr>
<tr>
<td>SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home</td>
</tr>
<tr>
<td>SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competiveness</td>
</tr>
<tr>
<td>SA15 Facilitate improved health and wellbeing of the population including enabling</td>
</tr>
<tr>
<td><strong>SA16</strong></td>
</tr>
<tr>
<td><strong>Economic</strong></td>
</tr>
<tr>
<td><strong>SA18</strong></td>
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</tbody>
</table>

### Collaborative work

2.5 The Planning Policy team held initial meetings early in the review process in which discussions on ways to progress the Wealden Local Plan were undertaken. Meetings were also held with adjoining and neighbouring local authorities as part of the Duty to Cooperate in which the approaches Wealden District Council were considering were presented and discussed.

2.6 Internal workshops were also held by members of the Planning Policy team with colleagues in Development Management to share and gain information on potential options for development in relation to the District’s villages and larger urban areas.

2.7 This Chapter details this collaborative work undertaken by the Planning Policy team in the early stages of option development for the Wealden Local Plan and the review of the Core Strategy.

### Planning Policy Team meetings

2.8 On the 21st January 2015 the Planning Policy team met to discuss the Wealden Local Plan. The meeting focused on identifying broad locations within the District in which to focus the search and option development for potential new housing, as well as covering other topic areas including development boundaries, the environment and conservation areas.

2.9 As a result of the meeting, several large, broad areas of search were identified. This meeting was very general in its nature and as such did not look at elements such as any constraints within the broad areas, it was purely to set a framework within which further assessment and option development could be undertaken. The broad areas were identified on maps of the District and would be used to further and refine the options development.

2.10 On the 4th February 2015 a second meeting, leading on from the 21st January 2015, was held between the Planning Policy team. At this meeting the broad areas of search were revisited and refined as well as ideas in
regards to other policy topic areas being discussed such as how to progress work on town centres.

2.11 On the 9th April 2015 a third Planning Policy team meeting was held. This meeting was a focused discussion on the actual process of the Wealden Local Plan and the form that the work would take. The meeting considered the Strategic project as a whole and what the contents of an Issues and Options (I&O) document would entail; what evidence base is required for an I&O document; how the projects contributing to the evidence base were going to work; the resource implications for the team and other teams within the Council potentially; the structure of the Sustainability Appraisal and the timescales for all of the work.

Duty to Cooperate Meetings

2.12 The Duty to Cooperate was introduced under the Localism Act 2011 and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

2.13 The Duty to Cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.

2.14 Local planning authorities must demonstrate how they have complied with the Duty at the independent examination of their Local Plans. If a local planning authority cannot demonstrate that it has complied with the duty then the Local Plan will not be able to proceed further in examination.

2.15 Members of the Planning Policy team at Wealden held Duty to Cooperate meetings with the following local authorities and bodies:

- Rother District Council and Hastings Borough Council – 3rd June 2015
- Tunbridge Wells Borough Council – 4th June 2015
- Tandridge District Council – 9th June 2015
- Eastbourne District Council – 9th June 2015
- Lewes District Council – 16th June 2015
- East Sussex County Council – 18th June 2015
- Mid Sussex District Council – 25th June 2015
- South Downs National Park Authority – 30th June 2015
- Brighton and Hove City Council – 1st July 2015
- Sevenoaks District Council – 28th July 2015
Internal workshops

2.16 Members of the Planning Policy team held two workshops with colleagues in Development Management regarding potential broad locations for development (a) around villages and (b) the settlements of Polegate and Willingdon, Hailsham, Uckfield, Heathfield and Crowborough. These were held on 19th June 2015 and 6th August 2015 respectively.

2.17 The workshops utilised maps of the settlements in question and each settlement was divided into broad sectors using elements such as existing roads and field boundaries. These did not imply any form of site allocation.

2.18 Discussions during these workshops focused on identifying any issues and constraints within each of the sectors in relation to potential development, as well as looking at opportunities and the positives and negatives of the sectors in terms of their sustainability. Areas discussed included access, transport links, environmental and landscape designations and availability of land.

2.19 The workshops and discussions were extremely useful in gaining knowledge and input from Development Management who have day to day dealings with potential sites and developers. The discussions from these workshops were incorporated into the development of the Issues, Options and Recommendations Consultation document.
3.0 Identifying and appraising the reasonable alternatives

3.1 The SEA Directive requires that the effects of ‘reasonable alternatives’ are covered. The Government’s SEA Practical Guide (2006) is clear that only reasonable, realistic and relevant alternatives need to be put forward.

3.2 Throughout the development of the options and alternatives, sustainability issues have been considered in their construction. These include:

- Environmental constraints such as avoiding impacts on the Ashdown Forest SPA and SAC; High Weald AONB and Pevensey Levels;
- Social considerations such as accessibility by public transport and creating mixed and balanced communities; and
- Economic concerns such as the regeneration of town centres and the rural economy.

Assessing what is a significant effect

3.3 What constitutes a ‘significant’ effect will vary depending on the context in which the effect is occurring and is a matter of professional judgement to a degree. Annex II of the SEA Directive includes a series of criteria for determining the likely significance of effects. These are:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
  - special natural characteristics or cultural heritage,
  - exceeded environmental quality standards or limit values,
- intensive land-use; and
- the effects on areas or landscapes which have a recognised national, community or international protection status.

3.4 The Planning Advisory Service (PAS) also provides guidance on assessing the significance of effects:

- Look at each case/option/alternative individually – effects that are significant in one situation are not necessarily significant in another;
- Analysis of significance needs to be proportionate to the expected severity of the effect; and
- Be careful of using mathematical models to determine significance. A comparison of scores on issues which are actually quite subjective can be more unhelpful. However, consider using quantitative information.
where possible (e.g. the distance of a site to services and facilities) to determine significant effects.

**Technical difficulties and uncertainties**

3.5 At this early draft plan stage there are a number of uncertainties with regard to the detail of planning policies and their consequential impacts. Where there is such uncertainty a precautionary approach has been applied and the impact is assessed as ‘unknown’ or ‘uncertain’.

3.6 Through the iterative process of policy development there should be greater certainty of impacts at subsequent stages in the assessment process as policy options and approaches are refined. There is also some uncertainty over some of the baseline data at this stage with information either lacking or potentially out of date. This is particularly an issue in regards to Census information where not all of the 2011 data has been released to date. This will be reviewed and kept up to date as part of the iterative process of the SA.

3.7 In many instances, at this initial SA stage, there are a number of unknown impacts depending on how the options would be implemented. It is likely that through the consultation process other options may be suggested that will need to be considered before the consultation plans are finalised.

3.8 Research and professional judgement can help to reduce the levels of uncertainty, but only to a certain extent. In response to this, the appraisal has taken very much a 'precautionary approach', looking to highlight all areas of potential conflict.

3.9 In addition, the assessments of Options for the potential location of development, such as broad locations around settlements, are carried out on the principle of development in those locations at this stage. This is due to the fact that land availability will play a significant, if not the significant, role in the allocations and locations of development and this work is currently underway through the Strategic Housing and Economic Land Availability Assessment (SHELAA). This work will assess land that has been submitted to the Council for consideration for all types of development and the results will be incorporated into the work for the Proposed Submission Wealden Local Plan and its accompanying Sustainability Appraisal assessment in 2016. It may be the case that Options are reviewed in light of there being insufficient land submitted for consideration for example.

**Appraisal of the reasonable alternatives/options**

3.10 The reasonable alternatives/options considered for the Wealden Local Plan Issues, Options and Recommendations have been appraised using the 18 SA Objectives. For each alternative/option it has been determined whether they will move towards or away from the achievement of each SA Objective and hence whether there will be positive or negative impacts. In some cases the alternatives/options will have no influence or relationship with an SA.
Objective or its influence will depend on how the alternative/option would be implemented. This is illustrated through the use of the following symbols:

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Description</th>
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<tbody>
<tr>
<td>+</td>
<td>Option moving towards the achievement of SA Objective – positive impacts</td>
</tr>
<tr>
<td>-</td>
<td>Option moving away from achievement of SA Objective – negative impacts</td>
</tr>
<tr>
<td>?</td>
<td>Unknown depends on how option would be implemented – positive and/or negative impacts</td>
</tr>
<tr>
<td>o</td>
<td>Neutral with no relationship with SA Objective</td>
</tr>
</tbody>
</table>

3.11 For the purposes of the SA, baseline conditions are assumed to be the ‘status quo’ for Wealden District. Implementation of the alternatives/options would result in either an improvement to or deterioration in this baseline. If the Wealden Local Plan was not implemented (a ‘do nothing’ situation) then it must be assumed that there will be no change to the current baseline. However, in reality this is unlikely to be the case as natural and social processes would continue to operate.

3.12 For each alternative/option a matrix shows the likely impact on the individual SA Objectives and a summary is provided. The full matrices for each alternative/option are contained within the Appendices of this SA Report and include commentary to explain the likely effects that have been identified.

**Presumption in Favour of Sustainable Development**

3.13 The National Planning Policy Framework is based upon the presumption in favour of sustainable development. This means that if the proposal is deemed to be sustainable then it is considered that it is acceptable. It is proposed that, after consideration of the alternative of not to include, this policy is brought forward into the Wealden Local Plan as shown below. Owing to the nature of the policy there are no other reasonable alternatives.

**Preferred Option for Testing 1**

3.14 The Wealden Local Plan Issues, Options and Recommendations Consultation Paper puts forward the Preferred Option for Testing in regards to the presumption in favour of sustainable development within the District. Please refer to page 21 of that document for the full wording.

3.15 The Preferred Option for Testing provides clarity with regards to national policy whilst also ensuring that the local context is taken into account. As the policy approach is predicated on proposals according with Local Plan, and neighbourhood plan, policies it is likely that it will have a positive effect on the SA Objectives through the implementation of these Local Plan policies.
3.16 The policy approach also ensures that where policies are out of date or where there are no policies relevant to the proposal applications for development are determined in line with national policy and the NPPF.

3.17 There may be the potential for conflict with some of the environmental SA Objectives however Local Plan policies and the national policy framework should ensure that this are avoided or at the least are mitigated.
4.0 Strategic Housing Strategy

4.1 Housing Issues

Objectively Assessed Need

4.1 Since the SA Scoping Report was consulted upon, a draft Strategic Housing Market Assessment (SHMA) for the District has been produced. The draft SHMA identifies the housing market area for Wealden to include:

- Wealden
- Eastbourne
- Tunbridge Wells
- Rother
- Lewes
- Mid Sussex

4.2 The SHMA has identified that for Wealden the OAHN is between 660 and 735 dwellings per annum over the Plan period 2013-2033. The 660 dwellings per annum are based on demographic projections which take into account patterns of migration, household formation, births and deaths.

4.3 The figure of 735 dwellings per annum is based on an assessment of market signals including the impact of the economy on housing need together with affordable housing need. This figure takes into account historic job growth and predicted rates of job provision within Wealden District as well as market signals and considers that 735 dwellings per annum is sufficient to meet both.

4.4 Based on this range and not taking into account any planning permissions granted or dwellings completed then the additional number of houses required in Wealden District alone is between 13,200 dwellings and 14,700 dwellings.

4.5 Taking the higher figure and taking into account consents granted, and development completed between April 2013 and April 2015 and Core Strategy broad locations and village allocated housing numbers, this leaves around 7,500 dwellings. Initially the end date of the Plan period was set at 15 years from the anticipated date of adoption, which is usually advised in Local Plan making.

4.6 In developing the Local Plan we are also required to consider the needs of the housing market area as a whole. Based on current Plans and most recent evidence we have calculated the objectively assessed need and the current under supply of the Plan. Under supply is where the Plan cannot

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3 Please note that it is acknowledged that Core Strategy housing numbers will be required to be re-assessed as Core Strategy policies will be superseded and therefore under review.

4 Plans in place do have different timescales than the Wealden Local Plan and may be subject to change and review as the Plan progresses.
meet the objectively assessed need of the area. Within the Wealden Housing Market Area the current calculation is 12,000 dwellings.

4.7 For the purpose of decision making the OAHN is 7,500 dwellings or 735 dwellings per annum, but for Plan making we are considering if it is possible to accommodate the additional 7,500 dwellings and some undersupply within the housing market area to deliver 19,500 overall (the Wealden OAHN and the under supply with the housing market area as a whole).

4.8 This is key baseline information upon which to appraise reasonable alternatives (i.e. lower and higher figures) for housing growth and delivery. In particular it has significant bearing on the extent to which SA13 (Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home) may be met.

4.9 Having considered the context and needs of Wealden District, a series of reasonable alternatives for housing options have been developed, presenting potential strategies under which Wealden could seek to deliver its OAHN. In summary these include:

- Strategic Housing distribution;
- Housing growth – Objectively Assessed Housing Need (number of dwellings);
- Wealden Settlement Hierarchy;
- Housing distribution (settlements);
- New settlements and Large Urban Extensions; and
- Preferred strategy.

4.10 The appraisal of reasonable alternatives/options is an integral and key task of the plan and SA process. When finalised, the Wealden Local Plan will be examined independently. The Planning Inspectors role will be to assess whether the plan has been prepared in accordance with legal and procedural requirements, and is sound. To be sound a plan must be:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet the objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy, when considered against the reasonable alternatives based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
4.11 In respect of SA, the plan should contain the most appropriate strategy when considered against all reasonable alternatives. The assessment of options through the SA process ensures that this is done in a consistent manner. It also ensures that the policies of the plan are tested in order that they may deliver the sustainable development for Wealden and its community as a whole.

**How the development of alternatives/options were identified**

4.12 The process of identifying a range of options allows for a comparison between different ways of approaching an issue and enables the testing of each option against the SA Objectives to determine the positive as well as negative effects of each. We are also required by law to consider reasonable alternatives. This means alternatives to overall growth and distribution, which in reality inform each other.

4.13 In developing the Wealden Local Plan various approaches to accommodating the housing growth required and the distribution of housing within the District were considered.

4.14 The Wealden Local Plan Issues, Options and Recommendations Consultation Paper provides several high level options as having the potential to assist in addressing the housing needs of the District. This paper describes the nature of each option and these are summarised and assessed against the 18 SA Objectives in the following sections.

4.15 The factors that needed to be included in these considerations were:

- Land availability;
- The impact on designations (European, national and local);
- Existing infrastructure and future needs;
- Current sustainability of the existing settlements;
- How best to fit the economy and achieve sustainable economic growth within the District; and
- How to best meet the needs of our settlements.

4.16 As already stated, the OAHN for decision making purposes is 7,500 dwellings but for plan making purposes we are considering how to accommodate additional housing to that which has been committed through planning consents, or built between 2013-2015. This is some 9,200 dwellings to meet the AOHN of the District to 12,750 to meet the under supply of the Housing Market Area as well as our own OAHN. These housing figures include those housing numbers within the adopted Core Strategy that have not yet been granted consent and require consideration of reasonable alternatives.
Strategic Constraints

4.17 There are a number of constraints within the District which direct the distribution and the timing of delivery of the housing required and therefore the overall amount of housing that can be accommodated within the Plan Period. Please refer to paragraphs 8.12 – 8.27 of the Wealden Local Plan Issues, Options and Recommendations Consultation document for a fuller explanation of these.

Waste water and the Pevensey Levels

4.18 During the preparation of the Core Strategy there were significant constraints due to the ability of the Wastewater Treatment Works (WwTWS) to discharge treated effluent to the Pevensey Levels due to the likely significant effect on the environment and the qualifying features of the Levels that warrant its designation as a Ramsar site and Site of Conservation Importance (SCI).

4.19 Southern Water have now informed us that they are working towards an anticipated solution to this issue for effluent discharged from WwTWS at Hailsham, Hellingly, Polegate, Willingdon and other small settlements within south Wealden by 2022. Subject to the timely delivery of this solution the issue of capacity will be resolved and development within south Wealden to be accommodated. The solution involves technology which may be incrementally installed and so there will need to be a phased approach to the occupation of development to be in line with the works.

Ashdown Forest

4.20 The situation with regards to the Ashdown Forest is more complex. We are required to consider the likely significant effect of development on the Forest under the Habitat Regulations. It is understood from modelled data that certain pollution levels on the Forest exceed the limit that means, in theory, damage may be taking place. It is probable that levels of pollution are higher within 200m of the road over the Forest.

4.21 The modelled information is mainly theoretical and the Council has started a monitoring programme on the Ashdown Forest to determine the actual levels of pollution and in particular nitrogen deposition and to look at the relationship between nitrogen levels and the ecology on the boundary of the road corridor. The work is not yet concluded and will take at least 1 more year to determine if there is an impact from roads crossing the Forest.

4.22 In light of this fact, the Council must take a precautionary approach when it comes to the impact of development and growth on the Ashdown Forest. This means the conservation objectives of the protected site should prevail where there is uncertainty.
Eastbourne Park Flood Storage Catchment Area

4.23 It has recently been brought to the Council’s attention that development areas within Wealden that feed surface water into the Eastbourne Park Flood Storage Catchment Area may be constrained in the short term due to the need to increase flood storage capacity in Eastbourne Park.

4.24 This may delay developments within the catchment area as it is necessary to ensure that existing housing within Eastbourne is not flooded as a direct result of new development in Wealden. Eastbourne Borough Council is undertaking work in relation to this.

National Landscape Designations

4.25 Other constraints include the need to protect the landscape character of the High Weald. The NPPF states that in exceptional circumstances major development may only be allowed in AONB’s where it can be demonstrated they are in the public interest.

4.26 In addition there is the duty under Section 85 of the CRoW Act 2000 that requires relevant authorities, in exercising or performing any functions in relation to, or so as to affect land in National Parks and AONB’s, to have regard to their purpose. This also applies to development proposals outside of National Parks and AONB’s but which might have an impact on the setting of and implementation of the statutory purposes of these protected areas.

Other constraints

4.27 In addition to the above identified constraints, other factors that will need to be taken into account include the promotion of brownfield land, the avoidance of flood risk areas and areas of ancient woodland.
4.2 Housing Growth and Distribution

Broad Distribution Options

4.2.1 In developing the Wealden Local Plan several Broad Distribution Options were initially considered as to how to distribute the amount of housing required within the District.

4.2.2 These were determined using the Settlement Hierarchy within the adopted Core Strategy, however this has been revised since the initial work described and assessed here and will be detailed and assessed against the SA Objectives later in this report.

4.2.3 This section outlines these initial Broad Distribution Options and provides the results of their assessment against the 18 SA Objectives. These options were developed and assessed prior to the announcement by Southern Water that the Waste Water Treatment Works affecting Hailsham and the surrounding urban areas could be upgraded to allow further development without causing a likely significant effect on the Pevensey Levels.

Option 1 - Proportionate growth in existing settlements

4.2.4 This involved distributing housing growth to all settlements within the District based on the number of existing dwellings. For the purposes of this option the number of houses was determined by taking the existing built up area of the settlement (in ha) and using a general density of 30 dwellings per hectare (dph). This was refined through the process once data on actual dwelling numbers in the settlements was completed.

4.2.5 As a general principle, this option can be considered a reasonable alternative as it would help meet housing needs of the District together with helping some settlements become more sustainable through the attraction of inward investment in services and facilities such as a village shop or post office. This option might involve one or more allocated settlement extensions of an appropriate scale in addition to a review of the built up area boundaries.

Option 2 - Proportionate growth in towns and large villages

4.2.6 This option involved concentrating new housing development within the existing boundaries of the main settlements and larger villages of Wealden. These are settlements within the Wealden Local Plan Settlement Hierarchy classified as ‘Towns with Development Boundaries’ and ‘Villages with Development Boundaries’.

4.2.7 This alternative is considered reasonable as focusing development in this way places housing growth within the most sustainable settlements which is in line with the national approach to development in general.
Option 3 - Growth focused on infill development to Neighbourhood Centres and proportionate to towns and large villages

4.2.8 This option allocates housing growth through infill development to those settlements classified as ‘Neighbourhood Centres’ in the Wealden Local Plan Settlement Hierarchy with the residual requirement being distributed on a proportionate basis (Option 1) to the main settlements and larger villages. The infill element of this Option is determined on 10% of the existing settlement size (ha) using a housing density figure of 30dph.

4.2.9 This is a reasonable alternative as again the approach seeks to locate housing growth in the most sustainable locations within the District.

Option 4 - Growth in settlements not routed to the Ashdown Forest

4.2.10 Reflecting the uncertainties surrounding the ability to mitigate the impacts on the Ashdown Forest Special Protection Area (SPA) and Special Area of Conservation (SAC), this option assumes a ‘precautionary approach’ and sets out how housing development could be planned within areas of Wealden that do not result in an increase in vehicular traffic on roads within close proximity to the Forest. This option therefore focuses on the south of the District as a location for housing growth.

4.2.11 This alternative is considered to be reasonable as it is incumbent on the local authority to consider how to accommodate the growth needed within the District whilst ensuring that the most highly sensitive biodiversity assets are protected in line with the relevant legislation, in this case the EU Habitats Directive and UK Habitats Regulations.

Option 5 - Growth in settlements away from the Ashdown Forest and WwTW

4.2.12 This option again assumes the ‘precautionary approach’ in regards to Ashdown Forest (as in Option 4) but also includes the Pevensey Levels Ramsar site and Site of Community Importance (SCI), reflecting the uncertainties surrounding the ability to mitigate impacts of development on the Pevensey Levels from Waste Water Treatment Works (WwTW) which discharge treated effluent into them.

4.2.13 This option sets out how housing development could be planned within areas of the District that do not impact on either of the designated sites and therefore focuses on the south of the District as a location for housing growth. However the option covers a more limited area than in Option 4 due to the presence of the Pevensey Levels in the south of the District.

4.2.14 This Option is again considered a reasonable alternative in relation to the Ashdown Forest and also in protecting the Pevensey Levels. There are significant issues with both designated sites and the need for development and so it is reasonable to consider how to accommodate housing growth without adversely impacting on them.
Option 6 - Housing distribution reflecting affordable housing need

4.2.15 This involved distributing housing growth to reflect the affordable housing need within the District and therefore would not be based on any assessment of existing settlement size. This could lead to development in all classifications of settlement within the Wealden Local Plan Settlement Hierarchy, although not all settlements may get housing development.

4.2.16 The affordable housing need in Wealden is significant, particularly in the rural areas as the SA Scoping Report highlights. And so it is reasonable to consider an alternative to housing distribution based on the affordable housing needs of the District.

SA Assessment

Predicting the effects of the Strategic Housing Distribution Options (SA Tasks B3/B4)

4.2.17 Appendix A sets out the detailed appraisal of each of the alternative Strategic Housing Distribution scenarios proposed to address housing need. For each of the alternatives the appraisal evaluates the likely significant effects of each which reflects the baseline sustainability issues identified within the SA Scoping Report (2015).

4.2.18 These options will be considered in preparing the plan. This might include a hybrid of the options currently proposed or additional options that emerge from the consultation.

4.2.19 It should be noted that this assessment of the options is in the broad sense of a housing distribution strategy, not specific housing numbers or the distribution to settlements.

4.2.20 This section provides a summary of the assessment in Appendix A for each of the options and highlights the key likely significant effects that may occur under each option.

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<th>Broad Distribution Options</th>
<th>SA Objectives</th>
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Option 1

Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.2.21 This option does not take into account the biodiversity of Wealden, principally the Ashdown Forest and the Pevensey Levels, and therefore there is likely to be significant negative impacts on these designations due to housing growth being distributed to settlements in close proximity. For sites in close proximity to the designations the ability to mitigate the negative impacts is uncertain as is the achievability of on-site mitigation. Therefore, the Option would need to be delivered in conjunction with strategic SANGs and SAMMS.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.2.22 In a similar vein, the landscape, historical and cultural assets (SA2) of the District are also unaccounted for and again may result in adverse impacts from housing growth. However, the impacts are uncertain and would depend on implementation of the approach under Option 1. This is on the basis that site specific or broad locations would be required to fully establish a likely significant positive or negative effect.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.2.23 In terms of the rest of the environmental SA Objectives (SA3-SA11) the option is likely to have beneficial impacts on water resources (SA5) through the fact that it will reduce the stress on water infrastructure in any one particular area. Greater levels of growth whilst resulting in greater land take, present the potential for implementing improvements for water quality such as SuDS.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.2.24 Option 1 has a neutral effect on SA6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.2.25 For SA7 there is the potential for negative effects under this Option due to the potential to increase flood risk. The development of greenfield sites could potentially increase surface water flooding, which is an issue within the District. This Option could also increase surface water drainage to Eastbourne Park where there are capacity issues at present, and so this will need to be taken into account.
4.2.26 However, due to their scale, they offer the opportunity to include mitigation measures such as SuDS which could avoid this impact and also provide additional benefits in terms of biodiversity and climate change mitigation/adaptation. Therefore, the impacts are uncertain and will also depend on other policies and strategies within the Local Plan.

**SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy**

4.2.27 In regards to SA8, this Option is less likely to achieve on site renewable energy within developments due to the high upfront costs associated with the technologies. These are only likely to come forward on larger sites, which may occur in some parts of the District under this Option.

**SA9 Ensure the best use of previously developed land and existing buildings**

4.2.28 However, the Option is likely to result in development proposals coming forward on mainly Greenfield land which would present negative effects against SA9. Proposals outside of settlement boundaries on Greenfield land may be likely to be delivered at lower densities than in the more urban areas or be expected to reflect the character created by the densities of adjacent development.

4.2.29 Some impacts on the environmental SA Objectives will be dependent on the implementation of Option 1 as well as on other policies and strategies such as for flood risk, design and renewable energy.

**Social SA Objectives (SA12-SA16)**

**SA12 Improve access to services; facilities; the countryside and open spaces**

4.2.30 In regards to SA12, assessment is difficult as implications for accessibility can be very site specific. However, this Option is likely to result in negative effects on the basis that the Option is less likely to create new employment opportunities in association with new development. Furthermore, sites under this Option are likely to be smaller and spread across numerous settlements which may result in fewer opportunities to deliver new services and facilities. Pressure on existing services may also be increased through development under this Option. Positive effects may arise however depending on scale and location of development.

**SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home**

4.2.31 It would appear that the distribution strategy under this Option (to disperse housing development) could limit delivery of housing in terms of SA13. This is on the basis that in practice there is a discord between the levels of capacity within each settlement and the strategy itself, which is to proportionately distribute housing growth. The Option would however provide
a number of benefits in respect of SA13. For example, it would provide housing in a range of locations to increase choice and affordability with the potential smaller nature of sites enabling short term housing delivery whilst long term sites come forward.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.2.32 This Option is likely to provide positive effects against SA14 by delivering growth which could result in the provision of new educational facilities, through increasing population growth and demand for schools. However it is also likely that in some areas, particularly rural settlements, residents would still need to commute to larger settlements for educational facilities.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.2.33 For SA15 this Option likely to present positive impacts either by virtue of development locations or scales of development or a combination of both. However, the relative significance of these positive impacts is difficult to predict at this stage.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.34 In regards to SA16, this approach to housing growth distribution is less likely to secure significant infrastructure on the assumption that sites may be smaller, however the Option would contribute well towards safeguarding existing services and facilities within settlements, by increasing the population throughout the District. In particular this Option provides housing in the rural areas of the District, which in turn will provide support for existing services here and potential enhancement. At a later stage the Option may result in some adverse impacts however if, once established spatially, the approach actually created excessive pressures on existing services. Suitable mitigation however may be established.

**Economic SA Objectives (SA17 and SA18)**

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

And

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism
4.2.35 For SA17 and SA18 this Option has the potential for positive effects by providing housing development close to existing employment opportunities and by encouraging new employment development. However its weakness lies in the fact that by distributing development in this way it is more likely that small sites will come forward for development which may offer less scope to deliver new employment sites that are attractive to the market within new housing developments. However, it could add to improved vitality within existing settlements and help regenerate town centres and rural economies.

Option 2

Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.2.36 Again this Option does not take into account the Ashdown Forest or Pevensey Levels and so like Option 1 there is likely to be negative impacts on these designations, as well as other biodiversity assets. However, the Option provides a more ‘urban’ focus, utilising previously developed land and providing development within existing larger settlements. Whilst it may therefore have less of an impact of the designated sites than Option 1, housing growth would still be allocated to settlements in close proximity to both designations. As a result of the more constrained distribution (i.e. only focusing on certain settlements) more housing is likely to be allocated to areas close to the designations. Sites within this Option may not be able to achieve on-site mitigation and therefore the Option would need to be delivered in conjunction with strategic SANGs and SAMMS.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.2.37 This Option is more likely to present significant positive effects in relation to SA2 on the basis that it provides a more ‘urban’ focus for new development which is less likely to result in harm to Wealden’s countryside and rural landscape. However, there is the potential for significant negative impacts due to the potential for Greenfield development around the larger villages, although the impacts are uncertain at this time and would to a degree depend on the implementation of the Option.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.2.38 As with Option 1, this Option has the potential for significant positive impacts on water resources (SA5) through the fact that it will reduce stress in more rural areas. However, there will be a knock on negative effect as water stress may be increased in the towns and larger villages. Much of this will depend on implementation and design of development. As before, greater levels of growth, whilst requiring more land take, may result in more likely positive effects on water quality through presenting the potential for implementing measures such as SuDS.
SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.2.39 Option 2 provides a neutral effect on SA6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.2.40 Against SA7 this Option has the potential for negative effects due to the potential to increase flood risk. Focusing development within the main towns may increase surface water flooding through the intensification of development. Additionally, the development of Greenfield sites around the towns and larger villages could potentially increase surface water flooding, which is an issue within the District. However, due to their scale, they offer the opportunity to include mitigation measures such as SuDS which could avoid this impact and also provide additional benefits in terms of biodiversity and climate change mitigation/adaptation. Therefore, the impacts are uncertain and will also depend on other policies and strategies within the Local Plan.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.2.41 In regards to SA8, this Option is less likely to achieve on site renewable energy within developments due to the high upfront costs associated with the technologies. These are only likely to come forward on larger sites, which may occur in some parts of the District under this Option. However, some building mounted renewable technologies may be feasible but it may be difficult to justify requiring these within developments. Furthermore, focusing development on the main towns and villages may result in smaller and more rural areas lacking in services resulting in an increase in commuting to reach services and facilities, with the knock on effect of increasing emissions.

SA9 Ensure the best use of previously developed land and existing buildings

4.2.42 This Option is likely to present significant positive effects against SA9 due to its 'urban' focus and the increased potential to utilise previously developed land. However, some Greenfield development is likely to come forward.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.2.43 For SA10 this Option is likely to have positive and negative effects as whilst locating development within the main towns and large villages would encourage use of existing sustainable transport modes, scales of development under this Option may not lead to opportunities to enhance or
improve transport networks. Furthermore, poor transport links within the District’s more rural areas would not be addressed under this Option and so reliance on private cars is likely to continue.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.2.44 Whilst not having a direct relationship with SA11, this Option has a focus on the most sustainable settlements within the District and so could help in the reduction of emissions through the enhancement and consolidation of services and facilities and the reduction in need to travel. However, similar issues arise as with SA10 and this Option.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.2.45 This Option could have a potential significant negative effect on SA12 as it may result in the redevelopment of some employment sites for housing within settlements. This could potentially lead to an increase in the need to travel to areas outside the District to access employment opportunities or from urban to rural areas of the District. Furthermore, whilst this Option seeks the most sustainable locations for housing in may in turn displace sites which could provide jobs and hence result in an increase in commuting patterns. Establishing employment land requirements would help the Option. However the Option does offer the opportunity for consolidating and enhancing access to services, facilities and the countryside in the most sustainable locations.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.46 This Option in isolation may not be able to achieve the Districts objectively assessed housing need, including affordable housing, through lack of available land for development and so would have negative effects on SA13. Focusing development on the towns and larger village’s means there may be fewer large sites available for development which would reduce the provision of affordable homes further. Affordable housing would be unlikely to be delivered in the more rural settlements of the District. Combined with the government’s policy on affordable housing provision only being achievable on sites of 11 net dwellings or more, delivery will be further reduced. However the Option would have potential positive effects on the towns and larger villages with increased housing provision. The Option could also contribute towards short term housing supply, in combination with other Options which have longer lead in times for housing delivery.
SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.2.47 Proximity to educational and training facilities is more likely to be easily accessed in and adjacent to existing urban areas and within the larger rural villages than in the most rural parts of the District. In this respect, Option 2 presents significant positive effects in regards to SA14. However, those in more rural areas will still need to commute to the main towns and larger villages to access these opportunities.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.2.48 The provision of significant housing growth should present positive effects for both the existing and new population of an area in terms of health and wellbeing. This is on the assumption that new development makes some contribution towards new or improved health, sport, community and open space facilities. Option 2 may present some negative impacts depending on the size of sites and whether they are able to provide on-site open space or community facilities and also through the prospect of the Option identifying open spaces for the release of housing. However, it does offer the opportunity to consolidate health, community and open space facilities in the towns and larger villages and provide potential enhancement.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.49 Through focusing housing growth on the main towns and larger villages there are significant positive effects as services and facilities are safeguarded ensuring communities have appropriate levels of provision to maintain themselves. However this Option would limit development in the more rural areas of the District which may have significant negative effects such as rising house prices, loss of services and facilities which in turn could lead to out-migration and an increase in housing affordability issues.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.2.50 In terms of SA17 and SA18 the effects of Option 2 are uncertain at this point. This is due to the fact that Option 2 may result in some loss of potential employment sites, that whilst considered unattractive to the economic market at present may become viable in the future, to housing. Establishing the employment land required over the Plan period would go a long way to helping mitigate this potential negative impact. However, as part of potential Greenfield sites around the main towns and larger villages opportunities to plan for employment sites may arise.
SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the District’s rural economy, increasing the vitality of the District’s villages and promoting sustainable tourism

4.2.51 For SA18 potential significant positive effects may arise directly from a site enabling regeneration of an area or as a result of growth stimulating regeneration within a settlement. There may also be small opportunities for positive economic effects presented through the improvement of the character of an area surrounding a site and the improvement in the quality of life for residents in that settlement. However, under this Option this is only likely to occur in the towns and larger villages, but may have subsequent knock on effects to the more rural areas of the District.

Option 3

Environmental SA Objectives (SA1-SA11)

4.2.52 The discussions had under Option 2 above in relation to the SA Objectives stand for this Option in relation to the residual housing requirement, after allocation through infill, going to the towns and larger villages on a proportional approach.

SA1 To protect and enhance biodiversity and geodiversity within the District

4.2.53 As with Options 1 and 2, this Option does not take into account the biodiversity of the District. Therefore, significant negative impacts are likely to occur in regards to the Ashdown Forest and Pevensey Levels. In particular, infill developments are unlikely to be able to provide on-site mitigation and therefore the Option would need to be delivered in conjunction with strategic SANGs and SAMMS.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.2.54 As with Option 2, this Option is likely to present significant positive effects in relation to SA2 as it would focus housing growth within certain existing settlements through infill as well as the main towns and larger villages. This is less likely to impact on the Districts countryside and rural landscape. However, as well as the potential for significant negative impacts to occur from Greenfield development around the larger villages, intensification of development through infill may result in significant negative impacts to a settlements historic character if not properly considered and designed. Therefore the impacts on SA2 are uncertain and may depend to a large degree on the implementation of the Option and other policies within the Local Plan.
SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

And

SA4 Improve the quality of the built environment

4.2.55 Whilst this Option has a neutral effect on SA3 and SA4 there may be some opportunities to improve the existing built environment through careful design of new development, particularly through infill. Similarly increased housing growth will result in an increased population and so more people may have access to the District’s countryside, landscapes and historic environment. This may require careful management.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.2.56 Again this Option has the potential for significant positive impacts on water resources (SA5) through the fact that it will reduce stress in more rural areas. However as with Option 2 there may be the knock on negative effect of increased pressure on water resources within the towns and villages and particularly in the settlements allocated infill. Much of this will depend on implementation and design of development. However, this Option has the potential to reduce the land take for new development, through infill, which may result in positive impacts on water quality by reducing the need to develop on Greenfield sites. But there will still be the need for some Greenfield development and SuDS measures to come forward, as with Option 2.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.2.57 Option 3 provides has a neutral effect on SA6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.2.58 Option 3 has the same potential for significant negative impacts as Option 2 on SA7, with regards to infill development and growth within the main settlements and larger villages potentially increasing surface water flooding. Again this may impact on the Eastbourne Park Flood Storage area.

4.2.59 However, suites of SuDS measures, starting at the dwelling/development level, should help mitigate this to some degree. This will be determined by other policies within the Plan. The development of Greenfield sites around the towns and larger villages could potentially increase surface water flooding. However, due to their scale, they offer the
opportunity to include mitigation measures such as SuDS which could avoid this impact and also provide additional benefits in terms of biodiversity and climate change mitigation/adaptation.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.2.60 Again Option 3 has similar effects to Option 2 on SA 8 in that renewable energy technologies may be difficult to incorporate into smaller developments (infill). However, building mounted technologies are evolving and becoming more widespread, such as solar panels, and so may become more feasible on smaller sites. It could be difficult to justify requirements for these through policies. This Option does offer the opportunity to consolidate facilities and services within the most sustainable locations reducing the need for people to travel. However, in more rural areas not identified for housing growth, a lack of services and facilities will result in continued reliance on cars to reach the more sustainable centres.

SA9 Ensure the best use of previously developed land and existing buildings

4.2.61 This Option specifically seeks to ensure significant positive effects on SA9 as it is promoting infill development first which will prioritise the use of previously developed land. Some Greenfield land will still be required but this is likely to be less than in Options 1 and 2.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.2.62 For SA10, Option 3 has the same positive and negative effects as Option 2 in that whilst the approach would encourage the use of existing sustainable transport modes, scales of development under this Option may not lead to opportunities to enhance or improve wider transport networks. This would result in the more rural areas continuing to suffer from poor transport links to the sustainable centres and hence the continued reliance on cars.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.2.63 Whilst not having a direct relationship with SA11, this Option has a focus on the most sustainable settlements within the District and so could help in the reduction of emissions through the enhancement and consolidation of services and facilities and the reduction in need to travel. However, similar issues arise as with SA10 and this Option.
Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.2.64 In regards to SA12, Option 3 has the same potential effects as Option 2 in that it may result in the loss of employment sites or the displacement of employment sites. This is more likely under this Option due to the fact it focuses on infill development within settlements first. Establishing employment land requirements would help the Option. However the Option does offer the opportunity, for consolidating and enhancing access to services, facilities and the countryside in the most sustainable locations although the focus of the Option means that it is less likely to result in the delivery of new services and facilities in all settlements.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.65 As with Option 2, Option 3 in isolation may not be able to meet the full objectively assessed housing need of the District, including for affordable housing, due to a potential lack in suitable and available sites (SA13). In the settlements the Option would identify, there is likely to be significant positive effects from an increase in housing choice and availability, however, infill development may be on small sites which combined with the national approach to affordable housing contributions, may temper the delivery of affordable housing. The Option also excludes the more rural areas where affordability and a choice of housing options can be limited.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.2.66 For SA 14, Option 3 offers the same positive effects as Option 2 as the spatial distribution is focused on the more urban areas and large villages, meaning housing growth will be in close proximity to existing educational and training facilities.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.2.67 Option 3, as with Option 2, should present positive effects for both the existing and new population of an area in terms of health and wellbeing. This is on the assumption that new development makes some contribution towards new or improved health, sport, community and open space facilities. Option 3 may present some negative impacts depending on the size of sites and whether they are able to provide on-site open space or community facilities and also through the prospect of the Option identifying open spaces for the release of housing. On infill sites, it is likely that space will be at a premium. However, it does offer the opportunity to consolidate health, community and open space facilities in the settlements that would be identified and provide potential enhancement.
SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.68 Through focusing housing under Option 3 there are significant positive effects as services and facilities are safeguarded ensuring communities have appropriate levels of provision to maintain themselves (SA16). However this Option would limit development in the more rural areas of the District, which may have significant negative effects such as rising house prices, loss of services and facilities which in turn could lead to out-migration and an increase in housing affordability issues.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.2.69 Again with regards to SA17 and SA18, the effects of Option 3 are as uncertain as with Option 2 due to the potential for some employment sites to be released for redevelopment as housing, particularly as this Option would focus on infill development. Establishing the employment land required over the Plan period would go a long way to helping mitigate this potential negative impact (SA17). However, as part of potential Greenfield sites around the main towns and large villages opportunities to plan for employment sites may arise.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the District’s rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.2.70 For SA18 the positive effects are the same as for Option 2 with the improvement of an area as a result of new development being more likely under Option 3 through the focus on infill development. Infill development is more likely to act as a catalyst for the regeneration of town centres and high streets than development around the outskirts of an existing settlement as it is by its nature embedded within the settlement.

Option 4

Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.2.71 This Option presents overall significant positive effects on SA1 in that it focuses housing growth away from the Ashdown Forest and so minimises any adverse impacts development may have had on the Forest. However, following this Option means that housing growth would be focused on the south of the District and there are known issues regarding the Pevensey Levels and the discharge of waste water. Therefore, significant negative impacts could occur as a result.
SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.2.72 Similarly, in relation to SA2 Option 4 has a significant positive effect in that directing housing growth to settlements with a zero influence on the Ashdown Forest protects much of the landscape within the northern part of Wealden. However, this does place greater pressure on the south of the District to accommodate the housing growth required and hence there may be potential significant negative effects on the landscapes including the Low Weald and South Downs National Park. Although the Low Weald is not as highly protected as the High Weald AONB it is an important landscape and protection from adverse impacts is needed.

SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

And

SA4 Improve the quality of the built environment

4.2.73 Again Option 4 has a neutral impact of SA3 and SA4 in that the spatial distribution of housing growth itself has no direct bearing on improving the built environment or providing and enhancing access to amenities. However, opportunities to improve the existing built environment, in the south of the District at least, may arise through careful design of new development and more people are likely to locate to an area which would increase the number of potential visitors.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.2.74 Option 4 has the potential for significant negative effects on SA5 in terms of water resources and quality as it focuses high levels of housing growth in the south of the District, which currently suffers water related issues in regards to the Pevensey Levels and WwTWs. Stress on water resources and infrastructure may be increased and significant investment would be needed in order to improve the treatment of waste water at WwTWs so that the water quality in the Pevensey Levels is not adversely affected and is, where possible, improved in line with its designation objectives and the Water Framework Directive.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.2.75 Option 4 has a neutral effect on SA 6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.
SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.2.76 Option 4 has the same potential for significant negative effects on SA7 as Options 2 and 3 and with growth likely to be focused around the Hailsham/Polegate area, where issues of surface water flooding are well known, flood risk is a key issue. However, suites of SuDS measures, starting at the dwelling/development level, should help mitigate this to some degree. The development of Greenfield sites under this Option could potentially increase surface water flooding further. However, due to their scale, they offer the opportunity to include mitigation measures such as SuDS which could help avoid this impact and also provide additional benefits in terms of biodiversity and climate change mitigation/adaptation as well as helping to improve water quality through filtration for example.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.2.77 Housing growth under Option 4 would have the potential for significant positive impacts in terms of air quality and the Ashdown Forest, as housing growth is directed away from those settlements which could have an impact. There are not the same issues in the south of the District. As with Options 2 and 3, Option 4 offers the potential also to consolidate services and facilities reducing the need for people to travel and hence aid a reduction in emissions, in the mid and south of the District at least. In terms of renewable energy technologies, Option 4 covers all categories of settlement in the south of the District and may therefore present opportunities through economies of scale to incorporate more renewable energy technologies on site.

SA9 Ensure the best use of previously developed land and existing buildings

4.2.78 Option 4 is likely to result in significant positive effects on SA9 as it focuses on settlements in the south of the District, which is more 'urban' than the north of the District, increasing the potential to utilise previously developed land. However, some Greenfield development is still likely to come forward, as with Options 2 and 3.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transport modes (walking, cycling and public transport)

4.2.79 As Option 4 would allocate housing growth to all categories of settlement in the south of the District, in line with the Settlement Hierarchy, there is likely to be significant positive effects particularly on the smaller villages where new housing could help with the provision and enhancement of services and facilities. Service provision could also be consolidated within the larger settlements reducing journey lengths and frequencies. Development under Option 4 may also encourage the use of existing sustainable transport modes and lead to opportunities to enhance or improve wider transport
networks. However, the focus on the south may result in significant negative effect in the north in terms of accessibility to services and facilities, especially for those residents in more rural areas.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.2.80 Whilst not having a direct relationship with SA11, this Option has a focus on the most sustainable settlements within the south of the District and so could help in the reduction of emissions through the enhancement and consolidation of services and facilities and the reduction in need to travel. However, similar issues arise as with SA10 and this Option.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.2.81 In relation to SA12, Option 4 makes best use of existing services and facilities in those settlements away from the Ashdown Forest, and new housing development would be located in close proximity to services and facilities and vice versa thus improving access. However, for those in the most rural areas this may still involve a commute to reach services and facilities. Depending on the scale of sites considered under this option, opportunities for new services and facilities may or may not be presented. As stated with Option 1, access is very much site and location specific.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.82 Option 4 would limit the potential positive effects on SA13 as it would only provide housing choice and hence a range of decent and affordable homes for people, within the south of the District and those areas further north not routed to the Ashdown Forest. Therefore, this may result in affordability issues being exacerbated within the north of the District however this will be reduced in the south. District housing need could be met under this Option however local need and aspirations in terms of specific locations for housing will not be realised district wide.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.2.83 As with Option 2 and 3, Option 4 offers the same positive effects however these will be focused on the south of the District. Housing growth will be in close proximity to existing educational and training facilities.
SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.2.84 Again Option 4 should present positive effects for both the existing and new population of an area in terms of health and wellbeing (SA15). This is on the assumption that new development makes some contribution towards new or improved health, sport, community and open space facilities. However, this will not be district wide and so could present negative impacts against SA15 in the north of the District. Site size again may be a factor as to whether the Option achieves positive or negative effects due to the ability to provide on-site open space or community facilities.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.85 As with Option 3, Option 4 presents the same potential positive and negative effects on SA16. Within the south of the District, Option 4 would ensure services and facilities are safeguarded and in some cases enhanced ensuring communities have appropriate levels of provision to maintain themselves. Significant negative effects could occur in the more rural areas still and particularly in areas in the north of the District, where house prices could rise, services could be lost and out-migration may be experienced.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.2.86 Focusing growth under Option 4 has the potential for significant positive effects for the economy of Wealden and SA17 due to the proximity of any potential development to the A27 and the centres at Eastbourne and Brighton. This would provide existing and new residents with good access to employment opportunities within and outside of the District. It would also help consolidate the employment opportunities in the south of the District and attract inward investment in the form of capital and in new businesses. However, improvements would be needed to the A27 to fully realise the positive effects and the north of the District may suffer negative impacts with focused growth on the south.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.2.87 In regards to SA18, Option 4 offers significant positive effects in the south of the District through potential sites in themselves enabling the regeneration of an area and as a result of overall growth stimulating regeneration within settlements. There may also be small opportunities for positive economic effects presented through the improvement of the character
of an area and the improvement in the quality of life for residents in that settlement. Furthermore, growth under Option 4 is likely to support the creation of a large tourism attraction in the south of the District, an objective of the Corporate Plan, which would also provide positive effects on SA18 in terms of tourism and the economy.

**Option 5**

**Environmental SA Objective (SA1-SA11)**

4.2.88 For Option 5, the positive and negative effects on the SA Objectives are the same as for Option 4, although this Option includes locating housing growth away from settlements with a waste water treatment issue as well. Therefore the discussion will not be repeated but updated in relation to the waste water element.

**SA1 To protect and enhance biodiversity and geodiversity within the District**

4.2.89 Option 4 takes full account of the biodiversity within the District as it includes both the Ashdown Forest and Pevensey Levels. Therefore, impacts on SA1 are likely to be significantly positive.

**SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets**

4.2.90 As with the other Options discussed above, the impact on SA2 under this Option has a significant positive effect in that directing housing growth to settlements with a zero influence on the Ashdown Forest and waste water issues protects much of the landscape within the District. However, this does place greater pressure on accommodating the housing growth required within a smaller number of settlements which may increase the rate of Greenfield development which in turn could result in negative impacts on the landscape.

**SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors**

And

**SA4 Improve the quality of the built environment**

4.2.91 Option 5 has a neutral impact on SA3 and SA4 in that the spatial distribution of housing growth itself has no direct bearing on improving the built environment or providing and enhancing access to amenities. However, opportunities to improve the existing built environment in those settlements identified under this Option, may arise through careful design of new development and more people are likely to locate to an area which would increase the number of potential visitors.
SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.2.92 Option 5 would have significant positive effects on SA5 due to the fact it distributes housing growth to areas away from waste water issues and so will help improve water quality in the District. Negative effects may arise as a result of development in a smaller area however measures such as SuDS should mitigate any adverse impacts, although these will be dependent on other policies within the Local Plan.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.2.93 Option 5 provides has a neutral effect on SA 6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.2.94 The impacts of Option 5 on SA7 and SA8 are the same as for Option 4 although Option 5 does present housing growth in a much smaller area and so could exacerbate issues of flooding in certain areas. Flood risk assessments would be required as would mitigation measures such as SuDS. These may be more difficult to achieve under this Option due to the potential site size of any development.

SA9 Ensure the best use of previously developed land and existing buildings

4.2.95 The limited area for housing growth under Option 5 is likely to have positive and negative effects on SA9 in that previously developed land will be utilised first although this is limited within the District as a whole and so the Option will still result in Greenfield development. This may be higher than in the other Options given the smaller area within which to accommodate the housing growth required.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.2.96 Again housing growth under Option 5 would be allocated to all categories of settlement in line with the Settlement Hierarchy and the restrictions of this Option. Therefore, there is likely to be significant positive effects particularly on smaller villages where new housing could help with the provision and enhancement of services and facilities. Service provision could also be consolidated within the larger settlements reducing journey lengths and frequencies (SA10). Development under Option 4 may also encourage the use of existing sustainable transport modes. The positive effects will only be felt in a small area of the District under this Option.
SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.2.97 Whilst not having a direct relationship with SA11, this Option would allocate housing growth to a limited area of the District and so may not result in a reduction in emissions as people still rely on their cars to access services and facilities.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.2.98 In relation to SA12, Option 5 limits the area for potential housing growth further, which in turn would exacerbate the positive and negative issues discussed in relation to this SA Objective and Option 4.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.99 Option 5 would limit the potential positive effects on SA13 further as it would only provide housing choice and hence a range of decent and affordable homes for people, within a small area of the District. Therefore, this may result in affordability issues being exacerbated within the District. As with the other Options, the national approach to affordable housing contributions will temper delivery of affordable housing.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.2.100 As with Options 2; 3 and 4, Option 5 offers the same positive effects for SA 14 however these will be focused on a much smaller area of the District. Housing growth, where it is allocated may be in close proximity to existing educational and training facilities, however it may not. This will depend on the location of any sites identified under this Option.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.2.101 Again Option 4 should present positive effects for both the existing and new population of an area in terms of health and wellbeing (SA15). This is on the assumption that new development makes some contribution towards new or improved health, sport, community and open space facilities. However, this will not be district wide and so could present negative impacts against SA15 in those areas not identified under this Option. Again the achievement of positive effects against SA15 here will be dependent on site size and location.
Economic SA Objectives (SA17 and SA18)

4.2.102 The effects of Option 5 on SA16; SA17 and SA18, both positive and negative, are the same as Option 4 although they will impact on a smaller area of the District due to the requirements of Option 5. The south of the District is still likely to take the majority of development under this Option but the positive impacts will not be as widely felt.

Option 6

Environmental SA Objectives (SA1-SA11)

4.2.103 This Option would distribute housing growth in very much the same way as Option 1 but it will be based on the affordable housing need for the District rather than the full objectively assessed housing need. This may result in higher housing growth as affordable housing is provided as a proportion of any development coming forward, and as it is only achievable on sites of 11 net dwellings or more (outside of the AONB) growth could be high.

SA1 To protect and enhance biodiversity and geodiversity within the District

4.2.104 As with Options 1 and 3, Option 6 does not take into account the biodiversity of the District and so significant negative effects are likely to occur in relation to the Ashdown Forest and Pevensey Levels (SA1). The degree of severity of these impacts would depend on the overall levels of housing growth put forward.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.2.105 Option 6 is likely to have significant negative effects on SA2 due to the fact that there is a need for affordable housing within rural areas as well and basing distribution on this fact could result in rural areas being allocated relatively high housing numbers, which could impact on the landscape and rural character of the District and those settlements.

SA4 Improve the quality of the built environment

4.2.106 Whilst Option 6 has no direct relationship with SA4, it may provide opportunities through new development to improve and/or enhance the built environment of settlements, including more rural areas, through careful design.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.2.107 As with Option 1, Option 6 will reduce stress on water resources (SA5) in any one particular area however the infrastructure in more rural areas may be insufficient to accommodate high levels of growth and so would need to be addressed to ensure water resources are not adversely affected. The
greater levels of growth that may present under Option 6, could offer opportunities for incorporation of SuDS measures within development which would help manage water resources and aid in improving the quality of water resources within the District.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.2.108 Option 6 has a neutral effect on SA 6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.2.109 As with Option 1, Option 6 has the potential for negative effects on SA7 due to the potential to increase flood risk. The development of Greenfield sites could potentially increase surface water flooding, which is an issue within the District. However, due to their scale, they offer the opportunity to include mitigation measures such as SuDS which could avoid this impact and also provide additional benefits in terms of biodiversity and climate change mitigation/adaptation. Therefore, the impacts are uncertain and will also depend on other policies and strategies within the Local Plan.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.2.110 The effects of Option 6 on SA8 and SA9 are the same, both positive and negative, as for Option 1 under these SA Objectives. Renewable energy technologies are more likely to be incorporated on larger scale developments due to upfront costs and economies of scale, which may occur under Option 6 particularly as sites would need to be larger than 11 net dwellings to achieve the affordable housing element.

SA9 Ensure the best use of previously developed land and existing buildings

4.2.111 Option 6 is also likely to result in more Greenfield development which would negatively affect SA9.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.2.112 As with Option 1, Option 6 distributes housing growth throughout the District, albeit not necessarily to all settlements, and as such has the potential for significant positive impacts on SA10 through locating development close to existing services and providing opportunities to enhance existing services and facilities. It also offers opportunities to improve cycling and walking links between settlements to encourage sustainable transport
modes. However, some settlements will remain isolated from services and private car use will still be the norm.

**SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development**

4.2.113 This Option does not have a direct relationship with SA11 as the reduction of CO₂ emissions is most likely to be achieved through the implementation of a renewable energy strategy/policy, as is climate change adaptation.

**Social SA Objectives (SA12-SA16)**

**SA12 Improve access to services; facilities; the countryside and open spaces**

4.2.114 In regards to SA12, again assessment is difficult as implications for accessibility can be very site specific. Sites under this Option may be small and spread across numerous settlements which may result in fewer opportunities to deliver new services and facilities. Pressure on existing services may also be increased through development under this Option. Positive effects may arise however depending on scale and location of development.

**SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home**

4.2.115 As with Option 1, Option 6 could limit delivery of housing in terms of SA13. This is on the basis that in practice there could be a discord between the levels of capacity within the settlements identified under this Option and the strategy itself. The Option would however provide a number of benefits in respect of SA13. For example, it would provide housing in a range of locations to increase choice and affordability.

**SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health**

4.2.116 This Option offers the opportunity to link affordable housing need with accessibility to learning resources and specific local skills needs in learning centres within the District (SA15). Growth would still be located close to existing educational facilities and an increase in population may help achieve new facilities. However, as with the other Options there will still be areas of the District where the population will have to commute to reach these facilities.

**SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community**

4.2.117 For SA15 and SA16, Option 6 is likely to have a positive effect as by providing housing growth based on affordable housing need, people will
be provided with a decent home in which to live and which they can afford. This in turn will help address health inequalities and issues of deprivation as well as allowing people to remain in their local communities.

**Economic SA Objectives (SA17 and SA18)**

4.2.118 For SA17 and SA18 this Option has the potential for positive effects by providing affordable housing close to existing employment opportunities and by encouraging new employment development. However its weakness lies in the fact that by distributing development in this way it is more likely that small sites would come forward for development which may offer less scope to deliver new employment. However, it could add to improved vitality within existing settlements and help regenerate town centres and rural economies, with a subsequent positive impact on the tourism economy.

**Housing Growth Options**

4.2.119 As previously stated, the Wealden Local Plan is looking at the potential to accommodate the OAHN for the District together with the under supply for the housing market area as a whole.

4.2.120 The Wealden Local Plan Issues, Options and Recommendations Consultation Paper puts forward 6 reasonable alternatives/options for meeting the Districts housing need (between 660 and 735 dwellings per annum) and these are assessed in this section. Subsequent sections of this report shall asses the alternatives/options for accommodating higher housing growth in order to meet the under supply for the housing market area together with the need in Wealden.

4.2.121 Earlier iterations of the SHMA identified lower housing numbers that that now published as part of the Wealden Local Plan. Earlier iterations of the SA considered the evidence base at the time, although now it is acknowledged this is out of date and the resulting options in the Wealden Local Plan reflects the current situation and the current OAHN. The following commentary is therefore based on a lower OAHN identified for the District.

**Option 1 - 7,843 dwellings (523 dwellings per annum)**

4.2.122 This figure reflects the housing number required to accommodate the growth in the population of Wealden over the Plan period based on demographic projections.

4.2.123 This is a reasonable alternative because the changing demography (i.e. population, household size, age structure) of an area impacts strongly on the housing market and the type and quantity of housing required. This relationship between household composition and the housing stock represents a key driver in determining the balance between supply and demand.
Option 2 - 9,127 dwellings (608 dwellings per annum)

4.2.124 This figure represents an intermediate assessment of the housing numbers required over the Plan period and is based on a mid-point between the demographic housing figure and a high economic growth housing figure, as detailed in the SHMA.

4.2.125 It is reasonable to consider this housing figure as it accounts for accommodating projected changes in the Districts population should economic growth and demographic projections follow predicted path, but moderates the figure should economic growth not be as high as projected.

Option 3 - 10,411 dwellings (694 dwellings per annum)

4.2.126 This figure is the highest from the SHMA data and represents the housing that would be required under a high economic growth scenario.

4.2.127 It is reasonable to consider this alternative because economic performance is closely interrelated with housing markets. The relative economic performance of an area and the number of jobs available are major factors in attracting new households and increasing demand to live within an area. Linking the future performance of the economy in Wealden with future housing requirements is therefore relevant.

Options 4-6 - 3,991 dwellings; 5,375 dwellings and 6,559 dwellings (266 dwellings; 358 dwellings and 437 dwellings per annum)

4.2.128 These Options represent the lowest potential housing figures considered as part of the Wealden Local Plan Issues, Options and Recommendations Consultation. They are significantly below the demographic housing figure.

4.2.129 Owing to the significant constraints within the District, the Ashdown Forest; High Weald AONB and the Pevensey Levels, and the uncertainties around any measures to address the specific issues related to them, it is reasonable to consider these low housing figures because there may only be capacity to accommodate this level in terms of land availability and suitable sites.

SA Assessment

Predicting the effects of the Housing Growth Figures (SA Tasks B3/B4)

4.2.130 Appendix B sets out the detailed appraisal of each of the alternative housing growth figures proposed to address housing need. For each of the alternatives the appraisal evaluates the likely significant effects of each which reflects the baseline sustainability issues identified within the SA Scoping Report (2015).
4.2.131 These options will be considered in preparing the plan. This might include a hybrid of the options currently proposed or additional options that emerge from the consultation.

4.2.132 This section provides a summary of the assessment in Appendix B for each of the Options and highlights the key likely significant effects that may occur under each Option.

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4.2.133 For SA3; SA6; SA8; SA10; SA11; SA14 and SA15 none of the Options have a direct relationship or effect due to the fact that these SA Objectives will be affected by other policies and strategies within the Local Plan such as the approach to the distribution of housing numbers within the District; renewable energy policies and design.

**Effects on SA Objectives common to all Options**

SA1 To protect and enhance biodiversity and geodiversity within the District

4.2.134 For SA1, all of the Options have the same likely significant negative effects due to the fact none take into account the biodiversity of the District. Option 4, which presents the lowest figure, may provide some positive effect in that it is such a low housing figure that it may be able to be accommodated in areas where there would be no impacts on the biodiversity assets of the District.

4.2.135 Significant negative effects that are likely to occur include increased visitor and hence recreational pressure on the Ashdown Forest; an increase in vehicular movements across or in close proximity to the Ashdown Forest resulting in contributions to nitrogen deposition and increased pressure on water resources and waste water treatment capacity in the south of the District impacting on water quality within the Pevensey Levels.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.2.136 The same general assessment is made in respect of the Options effects on SA2 and the District’s landscape, historic environments and cultural assets. The higher the housing figure, the more likely that there would be
significant negative effects. Significant negative effects could include the erosion of the historic environment through unsympathetic design and inappropriate development; encroachment into the countryside and landscape through Greenfield developments and the sense of a loss of local identity through inappropriate developments.

**SA4 Improve the quality of the built environment**

4.2.137 For SA4 design policies together with site selection and housing distribution will play the greatest role in determining effects. Opportunities may arise to improve the existing built environment through innovative development proposals or negative effects may occur if development is insensitive and inappropriate in design terms.

**SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management**

4.2.138 The effects on SA5 will largely be determined by the spatial distribution of the eventual housing figure. Pressure may be placed through large scale housing allocations on certain settlements which may have negative effects on water resources or contribute to deteriorating water quality. On the other hand large scale development provides more opportunity to incorporate measures such as SuDS into developments which would help with managing water quality and so large housing figures may offer more positive effects.

**SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.**

4.2.139 In regards to SA7, there is the potential for negative effects with all the housing growth Options, although these would be less significant with the lower housing figures. Any increase in hard surfacing through development has the potential to exacerbate issues of surface water flooding in certain areas and larger housing growth figures would likely mean more development of Greenfield sites. However, measures such as SuDS, which can be more viable on larger developments, would help mitigate this effect as well as offering additional benefits such as habitat creation and climate change adaptation. This would be dependent on other policies within the Local Plan, including the actual choice of sites and the design of development.

**SA9 Ensure the best use of previously developed land and existing buildings**

4.2.140 The effects on SA9 will again be largely determined by the spatial distribution of any housing figure option as well as settlement and site selection. Whilst smaller housing figures could provide positive effects in utilising brownfield land, which tends to be smaller by its nature but this is not always the case, brownfield land is scarce within the District and maybe needed for economic growth purposes and allocations. Therefore, any
housing figure is likely to result in some degree of Greenfield development, with higher housing figures obviously having more of an effect.

SA12 Improve access to services; facilities; the countryside and open spaces

4.2.141 The effects on SA12 are again dependant on the spatial distribution of housing rather than the number of dwellings itself. Positive effects may present themselves through the provision of housing for people in close proximity to existing services and facilities including the Districts countryside. Negative effects may arise however through the capacity of an area to accommodate an increased population being exceeded. With large housing figures and hence large developments opportunities arise to provide new and enhance existing services which may in turn have positive effects on access.

4.2.142 For the majority of the housing figure Options, dwelling numbers alone will not have an effect. Rather the way in which they are implemented, together with other policies within the Local Plan, will determine their effects.

4.2.143 Lower and higher figures present positive and negative effects purely through sheer numbers. With larger development it is often more likely that additional benefits can be achieved such as open space provision; renewable energy and contributions to infrastructure whereas these can be harder on smaller developments. Conversely smaller developments can offer positive effects in terms of innovative design whereas larger developments can sometimes be more standardised. Of course this can be turned around and is a generalisation.

Effects on SA Objectives that differ between Options

4.2.144 The following summarises the effects on SA Objectives that differ depending on the Option being assessed and are presented under the Option headings, which have been grouped together as appropriate.

Option 1 & Option 2 - 7,843 dwellings and 9,127 dwellings

Social SA Objectives (SA12-SA16)

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.145 Both Options have a positive effect on SA13. Option 1 provides for the demographic projections put forward in the SHMA, taking account of the increasingly ageing population of the District as well as the change in household composition, providing housing that is decent and affordable to meet local needs. Option 2 is likely to have a greater positive effect on SA13 as it also provides for an element of the economic projections for housing growth, which as already stated are closely linked. Option 2 provides a balance between the demographic and high economic housing growth scenarios.
SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.146 Against SA16 Option 1 has a positive effect for much the same reason as SA13. By providing a range of housing to meet the expected change in demographics will enable people to stay in their communities and also provide opportunities for new residents to locate in the District, hence creating vibrant and inclusive communities. Again Option 2 is likely to have greater positive effects because it is proposing a higher housing figure and is also linked to some degree of economic growth. This could in turn attract people into an area within the District hence adding to the creation of inclusive and diverse communities.

Economic SA Objectives (SA17 and SA18)

4.2.147 For SA17 and SA18 the effects of Options 1 and 2 would be dependent on their implementation. As previously stated, the economic performance of an area and housing requirements are closely linked. By providing more housing that is affordable and potentially in attractive areas of the District (environmentally, economically) more people are likely to locate there and hence increase the workforce. In this respect Option 2 is likely to have greater positive effects than Option 1. However, to ensure the economy of the District is strengthened and new job opportunities created, other policies and strategies would need to play a role.

Option 3 - 10,411 dwellings

Social SA Objectives (SA12-SA16)

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.148 This Option provides for housing under a high economic growth scenario and as such would have positive effects on SA13 through linking housing growth and economic performance. The Option will provide sufficient levels of housing to meet local demand and through economies of scale may be able to achieve more affordable housing than Options 1 and 2.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.149 Depending on how this Option would be implemented, it may have positive effects in that providing more housing may help stem out migration which in turn would enable communities to maintain themselves and also attract new people in. However, this would be dependent on the housing being affordable and accessible to local people as well as those from outside.
Economic SA Objectives (SA17 and SA18)

4.2.150 On SA17 and SA18 Option 3 is likely to have significant positive effects as it is linked to high economic growth within the District. The Option would help create new employment opportunities by providing appropriate housing development to meet the needs of those coming to work in the District. This would need to be provided in conjunction with appropriate economic policies as well as design and location policies. The large scale nature of the Option is likely to provide the conditions for significant infrastructure improvements and regeneration and hence have positive effects on SA18.

Options 4 – 6 - The lower housing figures

Social and Economic SA Objectives

4.2.151 The lower housing figures are all likely to have negative effects on SA13 and SA16-18 due to the fact the housing figures proposed are so low. These are likely to be less significant between Option 4 to 6 as the numbers increase, but overall the effects will be negative on the SA Objectives.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.2.152 The Options would not meet the OAHN for the District and as such will negatively impact on SA13 as they will not provide everyone with the opportunity to live in a decent and affordable home. If large scale sites did come forward they are likely to be in very limited areas of the District, due to the low housing figures, and so any potential positive impacts would be localised.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.2.153 With the low housing figures unlikely to provide sufficient housing to meet demand in the District, negative effects on SA16 are likely to occur as people migrate out of the District due to the lack of affordable and decent homes. This in turn could lead to a loss of community cohesion.

4.2.154 The low housing figures proposed under these Options are unlikely to help stimulate economic growth or provide access to new employment opportunities as there is no linkage with economic performance.

Additional Options Not taken forward

4.2.155 In addition to the 6 Options listed above, higher housing figures (based on the Duty to cooperate requirement and potential increase from Gatwick development) were considered. These figures stood at:
• 23,600 (1,573 dwellings per annum)
• 24,900 (1,660 dwellings per annum)
• 27,500 (1,833 dwellings per annum)

4.2.156 Having considered these figures in relation to the environmental, social and economic impacts they would have on the District they were not taken forward as they were not considered to be reasonable alternatives in terms of sustainability. The numbers were not considered deliverable within the timeframe of the Wealden Local Plan and have therefore not been assessed against the SA Objectives.

Conclusions

4.2.157 None of the housing figures proposed take account of the biodiversity and environmental/landscape assets and constraints of the District. They are purely based on demographic changes and economic growth projections and as such would need to be moderated in terms of the constraints within the District in order to arrive at a preferred housing figure. Housing needs have to be met but there needs to be a balance between growth and protection of the District's environment.

4.2.158 The lower housing figures are considered reasonable alternatives due to the constraints within the District, however they are not considered appropriate due to the fact they now will not enable the OAHN to be met. Lower housing figures would help achieve the environmental SA Objectives but would not meet the housing need. This is why they are not taken forward as part of the preferred spatial strategy for housing growth within the District.

As already stated, moderating elements can be in the form of other policies and strategies such as the spatial distribution of housing according to the Settlement Hierarchy (assessed in the next section). The Settlement Hierarchy identifies those settlements which are considered most sustainable and able to accommodate certain levels of growth.
4.3 Settlement Hierarchy

4.3.1 The Settlement Hierarchy groups together settlements, based on sustainability characteristics. As the NPPF is based upon sustainability, the ranking of settlements helps in considering how each settlement should develop in the future, taking into account government policy. The rural nature of Wealden means there are a number of settlements of varying size and function. The size of the settlement does not necessarily correlate to the number of facilities it has or its role.

4.3.2 The Wealden Local Plan Issues, Options and Recommendations Consultation paper aims to establish a hierarchy of settlements for the District based on their current role and service provision, together with their size. In outlining where new development should be directed, the Wealden Local Plan should comply with the principles of sustainable development.

4.3.3 The Wealden Local Plan aims to do this by encouraging close proximity of housing, jobs and services, therefore reducing the need to travel, especially by private car. However, a settlement's position within the hierarchy does not inevitably mean that significant growth should be accommodated there, because other factors need to be considered, such as environmental constraints.

Methodology

4.3.4 In order to assess the sustainability of the District’s settlements, work on identifying the facilities contained within the settlements as well as their accessibility by public transport to certain key facilities, whether within the settlement itself or in a nearby settlement, was undertaken. It may be that settlements within the Wealden look to towns and cities outside the District to meet certain needs.

4.3.5 Owing to the nature of the settlements within the District there is no one settlement that can meet all the needs of the residents for the purposes of shopping, health care facilities and education provision. It can also not be assumed that everyone has access to a private car and this has been taken into account to ensure sustainable development is considered.

4.3.6 The Scoping Report (2015) identified that in fact when travelling to work, many residents who had access to a private car actually chose public transport and so this is a key trend that the Wealden Local Plan should take account of.

4.3.7 Despite the lack of a settlement providing all the facilities needed by residents in one place, it is taken that the 5 main settlements of Crowborough, Uckfield, Heathfield, Hailsham and Polegate and Willingdon are sustainable due to their level of facilities, services and accessibility. They were however still included in the facilities and access assessments.
4.3.8 Information on service provision was gathered as part of desktop research as to whether a settlement benefits from, and/or has good access to other settlements with, the following:

Nursery/Pre School    Library
Primary/Secondary School    Doctor surgery
Dentist    Pharmacy
Hospital    Convenience Store
Post Office    Public House
Place of Worship    Community Hall
Petrol Station    Business area
Play area    Playing Pitches
Multi-green spaces    Pavilion/Facilities
Bus service

4.3.9 A simple matrix was used to assess all the settlements in the District, with the settlement listed in the vertical column and the services listed horizontally, and then a count of how many services were within each settlement. This was compared to the result from the matrix used to formulate the Settlement Hierarchy in the adopted Core Strategy (2013) to ascertain whether there had been any change in service provision. The assessment matrix can be seen in Appendix C.

4.3.10 Using this scoring as a baseline the District’s settlements were then assigned an ‘accessibility ranking’ and a ‘facilities ranking’ (see Appendix D). The ‘accessibility’ and ‘facility’ rankings were determined using the following criteria:

<table>
<thead>
<tr>
<th>Accessibility Criteria</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 inaccessible by public transport</td>
<td>poor intermittent service during the week (less than 5 days service) and low frequency</td>
</tr>
<tr>
<td>2 Poor accessibility</td>
<td>limited service to a limited centres and frequency of up to around 2 hours</td>
</tr>
<tr>
<td>3 accessible</td>
<td>a very good service of one type of transport option, or a good bus service 6 to 7 days per week frequency of one hour and duration up to and around 30 mins</td>
</tr>
<tr>
<td>4 very accessible</td>
<td>a range of public transport options preferably 7 days a week, up to around 30 mins frequency and duration generally less than 30 Mins</td>
</tr>
</tbody>
</table>
Facilities criteria

<table>
<thead>
<tr>
<th></th>
<th>No facilities or social facilities (pub and or community hall present) but no primary school or convenience store</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>No facilities but with a primary school or convenience store</td>
</tr>
<tr>
<td>3</td>
<td>Social facilities (pub and or community hall present) with primary school but no convenience store</td>
</tr>
<tr>
<td>4</td>
<td>Social facilities (pub and or community hall) with convenience store but no primary school</td>
</tr>
<tr>
<td>5</td>
<td>Social facilities (pub, community hall etc. at least one) with convenience store and primary school</td>
</tr>
<tr>
<td>6</td>
<td>Social facilities (pub, community hall etc. at least one) with convenience store, primary school and doctors</td>
</tr>
<tr>
<td>7</td>
<td>Social facilities (pub, community hall etc. at least one) with convenience store, primary and secondary school (not private fee school) and doctors and a number of retail outlets.</td>
</tr>
</tbody>
</table>

4.3.11 As a result of the scoring and ranking, the following Settlement Hierarchy was devised:

<table>
<thead>
<tr>
<th>Settlement Type</th>
<th>Function</th>
<th>Settlement name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Towns with development boundaries</td>
<td>very accessible with good local facilities / accessible with good local facilities</td>
<td>Crowborough; Forest Row; Hailsham; Heathfield; Polegate; Stone Cross; Uckfield; Willingdon</td>
</tr>
<tr>
<td>Villages with development boundaries</td>
<td>very accessible with good local facilities / accessible with good local facilities</td>
<td>Buxted; East Hoathly; Frant; Groombridge; Hartfield; Herstmonceux; Horam; Mayfield; Ninfield; Rotherfield; Wadhurst; Westham;</td>
</tr>
<tr>
<td>Neighbourhood centres – no development boundaries</td>
<td>accessible with local to very limited facilities</td>
<td>Bells Yew Green; Berwick Station; Boreham Street; Chelwood Common; Chelwood Gate; Colemans Hatch; Cross-in-hand; Danehill; Five Ash Down; Five Ashes; Framfield; Halland; Hellingly; Isfield; Little Horsted; Lower Dicker; Lower Horsebridge; Magham Down;</td>
</tr>
</tbody>
</table>
### Settlement Type | Function | Settlement name
--- | --- | ---
Infill settlements - no development boundaries | no accessibility but some facilities | Maresfield; Mark Cross; Maynards Green; Pevensey; Town Row; Upper Hartfield; Windmill Hill; Withyham
Infill settlements - no development boundaries | no accessibility but some facilities | Arlington; Ball Green; Blackboys; Broad Oak; Chiddingly; Hadlow Down; Hankham; High Hurstwood; Laughton; Muddles Green; Nutley; Old Heathfield; Pevensey Bay; Punnetts Town; Ripe & Chalvington; Rushlake Green; Selmeston; Upper Dicker;
Non-sustainable – no growth | no accessibility and no / very limited facilities | Best Beech Hill; Blackham; Bodle Street Green; Cade Street; Cousley Wood; Cowbeech; Fairwarp; Hooe Common; Fletching; Rosers Cross; Vines Cross; Waldron

4.3.12 The classification of settlements at this point was based on the level of services and facilities as well as accessibility by public transport rather than simply population/household levels. However, in addition to the analysis used for the Local Plan, the function of Towns with development boundaries and Villages with development boundaries in relation to other settlements also needs to be considered. For example a larger village, in an area where higher order service centres are located a considerable distance away, may act as a local service centre for nearby smaller villages, and this might warrant further growth.

4.3.13 The new Settlement Hierarchy comprises 5 classifications of settlement, Towns and Villages with development boundaries contain the most sustainable settlements and Non-sustainable settlements contain the least. The Hierarchy highlights those settlements with the highest level of services, which are therefore considered more sustainable, and may be more suitable for higher levels of development.

4.3.14 A description of each of the classifications and the methodology for allocating housing growth to them is below:
**Towns with development boundaries**

4.3.15 This classification contains the principal locations for accommodating housing growth (open market and affordable), as well as other development. They are the most accessible of settlements and will be the main focus for development in the District. They are also the most sustainable settlements in the District.

**Villages with development boundaries**

4.3.16 These settlements are mostly smaller in population size than Towns with development boundaries and provide important local services to their own and surrounding communities but they do not necessarily possess the wide range of facilities and functions found in the towns.

4.3.17 For both Towns with development boundaries and Villages with development boundaries housing growth would be allocated in proportion to their size and facilities and based on the following methodology in terms of exact numbers:

- Adding together the housing figures allocated to the lower classified settlements
- Deducting this figure from the overall housing figure to be delivered over the Plan period
- Distributing the residual housing figure to Towns and villages with development boundaries based on their size in terms of urban area (ha).

**Neighbourhood Centres – no development boundaries**

4.3.18 These smaller settlements provide a narrow range of local services and facilities, generally less than those offered by towns and villages with development boundaries but more than lower classified settlements. They have good or very good accessibility in general and by public transport. These small settlements are important to their local communities and provide a focus for rural living and opportunities for social interaction.

4.3.19 Housing growth (open market and affordable) would be allowed in Neighbourhood centres with no development boundaries in proportion to their size and facilities, and according to their capacity to accommodate growth due to environmental and infrastructure capacity constraints. The housing number allocated to these settlements would be based on 10% of the total number of existing houses.

**Infill settlements – no development boundaries**

4.3.20 These settlements provide a good range of local services and facilities but have poor access though public transport. As Neighbourhood Centres these settlements are important to their local communities and provide a focus for rural living and opportunities for social interaction.
4.3.21 Housing growth (open market and affordable) would be allowed in infill settlements in proportion to their size and facilities, and according to their capacity to accommodate growth due to environmental and infrastructure capacity constraints. The housing number allocated to these settlements would be based on 5% of the total number of existing houses.

4.3.22 For both Neighbourhood and infill settlements the number of existing houses, for the purposes of the new Settlement Hierarchy, was determined using the size of the exiting built area, in hectares, and applying a housing density of 30dph.

Non-sustainable

4.3.23 These settlements are generally the smallest in terms of size (number of households) and function and often possess few if any services. They also suffer from poor accessibility in general and by public transport. These settlements are considered unsuitable for housing growth allocations due to the fact they are inherently unsustainable.

4.3.24 Whilst the Wealden Local Plan will not allocate any housing growth to these settlements, limited development in the form of windfall sites to meet affordable housing for local needs may come forward over the Plan period and may be acceptable where proposals are well integrated into the settlement and are acceptable in terms of environmental and infrastructure capacity constraints, together with other policy considerations.

4.3.25 In regards to determining an approach to defining a Settlement Hierarchy, the Core Strategy Settlement Hierarchy, together with a ‘No Settlement Hierarchy’ approach, were considered reasonable alternatives and are assessed in this section together with the proposed new Settlement Hierarchy.

Amendments to the Settlement Hierarchy

4.3.26 It should be noted that following the initial Settlement Hierarchy classification the first two categories (Towns and Villages with development boundaries) were merged to form the Sustainable Settlement category. This has resulted in there being 4 settlement classifications instead of 5, however the fundamental ethos of the Settlement Hierarchy and the methodology underpinning it (and assessed above) has not altered.

4.3.27 The proposed classifications for settlements under the Settlement Hierarchy have also been renamed since the initial work and are proposed as follows (please see paragraphs 8.33-8.37 of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper for a full explanation):

- **Sustainable Settlement** – very accessible with good local facilities / accessible with good local facilities
- **Local Settlement** – accessible with local to very limited facilities
- **Neighbourhood Settlement** – no accessibility but some facilities
- **Residential Settlement** – no accessibility and no / very limited facilities

<table>
<thead>
<tr>
<th>Settlement Type</th>
<th>Function</th>
<th>Settlement name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainable Settlements</td>
<td>very accessible with good local facilities / accessible with good local facilities</td>
<td>Crowborough; Forest Row; Hailsham; Heathfield; Polegate; Stone Cross; Uckfield; Willingdon; Buxted; East Hoathly; Frant; Groombridge; Hartfield; Herstmonceux; Horam; Mayfield; Ninfield; Rotherfield; Wadhurst; Westham;</td>
</tr>
<tr>
<td>Local Settlements</td>
<td>accessible with local to very limited facilities</td>
<td>Bells Yew Green; Berwick Station; Boreham Street; Chelwood Common; Chelwood Gate; Colemans Hatch; Cross-in-hand; Danehill; Five Ash Down; Five Ashes; Framfield; Halland; Hellingly; Isfield; Little Horsted; Lower Dicker; Lower Horsebridge; Magham Down; Maresfield; Mark Cross; Maynards Green; Pevensey; Town Row; Upper Hartfield; Windmill Hill; Withyham</td>
</tr>
<tr>
<td>Neighbourhood Settlements</td>
<td>no accessibility but some facilities</td>
<td>Arlington; Ball Green; Blackboys; Broad Oak; Chiddingly; Hadlow Down; Hankham; High Hurstwood; Laughton; Muddles Green; Nutley; Old Heathfield; Pevensey Bay; Punnetts Town; Ripe &amp; Chalvington; Rushlake Green; Selmeston; Upper Dicker;</td>
</tr>
<tr>
<td>Residential Settlements</td>
<td>no accessibility and no /</td>
<td>Best Beech Hill;</td>
</tr>
<tr>
<td>Settlement Type</td>
<td>Function</td>
<td>Settlement name</td>
</tr>
<tr>
<td>-----------------</td>
<td>----------</td>
<td>-----------------</td>
</tr>
<tr>
<td></td>
<td>very limited facilities</td>
<td>Blackham; Bodle Street Green; Cade Street; Cousley Wood; Cowbeech; Fairwarp; Hooe Common; Fletching; Rosers Cross; Vines Cross; Waldron</td>
</tr>
</tbody>
</table>

**SA Assessment**

**Predicting the effects of the Wealden Settlement Hierarchy (SA Tasks B3/B4)**

4.3.28 Appendix E sets out the detailed appraisal in regards to the new Settlement Hierarchy against the 18 SA Objectives. The Table below summarises the effects.

<table>
<thead>
<tr>
<th>Options</th>
<th>SA Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18</td>
</tr>
<tr>
<td>Option 1: New Settlement Hierarchy</td>
<td>- - o ? ? o ? + + + + + + + + + +</td>
</tr>
<tr>
<td>Sustainable Settlement</td>
<td>- - o ? ? o ? + ? + + + + + + + +</td>
</tr>
</tbody>
</table>

**Option 1: New Settlement Hierarchy**

4.3.29 Option 1 performs strongly against the SA Objectives, with particular significant positive effects on the social and economic objectives (SA12-SA18). The methodology and approach to the Settlement Hierarchy under Option 1 ensures that the majority of development will be located in the existing market towns that provide the best range of services, employment opportunities and access to public transport. This Option makes the most use of existing infrastructure, reduces the need to travel and ensures the ongoing sustainability of the settlements.

4.3.30 In addition, the Option also recognises that the more rural settlements should have the opportunity where appropriate to accommodate small-scale
development including infill. This is designed to help address some of the local need for housing and employment outside the Sustainable Settlements classification.

4.3.31 The principles and methodology underpinning how future growth will be distributed across the new Settlement Hierarchy reflects the role of the settlements, and ensures that the scale of development is appropriate to the size of the town or village and that environmental and infrastructure capacity is accounted for. This approach ensures that sustainable development remains a central theme of the Wealden Local Plan.

4.3.32 The SA of Option 1 did highlight that there is the potential for likely significant negative effects in regards to the biodiversity, landscape, countryside, cultural assets and historic environment of the District (SA1 and SA2). However, this will depend on the precise location of development, the overall spatial distribution, the level of growth that is finally allocated to settlements and any forms of mitigation that are proposed or contained within the Local Plan and its policies.

4.3.33 The methodology behind the new Settlement Hierarchy ensures that good access to services and facilities and reductions in emissions, amongst other things, are achieved through focusing most development within the most sustainable settlements. It also ensures continued access to small facilities and vibrancy of more rural communities through the enabling of small-scale infill development.

4.3.34 Without this methodological approach, there could be risks relating to potential inappropriate development that is out of scale in terms of the settlement hierarchy, resulting in potentially reduced access to services and facilities and an increased need to travel.

**Classification of Settlement**

4.3.35 Sustainable Settlements perform very well against the SA Objectives with the exception of SA1 and SA2, however this was a common concern with the Settlement Hierarchy overall.

4.3.36 Focusing growth on Crowborough; Forest Row; Hailsham; Heathfield; Polegate; Stone Cross; Uckfield; Willingdon means that new development is located close to existing services and facilities which has the benefit of reducing the need to travel, offering more opportunities for use of sustainable transport modes and creating more inclusive communities.

4.3.37 The Sustainable Settlements Classification includes smaller villages which provide important services to their own communities as well as surrounding rural areas. They have good accessibility from and to other areas of the District and offer the same benefits, albeit on a smaller scale, to the larger market towns.

4.3.38 Local settlements have a narrow range of services and facilities but are accessible. However it is acknowledged that many bus services are limited in
terms of hours that they run and the frequency can be intermittent particularly outside of school hours/ term time. Again they perform well against the SA Objectives although the benefits on the economic SA Objectives are less than in the Sustainable Settlement Classification and may depend on location and type of development that is proposed. In the same respect they may have less of a significant impact on SA2 as development would be more limited and so less of an impact on the landscape and historic environment. However, adverse impacts are still likely in relation to SA1.

4.3.39 Neighbourhood Settlements have some services and facilities but poor accessibility and so benefits are likely to be restricted to the immediate population in which case residents of adjacent areas may find it easier to travel to other settlements which could increase frequency of travel which would have an adverse impact on emissions. However, limited development would ensure more beneficial impacts on the environmental SA Objectives and also on the maintenance of the existing communities within the settlements included under this classification.

4.3.40 Finally, Residential Settlements have no/very limited facilities and services and no real accessibility by public transport and as such would have no growth allocated to them. This would have the most beneficial effects on the environmental SA Objectives; however there would be significant negative effects on the social and economic SA Objectives. Notwithstanding this, appropriate windfall development will provide some benefits in terms of homes for local need but this will be dependent on the type and scale of development being in keeping with the settlement and its surroundings.

4.3.41 Overall, the new Settlement Hierarchy strikes an appropriate balance for development and focuses the majority within the most sustainable settlements whilst allowing for local needs to be met in all the Districts settlements ensuring their continued vitality and viability for communities.

Conclusions

4.3.42 It is clear from the assessment that in isolation some of the settlement classifications do not perform well against the SA Objectives particularly in the lower order settlements in relation to the housing and economic SA Objectives.

4.3.43 However, the new Settlement Hierarchy presents a very positive approach to the distribution of the housing growth required and its methodology in allocating levels of housing to settlements when assessed as a whole. It provides for the accommodation of the housing required whilst balancing the need to protect the environment of the District. The Hierarchy is a suitable framework for moving forward with housing allocations, as considered by the SA.
Option 2: Core Strategy Settlement Hierarchy

<table>
<thead>
<tr>
<th>Option 2: Core Strategy (2013) Settlement Hierarchy</th>
<th>SA Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>- - o ? ? o ? + + + + + + + + + + + + + + + +</td>
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</tbody>
</table>

4.3.44 It was considered that this was a reasonable alternative/option due to the fact that the Core Strategy Settlement Hierarchy was predicated on the principles of sustainable development in that it placed the settlements within the District in order of their sustainability, based on their services, facilities and access to public transport, together with their size at that time. The methodology followed to establish the hierarchy was the same as for the new hierarchy.

4.3.45 However, the Core Strategy Settlement Hierarchy was more restrictive in terms of criteria than the new Hierarchy.

4.3.46 The Core Strategy Settlement Hierarchy was determined following a similar methodology to that of Option 1, a matrix approach assessing the levels of services and accessibility of settlements. Although the NPPF replaced the raft of PPS’s, the principle of where to locate new development was the same when the Core Strategy Settlement Hierarchy was developed. As such, the effects on the SA Objectives are the same as for Option 1, the new Settlement Hierarchy, although some effects may be more or less significant for different settlements depending on where they are now placed within the Settlement Hierarchy.

Option 3: No Settlement Hierarchy

4.3.47 An alternative approach to the distribution of development within the District would be to not define a Settlement Hierarchy. This would leave the roles of the District’s settlements open and provide a more flexible approach, it could be argued.

4.3.48 Whilst there is no specific national planning guidance on how, or whether, a settlement hierarchy should be defined, the National Planning Policy Framework (NPPF) does provide some key issues that need to be addressed. It states that:

- Local Plans should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable ( Paragraph 17).
• In order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities and where there are groups of smaller settlements; development in one village may support services in another (Paragraph 55).

• Local Plans should prepare positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments. Local Plans should also ensure an integrated approach to considering the location of housing, economic uses and community facilities and services (Paragraph 70).

• Local Plans should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where (Paragraph 154).

• Local Plans must be based upon adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (Paragraph 158).

4.3.49 Therefore the absence of a Settlement Hierarchy would not accord with the principles of sustainable development and would mean that the roles of settlements, in terms of their size, services offered, facilities and access to public transport would be undefined. This would not provide a clear indication of what development is expected, and indeed what is suitable, acceptable and appropriate, across the District and therefore it does not provide developers and communities with the information they require. Therefore, it is not a reasonable alternative and hence has not been assessed against the 18 SA Objectives.

**Comparative analysis**

4.3.50 There are some significant differences in the new Settlement Hierarchy and the Core Strategy Settlement Hierarchy. The new settlement hierarchy reassess the Districts towns and villages and as such has reclassified some settlements higher up the hierarchy than in the Core Strategy.

4.3.51 The new hierarchy methodology however distributes development fairly and on a proportionate basis across the Districts settlements giving a firmer steer for decision makers, developers and communities as to the likely levels of development. The new hierarchy maintains the focus for development on the main towns but also recognises that in order to remain locally viable, smaller settlements will be able to accommodate some level of development.
4.4 Housing Distribution

4.4.1 The following section presents the SA findings of the options for housing distribution in the District. It is important to note that the following Options all stem from the overall Strategic Housing Distribution, Housing Growth Figures and Settlement Hierarchy Options considered in the previous section.

4.4.2 As such, the SA assessments carried out for these are applicable to the following Options and should be referred to at this time. In this respect, the assessment findings will not be repeated but any differences will be highlighted and commented upon in terms of the effects on the SA Objectives and SA Framework.

Housing distribution Options

4.4.3 Using the Strategic Housing Distribution, Housing Growth Figures and Settlement Hierarchy Options, 6 Distribution Scenarios for housing growth across the District’s settlements were devised for consideration and formed the first stage in identifying a preferred approach to accommodating housing growth within the District. Please refer to Option 1 of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper.

4.4.4 Tables detailing the Scenarios and the figures attributed to individual settlements can be seen in Appendix F. The 6 scenarios represent the 6 Housing Growth Figures assessed earlier in this section as follows:

- Scenario 1 – 7,843 dwellings
- Scenario 2 – 9,127 dwellings
- Scenario 3 – 10,411 dwellings
- Scenario 4 – 3,991 dwellings
- Scenario 5 – 5,375 dwellings
- Scenario 6 – 6,559 dwellings

4.4.5 The initial housing distribution was formulated using the figures above combined with elements of the Strategic Housing Distribution Options. In particular the proportionate approach with a focus on the larger towns and villages. This was then moderated using the Settlement Hierarchy and the methodology for allocating housing numbers which underpins it, resulting in the allocations of housing numbers to settlements contained at Appendix F (please refer to section 4.3 above)

- **Sustainable Settlements** – Residual housing number, distributed proportionately based on settlement size, after deducting allocations to Neighbourhood Centres and Infill settlements with no development boundaries

- **Local Settlements** – housing number allocated based on 10% of existing dwelling numbers
• **Neighbourhood Settlements** – housing number allocated based on 5% of existing dwelling numbers

• **Residential Settlements** – No allocation

4.4.6 The Distribution Scenarios were also mapped (see Appendix G) and used as a basis for discussions at the Duty to Cooperate meetings held with Wealden’s neighbouring authorities. The Maps each represent the following:

- Map 1 – This represents the housing numbers broken down by settlement and using a range. This Map was based on the higher housing numbers (Scenarios 1-3 above) and on a District wide distribution.

- Map 2 – This represents the housing numbers broken down by settlement and using a range. This Map was based on the lower housing figures (Scenarios 4-6 above) and included the large urban extensions/new settlements on a District wide distribution basis.

- Map 3 – This represents the housing numbers broken down settlement and routed to settlements away from the Ashdown Forest. The ranges represent numbers between the OAHN figures of 650 and 735.

- Map 4 – This represents the routing away from the Ashdown Forest and is based on the Settlement Hierarchy using the OAHN figures of 650-735. It also includes the large urban extensions/new settlements.

4.4.7 Maps 1-4 were based on the area of the settlements in hectares and applying a density of 30 dph to calculate the number of existing dwellings in the settlement. The proportions were then worked out on this basis. Map 1-3 were not based on the Settlement Hierarchy, Map 4 was based on the Settlement Hierarchy.

4.4.8 Following these first 4 maps, another 3 maps were produced and were based on actual numbers of houses in each settlement considered rather than the settlement area. The Maps each represent:

- Map 5 – This represent the same distribution approach as Map 4 and was based on the Settlement Hierarchy and actual number of existing dwellings in each settlements. It also avoids the Ashdown Forest and includes the large urban extensions/new settlements.

- Map 6 – This represents a general District wide distribution and was not based on the Settlement Hierarchy, hence the ranges shown for housing. This was based on the OAHN figures of 650-735 and the number of existing dwellings per settlement.
• Map 7 – This represents a District wide distribution based on the OAHN figures of 650-735 and the Settlement Hierarchy. It also uses the number of existing dwellings per settlement.

4.4.9 The Preferred Option for Testing 3 was developed through moderation of Maps 4 and 5 and is assessed later in this Chapter.

4.4.10 Due to the form of calculation it should be noted that the housing numbers attributed to each settlement in Appendix F and Appendix H do not total exactly the overall housing figures. However, this does not impact on the overall approach being assessed as this is a first iteration and will be subject to further modification through subsequent iterations.

4.4.11 As the Distribution Scenarios flow from the options for the Strategic Distribution of Housing and the Settlement Hierarchy, the assessments contained at Appendices A; B and E and summarised in sections 4.2-4.3 against the 18 SA Objectives are applicable to them. The effects highlighted and considered in those assessments apply to these Distribution Scenarios and so will not be repeated in this section. Please refer to the Appendices and previous sections.

4.4.12 Below is a general overall summary of the effects of the Distribution Scenarios on the SA Objectives, drawing together the other assessments.

**SA Assessment**

**Predicting the effects of Scenarios 1-3 (SA Tasks B3/B4): General Summary**

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<tr>
<th>Option (Distribution)</th>
<th>SA Objectives</th>
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<tbody>
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<td>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18</td>
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<td>Scenarios 1-3</td>
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**Environmental SA Objectives (SA1-SA11)**

SA1 To protect and enhance biodiversity and geodiversity within the District

4.4.13 These Distribution Scenarios do not take into account the Ashdown Forest or Pevensey Levels and so will have negative effects on SA1. Following the Settlement Hierarchy these Distribution Scenarios allocate significant growth to settlements with an Ashdown Forest impact such as Crowborough and Forest Row and a Pevensey Levels impact such as Hailsham and Polegate (all Towns with development boundaries). Negative effects may be able to be addressed through appropriate mitigation measures, in particular SANGs and SAMMS and improvements to WWTWs, however these measures are not fully in place at present, although work is ongoing to remedy this.
SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.4.14 For SA2 the effects are likely to be negative as again significant growth is allocated to settlements within or close to important landscape designations such as Heathfield, which is surrounded by the High Weald AONB (a Town with development boundary settlement) and Mayfield which is wholly within the AONB (village with development boundary settlement). There would also be growth at settlements in close proximity to the South Downs National Park, such as Selmeston and Ripe (both Infill settlements) which could impact on views into and from the South Downs.

SA4 Improve the quality of the built environment

4.4.15 The effects are uncertain for SA4 and SA5 from these Distribution Scenarios. Specific design policies are more likely to have an impact on SA4.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.4.16 With the distribution of housing under this Scenario it is likely that pressures on water infrastructure and resources will not be focused in one place, hence providing a beneficial impact. However, significant growth in Hailsham and Polegate, and in the south overall, will place pressure on water resources and the WWTWs there and so there could be significant negative effects on SA5 if mitigation cannot be met.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.4.17 Again the effects on SA7 are uncertain and will largely depend on specific site characteristics together with policies and strategies on managing flood risk, such as SuDS and flood resilient designs. However, the higher housing numbers and their distribution are likely to lead to more Greenfield development which could exacerbate flooding issues in some areas.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.4.18 SA8 is likely to have positive effects from the distributions due to the fact that following the Settlement Hierarchy, development will be located in close proximity to services and facilities hence reducing the need for people to travel by car, in turn reducing emissions. However, energy efficiency measures and the encouragement of renewable energy technologies will be dependent on design policies and strategies rather than housing distribution.
SA9 Ensure the best use of previously developed land and existing buildings

4.4.19 The distribution of housing under Scenarios 1-3 will have both positive and negative effects on SA9. Focusing development on the Towns and villages with development boundaries (most sustainable) will mean that priority is given to brownfield land as this is likely to be where the majority is. This will also be true for infill development to the lower order settlements. However, brownfield land is limited within the District as a whole and so significant Greenfield development is likely.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.4.20 On SA10 the effects are likely to be positive as the distribution scenarios focus the majority of development on the most sustainable settlements which by default have the most accessible and wide ranging number of facilities and services meaning people would not have to necessarily travel as far or as often. The scenarios also lend themselves to better use and enhancement of public transport. There could of course still be some negative effects in the more rural areas however the Settlement Hierarchy on which these distributions are based is inherently the most sustainable approach to accommodating growth within the District.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.4.21 For SA11 the distribution will help to a degree in reducing the emissions generated by traffic through the reduction in car journeys and increased use of public transport and other sustainable modes of transport however, climate change adaptation and mitigation measures are most likely to come forward as part of wider policies and strategies including design policies.

Social SA Objectives (SA12-16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.4.22 These distribution scenarios perform very positively against all of the social SA Objectives primarily due to the fact they provide the housing numbers required to meet the OAHN for the District together with the most sustainable approach to distribution amongst the settlements. Access to services, facilities, the countryside and open spaces will be improved (SA12) through the provision of housing close to sustainable settlements.
SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.4.23 The quantum and distribution of housing under these scenarios will ensure the level of affordable housing provision is maximised (SA13) in the most sustainable locations allowing everyone the opportunity to live in an affordable and decent home.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.4.24 There is likely to be positive effects on SA14 as the spatial distribution is focused on the more sustainable settlements, meaning housing growth will be in close proximity to existing educational and training facilities. However the limited growth allocated to the lower settlements will also help maintain and may contribute towards the provision of new educational facilities and training. This also applies to SA15 in terms of improving health and access to healthcare facilities, although other policies and funding options are likely to impact also.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.4.25 The distribution follows the Settlement Hierarchy and in that respect has a positive effect on SA16 in that it acknowledges that the lower order settlements provide vital local services to their communities and the surrounding rural hinterland. Allowing at least some growth, be that windfall, infill or allocations will ensure vibrant and inclusive communities are created and maintained. This is applicable to the higher order settlements also.

Economic SA Objectives (SA17 &SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.4.26 The distribution of growth under Scenarios 1-3 accounts for the higher economic housing figures identified in the SHMA and assessed in Section 4.2. In this respect they are likely to have significant positive effects on SA17 as economic performance is closely interrelated with housing markets. Focusing growth in line with the distribution scenarios will help attract businesses to the District and improve the economic performance.
SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.4.27 For SA18 potential significant positive effects may arise directly through the distribution enabling regeneration of an area or as a result of the growth stimulating regeneration within a certain settlement. This may be more apparent in the lower order settlements.

Predicting the effects of Scenarios 4-6 (SA Tasks B3/B4): General Summary

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<th>Option (Distribution)</th>
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<td>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18</td>
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**Environmental SA Objectives (SA1-SA11)**

SA1 To protect and enhance biodiversity and geodiversity within the District

4.4.28 These distribution scenarios are based on the lower housing figures, moderated through the Settlement Hierarchy, and as such have a more positive effect on SA1 and SA2 through the fact that lower proportions of housing growth would be allocated to the settlements in the District, in line with the Settlement Hierarchy which is inherently sustainable. However, the scenarios still allocate housing to settlements with an Ashdown Forest and Pevensey Levels impact and so there will still be negative effects, which will increase in significance in scenarios 5-6.

4.4.29 Significantly lower housing growth would be allocated to Crowborough and Heathfield, as well as other settlements within close proximity to the Ashdown Forest, under these scenarios and so this would lessen, although would not remove, any negative impact on the designated site (SA1), such as recreational pressure from an increase in population and nitrogen deposition from vehicle movements. The same is true for Hailsham and Polegate in the south in regards to the Pevensey Levels and WWTWs issues. Less housing would mean less waste water to be treated and discharged.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.4.30 For SA2 the effects are likely to be more positive than scenarios 1-3 for the same reasoning as SA1, less housing growth would be allocated to settlements close to or within highly valued and protected landscapes such Heathfield and Mayfield in the High Weald AONB. Again impacts would not necessarily be removed but they would potentially be lessened.
SA4 Improve the quality of the built environment

4.4.31 Whilst presenting lower overall housing figures, the effects on SA4 and SA5 are uncertain for the same reasoning as scenarios 1-3 above. Specific design policies are more likely to have an impact on SA4 and with the distribution of housing under these scenarios it is likely that pressures on water infrastructure and resources will not be focused in one place, hence providing a beneficial impact. However, growth would still be allocated to settlements in the south which will place pressure on water resources and the WWTWs.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.4.32 Again the effects on SA7 are uncertain and will largely depend on specific site characteristics together with policies and strategies on managing flood risk, such as SuDS and flood resilient designs. However, the lower housing numbers and their distribution are likely to lead to less Greenfield development which could help address flooding issues in some areas.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.4.33 For SA8 the likely effects may be negative in so far as the low housing growth may not support the provision or enhancement of services and facilities, particularly in the more rural areas and so people will have to travel to access these which any increase vehicle emissions. Energy efficiency measures and renewable energy will be dependent on other policies in the Wealden Local Plan.

SA9 Ensure the best use of previously developed land and existing buildings

4.4.34 The effects on SA9 are uncertain in as much as the low housing figures may mean that brownfield sites are more able to accommodate the need, reducing the reliance on developing Greenfield sites. However, low housing figures typically lend themselves to low density developments and these are more suited to Greenfield sites which could result in negative effects for SA9.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.4.35 In regards to SA10 the effects are likely to be positive for the same reasoning as Scenarios 1-3. The distribution means that more houses, and hence people, are placed in close proximity to services and facilities which may minimise frequency and length of journeys.
SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.4.36 For SA11 the effects of the distribution scenarios is likely to be neutral as climate change adaptation and mitigation measures are most likely to come forward as part of wider policies and strategies including design policies.

Social SA Objectives (SA12-16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.4.37 The distribution under these scenarios is likely to have positive effects on SA12 as it follows the Settlement Hierarchy which has sustainability at its core. Access to services, facilities, and the countryside and open spaces will be improved for existing and future residents.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.4.38 Whilst the distribution scenarios allocate housing growth to most settlements, the low housing figures may not lend themselves to maximising the provision of affordable housing and so there is the potential for negative effects on SA13.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.4.39 These distribution scenarios are likely to result in some degree of positive effects against SA14 by delivering growth which could result in the provision of new educational facilities, through increasing population growth and demand for schools. However, as the distribution scenarios are based on low housing figures, the degree of effect will be less than in scenarios 1-3. It is also likely that in some areas, particularly rural settlements, residents would still need to commute to larger settlements for educational facilities.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.4.40 For SA15 these distribution scenarios may present positive impacts by virtue of development locations. However, the relative significance of these positive impacts is difficult to predict at this stage, particularly given the low housing figures proposed.
SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.4.41 In regards to SA16, the distributions are less likely to secure significant infrastructure on the assumption that sites would be smaller, however the Option would contribute well towards safeguarding existing services and facilities within settlements, by increasing the population throughout the District. In particular this Option provides housing in the rural areas of the District, which in turn will provide support for existing services here and potential enhancement.

Economic SA Objectives (SA17 &SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.4.42 Economically the distribution scenarios do offer the potential for new employment opportunities and improved access to existing jobs (SA17) and hence a degree of positive effects. However, the low housing figures, distributed in this way, may not result in the level of housing growth needed to encourage and sustain economic growth.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.4.43 Again for SA18 the level of housing proposed under these distribution scenarios may not be sufficient to facilitate District wide town centre regeneration. However distributing housing in this way will help enhance the rural economy and increase the vitality of the Districts villages.

Ashdown Forest Housing Distribution Options

4.4.44 The Distribution Scenarios discussed above and in Appendix F do not take into account the Ashdown Forest (AF) (Option 4 under the Strategic Housing Distribution Options) and so further moderation of the approach to housing distribution was undertaken and settlements which routed to the Ashdown Forest, no matter on their position within the Settlement Hierarchy, were excluded from any housing allocations.

4.4.45 This is a reasonable alternative to consider for the same reasoning given in the Strategic Housing Distribution assessment earlier; the Council has a duty to protect the Ashdown Forest. The distribution of housing to settlements under this Option is contained at Appendix H and represents the second iteration of housing figures.

4.4.46 The AF Routing Distribution Scenario has the same effects, both negative and positive, as Option 4 of the Strategic Housing Distribution and so
these will not be repeated here but please refer to paragraphs 4.2.71 – 4.2.87 of this SA Report.

**SA Assessment**

**Predicting the effects of AF Routing Scenario (SA Tasks B3/B4): General Summary**

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<th>Option (Distributions)</th>
<th>SA Objectives</th>
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<tr>
<td>AF Routing scenario</td>
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4.4.47 The only difference between this Scenario and Option 4 of the Strategic Housing Distribution is that it has been moderated through the Settlement Hierarchy. Therefore, the assessment of Option 4 of the Strategic Housing Distribution against the 18 SA Objectives is also applicable to this Scenario although settlements routing to the Forest have been removed entirely from any allocation of housing, regardless of their position in the Settlement Hierarchy.

4.4.48 Factoring in the Ashdown Forest, this distribution scenario also removes housing allocations from some of the settlements in Scenarios 1-6 of the initial housing distribution tables (Appendix F) and as a result significantly increases housing allocations at other settlements, principally in the south. Please refer to Appendix H.

**Environmental SA Objectives (SA1-SA11)**

**SA1 To protect and enhance biodiversity and geodiversity within the District**

4.4.49 Overall, the distribution scenario will have positive effects on SA1 as it removes settlements with an Ashdown Forest link from any allocation. However, this could impact negatively on the Pevensey Levels as the majority of housing growth, together with other development, will be focused on the south of the District and the proportion of housing allocated to the settlements in the south will be much higher.

**SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets**

4.4.50 For SA2 the effects in the north of the District are likely to be positive as limited housing is allocated in line with the avoidance of impacts on the Ashdown Forest. This will help protect the High Weald AONB landscape to a degree. However, the landscapes to the south of the district, the Low Weald, Pevensey Levels and South Downs National Park may be adversely affected due to the increased proportion of housing allocated to settlements here.
SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

4.4.51 For SA3 and SA6 the effects of the distribution scenario are likely to be neutral as other policies within the Local Plan will have more of a bearing, although providing more housing in the south of the District will result in an increase in population which will be able to access the District’s countryside, historical and landscape assets here which may result in improvements in access to them.

SA4 Improve the quality of the built environment

4.4.52 The distribution scenario itself will not have a direct effect on SA4 however the provision of development in itself could lead to positive effects on the built environment and lead to improvements. Good design at the outset could help improve exiting as well as the new development.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.4.53 As the distribution scenario places greater development in the south of the District this could have negative effects on SA5 due to the presence of the Pevensey Levels. In the Hailsham, Polegate and Herstmonceux areas for example there are issues with WwTWs and their ability to discharge treated effluent to the Pevensey Levels. Stress on water resources and infrastructure may be increased and significant investment would be needed in order to improve the treatment of waste water at WwTWs so that the water quality in the Pevensey Levels is not adversely affected and is, where possible, improved in line with its designation objectives and the Water Framework Directive. However the inclusion of SuDS measures would go some way to mitigating these effects.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.4.54 With growth likely to be focused around the Hailsham/Polegate area, where issues of surface water flooding are well known, flood risk is a key issue. However, suites of SuDS measures, starting at the dwelling/development level, should help mitigate this to some degree (SA7) and the size of Greenfield land likely to be required for this Scenario allows for these to be included.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.4.55 In directing development growth away from the Ashdown Forest this distribution scenario will have positive effects in terms of air quality in relation to the environment (SA8) and nitrogen deposition on the Forest. The
distribution also offers the potential to consolidate services and facilities reducing the need for people to travel and hence aid a reduction in emissions, in the mid and south of the District at least. In terms of renewable energy technologies it is likely that other Local Plan policies will have more of a bearing.

**SA9 Ensure the best use of previously developed land and existing buildings**

4.4.56 The distribution scenario is likely to result in positive effects on SA9 as it focuses on settlements in the south of the District, which is more ‘urban’ than the north of the District, increasing the potential to utilise previously developed land. However, some Greenfield development is still likely to come forward.

**SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)**

4.4.57 By following the Settlement Hierarchy in distributing growth under this scenario housing is already allocated to the most sustainable settlements and hence increasing it will aid consolidation of services and help to minimise journey lengths and frequencies (SA10). However this will be confined to the south of the District and so there may be negative effects in the north.

**SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development**

4.4.58 SA11 is likely to be determined by other policies and strategies within the Local Plan.

**Social SA Objectives (SA12-SA16)**

**SA12 Improve access to services; facilities; the countryside and open spaces**

4.4.59 The distribution scenario makes best use of existing services and facilities in those settlements away from the Ashdown Forest, and new housing development would be located in close proximity to services and facilities and vice versa thus improving access (SA12). However, for those in the most rural areas this may still involve a commute to reach services and facilities. Depending on the scale of sites considered under this option, opportunities for new services and facilities may or may not be presented.

**SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home**

4.4.60 For SA13 the effects are likely to be positive for those settlements in the south of the District with an increase in choice and affordability of housing. However, the north may continue to experience affordability issues in terms of housing provision.
SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.4.61 SA14 is likely to be unaffected by the distribution scenario however growth is allocated to the most sustainable settlements in the south of the District and access to educational and training facilities is easier in close proximity to built up areas. In this respect there is the potential for some positive effects on SA14 from this distribution.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.4.62 For SA15 the effects of the distribution scenario are uncertain as it will depend to a degree on the ability of developments to contribute towards improved health facilities. With larger sites the provision of onsite open space and community facilities may be more easily achievable which could encourage healthier lifestyles of the population. However, again any positive effects are confined to the south of the District primarily.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.4.63 There is the potential for positive and negative effects on SA16. Within the south of the District services and facilities would likely be safeguarded and in some cases enhanced ensuring communities have appropriate levels of provision to maintain themselves. Significant negative effects could occur in the more rural areas and particularly in areas in the north of the District, where house prices could rise, services could be lost and out-migration may be experienced.

Economic SA Objectives (SA17 & SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.4.64 In economic terms (SA17 and SA18) the AF Routing Scenario will have significant positive effects in the south of the District due to the proximity of any potential development to the A27 and the centres at Eastbourne and Brighton. This would provide existing and new residents with good access to employment opportunities within and outside of the District and would also help consolidate the employment opportunities in the south. The Scenario may also attract inward investment in the form of capital and new businesses.
4.5 Amendments to Initial Work

4.5.1 As a result of additional work on the distribution methodology of allocating 10% to Local Settlements and 5% to Neighbourhood Settlements, it was determined to increase these percentages to 20% and 10% respectively. This was due to the fact that the original percentages, when applied to some settlements, did not make sense in that they proposed, for example 2 additional dwellings. This would not help achieve the housing growth that Wealden requires and so through professional judgement and testing of figures it was concluded to increase the percentages.

4.5.2 This does not in any way alter the fundamental approach to the distribution methodology nor does affect the SA assessments carried out above in regards to the distribution of housing, as these follow the Settlement Hierarchy which is in itself based on sustainability principles. Therefore it is not considered necessary to carry out another SA of the increased percentages as the assessment will conclude the same. The SA of the Settlement Hierarchy is contained in Section 4.3 and should be read in conjunction with the assessment of the housing distribution options.

4.5.3 The methodology for the distribution of housing to settlements now consists of the new Settlement Hierarchy and:

- **Sustainable Settlements** – Residual housing number, distributed proportionately based on settlement size, after deducting allocations to Neighbourhood Centres and Infill settlements with no development boundaries

- **Local Settlements** – housing number allocated based on 20% of existing dwelling numbers

- **Neighbourhood Settlements** – housing number allocated based on 10% of existing dwelling numbers

- **Residential Settlements** – No allocation

4.5.4 Furthermore, since the work began on housing distribution Southern Water have reached a solution for the WwTW issues albeit not to be implemented until 2022. However this releases development potential in south Wealden and has a positive impact upon the conservation interests of the Pevensey Levels.
4.6 New settlements and Large Urban Extensions

4.6.1 In order to help determine the housing distribution, the use of new settlements, enlarged villages and large scale urban extensions were considered to help meet the housing need. It was initially considered that these would be combined with the lower housing figures of Scenarios 4-6 already assessed.

4.6.2 This approach did not follow the Settlement Hierarchy or its methodology. Please refer to Chapter 8 from paragraph 8.38 of the Wealden Local Plan Issue, Options and Recommendation Consultation paper which details the issue considered and the Options.

4.6.3 This approach to housing growth was used as the basis for conversations with neighbouring authorities under the Duty to Cooperate. This approach was considered as a reasonable alternative due to the requirements to meet any shortfall in housing delivery within the Housing Market Area (HMA), which includes a number of our neighbouring local authorities as well as our own OAHN.

4.6.4 For this approach, the lower housing figures produced under the Strategic Housing Distribution Options 4-6 were combined with the identification of broad locations for new settlements and/or large urban extensions. The broad locations for these new settlements and/or large urban extensions are as follows:

- South Hailsham – 5,000 dwellings
- West Polegate – 10,000 dwellings
- Selmeston – 5,000 dwellings
- West Hailsham – 5,000 dwellings
- North west Hailsham – 10,000 dwellings
- Horam – 5,000 dwellings
- Herstmonceux – 5,000 dwellings
- Ninfield – 5,000 dwellings
- East Hoathly – 5,000 dwellings
- Isfield – 5,000 dwellings
- West of A22, Uckfield – 4,000 dwellings
- North west of A22 – 5,000 dwellings
- Maresfield – 5,000 dwellings

4.6.5 Maps showing the location of the proposed new settlements/large urban extensions, combined with potential housing ranges under Scenarios 4-6 (low housing growth) and the AF Routing Option, can be seen at Appendix G of this report.

4.6.6 This section assesses the provision of large urban extensions/new settlements combined with the low housing distribution scenarios of allowing
potential new settlements/large urban extensions, with specific nuances highlighted in relation to the locations where appropriate.

4.6.7 It then provides a summary assessment of combining a new settlement/large urban extension approach with the lower Housing Distribution Options and AF Routing Option, presented in Section 4.4 above. For ease of analysis of this combination the locations for new settlements and/or large urban extensions have been grouped together into south, north, central and east locations within the District with any nuances or differences highlighted in the appropriate assessment.

4.6.8 The assessments of the Housing Growth Options (Section 4.2 and Appendix B); the Settlement Hierarchy (Section 4.3 and Appendix E) and the Housing Distribution Options already discussed in this section (Appendix F and H) are all applicable to this assessment and should be referred to. Those SA findings will not be repeated here.

Low Housing Distribution and New Settlement/Large Urban Extension

SA Assessment

Predicting the effects of New Settlement/Large Urban Extension and Housing Distribution Scenarios 4-6 (SA Tasks B3/B4): General Summary

4.6.9 This next section combines the new settlement/large urban extension approach with the low housing distribution scenarios and assesses this against the 18 SA Objectives. For ease of assessment the new settlement/large urban extension approach has been split into the south, north, central and east locations.

4.6.10 At this point the SA assessments of the Housing Distribution Scenarios 4-6 (paragraphs 4.2.133 – 4.2.143 and 4.2.151 – 4.2.154) and the overall new settlement/large urban extension approach has been split into the south, north, central and east locations.

4.6.10 At this point the SA assessments of the Housing Distribution Scenarios 4-6 (paragraphs 4.2.133 – 4.2.143 and 4.2.151 – 4.2.154) and the overall new settlement/large urban extension approach should be referred to as they are applicable to this combined approach and will not be repeated here.

a) South Locations

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<th>Options</th>
<th>SA Objectives</th>
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<td>Scenarios 4-6</td>
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Options | SA Objectives
---|---
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18
Scenarios 4-6 | ? ? o ? ? o ? o o ? - o o - - -


Environmental SA Objectives (SA1 – SA11)

**SA1 To protect and enhance biodiversity and geodiversity within the District**

4.6.11 The combination of one or more of the above areas with the lower housing figures is likely to have positive and negative effects on SA1 as housing would be allocated to settlements with an Ashdown Forest and Pevensey Levels impact. However with a south focus for the larger scale development, the negative impacts would be lessened on the Ashdown Forest, although not removed. It may be easier to implement mitigation measures under this combination for the Ashdown Forest as there would be less development to mitigate against. Similarly, whilst added pressure would be placed on the Pevensey Levels and WwTWS the quantum of development under this combination may enable significant infrastructure improvements including SuDS.

**SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets**

4.6.12 This combination is likely to have positive and negative effects on SA2. Large scale development would be directed away from the High Weald AONB and hence reduce any negative impact on the designated site however focusing development in the south may have significant negative impacts on the Low Weald and South Downs National Park. In particular a potential 5,000 houses at Selmeston, combined with the other distribution, would be highly visible from the South Downs National Park and may have a potentially significant negative effect on this landscape as well as the Low Weald.

**SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors**

4.6.13 Whilst access to the countryside; landscape; historic environment and cultural assets (SA3) is likely to increase from simply sheer numbers of people living in these areas, the areas themselves do not enhance or provide access.
SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.6.14 Similarly, the achievement of SA6 will be largely reliant on policies and criteria that will ensure development is undertaken in the most resource efficient manner.

SA4 Improve the quality of the built environment

4.6.15 For SA4 the effects of this combination will be largely dependent on design policies as well as site selection. Master-planning of the large development areas would allow good design principles to be incorporated at the earliest opportunity, helping enhance the existing and new built environment, however design policies will play the greatest role.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.6.16 In regards to SA5, this combination will result in negative impacts on water quality due to the presence of the Pevensey Levels and the WWTWs issues in the south of the District. In terms of achieving sustainable water resource management, this combination may result in positive effects as the scale of development may allow for the inclusion of water efficiency measures in building design. However, it is out of the control of the control of the Local Plan as to whether householders continue to use such measures or not when the houses are occupied.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.6.17 The issue of reducing flood risk to properties and businesses (SA7) will largely be addressed through specific flood policies and strategies within the Local Plan. Surface water flooding is an existing issue in the Hailsham/Polegate area and development of the scale proposed under this combined approach would still mean large Greenfield site development which could exacerbate surface water flooding through a reduction in permeable surfaces. However, the scale of the proposed development in the south under this approach lends itself to the provision of significant SuDS measures on and off site to help manage surface water flow and help reduce flooding incidences.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.6.18 There are no issues of air quality in the District in regards to human health at present however this combination approach may alter that fact by increasing vehicle movements and emissions. However any effects on this SA Objective will be largely dependent on design policies and the promotion within new development of walking, cycling and public transport to access.
services and facilities. The large scale development locations will mean that services and facilities are closer to existing and new populations, reducing the need to travel and consequently emissions. Energy efficiency and renewable energy measures will be determined by other Local Plan policies.

SA9 Ensure the best use of previously developed land and existing buildings

4.6.19 In regards to SA9 the approach is likely to have a negative effect due to the fact the size of the large development locations mean that more Greenfield land would be used. However, brownfield land would still be prioritised but due to the lack of sites within the District as a whole the overall effect on SA9 will be negative. In addition, the low housing figures in Scenarios 4-6 may result in low density development elsewhere in the District which could also utilise more Greenfield sites.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.6.20 Allowing large scale development under this approach offers the potential to achieve a pattern of development which minimises journey lengths and frequencies (SA10) in the south of the District. New settlements and/or large urban extensions will require significant infrastructure provision in terms of services and public transport and so there will be positive effects on the wider area in particular the more rural parts of the south through the close proximity of housing to services, facilities and employment opportunities. The scale of development also lends itself to the promotion of walking and cycling within sites.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.6.21 As with SA8, the effects on SA11 are difficult to predict. The scale of potential development under this approach means that opportunities to adapt development to the likely effects of climate change are more viable and achievable together with providing housing and employment growth, on the larger sites at least.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.6.22 The overwhelming effects on these SA Objectives from this combined approach are likely to be positive. The location of the potential new settlements/large urban extensions in the south of the District, barring Selmeston, are focused on the Hailsham/Polegate area where good accessibility and service provision already exists. Therefore, the approach is likely to have positive effects on SA12 as the scale of development presents good opportunities for improving access to services and facilities. The
development as a result of distribution scenarios 4-6 will be in close proximity to services and facilities.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.23 The effects of the approach on SA13 are likely to be positive, for the south of the District, as the provision of decent and affordable homes will be easier to achieve within the large scale development. Affordable housing may not be as readily achieved in the other settlements due to the low housing figures. Large scale development at Selmeston would likely provide much needed affordable housing for the local community allowing people to stay within their village/Parish.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.6.24 Proximity to educational and training facilities is more likely to be easily accessed in and adjacent to existing urban areas which is the direction of this combined approach. In this respect the approach presents significant positive effects in regards to SA14. However, those in more rural areas would still need to commute to the main towns and larger villages to access these opportunities.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.6.25 This approach should present positive effects for both the existing and new population of the areas in terms of health and wellbeing (SA15). The size of the potential development under this approach would suggest likely significant contributions towards new or improved health, sport, community and open space facilities. The size of sites may also help with the provision of on-site open space or community facilities, which could be utilised by the wider population.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.6.26 Through focusing housing growth in new settlements and/or large urban extensions there are significant positive effects as services and facilities are safeguarded ensuring communities have appropriate levels of provision to maintain themselves (SA16). This will benefit the settlements allocated growth through Scenarios 4-6 also.
Economic SA Objectives (SA17 & SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.27 The effects on the economic SA Objectives are likely to be positive and in some cases significantly positive. The large scale of development at the locations identified will ensure that housing growth is sufficient to encourage and sustain economic growth (SA17). Even with the low housing distribution scenarios the larger areas would provide the support for employment opportunities and the support for local businesses. The quantum of development focused on Hailsham/Polegate will significantly strengthen the business case for improvements to the A27 which will enhance accessibility to other centres but also to the south of the District as well.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.28 The size of potential development under this approach could have mixed effects on SA18. The settlements created as a result of this potential approach would likely require their own town centre for example rather than rely on existing, such as at Hailsham and Polegate. This may have negative effects on the existing town centres drawing people and investment away however it could also provide the critical mass and impetus to aid the regeneration of the existing town centres together with the provision of new.

b) North Locations

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<tr>
<td>Scenarios 4-6</td>
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</tr>
<tr>
<td>10. Isfield</td>
<td>- /+</td>
</tr>
<tr>
<td>11. West of A22, Uckfield</td>
<td>- /+</td>
</tr>
<tr>
<td>12. North west of A22, Uckfield</td>
<td>- /+</td>
</tr>
<tr>
<td>13. Maresfield</td>
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</table>
Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.6.29 The combination is still likely to have significant negative effects on SA1 as whilst distribution scenarios 4-6 promote low housing numbers, the large sites at Uckfield and Isfield would create significant vehicular movements across or in close proximity to the Ashdown Forest. Combined with the smaller developments this would result in negative effects on the SPA and SAC.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.6.30 Similarly, the effects on SA2 are uncertain but are likely to have some negative impacts despite less housing through Distribution Scenarios 4-6 being delivered. This is as a result of the large development allocations. The location at Maresfield, combined with the housing distribution, could negatively affect the High Weald and the High Weald AONB in terms of visual impact and views to and from the landscapes. At Uckfield the impact on the assets under SA2 are less likely to be significantly negative on the designated landscapes.

SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

4.6.31 This combination approach is likely to have a neutral effect on SA3 and SA6. Whilst access to the countryside; landscape; historic environment and cultural assets (SA3) is likely to increase from simply sheer numbers of people living in these areas, the areas themselves do not enhance or provide access.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.6.32 Similarly, the achievement of SA6 will be largely reliant on policies and criteria that will ensure development is undertaken in the most resource efficient manner.

SA4 Improve the quality of the built environment

4.6.33 This approach could have positive and/or negative effects on SA4 but will be largely dependent on design policies as well as site selection. Master-planning of the larger sites may allow for innovative design to be incorporated which could help improve the existing and new built environment.
SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.6.34 This combination will have a positive effect on SA5 in regards to it moving the majority of development away from areas which impact on the Pevensey Levels, hence helping to protect the water quality there. On the larger sites SuDS measures could be provided which can help improve water quality in general through filtering of pollutants in surface water.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.6.35 For SA7 the effects will depend to some degree on specific flood policies and strategies but the large scale development locations lend themselves to the incorporation of SuDS measures to ensure that potential flooding is managed. Uckfield in particular has a history of significant flood events and the scale of potential development here could exacerbate this problem if mitigation measures are not put in place such as SuDS.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.6.36 With the locations in the north of the District, the effects on SA8 are likely to be negative in terms of air quality and the impact on the Ashdown Forest from nitrogen deposition. In terms of human health, the SA Scoping Report identified that the District does not suffer from air quality issues in this respect however an increase in development could alter this fact with a potential increase in vehicle movements. The design of any development and it being developed in such a way as to encourage walking, cycling and public transport use over the private car, will also impact on SA8. For renewable energy measures the effects of this approach could be positive as the size of development presents increased viability for on-site and building related technologies through economies of scale.

SA9 Ensure the best use of previously developed land and existing buildings

4.6.37 In regards to SA9 the approach is likely to have a negative effect due to the fact the size of the potential development means that more Greenfield land would be used. However, brownfield land would still be prioritised but due to the lack of sites within the District as a whole the overall effect on SA9 will be negative.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.6.38 For SA11, the scale of potential development under this approach means that opportunities to adapt development to the likely effects of climate change may become more viable and achievable together with providing
housing and employment growth, thus presenting positive effects. The design of development will play the largest role in determining the effects on SA11 including building design as well as the environment created. Reducing greenhouse gas emissions will be achieved as part of sustainable building design which again will be more viable on larger scale developments and so this approach further presents positive effects.

**Social SA Objectives (SA12-SA16)**

**SA12 Improve access to services; facilities; the countryside and open spaces**

4.6.39 The overwhelming effects on these SA Objectives from this approach are likely to be positive. The scale and location of potential development would mean housing is located in close proximity to existing services and facilities with the potential for the attraction and provision of new ones (SA12).

**SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home**

4.6.40 The effects of the approach on SA13 are positive for the north of the District as the provision of decent and affordable homes will be easier to achieve within large scale developments and the maximum requirement will be able to be met. House prices are generally much higher in the north of the District compared to the south and so large scale development here providing the maximum affordable housing will help reduce the affordability issue. However, the large scale development proposed is only within/adjacent to a few settlements and so issues may persist in the more rural areas of the north.

**SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health**

4.6.41 This approach should present positive effects for both the existing and new population of in the north in terms of health and wellbeing (SA15). The size of the potential development under this approach would suggest likely significant contributions towards new or improved health, sport, community and open space facilities which already exist in Uckfield at least. The size of the larger sites may also help with the provision of on-site open space or community facilities. This will all benefit the more rural areas.

**SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community**

4.6.42 Through focusing housing growth in new settlements and/or large urban extensions there are significant positive effects as services and facilities are safeguarded ensuring communities have appropriate levels of provision to maintain themselves (SA16). Combined with the distribution under Scenarios 4-6 means that people in the more rural northern settlements will have better access to services and facilities.
Economic SA Objectives (SA17 & SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.43 The effects on the economic SA Objectives are likely to be positive. Despite the potential for the low housing distribution scenarios to not result in the growth needed to encourage and sustain significant economic growth, the large allocations, at Uckfield in particular, will offer scope to create new employment and improve access to employment opportunities.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.44 This combination could have mixed effects on SA18. The settlements created as a result of this potential approach would likely require their own town centre for example rather than rely on existing, such as at Uckfield. This may have negative effects on existing town centres drawing people and investment away however it could also provide the critical mass and impetus to aid the regeneration of the existing town centres together with the provision of new. The rural economy in the north may experience positive effects as new settlements will provide new facilities and services close to the rural villages allowing greater and easier access.

4.6.45 This combination will provide a northern hub in terms of development which has its negative and positive effects. The approach will be positive for the economy of the north in particular and help address the disparity in housing and affordability here.

c) Central Locations

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<th>Scenarios 4-6</th>
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4.6.46 This combination would provide a focus on the central part of the District for major housing growth providing a focus for both the north and south areas.
Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.6.47 Both Horam and East Hoathly are at some distance from the Ashdown Forest and Pevensey Levels and so there is likely to be no significant impact on the designated sites from the large scale development however the distribution element of this approach still allocates some development to northern and southern settlements which may affect the Forest and the Levels. Therefore, the effects on SA1 may be positive and negative under this approach.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.6.48 In regards to SA2 Horam is close to the High Weald AONB and so there are likely to be significant impacts on the landscape by way of visual impact and also through recreational pressure. East Hoathly is further from the High Weald AONB and so large scale development here is likely to have little to no impact on the AONB and hence a positive effect on SA2. However, there may be significant effects on local landscapes around East Hoathly which will need to be taken into account together with effects on settlements allocated development, albeit small, under the distribution scenarios

SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

4.6.49 This combination is still likely to have a neutral effect on SA3 and SA6. Whilst access to the countryside; landscape; historic environment and cultural assets (SA3) is likely to increase from simply sheer numbers of people living in these areas, the areas themselves do not enhance or provide access.

SA6 Manage natural resources sustainably, minimising waste and maximise the re-use of materials, recycling and composting

4.6.50 Similarly, the achievement of SA6 will be largely reliant on policies and criteria that will ensure development is undertaken in the most resource efficient manner.

SA4 Improve the quality of the built environment

4.6.51 As with the other locations identified for large scale development under, the effects on SA4 of developing at Horam and/or East Hoathly, together with the distribution scenarios, are uncertain as they will depend largely on design policies, both in building design and the design of the environment themselves.
SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.6.52 Again the effects of large scale development at East Hoathly and/or Horam are uncertain in regards to SA5. The locations do not impact on the Pevensey Levels in terms of water quality as they are located at some distance and do not connect to WwTWS that discharge to the Levels; however there may be local effects on water quality and resources. As is common with all the locations of large scale development, there is likely to be pressure placed on water resources and infrastructure purely as a result of sheer numbers. And again, there is still development allocated to settlements with a Pevensey Levels effect through the distribution scenarios in the south.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.6.53 Again reducing the risk of flooding (SA7) will largely depend on design policies as well as any flood strategy developed; however there may be positive impacts from large scale development in general with the provision of SuDS on and off site as well as the layout and environment within which the development would sit. For Horam and East Hoathly large areas of Greenfield land would be needed for the large scale development proposed and whilst this would potentially increase the amount of impermeable surfaces it also allows for SuDS to be incorporated more fully to the development.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.6.54 For SA8 energy efficiency and renewable energy usage within development will be determined by other Local Plan policies. In terms of air quality, as East Hoathly and Horam are situated away from the Ashdown Forest this may have a positive impact on the air quality issues there compared to other closer locations by focusing large scale development around them, in particular nitrogen deposition. In regards to air quality and human health, the District at present does not have any issues but large scale development and the distribution scenarios may impact on this with increased traffic movements, which may be mitigated through the fact that new housing will be located close to facilities and services reducing journey lengths and frequencies together with improvements in public transport, walking and cycling routes.

SA9 Ensure the best use of previously developed land and existing buildings

4.6.55 The effects on SA9 are likely to be negative due to the fact that the large scale of development proposed means more Greenfield sites will be used for development as previously developed land is scarce in the District as a whole, let alone Horam and East Hoathly.
SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.6.56 The effects on SA10 are uncertain at this time. The location of the large scale development under this combination would be relatively central in the District allowing for new centres to emerge meaning that many settlements would be in close proximity to services and facilities minimising journey lengths. With improvements in public transport and the encouragement of sustainable modes such as walking and cycling, positive effects may arise. This will depend to a degree on other policies such as design and infrastructure.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.6.57 The effects on SA11 are difficult to predict. The scale of potential development under this approach means that opportunities to adapt development to the likely effects of climate change are more viable and achievable together with providing housing and employment growth. For example larger areas of green space and urban trees will be possible, without reducing overall viability of development, and will provide cooling effects in the summer and warming effects in the winter together with a means to manage any increased surface water runoff as a result of more intense rain events. Again however much of this will depend on the design of potential developments and design policies within the Local Plan.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.6.58 The effects on these SA Objectives are uncertain. The low distribution scenarios will likely have positive effects on SA12 as they follow the Settlement Hierarchy which is inherently sustainable. Access to services and facilities will be improved especially with the combination of the large scale new development proposed.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.59 The low housing distribution scenarios will not likely enable the achievement of sufficient affordable housing however the large scale locations at East Hoathly and Horam will and so there may be mixed effects on SA13.
SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.6.60 The effects on SA14 may be positive under this combination but the degree of significance may be low. The low level of housing under the distribution scenarios may not be sufficient to provide impetus for new educational facilities however with the large scale development as well this may provide sufficient population growth to improve access to existing educational and training facilities as well as new facilities. This will benefit those in more rural settlements in particular.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.6.61 The same can be said for the effects of this combination on SA15. The health and wellbeing of the existing and future population may be positively affected through provision of new and enhancement of existing healthcare facilities. No significant health facilities exist at Horam or East Hoathly but the large scale development could change this and make access to them easier.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.6.62 The effects on SA16 may be positive in that the combination may result in significant growth in the population of some settlements and help create vibrant and inclusive communities. The provision of new and consolidation of existing services may also help maintain communities and prevent out-migration.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.63 A housing growth distribution under this combination offers positive effects on SA17 in that it does create opportunities for new employment and improvement to existing jobs. Whilst the low level of housing under scenarios 4-6 alone would be unlikely to result in the level of growth needed to encourage and sustain significant economic growth, the large allocations would.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.64 This combination also provides sufficient levels of housing growth to facilitate some regeneration of existing town centres (SA18) however new
town centres would be likely to be created as a result of the large scale development around Horam and East Hoathly. These would provide improved access to new facilities for the surrounding population.

d) East locations

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Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.6.65 This combination again has positive and negative effects on SA1. The large scale housing growth at Herstmonceux and Ninfield would be away from the Ashdown Forest (positive) but would drain to WWTPS that discharge to the Pevensey Levels (negative). In addition the distribution scenarios would still place housing growth at settlements impacting on both sites, albeit low housing numbers.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.6.66 The effects on SA2 will be similar to SA1 in that there will be positive and negative. Herstmonceux borders the High Weald AONB on its northern boundary and Ninfield abuts the AONB to the western end of the settlement. The large scale development combined with the distribution would have negative impacts on the High Weald in particular but also on the Pevensey Levels. This may in terms of visual impact to and from the landscapes but also from a potential increase in recreational pressure.

SA4 Improve the quality of the built environment

4.6.67 The effects on SA4 will be dependent on other policies within the Local Plan, particularly those regarding design and so the effects of this combination are uncertain on this SA Objective at this time.
SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management.

4.6.68 As already stated in relation to SA1, this combination would have a likely significant negative effect on SA5 due to the issues around WwTWS and the discharge of water to the Pevensey Levels.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.6.69 Reducing flooding, as with the other combinations and assessments, will be largely influenced by other policies such as design and flood strategies. Therefore the effects of this combination on SA7 are uncertain because the large scale development will require Greenfield land and this will both increase the amount of impermeable surface but also provide opportunities for introducing SuDS onto development.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy.

4.6.70 As with the other combinations and assessments, the effects on SA8 will be positive and negative. This combination would maintain a more south development focus hence reducing vehicular movements in the north of the District and therefore reducing air pollution, however increases in the south may arise. At present the District has no air quality issues in terms of human health but this could change under any of the combinations assessed here.

SA9 Ensure the best use of previously developed land and existing buildings.

4.6.71 SA9 is likely to experience negative effects purely as there is a scarce amount of previously developed land in the District as a whole and as such large Greenfield sites will be needed to accommodate the development.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport).

4.6.72 The effects on SA10 are uncertain at this time but there should be positive effects in so far as the new development will place a greater number of people including those in more rural areas, within relatively close proximity to services and facilities, hence potentially minimising journey lengths and frequencies.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development.

4.6.73 Effects on SA11 are likely to be largely determined by other policies and climate change strategies although the pattern of development may help
with reducing emissions from traffic and the large scale sites may offer more opportunities for adaptation measures such as urban greening and renewable technologies to be incorporated.

**Social SA Objectives (SA12-SA16)**

**SA12 Improve access to services; facilities; the countryside and open spaces**

4.6.74 The effects on SA12 are likely to be similar to that of the assessments for the north, south and central combinations however, Herstmonceux and Ninfield are further away from some of the settlements making access a little more difficult and potentially longer.

**SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home**

4.6.75 The low housing distribution scenarios will not likely enable the achievement of sufficient affordable housing however the large scale locations at Herstmonceux and Ninfield would and so there may be mixed effects on SA13.

**SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competiveness**

4.6.76 The effects on SA14 may be positive under this combination but the degree of significance may be low. The low level of housing under the distribution scenarios may not be sufficient to provide impetus for new educational facilities however with the large scale development as well this may provide sufficient population growth to improve access to existing educational and training facilities as well as new facilities. This will benefit those in more rural settlements in particular.

**SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health**

4.6.77 The same can be said for the effects of this combination on SA15. The health and wellbeing of the existing and future population may be positively affected through provision of new and enhancement of existing healthcare facilities. Herstmonceux has a new health centre and Ninfield has a doctor’s surgery.

**SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community**

4.6.78 The effects on SA16 may be positive in that the combination may result in significant growth in the population of some settlements and help create vibrant and inclusive communities. The provision of new and consolidation of existing services may also help maintain communities and prevent out-migration.
Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses.

4.6.79 A housing growth distribution under this combination offers positive effects on SA17 in that it does create opportunities for new employment and improvement to existing jobs. Whilst the low level of housing under scenarios 4-6 alone would be unlikely to result in the level of growth needed to encourage and sustain significant economic growth, the large allocations would.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism.

4.6.80 As the large scale development under this combination is not adjacent to an existing town it is unlikely to have an effect on town centres, the closest being Hailsham. However, the combination could have a positive effect on the local centres at Herstmonceux as well as Ninfield and attract new businesses into the area, strengthen the rural economies here.

New Settlement/Large Urban Extension and Ashdown Forest

SA Assessment

Predicting the effects of New Settlement/Large Urban Extension and AF Routing Scenario (SA Tasks B3/B4): General Summary

4.6.81 This next section combines the new settlement/large urban extension approach with the AF Routing distribution scenario and assesses this against the 18 SA Objectives. Again for ease of assessment the new settlement/large urban extension approach has been split into the south, north, central and east locations.

4.6.82 At this point the SA assessments of the Ashdown Forest Routing Scenario (paragraphs 4.4.44 – 4.4.61 and Appendix H) and the overall new settlement/large urban extension approach should be referred to as they are applicable to this combined approach and will not be repeated here.
Environmental SA Objectives (SA1-SA11)

**SA1 To protect and enhance biodiversity and geodiversity within the District**

4.6.83 For SA1 this combination will have significant positive effects in regards to the Ashdown Forest however it may result in negative effects on the Pevensey Levels with a south of the District focus. Pressure to treat the additional waste water, combined with a potential increase in surface runoff, and may have negative effects on the water quality of the Pevensey Levels for which the qualifying features of its designation are based.

**SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets**

4.6.84 Similarly with SA2 the effects of this combination will be positive for the landscapes in the north of the District (the High Weald AONB in particular) as housing growth is directed away to the south, although they will not be wholly removed as some development would be proposed at settlements such as Herstmonceux where the AONB boundary does meet with the settlements. For the Low Weald and South Downs National Park there may be negative effects due to the large increase in housing and hence people through this combination.

**SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors**

4.6.85 The increased population in the south of the District will result in an increased number of residents being in close proximity to the National Park.

### South locations

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and the outer edges of the AONB and so some provision and enhancement of access may arise.

**SA4 Improve the quality of the built environment**

4.6.86 The effects on SA4 from this combination are uncertain as they will be largely determined by the design of development proposals which in turn will be determined by design policies within the Local Plan. However, the large scale of development may present opportunities for significant improvements in the built environment through infrastructure provision and enhancement.

**SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management**

4.6.87 The effects of this combination on SA5 are likely to be negative as it places significant development in the south of the District and there are issues with water quality on the Pevensey Levels already which may be exacerbated by this level of development. However, measures such as SuDS can be introduced to help manage runoff and filter any surface water before it would reach the Levels. Also, technical improvements the WwTWs will help achieve positive effects on this particular SA Objective.

**SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.**

4.6.88 Reducing flood risk (SA7) will largely be determined by other Local Plan policies and potential flood risk strategies. However this combination would place significant development in the south of the District particularly around the Hailsham and Polegate area where flood risk is a known issue and could potentially increase the risk. But similarly to SA5, a comprehensive suite of SuDS measures could be introduced to alleviate this potentially significant negative effect.

**SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy**

4.6.89 The SA Scoping Report identified that at present there are no air pollution issues (SA8) in the District in terms of human health and so this will need to be monitored going forward due to the large quantum of development proposed under this combination in a relatively confined area within the District. However the effects on the Ashdown Forest will be positive.

**SA9 Ensure the best use of previously developed land and existing buildings**

4.6.90 The effects on SA9 will be mixed due to the fact that previously developed land is scarce within the District as a whole however it will be prioritised over Greenfield sites in the first instance.
SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.6.91 The distribution of the housing follows the Settlement Hierarchy and so is already allocated to the most sustainable settlements and therefore increasing it under this combination, together with a large urban extension, will help consolidate services and facilities and also bring people within close proximity to them, which in turn will help reduce journey frequencies and lengths.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.6.92 This combination is likely to have no specific effect on SA11 as adaptation to climate change will largely depend on other Local Plan policies such as design and renewable energy. Reducing emissions may be positively affected by this combination as services and facilities will be consolidated and populations brought within close proximity meaning a reduction in car journeys. Better public transport and opportunities for walking and cycling may also present themselves as part of this approach.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.6.93 Access to services and facilities (SA12) within the south of the District will be positively affected by this combination as the distribution makes best use of existing settlements and the large urban extensions would provide new services and facilities in close proximity to residents.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.94 The effects on SA13 will be mixed as the focus is on the south of the District and so the north may suffer in terms of affordable housing delivery. The north of the District does have more significant housing affordability issues than the south and this combination may exacerbate them further.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competiveness

4.6.95 There is the potential for positive effects from this combination on SA14 in terms of it locating significant development in the south of the District close to existing centres at Hailsham and Polegate, making access to educational and training facilities easier as well as providing the potential for new facilities.
SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.6.96 The large scale nature of development under this combination is likely to have positive effects on SA15 however it is uncertain to what degree at present as it will depend to a large extent on a developments ability to contribute towards improved health care facilities for example. Large scale development may allow for the provision of more open spaces and community facilities which will help improve the health and wellbeing of the population. However this may be restricted to the south of the District.

4.6.97 The scale of development under this combination and the focus around Hailsham and Polegate will help address issues of deprivation here and contribute towards making vibrant and inclusive communities.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.98 The effects on SA17 from this combination are likely to be positive but confined mainly to the south of the District. Development under this combination would be in close proximity to the A27 with access to Brighton and Eastbourne and the employment opportunities they offer. The combination will also consolidate employment provision in the south and help attract new businesses and investment to the area which in turn will present new employment opportunities within the District.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.99 For SA18 the effects are likely to be positive as the scale of new development will provide the impetus and investment to regenerate the exiting high streets at Hailsham and Polegate whilst also presenting opportunities for new centres to develop. This will help diversify the local economy and support more rural areas in terms of their economies. The growth will also help support the development of a large tourist attraction and sports park in the south of the District.
f) North locations

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Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.6.100 This combination has a predominantly northern focus in terms of the large scale development and so will have a significant negative effect on the Ashdown Forest and the features that warrant its designation as an SPA and SAC (SA1). In this respect it goes completely against the AF Routing Scenario.

4.6.101 The Pevensey Levels would also be negatively affected (SA1) as the rest of the housing would be distributed to southern settlements under the AF Routing Scenario, in line with the Settlement Hierarchy.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.6.102 For SA2 the effects are likely to be uncertain as although the combination focuses the large scale growth in the north of the District, there would still be significant growth at the settlements in the south following the AF Routing Scenario and the Settlement Hierarchy. This may result in negative effects on the High Weald, AONB, Low Weald, Pevensey Levels and South Downs National Park in terms of visual impact and recreational.

SA4 Improve the quality of the built environment

4.6.103 As with the earlier assessments, this combination is unlikely to have a direct effect on SA4 as it will be design policies that play the largest role. However, development on the whole offers opportunities for good design from the outset which can help enhance and improve the existing and new built environment.
SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.6.104 There are not the same identified issues with water quality in the north of the District as in the south and so the effect of this combination is uncertain. However, the major growth would be focused in the north but there would still be housing allocated to southern settlements which may impact on the Pevensey Levels and water quality here. Water resources may have added pressure placed on them from the level of development but water efficiency measures in developments will be influenced by other Local Plan Policies.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.6.105 SA7 is likely to experience some degrees of effect from this combination as there are known flooding issues around Uckfield and large scale development here may exacerbate this. However, again SuDS measures can be implemented in development to mitigate this.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.6.106 The effects on SA8 are uncertain at this time. In common with the other assessments, there are no air quality issues in relation to human health in the District but there are in terms of environmental health and the Ashdown Forest. This combination, focusing large scale development within the north of the District, is likely to add to nitrogen deposition from vehicles on the Forest if mitigation measures are not incorporated.

SA9 Ensure the best use of previously developed land and existing buildings

4.6.107 As with the other assessments the effects on SA9 are likely to be negative due to the lack of previously developed land within the District as a whole and the fact that the large scale development proposed would require significant Greenfield sites.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.6.108 The combination is likely to have positive and negative effects on SA10. The large scale development in the north will offer opportunities to consolidate existing services and facilities as well as provide new ones, in a central location minimising journey lengths and frequencies. The distribution in the south would offer the same benefits to a wider range of settlements. People in the more rural areas may still have to travel some distance however to access services. Encouraging walking and cycling again will largely depend
on design of development however the large sale development may offer opportunities to improve transport networks.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.6.109 SA11 is unlikely to be affected by this combination directly as adaptation to climate change will depend on the design of development including building design as well as the design of the environment in which the development sits. Large scale development in the north may offer more opportunities to ‘green’ sites and provide opportunities for innovative design without compromising site viability.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.6.110 The combination will have positive and negative effects on SA12. The distribution will place more housing development in close proximity to existing services and facilities, improving access. The level of development will also attract new services and facilities to the District’s settlements making some more sustainable and providing amenities that did not exist previously.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.111 This combination is likely to have positive effects on SA13 in that the large scale development in the north will enable the maximum amount of affordable housing to be provided, whereas just following the AF Routing Scenario to distribution would have ruled out the north of the District, where issues of affordability are most pressing.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.6.112 There is the potential for positive effects from this combination on SA14 in terms of it locating significant development in the north of the District close to the existing centres of Uckfield and Maresfield, making access to educational and training facilities easier as well as providing the potential for new facilities. The distribution under the AF Routing Scenario would also locate development and hence the population close to existing centres in the south, namely Hailsham and Polegate.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.6.113 As with the other assessments, SA15 is unlikely to be directly affected by this combination although the large scale of development may
increase contributions towards health care facilities as well as allowing the inclusion of more open spaces within development which can help enhance people’s health and wellbeing, through for example encouraging outdoor activity.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.6.114 The scale of development under this combination and the focus around Uckfield will help address issues of deprivation here and contribute towards making vibrant and inclusive communities. The distribution under the AF Routing Scenario will also help create vibrant and inclusive communities and address issues of deprivation around Hailsham and Polegate in particular.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.115 Economically, this combination is likely to have a positive effect in that the large scale development around Uckfield and Maresfield in particular will attract new businesses to the area as well as the distribution overall under this combination bringing more people within close proximity, and with good access to, employment opportunities (SA17).

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.116 In terms of diversifying and strengthening the local economy, this will be dependent on other Local Plan policies surrounding employment and business locations, however the scale and distribution of development may well provide the impetus and critical mass required to support economic growth (SA18). The enhancement of the District rural economy, increasing the vitality of the villages and regenerating the town’s centres may all arise from this combination.

g) Central locations

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108
Environmental SA Objectives (SA1-SA11)

4.6.117 This combination offers the most positive effects for the environmental SA Objectives as it locates large scale development away from the Ashdown Forest and Pevensey Levels, yet there will still be some impact on the Levels from the AF Routing Scenario distributions. However the effects on the designated landscapes is less certain as the High Weald AONB borders Horam to the north, but the south and west is much less constrained in landscape terms.

4.6.118 In terms of the other environmental SA Objectives many of the effects will be dependent on other policies and strategies in the Local Plan such as design, flood risk, sustainable construction and SuDS. The combination, as already stated in the preceding combination assessments, offers the opportunity for consolidating services and facilities so as to minimise journeys and hence reduce emissions and air pollution whilst ensuring the population has good access to such amenities.

4.6.119 Whilst previously developed land will be prioritised through following the settlement hierarchy amongst other things, SA9 will still be adversely affected by this combination as a result of the limited amount of such sites within the District as a whole.

4.6.120 Having large scale development focused at Horam will mean more people will be in close proximity to the Cuckoo Trail which could in turn encourage walking and cycling to reach other settlements. This will help reduce vehicle journey frequencies and lengths and improve people’s health and wellbeing whilst also aiding reductions in emissions from vehicles.

Social SA Objectives (SA12-SA16)

4.6.121 For the social SA Objectives, the effects of this combination are likely to be positive overall, although some will not be determined until implementation of a final distribution strategy for housing within the District.

SA12 Improve access to services; facilities; the countryside and open spaces

And

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.122 Again access to certain amenities and facilities/services will be improved (SA12) through the location of development however this will not be District wide. Maximum affordable housing provision is likely to be achieved at the large scale development sites (SA13) ensuring people have access to a choice of housing. This may be more difficult to achieve on smaller sites.
SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.6.123 With regards to effects on education and training (SA14) there are primary schools and secondary schools at many of the settlements identified and particularly at Horam which may be enhanced through the large scale development proposed or may be overwhelmed.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.124 This combination is likely to have positive effects on the economic SA Objectives although the degree of significance may vary. Horam and East Hoathly would benefit from attraction of employment opportunities as a result of development which in turn would improve access to jobs for local residents (SA17).

4.6.125 Large scale development at East Hoathly would also put more people in close proximity to the A22 offering good access to other centres at Eastbourne, Hailsham, Polegate and Uckfield. This would also assist in attracting businesses to the settlement.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.126 In terms of diversifying and strengthening the local economy, this will be dependent on other Local Plan policies surrounding employment and business locations, however the scale and distribution of development may well provide the impetus and critical mass required to support economic growth (SA18). The enhancement of the District rural economy, increasing the vitality of the villages and regenerating the town centres may all arise from this combination.

h) East locations

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Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

4.6.127 Similar to the assessment for the central locations combination, this approach has mixed effects on the environmental SA Objectives. Whilst the Ashdown Forest is protected from adverse impacts, the Pevensey Levels are not due to the fact development would be focused within the south of the District. Therefore significant negative effects may arise in regards to treating waste water and discharging this to the Levels (SA1). Both Herstmonceux and Ninfield drain to the Levels.

SA2 Conserve and enhance the District's countryside, landscape, historic environments and cultural assets

4.6.128 The effects on the landscape could be significantly negative under this combination as the AONB borders Herstmonceux and Ninfield and the concentration of development would be in the south of the District, which could impact on the Low Weald, South Downs National Park and Pevensey Levels. Negative effects could arise from increased visitor pressure and from visual intrusion as a result of development.

4.6.129 The rest of the environmental SA Objectives, barring SA9, will be dependent on the final distribution strategy as well as other policies and strategies within the Local Plan such as flooding, design, location, site specific criteria and sustainable construction, to name a few.

SA9 Ensure the best use of previously developed land and existing buildings

4.6.130 SA9 is likely to be negatively affected under this combination for the same reasoning as the others, a lack of previously developed land in the District as a whole.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.6.131 For the social SA Objectives, this combination offers mainly positive effects with others being unknown at this time. Providing the large scale development at Herstmonceux and Ninfield would mean the resulting population would be in close proximity to the A271 main road with good access to other settlements such as Hailsham, where services and facilities exist (SA12). The level of development may also enable new services and facilities to emerge at other settlements, enhancing their sustainability.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.132 Affordable housing would be easier to achieve on the large scale developments and the AF Routing Scenario provides significant development
to the south of the District which may enable the maximum or close to it, amount of affordable housing to be achieved (SA13).

**SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness**

4.6.133 Locating large scale development close to existing educational/training facilities means that it will be easier for new residents to access them. There will also be the opportunity for new facilities to be developed although this may take some time to relate to a new settlement. In this respect SA14 is likely to be positively impacted upon.

**SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health**

4.6.134 For SA15 and SA16 this combination is likely to have positive effects as the scale is likely to facilitate improvements to health care facilities and provide services close to where people live enabling them to stay independent longer.

**SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community**

4.6.135 The scale of development will also mean improvements to public transport can be considered and may be more easily achieved helping create inclusive communities.

**Economic SA Objectives (SA17 and SA18)**

**SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses**

4.6.136 Economically, this combination results in large scale development focused on the south of the District which is likely to result in positive effects in terms of attracting businesses and inward investment. This will help create new employment opportunities close to where people live making them more readily accessible (SA17).

**SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism**

4.6.137 The consolidation of development in this way will create the conditions for enhancement of existing, as well as provision of new, town centres. In addition, the distribution of housing would be in line with the settlement hierarchy and so in some rural areas the economy will benefit from the attraction of small business and services such as retail (SA18).
Preferred Option for Testing 2

4.6.138 Having considered the above alternatives to accommodating the OAHN of the District together with options for accommodating some of the undersupply of the HMA, the Wealden Local Plan proposes the following Preferred Option for testing:

“To accommodate significant growth through allocations around the edges of the towns as well as significant urban extension(s) within the vicinity of Hailsham”

SA Assessment

Predicting the effects of the Preferred Option for Testing 2 (SA Tasks B3/B4): General Summary

4.6.139 The SA assessment of the New Settlements approach in Section 4.6 of this report is relevant to the Preferred Option for Testing 2 and should be read in conjunction with this assessment. This section provides a summary of the SA of the Preferred Option for Testing 2 and highlights the likely effects.

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Environmental SA Objectives (SA1-SA11)

4.6.140 For the majority of the environmental SA Objectives the effects of new settlements and/or large urban extensions are uncertain and will depend on other Local Plan policies such as design, flood risk and infrastructure.

SA1 To protect and enhance biodiversity and geodiversity within the District

4.6.141 For SA1 the Preferred Option for Testing 2 is likely to have positive and negative effects. Having the large urban extension being within the vicinity of Hailsham means that impacts on the Ashdown Forest are less likely, although cannot be completely ruled out. However there may be potential effects on the Pevensey Levels, in particular negative impacts on water quality due to the capacity issues at the WwTWS. However, Southern Water has developed a solution to the capacity issues although this is highly technical and not likely to come on stream until 2022. Nevertheless this does release development capacity in the south of the District.
SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.6.142 For SA2 the effects are largely uncertain but there are likely to be effects on the landscape and countryside, particularly the South Downs National Park and the Low Weald. These could be in the form of visual impact, recreational pressure and an encroachment into the countryside.

4.6.143 For SA3 and SA6 the effects of large development under this approach are likely to be neutral as other policies such as design and sustainable construction will determine the impacts.

SA4 Improve the quality of the built environment

4.6.144 The effects of this approach on SA4 will depend to a large degree on design policies however the scale of development under this approach offers the opportunities to improve the existing as well as new built environment including the context within which the new development will sit.

SA5 To maintain and improve the water quality of the District’s rivers and groundwater, and to achieve sustainable water resources management

4.6.145 Such large development under this approach may place pressure on water resources, particularly in the south of the District and this will need to be addressed (SA5). However in terms of water quality the southern focus may exacerbate the problems connected to the Levels and the WwTWS capacity issues. The discharge capacity restrictions which currently exist in the south of the District would make it extremely difficult to accommodate the increase in waste water treatment and alternative measures such as septic tanks may have to be looked at, however these are usually found on small development sites and in themselves present issues with water pollution from leakages/lack of maintenance. On the other hand the scale of development proposed could enable significant improvements in the waste water infrastructure in the south through upgraded sewer networks for example. But the issues are with discharge capacity rather than treatment capacity and this requires technical solutions that are in the hands of the utility provider, Southern Water.

SA7 Reduce the risk of flooding and the resulting damage to public wellbeing, the economy and the environment.

4.6.146 Similarly to SA5, the effects on SA7 are uncertain and will depend to a degree on other policies and strategies within the Local Plan. However, development on this scale will inevitably involve large Greenfield sites which lend themselves more readily to the incorporation of measures such as SuDS which can be effective in addressing flood risk through the management of surface runoff. This will be particularly important in the vicinity of Hailsham where surface water flooding issues exist.
SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

4.6.147 In terms of air quality and SA8, the SA Scoping Report identified that the District does not suffer air quality issues in terms of human health however development of this scale may alter that with an increase in traffic movements. The effects of this approach will be dependent to a degree on any development being designed in such a way as to encourage walking, cycling and public transport use over the private car to help ensure air quality issues do not arise. For renewable energy the effects of this approach could be positive due to economies of scale making their incorporation on and off site more viable.

SA9 Ensure the best use of previously developed land and existing buildings

4.6.148 The effects of this approach are likely to be negative on SA9 regardless of the location due to the fact that large scale Greenfield sites will be needed. Previously developed land will still be prioritised but it is scarce within the District.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes (walking, cycling and public transport)

4.6.149 The effects on SA10 are uncertain at this time. Large scale development in general would enable improvements in transport networks and public transport between the new development and existing centres minimising journey lengths and frequencies. Housing would be closer to services and facilities. Encouraging the use of more sustainable transport modes such as walking and cycling will depend to a degree on design polices as well as standalone transport policies in the Local Plan.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

4.6.150 The effects on SA11 could potentially be positive in the sense that large scale sites mean that the incorporation of ‘urban greening’ through trees, open space and other measures could be achieved without reducing overall viability of development. These can help built up areas adapt to climate change by providing cooling effects in summer and warming effects in winter. SuDS measures can be utilised in the same way and also offer the ability to manage surface water to mitigate flooding that may occur from increased rainfall. Much of this will depend on other policies within the Local Plan including design.
Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.6.151 The overwhelming effects from this approach are likely to be positive. The location of the large urban extension around the Hailsham area together with the allocations around the towns would mean housing would be within close proximity to existing services and facilities with there would be the potential for the attraction of new ones which will improve access to them (SA12).

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.6.152 The provision of decent and affordable homes (SA13) is likely to be easier to achieve under this approach due to the scale of development proposed. The approach would allow for the maximum affordable housing provision which will be particularly important for those allocations to settlements in the north of the District where house prices tend to be much higher. The Preferred Option for Testing will also help address issues of social exclusion and deprivation by providing appropriate and affordable housing for people.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

4.6.153 Proximity to educational and training facilities is more likely to be easily accessed in and adjacent to existing urban areas, which is the direction of development under the Preferred Option for Testing. Therefore there are likely to be positive effects on SA14. However those in more rural areas would still need to commute to larger centres to access these facilities.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.6.154 For SA15 the effects of the Preferred Option for Testing should be positive based on the assumption that the new development would make some contribution towards new or improved health, sport, community and open space facilities. The size of potential development, particularly the urban extension around the Hailsham area, may create new health centres, or help enhance the existing, particularly within and around the Hailsham area where linkages could be made to the development at Hellingly Hospital that includes sports facilities, a community hall and cycle ways. The size of development sites as part of the town allocations themselves may also help in the provision of on-site open space or community facilities.
SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.6.155 Under the Preferred Option for Testing the effects on SA16 should be positive in that it will enable the safeguarding and enhancement of services and facilities for existing and new communities. The large urban extension around the Hailsham area, depending on the final location, offers good potential to strengthen community cohesion and offer some potential for the more deprived areas of Hailsham. Again dependent on the location of the extension, it may offer the potential for development of a new neighbourhood centre which would have the added advantage of benefiting the existing community that are somewhat removed from the town centre. This would also be true of the allocations around the towns, depending again on the size of the allocations and their locations.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.6.156 Growth in and around the towns may help support and enhance the prosperity of the district and further assessment may be undertaken when site-specific detail is proposed. The scale of development presents opportunities for employment sites to come forward as the housing development would be present to support this and provide the critical mass needed (SA17). In addition, there is the potential to offer employment floorspace as part of mixed use developments. Access to jobs would be improved with the location of the population in close proximity to existing and new employment opportunities.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.6.157 For SA18 the effects of the Preferred Option for Testing will, to a degree, be dependent on the location of development as to whether it would stimulate town centre regeneration. For the allocations around the towns there are likely to be positive effects on the rural economy and local economy from employment provision and the attraction of other services and businesses but again location, design and type of development will be important.

4.7 Approaches to address the Preferred Option for Testing

2

4.7.1 The Preferred Option for Testing seeks to provide for the housing needed within the District, as well as some of the undersupply with the HMA, through a large urban extension in the vicinity of Hailsham together with
allocations to towns. On further consideration it was determined that there should be some appropriate growth allowed for at the Local and Neighbourhood Centres contained in the Settlement Hierarchy in order to meet local need and enhance their sustainability.

4.7.2 In light of this, further consideration was given to the housing numbers attributed to the settlements within Appendix H of this Report and they underwent additional moderation to address allocations to settlements wholly within the AONB. For these settlements the housing allocation figures were restricted to 20% of the existing total number of houses in the settlement. This is in order to take account of the unique and special characteristics of the AONB and to ensure the enhancement and conservation of the AONB.

4.7.3 In addition to the moderation for settlements wholly within the AONB, Heathfield had its housing allocation restricted to around 24% of the existing number of houses. Whilst Heathfield is not wholly within the AONB, parts of it are and it also is extremely constrained in terms of its ability to accommodate further growth.

4.7.4 To achieve the Preferred Option for Testing 2, the Wealden Local Plan Issues, Options and Recommendations Consultation Paper proposes two approaches, which will be assessed separately in the following sections.

**First Approach for Testing**

4.7.5 Please refer to Chapter 8, from paragraph 8.38 of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper at this point. This sets out the number of houses to be allocated to specific settlements under this First Approach (Table 5) as well as outlining potential constraints to achieving this Approach.

4.7.6 The First Approach distributes development away from the Ashdown Forest and concentrates development in the most sustainable centres. There is a significant focus on South Wealden; however development is identified to towns and villages to the north of the District where traffic can access Tunbridge Wells using an alternative route to the A26.

4.7.7 The housing allocations are based on the Settlement Hierarchy methodology together with the additional moderation discussed in paragraphs 4.7.2 – 4.7.4 above. Tables 5 and 6 and Figure 5 within the Wealden Local Plan Issues, Options and Recommendations Consultation Paper provide the housing numbers for each of the settlements and will not be reproduced here. Please refer to these Tables in conjunction with this assessment.

4.7.8 The SA assessments carried out in Sections 4.1-4.6 and their conclusions/findings are applicable to this approach as they have culminated in the Preferred Option for Testing 3.

4.7.9 The Option for this First Approach is Option 3 within the Wealden Local Plan Issues, Options and Recommendations Consultation paper:
“South Wealden Housing Option - With improvements to the Strategic Road Network

Provision of 735 dwellings per annum, including commitments and completions since 2013 and Core Strategy Strategic Sites with planning consent or resolved to be granted planning permission, with a distribution to those settlements which route development away from roads that directly cross the Ashdown Forest, based on a settlement hierarchy approach where 10% growth is allocated to settlements identified as a Neighbourhood Settlement and 20% growth allocated to settlements identified as a Local Settlement and Sustainable Settlements wholly within the Area of Outstanding Natural Beauty. The residual growth is distributed proportionately to the number of dwellings within each Sustainable Settlement. Provide for a large scale urban extension around Hailsham/ Polegate to help meet the Objectively Assessed Housing Need of the District and to go towards the shortfall from other local authority areas.

Please note the final dwelling numbers have been moderated to take into account environmental constraints such as landscape impact, impact on the historic characteristics of the settlement and potential for land supply”.

SA Assessment

Predicting the effects of the First Approach (Option 3) (SA Tasks B3/B4):

General Summary

4.7.10 It should be noted that the following SA Assessment considers the overall Option and the housing allocations will be assessed within the Preferred Option for Testing 3 later in this section. The allocations have been based on the Settlement Hierarchy and as such have been assessed as being appropriate for the individual settlements.

Environmental SA Objectives (SA1-SA11)

4.7.11 In terms of these SA Objectives, the effects are mixed, however are likely to be positive overall.

SA1 To protect and enhance biodiversity and geodiversity within the District

4.7.12 The First Approach focuses the majority of growth within the south of the District and so avoids any significant effects on the Ashdown Forest. However, to fully achieve positive effects on SA1, any development in and around the Hailsham/Polegate area will need to ensure no adverse impacts
occur in relation to the Pevensey Levels. Furthermore, northern allocations around towns and villages will need to make sure they either do not have an impact, or are able to mitigate any impact they may have, on the Ashdown Forest.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.7.13 For SA2 the effects will largely depend on specific site locations as well as other Local Plan policies related to the landscape, countryside and historic elements of the District. However, the scale of development proposed may have impacts on landscape in terms of visual intrusion although this will be minimised on the AONB due to the restriction in growth allowed. The Option also notes that the housing numbers have been moderated having regard to landscape impact and the impact on the historic characteristics of the settlements.

4.7.14 For the remainder of these SA Objectives any effects are likely to be determined by other Local Plan policies such as flood risk, renewable energy, transport, infrastructure and design. However the scale of development may make some of these elements easier to achieve, for example SuDS measures are easier to achieve on larger sites and can help manage flood risk as well as help improve biodiversity.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

4.7.15 Socially, Option 3 would likely have overall positive effects although again this will largely depend on other Local Plan policies playing their part and on the location of any housing allocations. Access to services and facilities for example (SA12) are very site specific but the provision of growth in itself offers opportunities to improve access to these amenities for people. This is particularly true within some of the village’s allocated growth for example as they may help enhance existing services the settlement offers and therefore offer a better service to residents.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.7.16 Option 3 offers a good opportunity, considering the Districts numerous constraints, to provide the new housing delivery required for the District. The scale of development offers the potential for significant proportions of affordable housing to be delivered as well. In addition, by allocating a small amount of growth to the villages, which are considered within the Settlement Hierarchy to be unsustainable in terms of the NPPF requirements, Option 3 ensures that local housing needs are met and this is particularly important in the villages and rural areas where house prices tend to be higher.
SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.7.17 Again the effects on SA15 will depend on other Local Plan policies; however the scale of growth proposed by Option 3 offers good potential to positively address this objective through new leisure, open space and health facilities as well as improving access to existing services and facilities. The large urban extension around the Hailsham/Polegate area would support the business case for a new sports park in the south of the District which would significantly contribute towards improving people’s health and wellbeing and support the achievement of SA Objective 15.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.7.18 The small amount of housing growth allocated to the villages will help improve their sustainability also which will in turn help improve people’s wellbeing. The same reasoning can be given for SA16 in that the levels of housing growth proposed under Option 3 provide opportunities to strengthen communities and allow people to remain within their communities through increased sustainability and affordable housing provision within them.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

4.7.19 In terms of these SA Objectives, Option 3 has the potential to offer positive effects but will also depend on other Local Plan policies and strategies. For SA17 the large extension around Hailsham offers significant opportunities to provide employment land alongside housing development. The level of growth is also likely to attract significant investment and improvements to infrastructure which in turn could attract businesses and new employers to locate within the District. The small amount of growth allocated to the villages will also help support smaller businesses and the rural economy. Growth in the towns can help support and enhance the prosperity of the District.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

4.7.20 For SA18, Option 3 has the potential for positive effects but this will depend on the location of development in regards to the town centres or village centres as to whether it will enable regeneration. Good linkages between new development, wherever it is located, and town centres will be key to achieving SA18 and this could take the form of improvements to walking and cycling routes.
Second Approach for Testing

4.7.21 The Second Approach assumes that there are no issues with regards to the ecology of the Ashdown Forest; it is referred to as Multi Centre Housing Option. This means that at present this Option is not a reasonable alternative however it would be a suggested approach if the issues with the Ashdown Forest did not exist. In this regard it is considered appropriate to SA the approach and for the purposes of the assessment it is assumed there are no issues with the Ashdown Forest.

4.7.22 The allocation of development would follow the same methodology as the First Approach and the Settlement Hierarchy in terms of the proportions of housing allocated to settlements (with the exception to sustainable villages wholly within the AONB). Tables 7 and 8 and Figure 6 of the Wealden Local Plan Issues, Options and Recommendations Consultation paper provide the housing numbers for each of the settlements and will not be reproduced here. Please refer to these Tables in conjunction with this assessment.

4.7.23 The SA assessments carried out in Sections 4.1-4.6 and their conclusions/findings are applicable to this approach as they have culminated in the Preferred Option for Testing 3.

4.7.24 The Option for this Second Approach is Option 4 of the Wealden Local Plan Issues, Options and Recommendations Consultation paper:

“Multi Centre Housing Option

Provision of 735 dwellings per annum, including commitments and completions since 2013 and Core Strategy Strategic Sites with planning consent or resolved to be granted planning permission, with a distribution based on a settlement hierarchy approach where 10% growth is allocated to settlements identified as a Neighbourhood Settlement and 20% growth allocated to settlements identified as a Local Settlement and redistributing the residual growth proportionately to the number of dwellings within each sustainable settlement. Provide for a large scale urban extension around Hailsham/ Polegate to help meet the Objectively Assessed Housing Need of the District and to go towards the shortfall from other local authority areas.

Please note the final dwelling numbers have been moderated to take into account environmental constraints such as landscape impact, impact on the historic characteristics of the settlement and potential for land supply”.

SA Assessment

Predicting the effects of the Second Approach (Option 4) (SA Tasks B3/B4): General Summary

4.7.25 It should be noted that the following SA Assessment considers the overall Option and any settlement specific housing allocations will be assessed within the Preferred Option for Testing 3 later in this section. The
allocations have been based on the Settlement Hierarchy and as such have been assessed as being appropriate for the individual settlements.

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<th>SA Objectives</th>
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**Environmental SA Objectives (SA1-SA11)**

4.7.26 As the First Approach, the likely effects on the SA Objectives will be positive overall and some will depend on other Local Plan policies and strategies.

**SA1** To protect and enhance biodiversity and geodiversity within the District

4.7.27 As the Second Approach assumes no issues exist with regards to the Ashdown Forest then the effects on SA1 are likely to be positive. The approach also lessens the amount of housing growth within the south of the District, although this remains the focus, which will help address any likely impacts on the Pevensey Levels.

**SA2** Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

4.7.28 In terms of SA2, the Second Approach distributes housing growth to a wider range of settlements and some of these are close to or have areas within the High Weald AONB and so there may be the potential for negative effects as a result of inappropriate development, design and visual intrusion. However, there are also opportunities to enhance the AONB particularly in areas where the quality of the AONB has been degraded. Again the full achievement of this SA Objective will be dependent on other Local Plan policies including that on design and the historic environment.

4.7.29 For the remainder of the environmental SA Objectives, the effects are more likely to be determined by other Local Plan policies and strategies. However the scale and distribution of housing growth under the Second Approach may still make some of these elements easier to achieve, for example SuDS measures are easier to achieve on larger sites and can help manage flood risk as well as help improve biodiversity.

4.7.30 Of course, were this approach to go ahead at present, without mitigation, it would have a likely significant negative effect on the Ashdown Forest in terms of nitrogen deposition and recreational pressure.
Social SA Objectives (SA12-SA16)

4.7.31 Socially, the effect on the SA Objectives will be largely the same as for the First Approach although the reduction in housing growth in the south may lessen the magnitude of any positive effects.

SA12 Improve access to services; facilities; the countryside and open spaces

4.7.32 Access to services and facilities for example (SA12) are very site specific but the provision of growth in itself offers opportunities to improve access to these amenities for people. Under the Second Approach the beneficial effects are likely to be more widespread as more settlements are allocated growth. This may help enhance existing services within the settlement and therefore offer a better service to residents.

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

4.7.33 For SA13, the positive effects are also likely to be more widespread and enable the provision of affordable housing within the more rural settlements. The types of affordable as well as other low cost housing will be dependent on other Local Plan policies concerning housing mix and may also be further modified through more detailed needs assessments of the settlements at later stages of the Local Plan process.

SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

4.7.34 Again the effects on SA15 will depend on other Local Plan policies; however the scale of growth proposed by Option 4 offers good potential to positively address this objective through new leisure, open space and health facilities as well as improving access to existing services and facilities. This is also likely to more widely achieved within the District as a result of more settlements being allocated some level of housing growth. The large urban extension around the Hailsham/Polegate area would still support the business case for a new sports park in the south of the District and contribute towards improving people’s health and wellbeing.

SA16 Create vibrant, active, inclusive and open minded communities and reduce poverty and social exclusion for all sectors of the community

4.7.35 The housing growth allocated to the villages will help improve their sustainability also which will in turn help improve people’s wellbeing. The same reasoning can be given for SA16 in that the levels of housing growth proposed under Option 3 provide opportunities to strengthen communities and allow people to remain within their communities through increased sustainability and affordable housing provision within them.
Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses.

4.7.36 Economically, the Second Approach is still likely to have positive effects. For SA17 the large extension around Hailsham would still offer opportunities to provide employment land alongside housing development. The level of growth is also likely to attract significant investment and improvements to infrastructure which in turn could attract businesses and new employers to locate within the District. The distribution of housing growth to a greater number of settlements within the north of the District would mean economics benefits would be more widespread. This type of growth would help support smaller businesses and the rural economy. Growth in the towns can help support and enhance the prosperity of the District.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism.

4.7.37 As with the First Approach, the Second Approach has the potential for positive effects but this will depend on the location of development in regards to the town centres or village centres as to whether it will enable regeneration. Good linkages between new development, wherever it is located, and town centres will be key to achieving SA18 and this could take the form of improvements to walking and cycling routes. Again the positive effects will be more widely felt under the Second Approach due to the greater number of settlements allocated housing growth.

Preferred Option for Testing 3

4.7.38 The Preferred Option for Testing in regards to the Strategic Housing Strategy includes elements of all of the Options discussed in Sections 4.2-4.7 of this report.

4.7.39 Chapter 8 of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper contains the Preferred Option for Testing 3 and lists the settlements allocated housing growth together with the housing figures for each. Please refer to that section to see the housing figures allocated to each settlement.

4.7.40 The Preferred Option for Testing states:

"The preferred option for testing is the South Wealden Option - with improvements to the Strategic Road Network. The proposed plan period is from 2013 to 2037 with a resulting housing supply of 840 dwellings per annum, which is greater than the Objectively Assessed Housing Need for the..."
District by 105 dwellings per annum or 2,520 dwellings in total in the plan period. On the basis of where development is located and the interaction within the Housing Market Area it is proposed that this Plan addresses the under supply of Eastbourne Borough, subject to evidence from the Authority showing that all efforts have been made to accommodate their housing need within the Borough.

This option will be phased to take into account the major infrastructure requirements. The following Core Strategy housing requirements are included in the number of additional dwellings to be provided.

- Polegate and Willingdon - 700 dwellings
- Hailsham - 418 dwellings
- Crowborough - 140 dwellings
- Stone Cross - 44 dwellings

**SA Assessment**

Predicting the effects of the Preferred Option for Testing 3 (SA Tasks B3/B4): General Summary

| SA Objectives | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
|---------------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|
| Preferred Approach for Testing 3 | + | ? | o | o | o | o | o | o | o | + | + | o | + | + | + | + | + |

**Environmental SA Objectives**

4.7.41 Overall the Preferred Option for Testing would have positive effects on these SA Objectives as its focus on the south of the District and so seeks to avoid any significant effects on the Ashdown Forest. In addition, the approach would seek to conserve and enhance the High Weald AONB through allowing for appropriate housing growth within settlements that border or are within the landscape designation. There may still be some degree of adverse impact on the landscape however due to the scale of development proposed, but other Local Plan policies such as those on design, the countryside and landscape will enable any adverse impacts to be mitigated or avoided.

4.7.42 Furthermore, the policy approach follows the First Approach, put forward and assessed against the SA Objectives, at the beginning of this section. As such it takes account of the moderation of housing numbers having regard to landscape impact, the AONB and the impact on the historic characteristics of the settlements.

4.7.43 For the remainder of these SA Objectives any effects are likely to be determined by other Local Plan policies such as flood risk, renewable energy, transport, infrastructure and design. However the scale of development may make some of these elements easier to achieve, for example SuDS measures
are easier to achieve on larger sites and can help manage flood risk as well as help improve biodiversity.

Social SA Objectives

4.7.44 In terms of social impacts, the Preferred Option for Testing would have overall positive effects as it delivers the Objectively Assessed Housing Need for the District together with seeking to meet the need of our neighbouring Local Authority, Eastbourne. The policy approach focus growth on the most sustainable settlements but also acknowledges and allows for proportionate housing growth in unsustainable settlements to meet local need. This will also help improve people’s overall sense of wellbeing and help foster cohesive and vibrant communities.

4.7.45 However, the focus of the policy approach being on the south of the District means that not all settlements will benefit from growth and this could have adverse impacts on local housing provision for them and also on community cohesion.

Economic SA Objectives

4.7.46 Economically, the Preferred Approach for Testing would have likely positive effects overall. The focus on the south, with the large extension around the Hailsham/Polegate area offers significant opportunities to provide employment land alongside housing development. The level of growth is also likely to attract significant investment and improvements to infrastructure which in turn could attract businesses and new employers to locate within the District. The small amount of growth allocated to the villages will also help support smaller businesses and the rural economy. Growth in the towns can help support and enhance the prosperity of the District.

4.7.47 The policy approach has the potential for positive effects in regards to the diversification of the economy and helping to improve town and village centres although this may depend on the location of development in regards to the town centres or village centres. Good linkages between new development, wherever it is located, and town centres will be key and this could take the form of improvements to walking and cycling routes.

The Housing Allocations of the Preferred Option for Testing 3

4.7.48 This section provides a summary overview of the SA assessment for each of the settlements allocated housing under the Preferred Option for Testing 3. For many of the settlements the assessment is the same despite them having differing characteristics. As the Wealden Local Plan progresses and potential sites are identified to accommodate the proposed housing, finer grain SA assessments will be carried out.
| Settlement/Dwelling No | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 |
|------------------------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|
| **Towns**              |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |
| Hailsham 9,380         | + | ? | o | o | o | 0 | 0 | - | - | + | - | + | + | 0 | + | + | + | + |
| Polegate & Willingdon – 1,000 | + | ? | o | o | o | 0 | 0 | - | - | + | - | + | + | 0 | + | + | + | + |
| Stone Cross – 500      | + | + | 0 | 0 | 0 | 0 | 0 | - | - | + | - | + | + | 0 | + | + | + | + |
| Heathfield – 800       | 0 | - | 0 | 0 | 0 | 0 | 0 | - | - | ? | - | + | + | 0 | + | + | + | + |
| Uckfield – windfalls that do not have adverse impacts on Ashdown Forest | + | ? | o | o | o | o | 0 | - | + | ? | - | + | + | 0 | + | + | ? | ? |
| Crowborough – 140 plus windfalls that do not have adverse impacts on Ashdown Forest | + | ? | o | o | o | o | 0 | - | + | ? | - | + | + | 0 | ? | + | ? | ? |
| Edge of Tunbridge Wells - 320 | ? | ? | o | o | o | o | 0 | - | ? | ? | - | + | + | 0 | + | + | + | + |
| **Villages**           |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |
| Arlington – 10         | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | + | 0 | 0 | + | o | 0 | 0 |
| Boreham Street – 10    | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 |
| Chiddingly – 10        | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | + | 0 | o | + | 0 | o | 0 |
| Hankham – 10           | + | + | 0 | 0 | 0 | 0 | 0 | ? | o | o | 0 | ? | + | o | o | + | ? | o |
| Laughton – 10          | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 |
| Muddles Green – 10     | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | o | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 |
| Rushlake Green – 10    | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | ? | + | 0 | o | 0 | 0 | 0 |
| Upper Dicker – 10      | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 |
| Chalvington and Ripe – 10 | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | ? | + | 0 | 0 | 0 | + | 0 | 0 |
| Berwick Station – 15   | + | ? | o | o | o | o | 0 | 0 | 0 | o | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 |
| Bells Yew Green – 20   | + | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | o | 0 | 0 | + | 0 | 0 | 0 | + | 0 | 0 |
| Blackboys – 20         | + | ? | o | o | o | o | 0 | o | 0 | 0 | ? | 0 | o | 0 | + | 0 | 0 | 0 | + | 0 | 0 |
| Lower Horsebridge – 20 | + | + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | o | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 |
| Mark Cross – 20        | ? | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | ? | + | 0 | o | 0 | + | 0 | 0 |
| Maynards Green –       | ? | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | o | 0 | 0 | + | + | 0 | 0 | 0 | + | 0 | 0 |
4.7.49 Many of the SA Objectives will not be directly affected by the allocations as other Local Plan policies and strategies will address them. Such as requiring a high standard of energy efficiency and water efficiency within new dwellings; renewable energy policies; design policies; infrastructure policies and flood risk strategies amongst others. Regard would be necessary, however, to the relationship between sustainable design, achieving other objectives and viability of development.

### Towns

#### Effects on SA Objectives common to all Town allocations

4.7.50 The effects on SA8 and SA11 are likely to be negative due to the fact that the scale of development proposed will inevitably mean more traffic on the Districts roads and hence a potential increase in air pollution and CO₂ emissions. Furthermore, the amount of housing proposed will likely mean more demands for energy consumption which too can increase emissions. However, these effects could be mitigated through other measures being
introduced such as improvements in public transport and other sustainable transport modes such as walking and cycling.

4.7.51 The scale of development lends itself to offering opportunities to provide these improvements. In addition, requiring higher standards of energy efficiency and sustainable construction methods will help reduce energy consumption and energy loss and hence help reduce emissions from dwellings. This will of course depend on other Local Plan policies together with any national initiatives to address these issues.

4.7.52 Socially, the effects on SA12 and SA13 of the town developments are likely to be positive, albeit to varying degrees. The Preferred Option for Testing 3 follows the South Wealden Approach and the scale of development proposed at Hailsham and Polegate & Willingdon is likely to have positive effects on SA12 presenting good opportunities for improving access to existing and providing new, services and facilities. There are good connections here too to the wider area through the A22 and the A27 although it is acknowledged that major improvements would be need to the infrastructure.

4.7.53 The housing allocations will also positively affect SA13 in that they will ensure a significant supply of affordable housing when taken together with other Local Plan policies such as that on affordable housing, housing mix and housing type.

4.7.54 The Preferred Option for Testing 3 focuses development within the most sustainable settlements (following the Settlement Hierarchy) and therefore by default is likely to improve access to services and facilities. The locations of sites for the housing will clearly play their role as location and access are intrinsically linked. Edge of settlement sites may have poorer connections with the centres for example.

4.7.55 The levels of growth are likely to attract new facilities and services to the towns and opportunities to improve access by public transport, walking and cycling should arise, particularly improving the Cuckoo Trail and its access points. Uckfield has good access onto the A22 but also has a thriving and vibrant centre offering a good range of varying facilities and services. Heathfield has a similar vibrant centre offering a wide range of services and facilities.

4.7.56 The growth promoted by the Preferred Option for Testing around the towns will achieve positive overall effects in terms of improving people’s health and wellbeing provided that the infrastructure, such as health facilities, is provided alongside the development. The south Wealden focus will help strengthen the case for a new sports park within the south of the District which will go towards achieving SA15 in terms of people’s health through the opportunities to participate in sports for example. Location of development again plays an important role in improving people’s health and wellbeing as; for example, proximity to roads and road noise can be harmful. This may be a particular concern in accommodating the housing growth at Stone Cross.
4.7.57 The provision of the large scale of housing, particularly at Hailsham and Polegate & Willingdon, can help address issues of deprivation and promote social cohesion and vibrancy (SA16) through the delivery of decent housing that is affordable and improvements in the general living environment. Again this will depend on locations and ensuring that any new development has good connectivity with the existing settlement and the wider area, so that new development does not become isolated. Provision of community facilities will also help achieve this SA Objective.

**Effects on SA Objectives that differ between Town allocations**

**Environmental SA Objectives (SA1-SA11)**

4.7.58 For Hailsham, Polegate & Willingdon and Stone Cross the effects on SA1 are likely to be positive as they are based in the south of the District and so do not have a direct influence on the Ashdown Forest. They are however dependent on major infrastructure improvements being carried out, in particular to the A27, to accommodate the growth proposed and in order to offer people an alternative route from south to north than heading for the A26 and the Ashdown Forest. It cannot be ruled out that people will still not use the Ashdown Forest route and that is why these are Options for Testing. Transport modelling is being undertaken to determine the impacts.

4.7.59 Both Crowborough and Uckfield are assessed as having positive effects in relation to SA1 because although they are within close proximity to the Ashdown Forest road routes, the Preferred Option for Testing specifically seeks to accommodate a small scale of development that does not have an impact on the Ashdown Forest. In addition both settlements were allocated housing growth through the Core Strategy which was found sound at independent examination and there are no reasons to believe this should be changed. Furthermore, mitigation measures such as SANGS and SAMMS are underway to help reduce any adverse effects that may occur as a result of development at these settlements.

4.7.60 For the Edge of Tunbridge Wells, the effects on SA1 are assessed as uncertain at this time due to the fact that the area contains a SSSI which may be impacted upon by the scale of development. However, some elements of the SSSI have become degraded as a result of not being managed and may benefit from development in terms of improving the quality of the SSSI though careful design and management of any development.

4.7.61 In terms of SA2, Hailsham, Polegate & Willingdon; Uckfield, Crowborough and the Edge of Tunbridge Wells are all assessed as having uncertain effects. The scale of development proposed at Hailsham and Polegate & Willingdon is of such a size that there may be negative visual impacts on the South Downs National Park in terms of views from it. This is where careful site selection and design will help mitigate any impacts. The development of 700 of these dwellings has already been established at Polegate & Willingdon and so the principle of development here in landscape terms has been deemed appropriate, with the relevant mitigation measures.
Crowborough is surrounded by the High Weald AONB and so there may be likely negative effects on the setting of the landscape or indeed on the landscape itself if land I allocated within it. This will depend on the land availability within the settlement which is part of ongoing work at this time.

4.7.62 In relation to SA9, the scale of housing proposed at Hailsham; Polegate & Willingdon; Stone Cross Heathfield and the Edge of Tunbridge Wells will inevitably mean the use of Greenfield land to deliver the development and so would move away from this SA Objective. At Crowborough and Uckfield the smaller scale of allocations and the focus on windfall means there are more opportunities to develop on brownfield land, particularly through infill and redevelopment opportunities. The effects will not be fully known until land availability has been established within and around the towns.

4.7.63 The achievement of SA10 will to a large degree depend on the eventual locations of any new development as well as improvements to infrastructure, the provision and proximity of services and facilities to new developments. Mitigation measures such as travel plans; emphasis on cycling routes and footpaths and improving public transport links could all be introduced alongside or as part of the new developments, particularly given the scale of development proposed.

4.7.64 Heathfield for example lacks the good public transport links necessary to cater for travel demand to destinations further afield such as access to the rail network and key employment/retail centres such as Eastbourne and Tunbridge Wells. On the other hand Crowborough’s proximity to the road network and Tunbridge Wells may encourage car use from new development.

4.7.65 The large scale development at Hailsham may minimise journey lengths (SA10) by providing mixed use development and a good range of services and facilities including employment opportunities. At Polegate & Willingdon there is good access to the train station and public transport links to Hailsham and Eastbourne and the growth proposed will be able to access this and may also provide improvements, to discourage car use. Stone Cross also has good public transport links with Eastbourne meaning that the development proposed here would have excellent potential to encourage and promote modes of transport other than the car, and this will be important in mitigating the good access to the road network. It also benefits from good access to the train station at Westham.

Economic SA Objectives (SA17 and SA18)

4.7.66 Growth in the towns can help support and enhance the prosperity of the district and this has been assessed at the higher level of options. This means that the effects on SA17 and SA18 are likely to be positive through growth providing employment floorspace as part of mixed developments. Again location will play an important role but the scale of development proposed is likely to be positive for the economy, provided the necessary infrastructure is in place.
4.7.67 The large scale of housing growth at Hailsham and Polegate & Willingdon has the potential for positive effects on SA17 due to the proximity to the A27 and the centres at Eastbourne and Brighton. This would provide existing and new residents with good access to employment opportunities within and outside of the District. It would also help consolidate the employment opportunities in the south of the District and attract inward investment in the form of capital and ion new businesses.

4.7.68 Stone Cross offers good access to Eastbourne and Hailsham for job opportunities as well as the scale of development being able to provide employment provision itself, provided land is available and suitable. The settlement already has a good employment provision at Dittons Road and is close to the Chaucer Business Park/Industrial estate.

4.7.69 For Heathfield, there may not be a significant need for employment floor space however the proposed housing growth will need to be accompanied by employment so as to prevent Heathfield becoming a commuter settlement.

4.7.70 The development at Crowborough has good potential for improving access to jobs and creating new employment opportunities if transport issues can be addressed and in Uckfield there are good links with existing employment and industrial sites and the proposed development would place people within close proximity.

4.7.71 In terms of SA18, all of the proposed development in and around the towns has the potential for beneficial effects, however again development location and linkages with the existing centres of the towns will play a key role. If development is too far removed from the existing town centre, it may not be able to influence its regeneration. However the sheer scale of growth being proposed should provide significant opportunities for town centre regeneration.

**Villages**

4.7.72 Again many of the effects on the SA Objectives from the village allocations won’t be fully known until broad areas or specific sites are identified or allocated. This will be presented in the Proposed Submission Wealden Local Plan later in 2016. The effects will also be determined by other polices, in particular those on the historic environment and design and the Ashdown Forest, which are assessed later in this report.

4.7.73 The methodology for accommodating village housing allocations of up to 50 dwellings is another Option to be tested as part of this consultation and alternative considered can be found in Chapter 15 of the Wealden Local Plan Issues, Option and Recommendations Consultation paper. The SA assessment of these alternatives and the Preferred Option for Testing in respect of them is undertaken in Chapter 10 of this SA Report.
Effects on SA Objectives common to all allocations

4.7.74 SA9 and the issue of development on brownfield land is perhaps the only SA Objective upon which the assessment reaches the same conclusion for all the villages. The effects are deemed to be uncertain at this time due to the fact that brownfield land is scarce within the District as a whole and particularly within the villages, but it is likely to exist. The full extent of available brownfield land available for development will not be known until the SHELAA work has been completed and potential sites identified. This will happen later in 2016 and will be included within the Proposed Submission Wealden Local Plan and accompanying SA Report.

4.7.75 However, for those villages allocated up to 50 dwellings there is a policy (assessed later) regarding the size of developments and that these should be relatively small sites within the villages. This lends itself to making the best use of previously developed land and buildings which may be available but small within settlements. Together the small allocations and potential policy regarding site size may have positive effects on SA9.

Likely Effects on SA Objectives from the Village allocations

Environmental SA Objectives (SA1-SA11)

4.7.76 Environmentally, the effects of the village allocations are likely to be positive as they follow the south Wealden focus for development and the numbers have been moderated to take into account any potential landscape or countryside impacts, including being moderated to account for settlements allocated growth where there may be constraints due to the presence of the High Weald AONB. The south focus ensures that avoidance measures are sought in relation to the Ashdown Forest as well as the Pevensey Levels through phasing of development to coincide with improvements to waste water treatment.

4.7.77 The remaining SA Objectives are unlikely to be directly affected by the village allocations as they will largely depend on other Local Plan policies and strategies, such as those on drainage; SuDS; design; development in the countryside and energy efficiency.

Social SA Objectives

4.7.78 Socially, the overall effects of the village allocations are likely to be positive. The Preferred Option for Testing 3, of which the allocations are a part, allows for growth in both sustainable and unsustainable settlements and this will ensure that local housing needs can be met. This is particularly important in rural areas where issues of affordability can arise.

4.7.79 With the provision of housing to meet local need this could also have benefits in allowing people to remain within their communities and so stem out-migration and help achieve cohesive and vibrant communities.
4.7.80 The housing growth allocated to the villages may also help improve their sustainability which will in turn help improve people’s wellbeing. The levels of housing growth provide opportunities to strengthen communities and allow people to remain within their communities through increased sustainability and affordable housing provision within them.

4.7.81 There only potential negative is that growth will not be allocated to all the District villages and so these settlements may not benefit from the levels of growth proposed. In this case it is considered that the environmental objectives outweighed the social objectives.

**Economic SA Objectives**

4.7.82 In economic terms, the growth allocated to the villages may help support smaller businesses and the rural economy, through an increase in population and the likely attraction of new businesses and services as a result of growth. It could also help them become more sustainable which in turn could help attract new businesses and contribute to job creation, although this is likely to be small.

4.7.83 Whether the growth in the villages is sufficient to help with regeneration efforts for the village centres will depend on the location of development in regards to those village centres. Good linkages between new development, wherever it is located, and village centres will be key to and this could take the form of improvements to walking and cycling routes.
5.0 Strategic Economic Strategy

5.1 The NPPF divides the economy into two broad categories – town centres and rural areas. It also provides an objective to make it easier for jobs to be created in cities, towns and villages. The economy, however, is not just about permitting offices, warehouses and industrial estates but includes jobs and development in retail, tourism, the arts and leisure.

5.2 When considering the economy and planning for it, it is important to consider not only location development where site are available but also whether they should be located in towns, town centres or elsewhere.

5.1 Strategic Economic Options

5.1.1 Chapter 9 of the Wealden Local Plan Issues, Options and Recommendations Consultation document details the considerations in seeking to develop a strategy and policies regarding the economy in Wealden. Paragraphs 9.1 to 9.10 and the corresponding Issues and Option boxes specifically outlines the Issues and Options and should be read in conjunction with the SA assessment detailed here. Chapter 9 considers Options for Strategic Economic Options; Strategic Tourism Options and Skills Development.

5.1.2 Briefly the 8 Strategic Economic Options are:

- **Option 1** – Focus employment provision in the south of the District and along the A22 corridor close to and as a part of new housing development. Seek opportunities for retail and employment in the other settlements based on the function of the settlement in relation to its catchment area and needs. Retail tourism to rural areas and settlements identified with key tourism features.

- **Option 2** – Focus on engineering clusters within the South Wealden Area and consider opportunities to expand this area including green energy technologies.

- **Option 3** – Distribute employment provision and retail across the District focusing on urban areas. Retail tourism to rural areas and settlements identified with key tourism features.

- **Option 4** – Consider tourism separately and seek a large scale tourism destination within the District.

- **Option 5** – Focus all employment provision within town centres. If land is not available then consider retail and employment separately using the sequential approach for retail and possible employment alongside and on Greenfield locations.
• **Option 6** – Only consider land that has come forward from interested parties for any employment opportunities.

• **Option 7** – Consider an urban and rural split for employment, with the focus on sustainable settlements with some employment opportunities to be made within rural settlements as well as intensification of rural estates.

• **Option 8** – Engender flexibility in terms of economic options to take into account emerging sectors and changes in the economy.

**SA Assessment**

**Predicting the effects of the Strategic Economic Options (SA Tasks B3/B4): General Summary**

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**Effects on SA Objectives common to all Options**

**Environmental SA Objectives (SA3-SA7)**

5.1.3 All of the Options are likely to have a neutral effect on these SA Objectives due to the fact that any impacts on them will be determined by other policies within the Local Plan.

5.1.4 The Strategic Economic Options have no direct relationship with SA3 and improving the quality of the built environment (SA4) will be determined through design policies and to some degree the location/specific site for development.

5.1.5 Whilst having no direct relationship or effect on SA5 or SA7 there may be opportunities to incorporate green measures such as SuDS as part of employment development which would help manage surface water run-off and
hence flood risk as well as improving water quality through filtration for example.

5.1.6 The Options will also have no direct relationship to SA6 as policies and criteria will be required to ensure development is undertaken in the most resource efficient manner.

Social SA Objectives (SA13; SA14 and SA15)

SA13 Ensure everyone has the opportunity to live in a good quality, sustainably constructed and affordable home

5.1.7 Again all 8 Options are unlikely to have any effect on these SA Objectives. SA13 is concerned with affordable housing and whilst housing and economic growth are related, the actual Options have no direct bearing on the provision of affordable homes.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

5.1.8 SA14 is concerned with educational and training facilities/opportunities and whilst the Options don’t specifically affect this SA Objective, there could be scope for training within any economic development that occurs in the District.

Effects on SA Objectives that differ between Options

5.1.9 The following summarises the effects on SA Objectives that differ depending on the Option being assessed and are presented under the SA Objective Category Headings.

Environmental SA Objectives (SA1; SA2 and SA9-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District and SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

5.1.10 Apart from Option 5, the effects of the Options on SA1 and SA2 are uncertain at this time. This is due to the fact that Options 1-4 and 6-8 seek to locate economic growth and employment provision either across the District as a whole or only on land that has been submitted by interested parties. Therefore the effects on the Ashdown Forest and Pevensey Levels (SA1) will depend on the location and scale of economic development.

5.1.11 Option 5 however seeks to focus all employment provision within town centres where possible and so will go some way to avoiding impacts on the designated sites (SA1 and SA2), although any element of Greenfield development or development outside Town Centres may impact negatively on
the Ashdown Forest, Pevensey Levels, High Weald AONB and South Downs National Park.

SA9 Ensure the best use of previously developed land and existing buildings

5.1.12 For SA9, Options 1-4 and 7-8 have uncertain effects at present again due to the fact they will depend to a large degree on the site selection for employment and tourism provision. Option 5 may have positive and negative effects on SA9 due to the fact it focuses on town centres for the provision of employment land and by default this will mean previously developed land. However there could be negative effects if there is insufficient previously developed land available.

5.1.13 Option 6 records a negative effect on SA9 because it only considers land that is put forward by interested parties and this is likely to be mainly Greenfield sites, although there is scope for brownfield sites. However, following this Option the Council would be restricted in its choice of land for economic development.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes

5.1.14 In regards to SA10, Options 1; 3 and 5 all record positive effects. This is due to the fact that, each in their own way, they would locate economic development and employment opportunities within close proximity to existing housing, services, facilities and sustainable settlements which in turn would help achieve SA10. Journeys, for accessing employment at least, would be minimised in frequency and length and public transport links together with improved opportunities for walking and cycling to work could be supported.

5.1.15 Options 2 and 4 have no effect on SA10 and will be dependent on other Local Plan policies.

5.1.16 Options 6-8 are likely to have uncertain effects on SA10. Option 6 restricts the choice of sites and the land submitted may not be in the most accessible or sustainable locations. Option 7 does focus on sustainable settlements first which may have positive effects on SA10 but the rural areas may still be less accessible and far away from centres of population. Option 8 depends on the national economic picture which does not give much certainty.

SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

5.1.17 For SA11, the majority of effects are likely to be as a result of other Local Plan policies on renewable energy and climate change strategies. However, the economic and employment Options considered here may provide opportunities for the incorporation of renewable energy technologies and sustainable building design to help contribute towards climate change adaptation and reducing emissions. Option 2 in particular offers positive
effects on SA11 as it specifically considers opportunities for green energy technologies to be developed as part of the economic growth in Wealden.

**Economic SA Objectives (SA17 and SA18)**

5.1.18 Clearly the economic SA Objectives are going to be most significantly affected by the Options proposed. The overwhelming effects are positive on both SA17 and SA18.

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.1.19 For SA17, Option 1; 3; 5 and 7 offer specific positive effects due to the fact they all create significant employment opportunities by directing development to the most sustainable settlements first and under Option 1 have a focus on the south of the District. The Options ensure that there is an appropriate level of employment and tourism provision within the rural areas as well as the more urban centres. Options 2; 4; 6 and 8 all have uncertain or no effects on SA17 primarily because they are either very narrow in their scope (Options 2 and 6) or rely on other policies or external circumstances (Options 4 and 8).

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

5.1.20 For SA18, Option 1; 3; 4 and 5 have specific positive effects. Option 1 locates economic development based on the Settlement Hierarchy principle and hence will help stimulate the regeneration of town centres in those settlements, and this does not just apply to the more urban settlements but the rural areas as well. This will also help diversify the rural economy. With a south focus the effects will be specifically felt here. Option 3 distributes economic growth across the whole of the District and specifically focuses on tourism in the rural areas, which again will have positive effects on those settlements and help diversify and strengthen the local economy and help create sustainable tourism opportunities. Option 4 clearly seeks to have positive effects on the tourism offer within the District, specifically in the south, and so will have positive effects on SA18 in tourism terms, with these being significantly positive within the south of the District. Option 5 will help achieve stimulate the regeneration of town centres as it focuses economic growth within them wherever possible.

5.1.21 Option 2 and Option 6-8 record uncertain effects against SA18. Option 2 is very narrow in its economic focus, seeking to promote engineering clusters and green energy technologies. This may limit the degree to which it can help with the regeneration of the town centres as it is a relatively niche area. However, there could be positive effects depending on the location and type of businesses attracted and the fact that creating a centre for this type of economic growth may attract other types of businesses. It does not relate to
tourism however. Option 6 again limits the Council in its choice of sites and locations for economic development; Option 7 may have positive effects in terms of employment opportunities in rural areas and the most sustainable settlements but negative effects may occur if there is not the infrastructure for example to support this in rural areas and Option 8 relies on the national economic picture which may not be conducive to economic and tourism growth and development in Wealden.

5.2 Strategic Tourism Options

5.2.1 The Wealden Local Plan Issues, Options and Recommendations Consultation Paper puts forward 5 Options for addressing tourism development in the District.

5.2.2 Briefly these are:

- **Option 1** – Complement and seek the best use of tourist accommodation in seaside towns, and in particular Eastbourne, by creating an additional tourist facility within south Wealden.

- **Option 2** – Complement and seek the best use of tourist accommodation in seaside towns by consolidating the existing facilities within the area identifying link in markets within and outside of the District and providing opportunities to supplement these, particularly through seeking to promote farm diversification.

- **Option 3** – Maintain the status quo and allow farm diversification for tourism opportunities in line with the National Planning Policy Framework.

- **Option 4** – Seek opportunities to promote the provision of tourism accommodation across the District within towns.

- **Option 5** – Seek opportunities to promote the provision of tourism accommodation across the District within rural areas.
## SA Assessment

### Predicting the effects of the Strategic Tourism Options (SA Tasks B3/B4): General Summary

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### Effects on SA Objectives common to all Options

#### Environmental SA Objectives (SA1-SA8 and SA11)

**SA1 To protect and enhance biodiversity and geodiversity within the District**

5.2.3 For SA1 all of the Options have the potential for positive and negative effects on the biodiversity of the District. Options 1 and 2 have a south Wealden focus and so are less likely to impact on the Ashdown Forest (positive) but could have negative impacts on the Pevensey Levels. Similarly Options 3-5 could result in tourism development throughout the District which may negatively impact on both biodiversity assets. Negative effects could occur from increases in visitor trips to the Ashdown Forest which result in disturbance of wildlife; nitrogen deposition from vehicles and on the Pevensey Levels increase in hard surfacing could increase the rate at which surface water runoff carrying pollutants reaches the watercourses. There may be positive effects however if development is carried out with mitigation measures such as SAMMS; SANGs and SuDS.

**SA2 Conserve and enhance the District's countryside, landscape, historic environments and cultural assets**

5.2.4 In regards to SA2, all of the Strategic Tourism Options record uncertain effects at this time. This is due to the fact that it will depend on specific site locations together with design policies to fully understand the effects.

5.2.5 Option 1 may negatively affect the South Downs National Park, for example, through an increased number of visitors that may be likely to visit the National Park as well as any tourism attraction created within the south of the District. There may also be a visual impact from this Option.
5.2.6 Options 2 and 3 share much of the same uncertain effects as Option 1, with the addition of any farm diversification, if not carefully managed, negatively affecting the landscape and countryside in terms of inappropriate development. Option 4 may have positive effects in that it focuses on the towns, whereas Option 5 may have negative effects for the opposite reason.

SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

5.2.7 For SA3 all the Options seek to provide tourism development in the District which by default will affect access to the District’s natural and historic assets. The effects will depend on the location, site selection, design and purpose of the specific tourism development, however all Options promote tourist accommodation provision but in different locations which will of course have different effects. Providing accommodation within the rural areas will help improve access to the countryside and historic assets whereas focusing development on seaside towns may limit access to the countryside.

5.2.8 The Options are unlikely to have any effect on SA4-SA8 and SA11 as these will be dependent on other Local Plan policies and strategies such as design; renewable energy; sustainable construction; flood risk and climate change.

Social SA Objectives (SA12-SA16)

5.2.9 The 5 Options all record the same effects in regards to the social SA Objectives.

SA12 Improve access to services; facilities; the countryside and open spaces

5.2.10 The effects of any of the Options on SA12 are uncertain as this concerns improving access to the countryside, services and open spaces and will be dependent on the implementation of the Option chosen as the preferred approach. Option 1 may improve access through the provision of an additional tourist facility in the south of the District, which could bring more people into close proximity with the countryside and existing facilities in this area, but any positive impact will be confined to the south. Option 2 may have positive effects in the fact that by consolidating existing facilities, and promoting farm diversification, more people will be able to gain access to an improved offer. However if other aspects such as infrastructure are not also improved, there could be negative effects from, for example, a breach of capacity.

5.2.11 Option 3 would continue the existing approach to tourism development with the addition of farm diversification. Depending on the type of diversification there may be positive effects in providing accommodation within the countryside and hence improving access but again this will depend on implementation and on other Local Plan policies.
5.2.12 Options 4 and 5 are opposites of the same coin. There may be positive effects through increasing tourist accommodation and hence the number of people with the opportunity to access the countryside, services and open spaces but also negative effects if the infrastructure is insufficient to cope.

5.2.13 For SA13-SA16 the Options are unlikely to have any direct effect as these will be dependent on other Local Plan policies and strategies such as affordable housing provision; improvements to health care facilities; improvements in education and training facilities/opportunities and strategies to promote social cohesion. There may be add on positive and negative effects as a result of any of the Options but these would depend on implementation.

Economic SA Objectives (SA17 and SA18)

5.2.14 Clearly these SA Objectives will be the most significantly affected from any of the Options. The overall effects are likely to be positive although there may be some negative effects depending on implementation.

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.2.15 In terms of SA17 all of the Options would create new employment opportunities and improve access to jobs through appropriate development and hence have a positive effect on this SA Objective. The degree of positive effect will vary however. Option 1 offers significant positive effects through the creation of a new tourist facility, however this would be restricted to benefitting the south of the District.

5.2.16 For Option 2 the consolidation of existing facilities within an identified area offers positive effects in that it provides a central focus for economic development seeking to link this to markets within and outside of the District, which offers wider opportunities for improving access to employment and providing a wider pool of workforce choice for businesses.

5.2.17 Option 3 would have positive effects in that it would allow rural employment to grow through the diversification of farms. The nature of the employment opportunities created would be dependent on the type of diversification but are relatively wide ranging. Maintaining the status quo elsewhere in the District may have negative effects in that it does not allow for growth in different types of businesses.

5.2.18 In terms of Options 4 and 5 there is scope for new employment opportunities linked to tourist accommodation, but the effects on SA17 from these Options is not likely to be significant.
SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

5.2.19 For SA18 all of the Options offer some form of positive effect in terms of diversifying the local economy; regenerating town centres; enhancing the rural economy and promoting sustainable tourism. There are also potential negative effects.

5.2.20 Option 1 has a south Wealden focus with a new tourist facility and hence has the potential to be beneficial to the regeneration of the town centres in Hailsham and Polegate through broader economic connections. However, the tourist accommodation offer is limited to the seaside towns which towns which discount those visitors that perhaps want a more rural tourism experience. The Option also excludes any link to the historic tourism offer that the District has, which is principally focused within the more rural areas of the District.

5.2.21 Whilst Option 2 promotes the same offer as Option 1 in terms of tourist accommodation, and so the same effects, it does also promote support for farm diversification. This could have positive effects on SA18 in terms of enhancing the rural economy through accommodation provision and also other tourist related ventures. It also provides alternatives to seaside towns for those wanting a more rural stay in the District. This also fits well with accessing the historic tourism offer. Linking to other markets inside and outside of the District widens the tourism offer further and will help in increasing the vitality of villages.

5.2.22 Option 3 would have the same effects as Option 2 with regards to SA18, however the positive effects may be less as maintaining the status quo may offer the scope to regenerate the town centres or strengthen the local economy. Despite this, Option 3 has positive effects in that farm diversification will allow rural areas to become more accessible to visitors in terms of being able to stay within them and offers employment opportunities in other businesses, depending on the nature of the diversification.

5.2.23 Options 4 and 5 are mirror images of each other and so their effects on SA18 mirror each other. Focusing tourism accommodation within the towns will have a positive effect on SA18 in that it will provide demand for services and facilities and so help towards the regeneration of town centres by attracting additional investment and new services. This is the same for Option 5 in that there will be positive effects on the village economies and local high streets. Negative effects could arise however if, for example, the infrastructure is insufficient to cope or unable to keep up with the rate of tourist accommodation and associated economic development.
Effects on SA Objectives that differ between Options

5.2.24 The following summarises the effects on SA Objectives that differ depending on the Option being assessed and are presented under the SA Objective Category Headings.

Environmental SA Objectives (SA9-SA10)

SA9 Ensure the best use of previously developed land and existing buildings

5.2.25 Options 1, 2 and 4 are likely to have positive effects on SA9 as they seek to promote tourist development and accommodation within towns mainly, which will utilise existing accommodation and brownfield sites. However, Option 1 may use Greenfield sites to provide an additional new tourist facility but this will depend on the type of facility proposed and its location. Options 3 and 5, and to some degree Option 2, promote farm diversification as well which is likely to involve conversion of existing buildings, providing positive effects in terms of SA9 but there is the potential for Greenfield sites to be used within the countryside which may result in negative effects on SA9. The effects will depend to a degree on the type of development proposed and its location in terms of settlement choice.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes

5.2.26 For SA10, Option 2 offers positive effects in that it seeks to consolidate existing facilities within identified areas which could help minimise journey lengths by providing services and facilities close to existing and future populations. For the remaining Options, it will depend on the location and specific site choices for tourism development as to whether effects are positive or negative on SA10.

5.2.27 The Wealden Local Plan Issues, Options and Recommendations Consultation Paper puts forward 2 Options for addressing skills development in the District.

5.2.28 Briefly these are:

- **Option 1** - To use the Wealden Local Plan to encourage employing the local workforce with the objective to improve skills within the area.

- **Option 2** - To not identify this as an issue as part of the Local Plan.
SA Assessment

Predicting the effects of the Skills Development Options (SA Tasks B3/B4): General Summary

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5.2.29 As can be seen from the SA assessment, these Options are very limited to the SA Objectives they are likely to affect. In this case all of the environmental SA Objectives and the majority of the social SA Objectives are unlikely to suffer any effect. Therefore the following commentary will relate to those that are likely to be affected.

Social SA Objectives (SA14)

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competitiveness

5.2.30 SA14 is specifically concerned with improving the level of skills, education and training amongst the population and developing a skilled workforce to support long term economic competitiveness.

5.2.31 Option 1 will have a positive effect on this SA Objective as it will place the aspiration to develop a local workforce with the right skills; education and training, within a framework that seeks to provide a holistic approach to development within the District as a whole. It will allow additional benefits to be gained from employing a local workforce such as reducing travel times and distances which could indirectly benefit objectives of reducing emissions and addressing climate change for example. As new employment opportunities arise it will enable linkages to be made through the planning process to the local communities. And fundamentally it is within the SA Framework to achieve this Objective and is part of the Corporate Plan Objectives also.

5.2.32 Option 2 would have a negative effect of SA14 as it would mean that the connection between new employment development and the opportunities that could offer for training and development of the local population could not be made. This may result in an increase in out-commuting to areas where these types of opportunities would be offered. It would also mean that the local talent pool for employment would be minimised meaning potential employers looking to locate to an area may be dissuaded due to the lack of a skilled local workforce. This could affect the economic competitiveness of the District in regards to its neighbours and the wider South East area.
Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.2.33 Improving access to jobs (SA17) is not just concerned with physical access (i.e. proximity of populations to employment opportunities) but also with access in terms of knowledge, skills and training. New businesses may require new skills sets of their workforce and Option 1 would allow this link to be made locally.

5.2.34 Option 2 may result in there being barriers to employment opportunities within the District for local people meaning they will have to look further afield for employment which could have knock on economic effects as the local workforce reduces and so the pool of potential employees for businesses diminishes. Again this may dissuade businesses from locating within the District when they have options such as Brighton, Eastbourne and Tunbridge Wells close by.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

5.2.35 The effects on SA18 uncertain as it would be difficult to diversify the local economy without a skilled workforce possessing the right training and education to take advantage of any employment opportunities. Option 2 has no bearing on SA18.

Preferred Option for Testing 4

5.2.36 The preferred Option for testing in regards to the Strategic Economic Strategy for Wealden combines elements of the 3 sub topics assessed above; Strategic Economic Options; Strategic Tourism Options and Skills Development Options.

5.2.37 In this regard, the SA assessments carried out for these are relevant and should be read in conjunction with this section. The Preferred Option is stated at Chapter 9 of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper. In summary it seeks to:

- Focus employment provision in the south of the District, along the A22 corridor, considering Hailsham town centre first followed by edge of centre and then sites close to new housing development.
- Enhance the retail offer of the District as part of the growth within the south.
- Seek to maximise the potential for engineering clusters and green energy technology including consideration of a renewable energy centre.
• Provide opportunities for existing businesses to grow and to attract larger business into the area particularly through improved transport and communication infrastructure.
• Seek opportunities for retail and employment in other settlements based on the settlement function in relation to its catchment area
• Intensify and improve existing industrial estates.
• Retain tourism to rural areas and settlements identified with key tourism features such as historic features.
• Provide opportunities to help consolidate the accommodation and attractions offer within the District whilst complementing that provided in seaside towns such as Eastbourne.
• Explore a new tourism attraction within south Wealden
• Identify and promote the need to develop skills within the local workforce and positively encourage the employment of the local workforce.

Predicting the effects of the Preferred Option for Testing (SA Tasks B3/B4): General Summary

5.2.38 As already stated, the SA assessments of the Strategic Economic Options; Strategic Tourism Options and Skills Development Options are applicable to the Preferred Option for Testing and so will not be repeated here. The assessments and conclusions arrived at as a part of the SA of the Options which are included in the Preferred Option still stand.

5.2.39 This section will provide a summary, drawing together the relevant commentary from the previous SA assessments, of the likely effects the Preferred Option will have on the SA Framework and Objectives.

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Environmental SA Objectives (SA1-SA11)

SA1 To protect and enhance biodiversity and geodiversity within the District

5.2.40 From the Table above and the previous SA assessments, the Preferred Option for economic growth is likely to have both positive and negative effects on SA1. The focus is clearly on the south of the District for major economic growth and so the Ashdown Forest is unlikely to be significantly impacted upon, although some business development will be allowed in other areas of the District which may increase traffic movements across or in close proximity to the Forest, which could exacerbate the issues of nitrogen deposition. It is also unclear at this time whether economic development within the south of the District may still impact on the Forest through increasing traffic movements. This will need further investigation through traffic modelling.
5.2.41 However, the Pevensey Levels are likely to experience some potential negative effects from, for example an increase in the amount of hard surfacing and the land take from Greenfield sites, which will be needed. This may result in increased surface water runoff which could convey pollutants from business and industrial developments to the watercourses feeding the Pevensey Levels. This in turn may affect to water quality which will then impact on the flora and fauna for which the Pevensey Levels are designated.

5.2.42 However, this may be mitigated, as with housing development, through careful design and the use of measures such as SuDS, which may become more viable on sites due to economies of scale and could in fact help attract businesses to the area through improving the quality of the environment.

5.2.43 The tourism accommodation aspect of the Preferred Option is likely to be District wide and so could have negative impacts on the Ashdown Forest through increased visitor numbers and vehicular movements. However, again mitigation measures alongside any development will help to reduce this.

SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

5.2.44 For SA2 the likely effects of the Preferred Option will depend to some degree on the settlement location and site specifics as well as other areas such as design. And so at this point the effects are uncertain and could be positive and negative. However, it is likely that the quantum of economic growth proposed in the south of the District, together with a new tourism facility, may impact on the South Downs National Park in terms of visual as well as increased visitor impacts. Similarly, economic development in the rural areas may result in negative effects on the High Weald AONB as well as the countryside in general in not properly managed. This is particularly true of farm diversification if it is carried out inappropriately.

SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

5.2.45 The effects of the Preferred Option on SA3 are assessed as uncertain at this time. The employment provision, engineering clusters and retail development is unlikely to have any direct effect on SA3 however the tourism aspect will. The Preferred Option seeks to provide tourism development (including accommodation) throughout the District, to varying degrees, which by default will affect access to the Districts natural and historic assets. The effects will depend on the location, site selection, design and purpose of the specific tourism development, however all Options promote tourist accommodation provision but in different locations which will of course have different effects. Providing accommodation within the rural areas will help improve access to the countryside and historic assets whereas focusing development on seaside towns may limit access to the countryside. Provision of a new tourism facility in the south of the District will likely have a knock on
effect with access to other tourism offers, the countryside and historic assets which could be positive and/or negative.

SA8 Reduce air pollution and ensure local air quality continues to improve; promote energy efficiency measures and encourage the use of renewable energy

5.2.46 For SA8 the fact that the Preferred Option includes opportunities for green energy technologies and a renewable energy centre means it is likely to have more positive effects in that it will help, and could be used, to promote the use of renewables in development as well as being sustainable and ‘green’ itself and expanding knowledge of this sector. However it will depend on the nature of the development.

SA9 Ensure the best use of previously developed land and existing buildings

5.2.47 The effects on SA9 are uncertain due to the fact that the quantum of development proposed is likely to mean Greenfield sites are utilised even though the focus for employment provision will be on Hailsham town centre first. This will be particularly true for the development of a new tourism facility in the south of the District. There is a scarcity of brownfield land within the District. Consolidating tourist accommodation and facilities within existing settlements however, will be positive for SA9 as it will utilise existing buildings and brownfield land and is on a scale compatible with brownfield sites. Yet there may be issues in the rural areas where development may be on brownfield land but within the countryside setting and so careful design will be needed.

SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes

5.2.48 For SA10 the effects are assessed as uncertain at this time due to the fact that it is not known how the Preferred Option will affect travel patterns. Locating employment and tourism opportunities close to existing services and facilities as well as existing and new housing, may help to reduce journey lengths however it will depend to a degree on the location and type of development as well as where people are coming from to access these. The Preferred Option does seek to improve transport and communication infrastructure as part of the economic strategy to attract new larger businesses and this could help achieve SA10 through providing improvements to public transport and promoting more sustainable modes of transport, as well as improving broadband for example which would enable more flexible working.
SA11 Mitigate the causes and adapt to the effects of climate change through reducing emissions of greenhouse gases and promoting appropriate design measures in development

5.2.49 The effects on SA11 from the Preferred Option are assessed as uncertain for similar reasoning to SA8. The renewable energy centre and green energy technologies companies as part of the engineering cluster could help promote design measures and technologies within developments as well as being ‘green’ themselves. But the achievement of SA11 will be dependent on other Local Plan policies such as design and climate change strategies.

Social SA Objectives (SA12-SA16)

SA12 Improve access to services; facilities; the countryside and open spaces

5.2.50 For SA12 the Preferred Option is assessed as having uncertain effects at this time. The economic and business growth element does not really have a direct bearing on the issues of improving access to the countryside and open spaces but will improve access to employment opportunities/services for people. The provision of an additional tourist facility in the south of the District, may improve access through bringing more people into close proximity with the countryside and existing facilities in this area, but any positive impact will be confined to the south. By consolidating existing tourist facilities, and promoting tourist accommodation in the rural areas and seaside towns means more people will be able to gain access to an improved offer and hence the number of people with the opportunity to access the countryside, services and open spaces. This will all be dependent on the implementation of the Preferred Option if taken forward.

SA14 Improve the level of skills, education and training amongst the population and develop a skilled workforce to support long term economic competiveness

5.2.51 As SA14 is specifically concerned with improving the level of skills, education and training amongst the population and developing a skilled workforce to support long term economic competiveness, the Preferred Option would will have a positive effect as it will place the aspiration to develop a local workforce with the right skills; education and training, within a framework that seeks to provide a holistic approach to development within the District as a whole. As new employment opportunities arise it will enable linkages to be made through the planning process to the local communities.

Economic SA Objectives (SA17 and SA18)

5.2.52 Clearly it is these SA Objectives that the Preferred Option will affect the most.
SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.2.53 For SA17 the effects are overwhelmingly positive. The Preferred Option would create significant employment opportunities by directing development to the most sustainable settlements first with a focus on the south of the District as well as ensuring there is an appropriate level of employment and tourism provision within the rural areas. This in turn would improve access to jobs within the District and allow rural employment to grow through, for example, the diversification of farms. The skills element of the Preferred Option is key as improving access to jobs is not just concerned with physical access but also with access in terms of knowledge, skills and training. New businesses may require new skills sets of their workforce and the Preferred Option would allow this link to be made locally.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

5.2.54 In terms of SA18 the effects are positive. The Preferred Option would locate economic development based on the Settlement Hierarchy principle and hence will help stimulate the regeneration of town centres in those settlements. Focusing on tourism in the rural areas will have positive effects on those settlements and help diversify and strengthen the local economy and help create sustainable tourism opportunities.

5.2.55 The promotion of engineering clusters and green energy technologies, whilst a relatively niche sector could have positive effects through creating a centre for this type of economic growth which may attract other types of businesses to the District. The south Wealden focus, with a new tourist facility, has the potential to be beneficial to the regeneration of the town centres in Hailsham and Polegate through broader economic connections.

5.2.56 The provision of tourist accommodation and related activities in the rural areas will enhance the rural economy and provide alternatives to seaside towns for those wanting a more rural stay in the District. And the skills element of the Preferred Option would offer positive effects as it would be difficult to diversify the local economy without a skilled workforce possessing the right training and education to take advantage of any employment opportunities.

5.3 Business Areas

5.3.1 This part of the economic strategy deals with current and future business areas, including traditional industrial estates within the District. Please refer to Paragraphs 9.11 to 9.13 with associated Issues and options boxes of the Wealden Local Plan Issues, Options and Recommendations Consultation document for details of the specific issues in relation to this area.
5.3.2 The Wealden Local Plan Issues, Options and Recommendations
Consultation document sets out 5 Options for policies on business areas. These are:

- **Option 1** – Identify business area boundaries to take into account the current area of businesses and seek to retain traditional uses within the area wherever possible.

- **Option 2** – Identify business area boundaries to take into account the current area of businesses and seek to retain traditional uses within the area but allowing diversification to non-traditional uses including leisure and retail uses.

- **Option 3** – Remove all business area boundaries and rely upon generic employment policies for the District.

- **Option 4** – Only identify business area boundaries where traditional business uses take place (office, industrial, warehousing) and exclude retail and leisure uses.

- **Option 5** – Consider extending existing business areas which may be suitable for business development.

**SA Assessment**

**Predicting the effects of the Business Area Options (SA Tasks B3/B4): General Summary**

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**Environmental SA Objectives (SA1-SA11)**

5.3.3 The majority of these SA Objectives will not be directly affected by any of the Options.
SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

5.3.4 For SA2 there may be effects as a result of Option 3 and Option 5. Both of these Options could lead to an extension to business areas and result in business uses of all types locating beyond existing boundaries. Where these existing businesses areas are located close to certain landscapes, such as the High Weald AONB, this could result in an encroachment of built form into the countryside with uses that may not be conducive to that landscape. Notwithstanding this, Option 5 does offer more control as it would allow the Council to consider and designate any extended business area whereas Option 3 would not. The effects are assessed as uncertain at present as it would depend on the implementation of any Option and the types of businesses uses allowed within the extended areas as well as the consideration of mitigation measures.

SA9 Ensure the best use of previously developed land and existing buildings

5.3.5 In regards to SA9 and the best use of previously developed land and existing buildings, all the Options have the potential to exact positive effects as they seek to retain existing uses but some also have the potential for negative effects. For example, Option 2 allows for diversification and hence the reuse of existing buildings for other business uses (positive effect) yet Option 1 and Option 4 may result in some Greenfield development for business uses that are excluded from the existing business areas (negative effect). Again the degree and type of effects would be dependent on implementation, location and type of business development.

Economic SA Objectives (SA17 and SA18)

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.3.6 Again all of the Options have the potential for positive and negative effects. For SA17, Option 1 is assessed as having uncertain effects at present as it seeks to identify boundaries for existing business areas which will result in a focus for business development in the District (positive effect) however it limits this business development to traditional uses, which may not result in new employment opportunities or improve access to jobs (negative effect). Option 2 on the other hand is assessed as wholly positive as it have the same approach as Option 1 but in addition would allow non-traditional business uses to develop which could help diversify business area, providing new employment opportunities as well as facilitating appropriate development to meet the needs of the economy.

5.3.7 Options 3 and 4 are both assessed as having uncertain effects at present in relation to SA17. Option 3 would remove business area boundaries which would remove the focal point for business development (negative effect) but may allow the scope for businesses to expand into different areas and hence improve the employment offer and access to jobs within the District
Option 4 takes a very restrictive stance and whilst designating business areas and providing a focus for business development (positive) leisure and retail would be excluded restricting the creation of new and varied employment opportunities (negative).

5.3.8 Option 5 is assessed as having positive effects on SA17 due to the fact that it would seek to extend the business area boundaries and does not restrict the types of business development that would be allowed.

**SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism**

5.3.9 In regards to SA18, the Options mirror the assessment of SA17 but for slightly different reasons. Option 1 would still allow business development in defined areas, which may include rural areas, and hence help enhance the Districts rural economy as well as the town centres (positive effects) however focusing on traditional business development only will hamper the diversification of the local economy (negative effects). Option 2 is also assessed as having uncertain effects for similar reasons to Option 1 but with the additional potential negative effect on town centres from allowing retail and leisure uses to locate within business areas. This may take trade away from the high streets and hamper regeneration efforts. However this would be in a defined area which could be relatively small.

5.3.10 Options 3 and 4 are both assessed as having uncertain effects. Option 3 may lack the direction to enhance the local economy and allow diversification due to there being no specific focus for business development (negative effect) but at the same time this may offer the flexibility that businesses could require in order to grow (positive effects). Option 4 may have positive effects on the regeneration of town centres through its exclusion of retail and leisure uses from business areas but this could in fact stifle the attraction of larger retail/leisure businesses and companies who may wish to locate in the District but need larger sites.

5.3.11 Option 5 offers overall positive effects on SA18 as it would allow expansion of business areas and does not restrict the type of business development allowed. Other measures would need to be in place to ensure no harm was caused to town centres for example from this approach.

**Preferred Option for Testing 5**

5.3.12 The preferred Option for testing in regards to Business Areas for Wealden combines elements of the 5 Options assessed above.

5.3.13 In this regard, the SA assessment carried out for these Options are relevant and should be read in conjunction with this section. The Business Areas Preferred Option for Testing 5 is stated at of the Wealden Local Plan Issues, Options and Recommendations Consultation Paper is provided.
together with its advantages and disadvantages. The Preferred Option seeks to:

“Reconsider business areas within the District and create new categories, particularly to take into account where new uses have taken place and where new uses may be appropriate particularly within Towns and edge of Town Centres. Retain traditional estates and the traditional mix of uses out of town, taking into account the type and accessibility of the estate and the market. Consider opportunities to extend or intensify existing successful estates and the provision of new areas”.

**SA Assessment**

**Predicting the effects of the Preferred Option for Testing 5 (SA Tasks B3/B4): General Summary**

5.3.14 As already stated, the SA assessments of 5 Options are applicable to the Preferred Option for Testing and so will not be repeated here.

5.3.15 This section will provide a summary, drawing together the relevant commentary from the previous SA assessment s, of the likely effects the Preferred Option will have on the SA Framework and Objectives.

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**Environmental SA Objectives (SA1-SA11)**

5.3.16 As the Table shows, the majority of these SA Objectives are not directly affected by the Preferred Option.

**SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets**

5.3.17 The effects remain uncertain in terms of SA2 and the effects on the Districts landscapes, cultural and historic assets. By reconsidering the business areas to take account of development which has occurred, there is the opportunity to define a boundary beyond which business development will not be acceptable and this could help protect the elements of SA2. However in allowing the consideration of extending or intensifying existing successful estates there may be the potential for encroachment on areas of landscape or historic interest which could have negative effects.
SA9 Ensure the best use of previously developed land and existing buildings

5.3.18 The Preferred Option places the focus for business development within towns and edge of town centres as well as in existing estates which lends itself well to achieving positive effects on SA9 as this allows a consideration of previously developed land first. The extension of successful estates however may pose negative effects as it is likely to require Greenfield sites for development. However, careful design, siting and site choice may go some way to mitigating any negative effects.

Economic SA Objectives (SA17 and SA18)

5.3.19 As expected the effects of the Preferred Option are likely to be positive in terms of SA17 and SA18 as they are connected to the economy.

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.3.20 The Preferred Option would help create new employment opportunities by facilitating appropriate development in designated business areas, including the creation of new categories to account for new uses which have taken place and which may be appropriate going forward. In this respect it has positive effects on SA17. The inclusion of other non-traditional uses within business areas means that Wealden will be able to meet the needs of local economy as well as the wider economy through the attraction of larger businesses as well as supporting local and small businesses. This is also true of the consideration of opportunities to expand or intensify existing successful estates.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

5.3.21 In terms of SA18, the Preferred Option has positive effects in that allowing non-traditional uses to be included within business areas will help towards diversifying the local economy whilst at the same time strengthening it. The consideration of appropriate business uses within Towns and on the edge of town centres will go some way to aiding the regeneration of town centres but caution should be exercised that uses such as retail are not taken away from the town centres and high streets and that the Preferred Option compliments town centres uses and functions.

5.4 Strategic Cultural and Leisure Options

5.4.1 Leisure and cultural opportunities are usually associated with town centres but they can be located elsewhere. In the past, leisure and cultural
facilities within the District have been focused on town centres, but with some opportunities arising in rural locations.

5.4.2 The amount of growth proposed within the District may provide a market for additional leisure and cultural facilities and as such the Wealden Local Plan Issues, Options and Recommendations Consultation document considers the issues and puts forward several policy Options at paragraphs 9.14 to 9.17 and the associated issues and Options boxes. These include general policy Options for leisure and cultural facilities as well as specific Options related to the potential delivery of a sports park within the District.

**General Options**

- **Option 1** - To first seek opportunities within town centres for leisure and cultural facilities before considering edge of centre.

- **Option 2** - To consider any requests for consideration of land allocation.

- **Option 3** - To undertake a study for needs for both cultural and leisure facilities and provide only where there is a deficit of need and in locations of greatest need.

- **Option 4** - To undertake a study for the needs for both cultural and leisure and provide only where there is a deficit of need and in locations of greatest accessibility by public transport.

**Sports Park Options:**

- **Option 1** - Determining where there is the greatest need in terms of under provision for the local area together with the greatest need arising through additional residential development and prioritise this location.

- **Option 2** – Consider whether there is demand or need for more than one sports park within the District, taking into account any cross boundary issues.

- **Option 3** – Seek opportunities where the greatest housing provision will take place in south Wealden District Council.

- **Option 4** – Locate sports park in an area with the greatest accessibility to the wider area through public and sustainable transport.
SA Assessment

Predicting the effects of the Strategic Cultural and Leisure Options (SA Tasks B3/B4): General Summary

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<th>Strategic Cultural and Leisure Options</th>
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Environmental SA Objectives (SA1-SA1)

General Policy Options

5.4.3 The majority of these Objectives are not directly affected by any of the Options.

SA1 To protect and enhance biodiversity and geodiversity within the District and SA2 Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

5.4.4 Options 2-4 all record uncertain effects against SA1 and SA2. This is due to the fact that all could seek to promote leisure and cultural development throughout the District and this could affect both positively and negatively the biodiversity assets (Ashdown Forest and Pevensey Levels) and the landscape assets (High Weald AONB, Low Weald and the South Downs National Park) of the District.

5.4.5 Option 2 would consider any requests for land allocations and as such could involve the submission of sites with an impact on the assets mentioned being considered. It may be the case that only sites with an impact on the assets are submitted and this would restrict the Council in its choice. However, this Option does give the Council the opportunity to refuse certain sites when taking other matters into consideration.
5.4.6 Option 3 may result in a study that identifies areas of greatest need and highest deficit as those in close proximity to protected sites and landscapes, again presenting the Council with the same issues that Option 2 does. However, a positive effect of this Option is that it would give the Council a firm evidence base on which to make their decisions on cultural and leisure allocations.

5.4.7 Option 4 also records uncertain effects against SA1 and SA2 for the same reasons as Option 3.

5.4.8 However, all of the Options are uncertain because it will depend on the outcome of any evidence base studies and submissions of land which are as yet not commissioned and not known.

**SA9 Ensure the best use of previously developed land and existing buildings**

5.4.9 Option 1 records positive effects against SA9 due to the fact that it focuses on town centres first and so will utilise brownfield sites in the first instance. Even with edge of centre sites, brownfield land will be prioritised. However there is a lack of brownfield sites in the District and some Greenfield development may be required.

5.4.10 Option 2 records uncertain effects on SA9 because it relies on the submission of land from the public and as yet the Council does not know what types and amount of land has or will be submitted for consideration. However, again brownfield land would be prioritised wherever possible.

5.4.11 Options 3 and 4 involve undertaking studies and as such do not have a direct bearing on SA9 however their findings and conclusions may, going forward.

**SA10 Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transports modes**

5.4.12 For SA10, Option 1 records positive effects as it focuses cultural and leisure development within town centres, consolidating the offer and making it more accessible. However, it will depend on which town centres/edge of town centres this development takes place as to whether it minimises journey lengths. People in the more rural areas may need to travel further to access such developments and facilities.

5.4.13 Option 2 records uncertain effects against SA10 as again it relies on the submission of land for consideration and this process is not yet complete. It may be the case that sites come in which are in inaccessible or remote locations and as such would not achieve a pattern of development that would reduce journey lengths.
5.4.14 Option 4, with its focus on locating cultural and leisure development in areas of greatest accessibility by public transport records positive effects against SA10 as specifically seeks to encourage sustainable transport modes.

**Sports Park Options**

**SA1** To protect and enhance biodiversity and geodiversity within the District and **SA2** Conserve and enhance the District’s countryside, landscape, historic environments and cultural assets

5.4.15 Options 1 and 4 record uncertain effects against SA1 and SA2 at this time due to the fact that their direction may be at odds with the protection of the biodiversity assets of the District together with the countryside, landscape, cultural and historic assets. The areas with greatest need in terms of under provision may be those areas close to the Ashdown Forest or would have an impact on the Ashdown Forest, which would be incompatible with SA1. Similarly this could be true of impacts on the High Weald AONB for example.

5.4.16 Option 3 is likely to have a positive impact on SA1 as it focuses on the south of the District, away from the Ashdown Forest. Option 3 records uncertain effects on SA2 because although it is focused on the south of the District, such a large scale development may impact on the South Downs National Park, particularly on views into and out of the Park, as well as potential impacts on the Low Weald.

**SA3** Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

5.4.17 For SA3 Options 1 and 3 again are assessed as having uncertain effects. This is due to the fact that, directly, a sports park will not enhance or provide access to the District's countryside, landscape, historic environments and cultural assets however indirectly it may bring more people into the vicinity of such assets and hence open them up to a wider range of people. This in turn could lead to the enhancement and provision of access. Option 4 is assessed as having a positive effect on SA3 due to the fact it seeks to locate the sports park in an area with greatest accessibility to the wider area through public transport and sustainable transport.

**SA10** Achieve a pattern of development which minimises journey lengths and encourages the use of more sustainable transport modes

5.4.18 For SA10 Option 1 is assessed as having uncertain effects at this time because the area where there is greatest need in terms of under provision and need arising from additional housing development may not tally with the most sustainable location in terms of transport. Options 3 and 4 are assessed as having positive effects as they focus on areas where the greatest housing provision will take place, hence placing more people in close proximity to the sports park facility and helping to reduce journey lengths, and in areas with
greatest accessibility to the wider area through public and sustainable transport, hence enabling enhancement and additional provision.

Social SA Objectives (SA12-SA16)

General Policy Options

5.4.19 The majority of these Objectives are not directly affected by any of the Options.

**SA12 Improve access to services; facilities; the countryside and open spaces**

5.4.20 Option 1 is assessed as having positive effects on SA12 as it would locate leisure and cultural facilities within town centres first, meaning they would be more accessible to the population of the District.

5.4.21 Option 2 has no direct relationship with SA12 as it is concerned with only looking at land submitted for consideration and this may be in remote or less accessible locations and may be at a distance from any significant population.

5.4.22 Options 3 and 4 are assessed as having uncertain effects due to the fact that they are primarily concerned with producing studies and an evidence base. However, the results of the studies may identify areas for leisure and cultural development which are in close proximity to centres of population or within sustainable locations/settlements, which by their nature would result in greater access to services and facilities.

Sports Park Options

**SA12 Improve access to services; facilities; the countryside and open spaces**

5.4.23 Options 1; 3 and 4 are assessed as having positive effects against SA12. This is due to the fact that they will all seek to locate the sports park within close proximity to existing and new residential developments, in areas where there is greatest need in terms of deficit of sports provision and in areas with good public and sustainable transport links to the wider area. All in all this will help improve access to services and facilities, principally sports and recreation, for the population of Wealden as well as outside of the District with the indirect effect of bringing more people into reach of the countryside and open spaces.

**SA15 Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health**

5.4.24 For SA15, all of the Options have the potential for positive effects through the provision of a Sports Park in general as this will provide enhanced and additional access to sports facilities and perhaps open spaces, enabling more people to lead healthy lives through an increase in activities.
Economic SA Objectives (SA17 and SA18)

General Policy Options

SA17 Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.4.25 All of the Options have been assessed as having no direct relationship with SA17 primarily because SA17 is concerned with creating new employment opportunities and improving access to jobs. However, indirectly the leisure and cultural development that emerges as part of any policy direction will result in some employment opportunities, although this is not the primary purpose.

SA18 Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the Districts rural economy, increasing the vitality of the Districts villages and promoting sustainable tourism

5.4.26 For SA18, Option 1 is likely to have positive effects as it will help stimulate the regeneration of town centres through new and diversified development. For the rest of the Options the effects are uncertain as it would depend on what land is submitted for consideration (Option 2) and on the results of any evidence base studies carried out (Options 3 and 4).

Sports Park Options

5.4.27 Whilst the assessment has deemed that the sports park Options would have no direct relationship with SA17 and SA18, if combined with wider leisure and cultural development there may be opportunities for employment provision and also to diversify the local economy through connected developments.

Preferred Option for Testing 6

5.4.28 The Preferred Option for Testing (6) combines elements of the General Policy Options for leisure and cultural development with those of the Sports Park Options and is provided at Chapter 9 of the Wealden Local Plan Issues, Options and Recommendations Consultation document. This combination provides a holistic approach to the provision and leisure and cultural facilities within the District and should be read at this time.

5.4.29 The Preferred Option states:

“To undertake a study for the need for both cultural and leisure facilities, including a sports park, and provide opportunities where there is a deficit of provision and where future growth will exacerbate the situation. Allocation to be based upon the principle of considering town locations first, but seeking
opportunities in locations of the greatest accessibility by public transport taking into account where the needs arise”

Predicting the effects of the Preferred Option for Testing 6 (SA Tasks B3/B4): General Summary

5.4.30 The SA assessments of the General Policy Options for leisure and cultural development Options and the Sports Park Options are applicable to the Preferred Option for Testing and so will not be repeated here. In this regard, the SA assessment carried out for these Options are relevant and should be read in conjunction with this section.

5.4.31 This section will provide a summary, drawing together the relevant commentary from the previous SA assessment s, of the likely effects the Preferred Option will have on the SA Framework and Objectives.

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Environmental SA Objectives (SA1-SA11)

5.4.32 As with the separate assessments of the Options, the majority of these SA Objectives will not be directly affected by the Preferred Option for Testing. Of those it does have an impact on, the effects are assessed as uncertain at this time as there is the possibility of both negative and positive effects.

5.4.33 The effects on SA1-SA3 are uncertain as it will depend on where the locations of new leisure and cultural facilities, together with the Sports Park, are determined. This will only be known once the study has been undertaken. The overall approach will be to focus provision within the areas of greatest need and these may be determined to be areas where there will be an effect on the Ashdown Forest such as an increase in traffic movements to reach such facilities. On the other hand, the approach seeks to locate such development in areas of future growth, where the deficit would be exacerbated, and as the preferred approach to overall strategic development within the District is on a south Wealden focus this would likely minimise any impact on the Forest. The same arguments can be used for the effects on SA2 and the District landscape, although a south focus for development may impact on the South Downs National Park in particular.

SA3 Where appropriate enhance and provide access to the District’s countryside, landscape, historic environments and cultural assets for residents and visitors

5.4.34 In terms of SA3, the effect are assessed as uncertain because, directly, the Preferred Option will not enhance or provide access to the Districts countryside, landscape, historic environments and cultural assets however
indirectly it may bring more people into the vicinity of such assets and hence open them up to a wider range of people. This in turn could lead to the enhancement and provision of access, particularly if opportunities for provision are sought in locations of greatest need with the greatest accessibility through public and sustainable transport.

**Social SA Objectives (SA12-SA16)**

**SA12** Improve access to services; facilities; the countryside and open spaces

5.4.35 For SA12, the effects of the Preferred Option are likely to be positive as access to facilities in terms of sport, leisure and culture will be enhanced, not least by the focus being on town centres first and within areas of greatest need but also within areas of greatest accessibility by public and sustainable transport. As an indirect effect access to the countryside and open spaces may be improved through the location of such facilities attracting more people to an area.

**SA15** Facilitate improved health and wellbeing of the population including enabling people to stay independent and reducing inequalities in health

5.4.36 As SA15 is concerned with improving people’s health in the District, the Preferred Option is likely to have positive effects through the provision of a standalone sports park, although the nature of the facilities and services it provides would determine the degree of significance of any positive effect.

**Economic SA Objectives (SA17 and SA18)**

**SA17** Create new employment opportunities and improve access to jobs through facilitating appropriate development opportunities to meet the needs of the economy including support for small and local businesses

5.4.37 The effects of the Preferred Option on SA17 are assessed as uncertain at present. This is due to the fact that as part of a wider integrated economic approach, the Preferred Option is likely to provide positive effects in terms of creating new employment opportunities (SA17) but the extent to which these reach will only be determined once the types of development and their locations are better known. The positive effects may be limited to certain employment sectors or sections of the population but they may also be felt on a wider scale through connected or ancillary developments and services.

**SA18** Diversify and strengthen the local economy through stimulating the regeneration of town centres, enhancing the District’s rural economy, increasing the vitality of the District’s villages and promoting sustainable tourism

5.4.38 In terms of SA18 the effects of the Preferred Option are likely to be positive in that the approach seeks to prioritise town centre locations first for leisure and cultural developments which may help with regeneration efforts for
town centres and high streets. The approach will also help diversify the local economy, particularly by creating more vibrant town centres and high streets.