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You may also visit the Council Offices, Vicarage Lane, Hailsham, East Sussex BN27 2AX, between the hours of 8.30am to 5.00pm Monday to Friday, to view Local Development Framework documents.

If you, or somebody you know, would like the information contained in this document in large print, Braille, tape/CD or in another language please contact Wealden District Council on 01323 443322 or info@wealden.gov.uk
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1 Summary and Outcomes

Non-Technical Summary

Introduction

1.1 The purpose of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) is to help planning authorities contribute to achieving sustainable development in preparing their plans. Sustainable development aims to balance the need to stimulate economic growth with the needs of all sectors of society whilst conserving and enhancing the local environment. The Planning and Compulsory Purchase Act 2004 requires that sustainable development is incorporated into development plans.

1.2 The Core Strategy is the key overarching component of the Local Development Framework (LDF), which is the emerging Development Plan for the District. It sets out the overall vision, objectives and spatial planning strategy for development in the District until 2030.

1.3 The SA/SEA (hereafter referred to as SA) forms part of the evidence base and justification for the policies within the Core Strategy. This report aims to provide information which will support evaluation of the Core Strategy policies by stakeholders and members of the public and assist in the provision of feedback on the Core Strategy. The Council also welcomes any comments on the SA Report itself.

Outline of the Contents of the Core Strategy

1.4 At the heart of the Core Strategy are policies and proposals about how different places in the District will change, this includes the main towns of Hailsham, Uckfield, Heathfield, Crowborough, Polegate and Stone Cross, as well as the rural area. These placed-based sections contain all the key elements of planned change, including housing, employment and retail as well as the infrastructure needed in those places to deliver the strategy.

1.5 There are also some overarching strategic and key delivery policies that guide the spatial strategy and cover topics such as affordable housing and the provision of sites for Gypsy and Traveller accommodation.

1.6 The Core Strategy is driven by a vision which, describes how the District will change by 2030. The vision is presented in full in Chapter 2 of the main SA document, but it is worth noting here that a key element of the vision for Wealden that has been shown to be of considerable importance through the consultation process is the amenity value of the countryside, which is described as a key to understanding Wealden people and places.

1.7 Plan Objectives set out how the Core Strategy is going to achieve the vision in spatial planning terms and set the context for the development of a number of policy options that might deliver the vision. Both the Plan Objectives and policy options are subject to SA to identify their relative merits in achieving sustainable development. The outcomes of this process are discussed later in this summary.
The SA and Plan-Making Process

1.8 The following diagram shows the stages of the plan-making process and the SA process.

![Figure 1 DPD and SA Processes](image)

1.9 This is the SA Report for the Core Strategy DPD presented alongside the publication of the DPD for representations. The preparation of the SA has involved 3 key stages:

- The production of the Scoping Report setting out what the scope of the Sustainability Appraisal would be, which was published and consulted upon in 2006. The SEA Bodies as referred to in Figure 1 included English Heritage, The Environment Agency, The Countryside Agency and English Nature (the latter two have since been merged into one body known as Natural England).
• The production of the Sustainability Appraisal Report which accompanied the Core Strategy Spatial Development Options published and consulted upon between July and August 2009.
• The production of the Sustainability Appraisal Report, which accompanies the Submission Core Strategy DPD and appraises significant changes since the Core Strategy Spatial Development Options.

Outcomes of the early stages of the SA

1.10 The SA Scoping Report identified the links and relationship of the Core Strategy with other relevant plans and programmes such as those at International, European, National, Regional and local scale and highlighted the key messages for the Core Strategy and the Sustainability Appraisal from them.

1.11 The current state of the environment was then described including social, environmental and economic characteristics and this is presented again in Chapter 3 of the main document. As a result of these two exercises locally-specific environmental, social and economic issues were identified for the District and objectives created in order to address these particular local issues. These are known as SA Objectives and collectively form the SA Framework, the primary tool used to assess the Core Strategy. The methodology for the assessment process is given in full in Chapter 4 of the main report.

1.12 The first task in assessing the Core Strategy is to check the compatibility of the Plan Objectives with the SA Framework to identify if there are any major conflicts. The Plan Objectives are broadly compatible with the social and economic SA Objectives and no major conflicts are highlighted. There is potential however for conflict with the environmental SA Objectives, which seek to protect and enhance environmental assets, where the plan objectives promote growth and development. This is a somewhat inevitable outcome and indicates where options designed to meet such objectives will need to consider ways to mitigate adverse environmental impacts.

1.13 Overall, the Plan Objectives are shown to strike a balance between promoting a sustainable form of development and meeting the growth requirements for the Plan period.

SA of Spatial Development Options

1.14 The consultation document Core Strategy - Spatial Development Options July 2009 provides six housing and four employment options for delivering the development needs of the District. These are summarised below:

• Option 1: proportionate growth in existing settlement hierarchy
• Option 2: growth focused at Uckfield and Hailsham
• Option 3: growth focused at Uckfield and Polegate
• Option 4: housing distribution reflecting the Areas of Outstanding Natural Beauty, affordable housing needs and accessibility criteria
• Option 5: growth based on existing rural services
• Option 6: growth in Lewes/Uckfield railway line catchment
• Option 7: dispersed employment developments
Option 8: town and service centre employment focus
Option 9: intensification at existing employment locations
Option 10: Polegate/Hailsham focus with support from Uckfield and Crowborough

1.15 The SA Framework was used to test each of the options and predict their likely positive and negative impacts. The results of this assessment were presented for consultation alongside the Core Strategy Consultation Document. The table below presents the decisions taken to select options, in whole or in part, as a result of the SA and the consultation processes.

Table 1.1 Reasons for Selecting Alternatives

<table>
<thead>
<tr>
<th>Option</th>
<th>Reasons for Selecting Alternatives</th>
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<tbody>
<tr>
<td>Strategic Spatial Housing Options</td>
<td></td>
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<tr>
<td>Option 1</td>
<td>Not taken forward - the option does not give due consideration to the unique character of individual settlements, the settlement hierarchy or the overall needs of the District. The option does not conform to the South East Plan and does not address economic and social needs of south Wealden (and therefore may not address the economic disparity) or the environmental needs of the District.</td>
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<tr>
<td>Option 2</td>
<td>Selected - the option focuses on centres with aspirations for growth and regeneration and centres with more ability to create self-sufficient settlements with an emphasis to provide for their surrounding rural hinterland. At the strategic level takes account of environmental constraints and conservation requirements particular to the District.</td>
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<tr>
<td>Option 3</td>
<td>Not taken forward - the option does not meet the north, south growth aspirations of the South East Plan and does not address the economic and social needs of south Wealden. Polegate is not deemed suitable for significant growth, due to the Town Council aspirations and reflecting the limited service centre function and possibility for growth.</td>
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<tr>
<td>Option 4</td>
<td>Selected - the option performed well during the consultation and is considered favourable due to the fundamental sustainability principles it follows in reflecting affordable housing need, accessibility and environmental, in particular landscape concerns.</td>
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<tr>
<td>Option 5</td>
<td>Selected - the option performed well during the consultation and is considered favourable due to the fundamental sustainability principles it follows in reflecting affordable housing need, accessibility to and the provision of existing services and facilities.</td>
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<tr>
<td>Option 6</td>
<td>Not taken forward - the option does not conform with the South East Plan; There is also further concern over delivery of the railway line and the</td>
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significant quantity of growth in small settlements such as Isfield that would be required in order to facilitate the building of the line.

Strategic Employment Options

Option 7  **Not taken forward** - the option does not give due consideration to sustainability principles of accessibility and environmental impact.

Option 8  **Selected** - option is based upon sounder sustainability principles seeking readily accessible town and service centres where employment can be delivered at lower environmental impact and in balance with new housing growth.

Option 9  **Selected** - option follows sustainability principle of making best use of land and buildings and can encourage the regeneration of employment areas, meeting the recommendations in the South East Plan and taking into account market demand and economies of scale building on existing business locations.

Option 10  **Selected** - option would direct new jobs to locations that could help address issues of deprivation by providing new opportunities in the south of the district, while building on the success of businesses in the area e.g. Polegate. Option should meet employment needs in line with new housing growth in Hailsham and help with addressing pockets of unemployment in Crowborough.

(N.B The South East Plan is at this stage part of the Development Plan for the District and therefore guides the decision-making process.)

**SA of the Settlement Hierarchy**

1.16 The rural settlements in the District have been placed in a Settlement Hierarchy according to their accessibility by public transport and the services and facilities they offer. The purpose of the Settlement Hierarchy is to establish a reasonable method by which to identify where growth may be placed both to help sustain communities and where new development would have access to services and facilities whilst considering environmental and infrastructure constraints which may limit opportunities for growth. The same settlements have also been considered using the SA Framework to determine their relative sustainability for accommodating future growth.

1.17 The SA work concluded that on balance the Settlement Hierarchy represents a broadly appropriate ranking of the settlements with a few notable exceptions. In the south of the District Herstmonceux features lower in the sustainability ranking than in the Settlement Hierarchy due to performance against the economic objectives and environmental issues concerning the wastewater treatment works capacity (although this issue has subsequently been resolved). Alfriston and Upper Dicker rank better in SA terms that in the settlement hierarchy, largely due to a strong social and economic assessment.
1.18 In the north of the District, Forest Row and Maresfield both rank lower in SA terms than in the Settlement Hierarchy. Forest Row due to its particular environmental constraints and likelihood for adverse impacts on biodiversity, coupled with a lack of available development land. Maresfield’s SA position is largely due to social issues including access to health and other services and facilities, which highlights that any new development opportunities ought to assist in delivering community and health facilities. Rotherfield, Horam and East Hoathly are ranked higher in SA terms than in the settlement hierarchy and this is due to their strong social and economic performance in the SA.

1.19 As a quick check the SA of the Settlement Hierarchy has been able to verify that the Hierarchy is an appropriate way of categorising the settlements as broadly more or less sustainable and therefore its use as a yardstick by which to apportion levels of growth to the settlements.

SA of Plan Alternatives

1.20 A number of alternatives for the levels and detailed distribution of housing and employment growth including alternative broad locations for development and for affordable housing contributions have been considered and appraised through the SA process. The outcomes of this stage can be viewed in Chapter 8.

Sustainability Appraisal of the Core Strategy Policies and Spatial Strategy

1.21 The Plan Policy and Spatial Strategy Titles are listed below:

- WCS 1 - Provision of homes and jobs 2006-2030
- WCS 2 - Distribution of Housing Growth
- WCS 3 - Distribution of Employment and Retail
- WCS 4 - Strategic Development Areas (not subject to SA)
- WCS 5 - Managing the release of housing land (not subject to SA)
- Town Strategies:
  - Crowborough
  - Heathfield
  - Uckfield
  - Hailsham / Hellingly
  - Polegate / Willingdon / Stone Cross
- WCS 6 - Rural areas strategy
- WCS 7 - Effective provision of Infrastructure
- WCS 8 - Affordable Housing
- WCS 9 - Rural Exception
- WCS 10 - The Travelling Community
- WCS 11 - The Travelling Community
- WCS 12 - Biodiversity
- WCS 13 - Green Infrastructure
1.22 The full detail of the Plan Policies can be found in Background Paper 8 and in the Core Strategy. A pictorial summary of the Sustainability Appraisal of the Core Strategy Policies and Strategies is shown in Table 1.2 and a short summary of the assessment by Sustainability Objective follows the table. Green indicates potential beneficial effects, amber indicates that the effect may depend upon the implementation detail, red indicates a potential adverse effect and white indicates no effect or neutral insofar as the beneficial and adverse appear to cancel each other out.
## 1 Summary and Outcomes

### Table 1.2 Summary of the SA of the Core Policy and Strategies

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

1.23 The focus of the Spatial Policies and Strategies within the Core Strategy to provide an adequate supply of land for a range of homes to meet the needs of all sectors of the society and communities of Wealden will provide significant beneficial effects for this SA Objective. WCS 1, 2, 6, 10, 11, 12, 13 and the Town Strategies contribute to ensuring that everyone has the opportunity to live in a good quality and affordable home.

2. Improve the health and well being of the population

1.24 Within the remit of the Core Strategy the health and well being of the population is mainly addressed through the provision of homes and job opportunities, which underpin people's well being, and the provision of open space, leisure and recreation facilities as well as connectivity by foot and cycle. The provision of new health facilities during this Plan Period is addressed specifically in the Infrastructure Delivery Plan (IDP) and will be developed through future iterations of the IDP and future DPDs. In particular individual policies WCS 1, 8 and 9 are judged to have significant beneficial effects for the health and well being of the population as they deal with the provision of housing to meet local need. WCS 13 regarding Green Infrastructure should also have significant beneficial effects as there are strong links between a green infrastructure network and health.

3. Promote social inclusion and create/ sustain vibrant communities

1.25 Most of the policies and strategies within the Core Strategy contribute to promoting social inclusion and creating and sustaining vibrant communities. This results from the consideration of these issues all the way through the production of the Core Strategy. The broad locations for growth associated with the Town Strategies are specifically chosen where strong links by walking, cycling and public transport can be made with existing town centres and communities in order to ensure the promotion of social inclusion with new development schemes.

4. To ensure a safe environment including reducing crime and the fear of crime

1.26 Community safety through planning can be addressed in a number of ways; the provision of adequate housing and jobs can help to underpin safe communities; the provision of facilities including youth and young people's facilities; addressing the needs of under represented cultural groups such as Gypsies and Travellers; and design and layout of new development can all contribute to reducing crime and the fear of crime. There are beneficial effects from Policies WCS 1, 8, 10 and 11, which deal with the provision of housing and jobs, affordable housing and the provision and criteria for the location of pitches for the Travelling Community.

5. To provide accessible and high quality public services and facilities

1.27 The distribution of housing and employment growth in the Core Strategy and the Strategies for the Towns is concentrated on placing people in good connection with existing services and facilities. Therefore these areas of the Core Strategy are judged to have a
beneficial effect for this SA Objective. The Site Allocations DPD and other subsequent DPDs will provide detail of specific new services and facilities that might be provided in any particular scheme which will be assessed in more detail through the accompanying SA.

6. To reduce the risk of flooding and the consequential damage to property and public well being

**1.28** The Core Strategy is committed to ensuring the safety of residents and reducing the economic impact of flooding by avoiding the allocation of land for employment or housing in areas subject to medium or high flood risk, taking into account the predicted impact of climate change.

7. Make the most efficient use of land by prioritising brownfield sites for development, the re-use of existing buildings and promoting higher development densities

**1.29** There is some uncertainty with regard to the effects on this SA Objective as the Core Strategy does not provide detail of how broad locations will be delivered, for example at what density and on exactly which plots of land. There are some early indications from the Strategic Housing Land Availability Assessment (SHLAA) that a large proportion of greenfield land will be required. Employment locations include making best use of existing employment areas and brownfield sites so this should be beneficial. More detail at the Site Allocations Stage may highlight specific impacts.

8. Reduce air pollution and ensure local air quality continues to improve

**1.30** The planned growth and the development of land proposed within the Core Strategy are likely to have an adverse effect on the objective to reduce air pollution. The results of new housing growth are likely to be an increase in vehicle movements and new employment growth may additionally create new car journeys and also generate journeys by vans and lorries through supply and distribution needs.

9. Reduce emissions of greenhouse gases

**1.31** Policies and Strategies proposing growth and development in the Core Strategy are contributing to the potential for a rise in greenhouse gas emissions. The construction and operation of new dwellings and employment space will generate greenhouse gas emissions through their demand for energy as well as through traffic emissions from traffic generated by the development. Potential for use of renewable energy in new development will be considered at Site Allocations Stage, and the Strategy does seek to promote development where public transport is available, to reduce the need to travel by car.

10. Conserve and enhance the biodiversity of the District

**1.32** There is uncertainty over the specific impacts on biodiversity from the spatial policies and strategies and these will be explored and understood further at the Site Allocations Stage. The Core Strategy has two policies that will have significant beneficial effects for biodiversity, WCS12 and WCS13 aim to put biodiversity central to considerations
when planning and designing development areas and this should help to mitigate overall impacts on biodiversity on a district wide level.

11. **Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment**

**1.33** This is an interesting objective in that it is not always the case that making the countryside, landscape and historic environment accessible for enjoyment is conserving or enhancing it. However both aspects, the preservation and the access are considered when appraising the policies and strategies against it. The detail of sites is not known at this stage and so particulars of type of agricultural land, landscape impacts and connectivity with the countryside and Public Rights of Way are not known. However, local landscape impacts are addressed in the SHLAA which forms the evidence of site suitability and informs the Core Strategy and subsequent DPDs. These issues will be addressed at the Site Allocations Stage.

12. **Reduce the need to travel by car and promote alternative methods of transport**

**1.34** The development of the spatial approach to the Core Strategy through Issues and Options, the Spatial Development Options and further work on alternatives has been heavily guided by the need to reduce the need to travel by car. Overall the Core Strategy should have a beneficial effect for this SA Objective and improve connectivity for people to their local services and facilities for their everyday needs thus reducing the need to travel. Policy WCS13 on Green Infrastructure will significantly contribute to the beneficial effects promoting the ability to cycle and walk between home and local services.

13. **Minimise waste, maximise the re-use of materials, recycling and composting**

**1.35** The Core Strategy does not explicitly deal with this SA Objective. At the strategic level the County Council Waste Core Strategy will set the overall framework for minimising waste and maximising the re-use of materials, recycling and composting in the district.

14. **Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency**

**1.36** There are two policies within the Core Strategy that should ensure significant beneficial effects on this objective WCS7 and WCS13 Infrastructure and Green Infrastructure require no detrimental effects on watercourses and ground water. WCS13 seeks ecological gains including for wildlife connectivity, which can be achieved through the protection and management of watercourses.

15. **Promote energy efficiency measures and encourage the use of renewable energy**

**1.37** The Core Strategy does not address this objective in any detail. There are no policies that are considered to have a significant effect on promoting energy efficiency and encouraging the use of renewable energy. There is a passage in the Core Strategy, which highlights the need for sustainable construction and proposes that development in
Wealden will be guided by the Government's revisions to the Building Regulations. It further commits that opportunities for renewable and decentralised energy will be explored at the Site Allocations Stage. Therefore the Core Strategy is setting the framework for the promotion of energy efficiency and renewable energy though not actively encouraging it.

16. Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products

This SA Objective may be better addressed at the Site Allocations Stage and at subsequent DPD and SPD stages where the detail of specific proposals may be set out. The strategic nature of the Core Strategy means that the resourcing of materials for construction for example is too detailed. The commitment to retaining and supporting the livestock market at Hailsham and establishing a Farmers Market in Crowborough as a central feature of the Towns offer, in the Core Strategy results in positive effects for this SA Objective.

17. Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy

The majority of the Core Strategy Policies and Options contribute to achieving this SA Objective. The prosperity of the District as a whole underpins this strategic document and all the aspects of growth and development within the settlements and the rural area aim to enhance the prosperity of the District. Particular focus is laid on regenerating the town centres in Hailsham and Uckfield and in redressing the economic disparity between the north and south of the District through regeneration and growth in employment opportunities.

18. Promote sustainable tourism

Sustainable tourism is recognised by the Core Strategy as having an important role within the economy of Wealden. Specifically the context in the Economy section highlights the importance and the commitment to support sustainable tourism. The Spatial Strategy for Crowborough seeks to improve the tourism offer through additional accommodation, interpretation facilities and other attractions, which should be beneficial for promoting tourism in the north of the District. The Green Infrastructure Policy (WCS13) should also have beneficial effects for promoting sustainable tourism by supporting jobs in rural tourism and maintaining an attractive environment to encourage tourism and sustainable transport through improved connectivity.

19. Ensure high and stable levels of employment and provide support for small firms and local businesses

In allocating land for employment premises, including office and industrial, retail and small business units the Core Strategy should have a significant beneficial effect for this SA Objective. The Spatial Strategies for the towns commit to a delivery of employment space as well as in most cases employment opportunities through the regeneration of town centres and improvements in the retail offer. The Site Allocations Stage will be
important for determining the type of employment space provided and the necessary linkages with services and facilities to best promote the offer. Small firms and businesses are an important sector of the economy and their ability to expand and locate in the right employment space should be supported and this will be further assessed at the next stage of the planning process.

20. Develop and maintain a skilled workforce to support long term competitiveness

1.42 The education and skills training of the workforce is a matter more directly affected by the County Council through their role as education provider. There is no secondary or further education provision identified for Wealden, however the improvement in job opportunities created by the Core Strategy should help to maintain a skilled workforce and support long term competitiveness.

21. Stimulate regeneration of town centres

1.43 The Core Strategy should have significant beneficial effects for this objective due to its commitment to the regeneration of three of its main town centres, Crowborough, Hailsham and Uckfield. The Site Allocations DPD will provide more detail of the retail, employment and connectivity improvements proposed by the regeneration plans, which will then be assessed by the SA in more detail.

22. Develop a dynamic, diverse, and knowledge-based economy

1.44 This SA Objective will be better assessed at the Site Allocations DPD Stage when the detail of employment provision by type and design will be better known. The Core Strategy is broadly supportive of the need to develop a diverse and dynamic knowledge based economy and sets the framework for the provision of a wide range of new employment space to fit market requirements. The flexibility of policies within the Core Strategy and the realistic quantum of floorspace allocated should allow the development a suitable diversity of new employment premises that promote high tech industries.

Statement on the Difference the Process has made to Date

1.45 The SA process was largely carried out ‘in house’ by policy officers, SEA/SA and other technical specialists at Wealden District Council. This has made a positive difference so far as it has allowed a greater understanding of the sustainability issues and made it easier to feed recommendations from the SA into the Core Strategy and other areas of work. The assessment has provided an initial check on the sustainability of the options as envisaged by government guidance. Recommendations from the SA have been incorporated into the proposed policies of the Core Strategy.

1.46 The ultimate effectiveness of the DPD from the perspective of sustainable development will depend on an effective partnership between Wealden District Council, its partner agencies, prospective developers and the community.
How to Comment on the Report

1.47 The SA/SEA forms part of the evidence base and justification for the policies within the Core Strategy. This report aims to provide information which will support evaluation of the Core Strategy policies by stakeholders and members of the public and should be used, where relevant, to support representations made on the Proposed Submission Core Strategy.

1.48 If you have any comments to make with direct reference to this document, which cannot be covered by responding to the Proposed Submission Core Strategy, then please write to Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR.

1.49 If you have any questions relating to this document please contact the Planning Policy Team on 01892 602007 or e-mail us at ldf@wealden.gov.uk.


Representations cannot be treated in confidence. The Council will provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting representation on the Proposed Submission Core Strategy or the Sustainability Appraisal Report you confirm that you agree to this and accept responsibility for your comments.
2 Introduction

Purpose of the SA and the SA Report

2.1 Under the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for DPDs. The purpose of SA is to promote sustainable development through better integration of sustainability considerations into the preparation and adoption of plans. SA is an integral part of good plan making and should not be seen as a separate activity. It is an iterative process that identifies and reports on the likely significant effects of the plan and the extent to which implementation of the plan will achieve the social, environmental and economic objectives by which sustainable development can be defined.

Compliance with SEA Directive/Regulations

2.2 In summer 2001, the European Union legislated for Strategic Environmental Assessment (SEA) with the adoption of Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the ‘SEA Directive’). The Directive applies to a range of UK plans and programmes, including DPDs, whose preparation began after 21st July 2004, or whose formal adoption is not complete by 21st July 2006.

2.3 The SEA Directive calls for an Environmental Report “identifying, describing and evaluating the likely significant environmental effects of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.

2.4 Government Guidance integrates the requirements of the SEA Directive into the SA process. To comply with the Directive, authorities are obliged to report on the environmental impacts of various alternatives considered before the plan is adopted, and the guidance calls for the SA Report to incorporate the elements of Environmental Report required by the Directive.

Compliance with the SEA Regulations:

Where this report addresses the requirements of the SEA Regulations this will be explained in a box like this.

2.5 The SEA Regulations set out a legal assessment process that must be followed. In light of this, Table 2.1 sets out the relevant requirements of the SEA Regulations and explains how these have been satisfied. In particular, the SEA Regulations require the preparation of an ‘Environmental Report’ on the implications of the plan or programme in question. This report fulfils this requirement.
### Table 2.1 Compliance with the SEA Regulations

<table>
<thead>
<tr>
<th>Requirement</th>
<th>Where Met</th>
</tr>
</thead>
<tbody>
<tr>
<td>An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes</td>
<td>Scoping Report &amp; Ch2, Ch3 &amp; Ch5</td>
</tr>
<tr>
<td>Relevant aspects of the current state of the environment and its likely evolution without the implementation of the plan</td>
<td>Scoping Report &amp; Ch3</td>
</tr>
<tr>
<td>The environmental characteristics of the areas likely to be significantly affected</td>
<td>Scoping Report &amp; Ch3</td>
</tr>
<tr>
<td>Any existing environmental problems (issues) in particular those relating to areas designated under the Habitats and Birds Directives</td>
<td>Scoping Report &amp; Ch3</td>
</tr>
<tr>
<td>The environmental protection objectives which are relevant to the plan or programme, and the way those objectives have been taken into account in its preparation</td>
<td>Scoping Report</td>
</tr>
<tr>
<td>The likely significant effects on the environment (and economic and social impacts)</td>
<td>Ch1 &amp; Ch9</td>
</tr>
<tr>
<td>The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment</td>
<td>Ch6, Ch8 &amp; Ch10</td>
</tr>
<tr>
<td>An outline of the reasons for selecting the alternatives dealt with … and a description of how the assessment was undertaken, any problems, etc.</td>
<td>Ch6 &amp; Ch8</td>
</tr>
<tr>
<td>… and a description of how the assessment was undertaken, any problems, etc.</td>
<td>Ch4, Ch10</td>
</tr>
<tr>
<td>A description of the measures envisaged concerning monitoring</td>
<td>Ch11</td>
</tr>
<tr>
<td>A non-technical summary of the information provided under the above headings</td>
<td>Ch1</td>
</tr>
</tbody>
</table>

### Plan Objectives and Outline of the Contents

**Compliance with the SEA Regulations:**

*The Environmental Report should provide information on: "an outline of the contents, main objectives of the plan or programme" (Annex I (a))*

#### 2.6

The Core Strategy DPD of the Local Development Framework (LDF) sets out the overall approach which the Council, working with its partners in the local and regional community, will use to guide and control the future use and development of land to improve and protect District’s environment.
2.7 The Core Strategy Spatial Vision is:

By 2030 Wealden will have successfully accommodated growth to meet future needs whilst protecting and enhancing its essential rural character and high quality environment and promoting the countryside as a resource for recreation and tourism. Its market towns will have been regenerated providing opportunities for residents to access suitable housing, local jobs, services, facilities and recreational opportunities and a number of its villages and rural settlements will have enhanced their sustainability through successful growth including provision of affordable housing.

2.8 The Wealden Core Strategy identifies the spatial distribution of development in the District for the period up to 2030. The process of determining the appropriate, sustainable distribution for growth in line with the Spatial Vision has been informed by the Sustainability Appraisal as well as infrastructure testing, the Strategic Housing Land Availability Assessment, the Appropriate Assessment (under the Habitat Regulations), Strategic Flood Risk Assessment, a number of other factual evidence bases for housing growth and Consultation responses under Regulation 25 of the Planning and Compulsory Purchase Act 2004.

2.9 Figure 2.1 shows a summary of the process of developing the spatial distribution in relation to the SA. Over the course of the process three options were developed and appraised; Scenario A, B, and C. Scenario A seeks to distribute the quantum of housing development identified by the South East Plan for the south (1) and north (2) of the District, which biases development to the south of the District. Scenario B seeks to provide a contingency to distribute the same quantum of growth with a less significant bias to development in the south of the District due to emerging concerns over infrastructure capacity. Scenario C was developed at a later stage as it became clear that infrastructure capacity and other evidence was not supporting Scenario A or B.

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1 for the purposes of this paper south Wealden is the part of the District in the area described as the Sussex Coast Sub Region in the South East Plan
2 north Wealden is the area of the District outside of the Sussex Coast Sub Region
Figure 2.1 Summary of the Evolution of the Core Strategy Spatial Distribution in Relation to SA

Wealden District Council Local Development Framework Sustainability Appraisal

Introduction
2.10 The Core Strategy DPD sets out broad locations for delivering housing and other strategic development needs such as:

- Employment
- Retail
- Leisure
- Community facilities
- Essential public services

2.11 The Strategic and Spatial Plan Objectives and the SA of the Plan Objectives can be found in Chapter 5.

2.12 The next chapter documents the summary findings from Stage A (the first stage) of the SA process, which can be found in full in the SA Scoping Report. This includes the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of a Core Strategy DPD.

2.13 The appraisal methodology used to identify and assess the environmental impacts is described in Chapter 4. The Plan Objectives and their corresponding SA are presented in Chapter 5. A summary of the appraisal of the Core Strategy Spatial Development Options presented in the July 2009 public consultation exercise is contained within Chapter 6. The SA of the Settlement Hierarchy follows in Chapter 7. The appraisal of the Plan Alternatives is documented in Chapter 8. Chapter 9 presents the SA of the Plan Policies and Strategies. Proposed mitigation measures are in Chapter 10. The final chapter of the SA looks at implementation and monitoring proposals.
2 Introduction
3 Sustainability Background

Introduction

3.1 This chapter discusses the sustainability background for the District using the evidence gathered through the first stage of the SA process. The scope of the SA was defined in the stakeholders consultation document, the SA Scoping Report. This set out the context and objectives for the SA, collected baseline data and identified key issues / problems for the District.

3.2 This chapter, in compliance with the SEA Regulations, details the current state of the environment as identified in the updated Scoping Report. This includes a description of the current environment in the District and suggests the likely future state without the implementation of the DPD and identifies the sustainability issues / problems for the District.

Links to Other Policies, Plans and Programmes and Sustainability Objectives and How These Have Been Taken Into Account

Compliance with the SEA Regulations:

The Environmental Report should provide information on:
“The relationship [of the plan or programme] with other relevant plans and programmes” (Annex I (a))
“The environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan or programme … and the way those objectives and any environmental considerations have been taken into account during its preparation” (Annex I (a), (e))

3.3 Links with other plans and programmes are given in the updated Scoping Report for the Wealden Local Development Framework. No additional plans and programmes have been reviewed.

Description of the Social, Environmental and Economic Baseline Characteristics and the Predicted Future Baseline

Compliance with the SEA Regulations:

The Environmental Report should provide information on:
“Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme” and “the environmental characteristics of the areas likely to be significantly affected” (Annex I (b), (c))
3.4 The description of the social, environmental and economic baseline characteristics and the predicted future baseline can be found in Section 4 of the SA Scoping Report. The council has recently updated this for publication in 2010 and will periodically update this information in the future as new statistics and data become available.

3.5 Covering 323 square miles, Wealden is the largest district in East Sussex, and is home to just over 145,000 people (Population estimates 2009 East Sussex in Figures). Half of the population live in the five main towns of Crowborough, Hailsham, Heathfield, Polegate and Uckfield, with the rest living in villages and hamlets across the remainder of this large rural District.

3.6 Wealden as a whole has a low population density, with the 2001 Census showing just 1.7 people per hectare compared to 4.2 in the South East. The largest population groups include those people aged between 40 and 59, with the over 65’s estimated to see the most significant increase in population by 2026 (Wealden Housing Needs Survey, David Couttie Associates 2005).

3.7 The life expectancy of males and females (80.5 and 83.5 respectively) compares favourably with the rest of the South East and England. Wealden’s population is also predominately white, with just 1.7% of people registering as being non-white in the 2001 Census (East Sussex County Council, 2006).

3.8 Two thirds of the District is designated as Areas of Outstanding Natural Beauty (AONB), a national recognition of landscape quality. In Wealden the Sussex Downs AONB stretches from the coastline at Seven Sisters and Birling Gap to Wilmington, Berwick and Jevington. This became the South Downs National Park on 31st March 2010. The High Weald AONB encompasses much of the north of the District including Ashdown Forest.

3.9 Within Wealden, the Pevensey Levels is designated as a Site of Special Scientific Interest (SSSI), a Wetland of International Importance under the Ramsar Convention and (subsequent to the Scoping Report) a proposed Candidate Special Area of Conservation (SAC). In addition, the Ashdown Forest SSSI is designated as a Special Protection Area.
(SPA) under the EC Birds Directive 1979, and a Special Area of Conservation (SAC) under the Habitat Regulations 1994.

3.10 Despite these valuable environmental designations, the District faces significant pressure for future development, particularly in terms of new business and housing to support the economic and social requirements, which aim to balance the quality of life for residents.

3.11 These pressures mean that it is becoming increasingly important for Wealden to balance the needs of development whilst maintaining and enhancing the high quality environment and ensuring an adequate level and range of services and facilities.

3.12 The majority of businesses are in the service sector, with a smaller but valuable number in manufacturing and construction. Whilst a predominantly rural area, only a small number of people are employed in farming.

![Figure 3.2 Graph showing employment in Wealden by sector](image)

3.13 Although housing in Wealden is in good condition, it is also expensive and increasingly beyond the reach of local people. The average house price in the District is £266,000 (Q2 2009), with average earnings falling below the average for the South East, and not increasing at the same rate.

3.14 House building density is significantly lower than the rest of the County, and there is a shortage of affordable housing in the District (Housing Needs Survey). The number of homeless people accepted as in priority need has reduced in Wealden from 251 in 2004/05 to 121 in 2007/08, but this figure is high compared to Lewes and Rother local authority areas.

3.15 Crime statistics for the area have shown that Wealden performs favourably against the rest of the South East and England in relation to domestic burglaries, violent offences, and vehicle and other theft. Trend data shows that overall crime rates have been reducing since 2003/2004.
A significant proportion of people in Wealden travel to work using a car or van, with a smaller proportion choosing to use public transport, or walking or cycling (Census, 2001). Many of these commute out of the district, towards Tunbridge Wells, East Grinstead, Brighton, Crawley, Gatwick and London. Car ownership in the District is also relatively high, with 34% of people owning 2 cars, compared to 23.6% nationally.

**Predicted Future Baseline / Evolution without the Plan**

- Wealden’s population is projected to increase by 16,200 persons between 2006 and 2027 (ONS October 2010)
- Wealden’s households are expected to increase by 14,800 between 2006 and 2027 (ONS October 2010)
- A likely increase in the affordability gap between income and house prices
- A reduction in households that are homeless and in priority need
- Continued higher life expectancy at birth than the national average
- Potential decline in access to services and facilities by public transport, walking and cycling
- Continued relatively low rates of crime
- Rising carbon dioxide emissions
- High proportion of people travelling long distances travelled to work
- Continued high car use
- Continued high water consumption
- Limited employment and growth in high value added sectors
3.18 Policies developed in the LDF will in turn impact on the population and projected household and workforce figures. Regardless of the Wealden LDF, it will be necessary to provide for the increasing number of households forming, as well as providing employment opportunities.

Limitations of the Information and Assumptions Made

3.19 The updated Scoping Report identifies the data gaps and limitations of the information. The updated version has been able to reduce the number of data gaps by rationalising the baseline and choosing indicators that are regularly monitored. These indicators are predominantly those that are published on the East Sussex in Figures website. This resource is extremely useful as it presents up to date information for all the districts and boroughs in East Sussex as well as for East Sussex as a whole, regionally and nationally.

Main Social, Environmental and Economic Issues and Problems Identified

Compliance with the SEA Directive:

The Environmental Report should provide information on:
“Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC” (Annex I (c))

3.20 The key sustainability issues are identified in the SA Scoping Report. Table 3.1 provides a summary of these issues.

<table>
<thead>
<tr>
<th>Sustainability Issue</th>
<th>Supporting Evidence</th>
</tr>
</thead>
<tbody>
<tr>
<td>Social</td>
<td></td>
</tr>
<tr>
<td>Improvement of the health and well-being of the population</td>
<td>ESiF, Sustainable Community Strategy for East Sussex 2008-2026, Open Space Study 2008</td>
</tr>
<tr>
<td>Promotion of good design</td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>The need for adequate and accessible educational facilities</td>
<td>ESiF, A Sustainable Community Strategy for East Sussex 2008-2026</td>
</tr>
<tr>
<td>The need for a vibrant community free from crime and disorder</td>
<td>ESiF, A Sustainable Community Strategy for East Sussex 2008-2026</td>
</tr>
</tbody>
</table>

**Environment**

<table>
<thead>
<tr>
<th>Prevent the loss of biodiversity Protection and enhancement of heritage Conservation and enhancement of landscape quality</th>
<th>PPS9, Wealden District Council AMR 2008/09, ESiF, Habitats Regulations Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ambient air quality is to be maintained and where possible improved</td>
<td>NOMIS Local Area Labour Force Survey ESiF</td>
</tr>
<tr>
<td>Sustainable use of land</td>
<td>ESiF, AMR</td>
</tr>
<tr>
<td>Conservation and quality of water resources Adequate flood and coastal defence systems Reduce Flood Risk Promote Sustainable Drainage Systems (SuDS)</td>
<td>Wealden non-statutory Local Plan 2005, SFRA, ESiF, South Foreland to Beachy Head SMP First Revision (May 2007)</td>
</tr>
<tr>
<td>Reduce the use of non-renewable resources and promote renewable energy</td>
<td>DTI Energy Trends, ESiF, PPS22, PPS1 Supplement</td>
</tr>
<tr>
<td>Encouraging reduction, reuse and recycling of waste materials</td>
<td>ESiF, DEFRA, East Sussex and Brighton &amp; Hove Municipal Waste Management Strategy 2006-2020</td>
</tr>
</tbody>
</table>
### Economic

<table>
<thead>
<tr>
<th>Objective</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Encourage continued dynamic and knowledge based economic development with a diverse rural economy</td>
<td>Wealden non-statutory Local Plan 2005, ESiF, PPS4</td>
</tr>
<tr>
<td>Provide support for small firms and local businesses</td>
<td>PPS4, ESiF</td>
</tr>
</tbody>
</table>
3 Sustainability Background
4 Appraisal Methodology

Introduction

Compliance with the SEA Directive:

*The Environmental Report should provide information on:* 
"...a description of how the assessment was undertaken" (Annex 1 (h))

4.1 The chapter discusses the approach adopted to carry out the assessment stages of the SA, detailing the methods used in assessing the plan options at their various stages of development.

Approach Adopted to the SA

4.2 The SA was carried in the following three stages:

- Firstly as a result of the Scoping exercise the SA Framework was devised for use as a tool in the assessment process. The SA Framework, as shown in Table 4.1 consists of Sustainability Objectives that reflect specific priorities and needs of the District and provides the methodology for identifying possible conflicts and suggesting solutions. The associated indicators and targets are shown in SA Background Paper 1. The internal compatibility of Objectives within the Framework is examined to highlight where conflicts may arise throughout the Plan-making process and where priorities may need to be stated. The compatibility matrix is shown in SA Background Paper 2 and a summary of findings is given in the box following Table 4.1.

Table 4.1 Sustainability Appraisal Framework

<table>
<thead>
<tr>
<th>Social Objectives</th>
<th>Environmental Objectives</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Ensure that everyone has the opportunity to live in a good quality, sustainably</td>
<td>6 To reduce the risk of flooding and the consequential damage to property and public</td>
</tr>
<tr>
<td>constructed and affordable home</td>
<td>well being</td>
</tr>
<tr>
<td>2 Improve the health and well being of the population</td>
<td>7 To provide accessible and high quality public services and facilities</td>
</tr>
<tr>
<td>3 Promote social inclusion and create/ sustain vibrant communities</td>
<td>8 Providing accessible and high quality public services and facilities</td>
</tr>
<tr>
<td>4 To ensure a safe environment including reducing crime and the fear of crime</td>
<td>9 Providing accessible and high quality public services and facilities</td>
</tr>
<tr>
<td>5 To provide accessible and high quality public services and facilities</td>
<td>10 Providing accessible and high quality public services and facilities</td>
</tr>
<tr>
<td>7</td>
<td>Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities</td>
</tr>
<tr>
<td>8</td>
<td>Reduce air pollution and ensure local air quality continues to improve</td>
</tr>
<tr>
<td>9</td>
<td>Reduce emissions of greenhouse gases</td>
</tr>
<tr>
<td>10</td>
<td>Conserve and enhance the biodiversity of the District</td>
</tr>
<tr>
<td>11</td>
<td>Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment</td>
</tr>
<tr>
<td>12</td>
<td>Reduce the need to travel by car and promote alternative methods of transport</td>
</tr>
<tr>
<td>13</td>
<td>Minimise waste, maximise the re-use of materials, recycling and composting</td>
</tr>
<tr>
<td>14</td>
<td>Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency</td>
</tr>
<tr>
<td>15</td>
<td>Promote energy efficiency measures and encourage the use of renewable energy</td>
</tr>
<tr>
<td>16</td>
<td>Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products</td>
</tr>
</tbody>
</table>

**Economic Objectives**

| 17 | Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy |
| 18 | Promote sustainable tourism |
| 19 | Ensure high and stable levels of employment and provide support for small firms and local businesses |
| 20 | Develop and maintain a skilled workforce to support long term competitiveness |
| 21 | Stimulate regeneration of town centres |
| 22 | Develop a dynamic, diverse, and knowledge based economy |
SA Framework Internal Compatibility

There are obvious tensions between the need to ensure everyone has the opportunity to live in a good quality and affordable home (SA Objective 1) and both the need to conserve and enhance biodiversity (SA Objective 10) as well as the need to reduce greenhouse gas emissions (SA Objective 9). Notwithstanding the element of SA Objective 1, which refers to sustainably constructed homes, there will be a need to provide land for new homes which may also include greenfield sites (brownfield sites can also have biodiversity value) that will impact upon biodiversity and the provision of additional dwellings in the District will inevitably increase emissions of greenhouse gases both during construction and operation. Given the national importance of the provision of new homes this conflict is unavoidable but presents an opportunity to ensure consideration is given to mitigating the impacts as far as practicable, for example through policy that protects the most important sites in terms of biodiversity, whether greenfield or brownfield and minimises the production of greenhouse gases.

- Secondly, an initial appraisal of the Spatial Development Options was conducted using the SA Framework. The results of this can be found on the Council website. Wealden District Council took the results into account during the preparation of the Core Strategy DPD.
- Thirdly the Core Strategy Objectives were tested for compatibility with the SA Objectives.
- Next, the rural settlement hierarchy, alternatives for the overall spatial distribution, the broad locations, the economic strategy and affordable housing were tested against the SA Framework to inform the preparation of the submission Core Strategy.
- Finally the preferred Draft Proposed Core Strategy (submission) DPD was appraised against the SA Objectives to predict and evaluate the significance of effects, including cumulative, secondary and indirect over the short medium and long term.

Predicting the Effects

4.3 The purpose of this task is to predict the social, environmental and economic effects of the options/policy being considered in the DPD process. The potential effects need to be quantified where appropriate, or a judgement made where this is not possible, with reference to the baseline situation.

4.4 Predictions do not have to be expressed in quantitative terms. Quantification is not always practicable, and qualitative predictions can be equally valid and appropriate. These are often expressed in easily understood terms such as ‘getting better or worse’ or a scale from very positive to very negative. Predictions need to be supported by evidence, such as references to any research, discussions or consultation.

4.5 Any difficulties such as uncertainties or limitations in the information underlying both qualitative and quantitative predictions are documented. Assumptions, for instance about
underlying trends or details of projects to be developed under the plan or programme, need to be clearly stated.

4.6 Each option, policy or proposal is assessed against each SA Objective (using the decision-aiding questions attributed to each SA Objective - shown in SA Background paper 1) in order to identify:

- Whether the principal impacts are positive or negative (clearly some may support one objective while conflicting with another, although this does not mean the impacts cancel one another out);
- How these impacts may change over time (this cannot always be determined); and
- The relative magnitude of the impacts.

4.7 The final point, referring to magnitude, serves as an initial proxy for identifying the relative significance of the impacts. This activity also provides an initial opportunity to identify potential cumulative and synergistic impacts and to consider appropriate mitigation measures (see sections below).

Evaluating the Effects

4.8 Having identified and described the likely effects of the DPD, an evaluation of their significance is then made.

4.9 Whether an effect is considered likely to be significant will depend on whether it has a material impact on an SA Objective. The effects may be judged according to:

- Probability, duration, frequency and reversibility of the effects;
- Cumulative nature of the effects;
- Trans-boundary nature of the effects;
- Risks to human health or the environment;
- Magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- 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; or effects on areas having a recognised national, Community or international protection status; and
- How they contribute to achieving, or restrict the achievement of, the various elements of the SA Objectives.

4.10 Assumptions used in making judgements on the significance of effects are documented. Any inconsistencies between the objectives of the DPD and its policies are highlighted, and amendments made where possible to reduce conflicts.

4.11 The assessment criteria are shown in Table 4.2.
4 Appraisal Methodology

Table 4.2 Assessment Criteria

<table>
<thead>
<tr>
<th>Symbol</th>
<th>Likely effect against the SA Objective</th>
</tr>
</thead>
<tbody>
<tr>
<td>✓</td>
<td>Potentially significant beneficial effect</td>
</tr>
<tr>
<td>(✓)</td>
<td>Option supports this objective though it may only have a minor effect</td>
</tr>
</tbody>
</table>
| ~      | 1. Policy has no effect  
         | 2. Effect is neutral insofar as the benefits and drawbacks appear equal and neither is considered significant |
| ?      | Uncertain or insufficient information on which to determine the assessment at this stage |
| (x)    | Option appears to conflict with the objective and may result in minor adverse effects |
| x      | Potentially significant adverse effect |

When the SA was Carried Out

4.12 The SA Scoping Report was produced and consulted on in 2006 and published in February 2007. An update of the Scoping Report was produced in 2009, internally consulted upon in early 2010 and published in October 2010. A Sustainability Appraisal of the Spatial Development Options was undertaken in 2009 and published for consultation in July 2009. The SA of the alternatives for the broad locations, spatial distribution, affordable housing and the economic strategy as well as the SA of the rural settlement hierarchy was carried out between January and May 2010 and the SA of the proposed submission Core Strategy DPD was carried out between May and September 2010. Final amendments to the Strategy and SA were carried out between September and December 2010.

Who was Consulted, When and How

Compliance with the SEA Directive:

The Environmental Report should provide information on:

“Authorities which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programmes …shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report” (Article 5.4).
4.14 The following bodies were consulted in 2006 in respect of the SA Scoping Report:

- English Heritage
- The Countryside Agency
- English Nature
- The Environment Agency
- Government Office for the South East
- Highways Agency
- East Sussex County Council
- High Weald and South Downs AONB Bodies
- Wealden Local Strategic Partnership
- Wealden Parish and Town Councils
- District Councillors

4.15 The SA of the Spatial Development Options underwent full public consultation between July and August 2009, which included the bodies mentioned above, key local stakeholders including developers, the business community, utilities providers and hard to reach groups.

4.16 The SA of the submission Core Strategy DPD and the alternatives considered in its preparation was carried out in consultation with the Environment Agency and Officers of the District Council from the following departments:

- Development Management North and South Teams
- Development Management Major Planning Applications Team
- Housing
- Planning Policy
- Policy and Review
5 Plan Objectives

Introduction

Compliance with the SEA Regulations:

The Environmental Report should provide information on:
"an outline of the contents, main objectives of the plan or programme" (Annex I (a))

5.1 The objectives of the DPD set out what it is aiming to achieve in spatial planning terms and set the context for development of options for the DPD. It is important for the objectives of the DPD to be in accordance with sustainability principles. The objectives therefore are tested for compatibility with the SA Objectives. This helps to refine the DPD objectives as well as in identifying options. The DPD objectives also need to be consistent with each other, and the SA objectives will be one way of checking for this. Where there is conflict between objectives, the LPA will need to reach a decision on priorities.

The Spatial Plan Objectives

5.2 The following list constitutes the Spatial Plan Objectives for the Core Strategy DPD:

1. We will help manage countryside resources and assist in the development of the rural economy whilst protecting and enhancing recognised biodiversity and geodiversity attributes, in particular we will protect the internationally important sites of the Pevensey Levels and Ashdown Forest and other designated areas of biodiversity and geodiversity. We will also protect, and will work with others to enhance and manage, the distinct landscapes of the District, particularly, but not exclusively, those nationally designated.

2. We will ensure that the intrinsic quality of the historic environment is protected and that Wealden's environmental, heritage and cultural assets are used appropriately to encourage suitable tourism development and support inward investment.

3. To help address the need for homes, to ensure the economic prosperity of the District and to support its residents and the changing requirements of residents in terms of size, type, tenure and location of homes, whilst protecting our valued environment we will provide for at least 9600 homes within Wealden from 2006 to 2030. The phased delivery of on average 400 dwellings per annum across the 24 year period of the strategy provides a realistic time frame for the market to deliver the housing, and is a rate that allows our communities to adjust to the growth and create mixed and balanced communities. This timescale also better provides for the timely delivery of necessary infrastructure. The majority of new housing will be accommodated within, or as sustainable extensions to, existing towns, while allowing for limited growth within those villages capable of accommodating development in a sustainable fashion. Development will be focused in and around the settlements of Hailsham/ Hellingly, Polegate/ Willingdon/ Stone Cross and Uckfield to help stimulate investment in those centres, and, to varying but lesser degrees, in and around Crowborough and Heathfield to meet housing need.
5. Plan Objectives

4. We will ensure the long term viability of our five principal towns by supporting a range of improvements compatible with their local retail and service functions and reflecting the scope that exists for physical change within their centres. This will include more substantial investment in Uckfield and Hailsham which will allow multi-agency planned and managed developments with improved business and community infrastructure, and with a range of new job opportunities.

5. We will continue to work with East Sussex County Council and schools to meet the learning needs of local people, and to ensure that the local workforce has the necessary skills and facilities to be able to participate fully in local employment.

6. In order to improve economic prosperity we will support the growth of the Wealden economy by helping existing companies to expand and develop. We will help improve the range of employment opportunities available and provide for an additional 40,000 sq. metres net of employment floorspace, to that already committed, and 17,000 sq. metres net of retail floorspace. There will be an increased opportunity for people to work close to where they live, to improve access to jobs, help reduce current levels of net out commuting from Wealden and decrease the net out migration of 15 to 24 year olds. New jobs will make a positive contribution to the improved economic performance of Uckfield, Hailsham, Polegate and Willingdon and assist in tackling forms of deprivation caused by economic circumstances.

7. We will encourage reduction of the need to travel by car by concentrating development where it can most closely relate to public transport opportunities, improving the offer of our towns in terms of retail, leisure and recreation and by making it easier to travel by more sustainable modes of transport. We want to see noticeable improvements in journey quality for those people making trips on foot, bicycle or by public transport.

8. We will maintain and where appropriate enhance, through the encouragement of growth, the effective network of villages which will continue to support the day to day needs of our rural communities, and which will accommodate some additional growth where this would be sustainable.

9. We will ensure development takes full account (by mitigation or adaptation) of the likely forecast impacts of climate change including: minimising the emissions of greenhouse gases; the use of non-renewable energy and natural resources; and construction using sustainable techniques.

10. We will seek to ensure the safety of residents and reduce the economic impact of flooding events by avoiding the allocation of land for employment and housing growth in areas subject to medium and high flood risk, taking into account the predicted impact of climate change.

11. We recognise the shortfalls in open space, leisure and recreational facilities identified within the District and will work with others to enhance the District’s geodiversity and biodiversity including creating a coherent network of green infrastructure, especially in and around our towns, that can better support wildlife and the impact of climate change as well as improving human health through increased accessibility.
12. We will continue to work with partners to help ensure that Wealden remains a safe place, with levels of crime and disorder well below the national average, and to achieve significant improvements in the safety records on Wealden’s roads.

13. We will encourage the development of high quality, safe and attractive living environments for communities in both towns and villages, while promoting local distinctiveness through good design in all new development. We want future built development to create spaces and places which are sustainable, distinctive and durable. These will be expected to make a real contribution to addressing climate change issues and addressing the needs of our ageing population.

14. We will maximise the use of previously developed land for new development wherever possible, and make the most efficient use of existing resources, for example by ensuring higher housing densities compatible with the particular location and by utilising existing capacity in infrastructure, services and facilities.

15. We will ensure, with our partners, that the spatial strategy’s infrastructure requirements are clearly identified and will work with partners to ensure that this is provided at the right time to support development. New development will be expected to contribute to strategic and local infrastructure requirements, through both on site facilities and financial contributions for off-site works. In some cases development will require to be phased to ensure delivery of necessary infrastructure to support proposed growth.

**Summary of the SA of Spatial Plan Objectives**

5.3 The detailed appraisal of the Spatial Plan Objectives can be found in SA Background Paper 2. A summary is presented below.

5.4 The Spatial Plan Objectives considered holistically have broadly beneficial effects for the Sustainability Objectives of the SA Framework, particularly the social and economic objectives. This is to be expected as the Plan Objectives are high level directions that guide the development of a Spatial Plan, which seeks to improve the opportunities and places for residents and future residents of the district.

5.5 Given the imperative need to plan for future growth to address housing and employment needs there are some uncertain and some likely adverse effects for a number of the environmental SA Objectives. Plan Objectives 3 and 6 are likely to produce some adverse effects on the SA Objectives to ‘reduce air pollution’, to ‘reduce greenhouse gas emissions’ and to ‘minimise waste’ and are uncertain concerning their impacts on biodiversity and the countryside.

5.6 This is not unexpected and mitigation is given in part through Plan Objectives that seek to conserve and enhance these assets as well as Objectives requiring sustainable construction techniques and the overall spatial emphasis of developing in sustainable locations in and around settlements that provide convenient access to services and facilities, negating wherever possible the need to travel by car. Further mitigation requirements are highlighted by this appraisal exercise and will be embedded in lower
tier policies within the Core Strategy DPD as well as subsequent site-based DPDs and other documents within the LDF.

The Town Objectives

5.7 The following list presents the Town Objectives, which inform the Strategies for the Towns within the Core Strategy:

Heathfield

1. Limited housing growth to provide for both affordable and market housing, meeting local needs which include the elderly and those people seeking to work in Heathfield and surrounding villages
2. Support some employment development (perhaps in mixed use developments) but in scale with size of town
3. Enhance town’s function as a local service centre hub, providing jobs and services to people living within the town and outlying villages who rely on town for leisure, retail and health care provision
4. Create a more self-sufficient place, providing facilities for the less mobile, and improving leisure and youth facilities
5. Focus on increasing accessibility to the outlying villages, and to larger neighbouring towns served by public transport

Crowborough

1. Provide for market and affordable housing, including provision for the elderly, at a scale consistent with its AONB location but balanced with the desire to support town centre regeneration aspirations
2. Focus development on land opportunities that exist within the urban area and between the urban area and the AONB boundary
3. Regeneration and revitalisation of the town centre in order to increase commercial activity, reduce vacancy rates and develop the range of choice available to visitors
4. Maintain the town’s role and function as a local service centre meeting the needs of the residents and surrounding village communities, whilst recognising the continuing influence of Tunbridge Wells as an important provider of services and facilities (including retail, health and entertainment)
5. Support some limited employment development to increase local job choice and address localised unemployment, but in scale with population growth and acknowledging the historic trend of net out-commuting
6. Promote traffic management measures to reduce the impact of vehicular traffic on the town centre
7. Provide a framework for development which grasps the opportunities created by the proposed move of Wealden District Council offices from the town centre of Crowborough
8. Help promote the High Weald tourism interests of the town while protecting the character, appearance and functioning of the Ashdown Forest
Uckfield
1. Develop its role and function as a principal service centre for its local residents and surrounding communities, including Heathfield, especially for retail, jobs, leisure (including entertainment), education and healthcare
2. Reflect the focus in SE Plan by providing market and affordable housing to meet the needs of households seeking to live in Uckfield
3. Provide additional employment opportunities, in scale with the growth of population, for those living in Uckfield and surrounding areas, and support improved access to training facilities
4. Increase retail floorspace and support significant improvement of the town centre public realm, taking into account local environmental assets, including the local green network
5. Build on the momentum associated with Uckfield master planning
6. Address town centre highway issues by seeking to enhance highway capacity and ease congestion

Polegate
1. Retain the town as service centre to meet day-to-day needs of local residents primarily, while acknowledging function of Eastbourne as the main service provider in terms of retail, leisure and entertainment
2. Provide leisure facilities to meet the needs of the local population, including the less mobile
3. Provide market and affordable housing to help meet needs of the aging population, and households seeking to live and work in the Eastbourne and Polegate area, taking into account the limitations of the local service centre role and the dependency on Eastbourne and Hailsham for other facilities.
4. Protect the character and landscape value of the National Park and its surroundings, while promoting access
5. Provide employment opportunities at a more limited scale than perhaps envisaged in Triangle report/SE Plan, but which reflects local age composition and needs of those living within Polegate and Eastbourne
6. Support improvement of access to training facilities to help increase the skills base of the population, including the elderly

Hailsham
1. Develop its role and function as a principal service centre for its local residents and surrounding communities, especially for retail, jobs, leisure (including entertainment and youth provision), education and healthcare
2. Reflect the SE Plan strategy and seek to provide sufficient market and affordable housing to assist regeneration of the town
3. Provide additional employment opportunities sufficient to meet both the needs of Hailsham residents, and those living in a wider catchment area of the sub region
4. Hailsham, rather than Polegate, becomes the principal location for growth
5. Address issues of deprivation and unemployment in certain wards together with associated health issues, and support improved access to training facilities
6. Utilise the opportunity created by a single site District Council Office to assist town centre regeneration/revitalisation
7. Build on the momentum associated with Hailsham/Hellingly master planning
8. Increase retail floorspace and support a significant improvement of the public realm, taking into account local environmental assets
9. Increase public transport connectivity with Polegate and Eastbourne, especially utilising Polegate railway station
10. Ensure development addresses highway issues associated with the A271 and A27, as evidence determines
11. Seek to protect the character, appearance and function of the Pevensey Levels and create a robust landscape structure around the town

Summary of the SA of the Town Objectives

5.8 The detailed appraisal of the Town Objectives can be found in SA Background Paper 2. A summary is presented below.

5.9 The Town Objectives are broadly compatible with the social and economic SA Objectives and no major conflicts are highlighted. There is potential however for conflicts with the environmental SA Objectives, which seek to protect and enhance environmental assets, where the Town Objectives promote growth and development.

5.10 There are objectives for the towns which specifically focus on protecting and enhancing aspects of the natural and built environment. However, as can be seen with internal compatibility testing of the SA Objectives, the internal compatibility of the suite of Town Objectives would highlight broadly similar conflicts between social and economic growth aspirations and the enhancement of environmental assets.

5.11 The following bullets describe the somewhat inevitable potential conflicts that arise when testing the Plan Objectives for the towns with the SA Objectives. Where applicable mitigation measures are suggested for reducing the magnitude of conflict.

- Housing and employment development may lead to increased land take which long term may have a negative impact upon the environment. It needs to be ensured that new build housing schemes are focused on brownfield land wherever possible (SA Objective 7). Potential for conflict with SA Objective 10 to conserve and enhance biodiversity - mitigated through the protection and enhancement of designated sites and maximising opportunities to ensure green linkages and green infrastructure are incorporated into development design.
- Housing and employment development may increase emissions of greenhouse gases - potential for conflict with SA Objective 9 to reduce greenhouse gas emissions - mitigate through location choice and maximising regeneration opportunities and requirement for Combined Heat and Power, energy efficiencies, renewable energy.
- Housing and employment development as well as new services and facilities, including new retail floorspace, will result in additional waste being generated and therefore a
potential conflict arises with part of SA Objective 13 - to minimise waste. Potential to be compatible with this SA Objective in terms of maximising the re-use of materials, recycling and composting and thereby minimising the quantity of additional new waste being produced. Strong requirements to minimise construction waste will be important in reducing cumulative effects of development across the District.

- Encouraging economic growth is likely to result in an increase in car use and may conflict with SA Objective 12 to reduce the need to travel by car - however the effects can be mitigated to some extent by promoting and ensuring alternative methods of transport as well as by the choice of location.

- Possible tensions may arise between the need for growth in housing and employment, the regeneration of town centres and the provision of new services and facilities and the SA Objective to conserve and enhance the District's landscape, historic and built environment and best and most versatile agricultural land. Mitigation through the choice of location, landscaping and screening and the use of top quality design and materials.

- Growth and enhancement of the towns as service centres for their residents and those of surrounding and outlying villages may present conflicts with the SA Objective 8 to reduce air pollution and ensure local air quality improves. Such enhancement of service centres is likely to result in an increase in people using them and consequently an increase in levels of commuting both within the towns and to and from the outlying settlements with commensurate increase in transport emissions and air pollution. Mitigation is through sustainable travel management plans for the towns including improvements to public transport systems and public rights of way.
5 Plan Objectives
6 Plan Issues and Options

Compliance with the SEA Directive:

The Environmental Report should provide information on:
“Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with” (Article 5.1 and Annex I (h))

Introduction

6.1 This chapter documents the Options identified by the Council in the 2007 “Issues and Options” Consultation Paper and the 2009 Public Consultation Paper “Spatial Development Options” and summarises the Sustainability Appraisal and how social, economic and environmental effects have been considered in choosing the Options to progress. The chapter concludes by looking at the Options chosen and the reasons for rejecting other Options. All the work on Options at this stage is carried out with regard to the governing South East Plan.

Main Strategic Options Considered and How they were Identified

6.2 Public consultation on an Issues and Options Paper took place in Summer 2007. This was the first stage of public consultation in the preparation of the Core Strategy. The paper was aimed at helping focus discussion on the key planning issues and future choices for Wealden.

6.3 The Consultation Paper draws out a number of key themes that could underpin a new vision for Wealden. The key themes are:

- Protecting Wealden’s landscapes and environment;
- Improving economic prosperity;
- Focusing new development where it will be most sustainable and offer the greatest potential benefit for existing communities; and
- Improving health and well-being of our communities.

6.4 The Issues and Options Consultation Paper also identifies some of the key elements of infrastructure which could be necessary to support the levels of housing growth required by the South East Plan. Views were sought on these, including the need for:

- Improvements to the A27 trunk road in the Polegate area;
- New sewage treatment works in the Hailsham area to serve any future development taking place either at Hailsham or Polegate;
- New and/or expanded reservoirs at Bewl Water and at Clay Hill (in Lewes District);
- New primary schools and additional secondary school places/facilities;
- New/expanded doctors surgeries;
Additional recreational facilities and public open space; and
Highway improvements and enhanced public transport.

6.5 The responses to this consultation were analysed alongside further technical and other studies to explore ways forward in developing the Core Strategy. Much of the work has focused on finding out more about the communities in Wealden.

6.6 The next consultation stage draws together the elements and defines a range of alternative district-wide spatial approaches to accommodate development. These alternatives are presented in the Spatial Development Options Consultation Document 2009, which can be found on the Wealden website at www.wealden.gov.uk and are detailed below:

**Strategic Spatial Housing Options**

- **Option One: Proportionate growth in existing settlement hierarchy** - distributes future housing growth in proportion to the number of households currently in each parish/town. In order to retain the hierarchy across the District the South East Plan’s split between north and south has not been applied.

- **Option Two: Growth focused at Uckfield and Hailsham** - achieves close conformity with the South East Plan. The overall housing distribution proposed between north and south Wealden takes account of general environmental and accessibility considerations, and the focus on Uckfield and Hailsham is in line with regional strategy. Affordable housing requirements are used as a basis for a distribution of housing to the remaining parishes.

- **Option Three: Growth focused at Uckfield and Polegate** - meets the aspirations of the South East Plan but distributes the 11,000 dwellings across Wealden as a whole, rather than between north and south. It provides urban extensions in south Wealden, a balanced distribution strategy in north Wealden, and some focus on Uckfield to meet wider housing requirements.

- **Option Four: Housing distribution reflecting the Areas of Outstanding Natural Beauty, affordable housing needs and accessibility criteria** - development in north and south Wealden follows the South East Plan split and the rural settlements are considered in relation to the these three important criteria. The Option limits development within Areas of Outstanding Natural Beauty, in flood risk areas and close to the Ashdown Forest Special Protection Area. It promotes development in rural settlements accessible by public/sustainable transport to railway stations.

- **Option Five: Growth based on rural services** - rural parishes receive 30% of the overall district requirement for new homes (3,300 dwellings), based on their existing services and facilities, including accessibility to rail transport. Affordable housing requirements are used as a basis for a distribution of the remaining housing to the five towns.

- **Option Six: Growth in Lewes/Uckfield railway line catchment** - seeks to assist in the case for the reinstatement of the Lewes-Uckfield railway line by focusing growth around the catchment stations on the existing Uckfield / Crowborough line, and allocating more limited growth to those settlements within 30 minutes by public transport to these stations. There may be potential to re-open a station at Isfield and
this Option, taking into account flooding constraints, also proposes a significant amount of development in this area. Growth elsewhere in Wealden is based on the existing settlement hierarchy, with the exception of Forest Row and Pevensey where development is limited by flooding and other environmental constraints.

Strategic Spatial Employment Options

- **Option Seven: Dispersed employment developments** - locates employment land in proportion to the distribution of new housing in Wealden. This dispersed development Option takes account of the existing and projected working age population in an area, together with the existing and allocated employment sites in that locality. An assessment of local need and demand will determine the type of employment site envisaged.

- **Option Eight: Town and service centre employment focus** - distributes employment land primarily within, or on the fringes of, towns and local service centres, where good basic facilities exist. These sites are close to the strategic road network and are readily accessible by means of sustainable / public transport. It takes account of the existing role and function of each settlement and its proximity to the road / public transport network. This is important for road freight movement and for general accessibility for employees. It is a more selective dispersed development option than Option Seven, based on the existing hierarchy of towns and villages in Wealden.

- **Option Nine: Intensification at existing employment locations** - locates development in areas with existing employment sites and includes the opportunity to intensify and expand industrial estates if appropriately located. It therefore meets recommendations in both the Wealden Employment Land Review and the South East Plan. The Option also takes account of market demand and potential economies of scale by providing new employment opportunities in proportion to the size and extent of existing business locations.

- **Option Ten: Polegate/Hailsham focus, with support from Uckfield and Crowborough** - provides a significant proportion of future employment floor space at Polegate/ Willingdon and Hailsham/ Hellingly, with additional provision at Uckfield and Crowborough. By providing a catalyst for regeneration, the emphasis on Polegate and Hailsham reflects the aspirations of the recent Eastbourne - Hailsham Triangle report as well as the strategic policy approach of the South East Plan. In north Wealden, the Employment Land Review identifies Uckfield and Crowborough as locations for further employment growth. Unlike previous options, this Option focuses growth in a limited number of locations.

Comparison of the Social, Environmental and Economic Effects of the Options

6.7 The comparison of the social, environmental and economic effects of the Options is presented in the Sustainability Appraisal of Spatial development Options 2009, which can be found on the Wealden website at www.wealden.gov.uk.
How Social, Environmental and Economic Issues were Considered in progressing the Plan

6.8 The overarching issues identified through the SA of the Spatial Development Options have been important in progressing the Core Strategy. These issues are given below:

Housing

6.9 The Housing Needs Survey reports a shortage of affordable housing, although an update of this document is required to provide more comprehensive and robust evidence. In addition, the Scoping Report identifies that 22% of the population is over 65. Demand for special needs housing may, therefore, increase during the plan period and that demand requires identification.

Landscape and biodiversity

6.10 Some options avoid impacts on the AONBs, but with likelihood that greenfield sites will be required for any option it will be necessary to protect open landscapes more generally. Policy can stipulate that character assessment will be necessary for developments where landscape issues arise, or as a general rule. The aim would be to minimise harm and seek enhancement where possible.

Sustainable design

6.11 In addition to the strategic approach to securing sustainable patterns of development it will be important to further the achievement of carbon reductions through energy efficiency and renewable energy capacity in new properties. Energy efficiency can be achieved through the implementation of targets through the Code for Sustainable Homes and the application of a renewable energy policy. Regard would be necessary, however, to the viability of development given the need to achieve other objectives. The most effective policy for reducing carbon emissions may be to support retrofitting of existing properties. With respect to water efficiency it may be appropriate for all options to seek to maximise if the performance of new dwellings in the District given the context of water treatment capacity in the south of the District and the location of the District in an area of 'water stress'.

Employment

6.12 The options vary in the level to which they match employment and existing settlement patterns. It will be important in any option, however, that opportunities are maximised to link affordable housing need/delivery with accessibility to learning resources and specific, local skills needs.

Sustainable tourism

6.13 The sustainability credentials for tourism could be determined by standard policy controlling/guiding tourism development that would, in particular, further the aims of the AONB Management Plans. This could be linked to development in Polegate in the south and in Crowborough, Wadhurst, Hartfield and Uckfield in the north. In addition, most
development strategies (options) would help support, to varying degrees, the long term business case for establishing a rail link to Lewes.

**Any Proposed Mitigation Measures**

**Compliance with the SEA Directive:**

The Environmental Report should provide information on:

“The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme…” (Annex I (g))

6.14 Mitigation measures and/or requirements were identified in the Sustainability Appraisal of the Spatial Development Options and these are documented below:

**Option 1**

- Flood risk assessment may be required for several areas to identify suitable sites and demonstrate deliverability. Areas within or near to flood plains include the Parishes of Danehill, Horam, Maresfield, Mayfield, Rotherfield, Uckfield, Hailsham, Forest Row and Isfield.

**Option 2**

- The additional recreational pressure on the Ashdown Forest possibly created by new residents in the vicinity will require some form of mitigation.
- A key supplementary policy to the development strategy would need to include a substantial contribution to improving walking and cycling facilities and improving connectivity by bus between Polegate and Hailsham, and between rural areas and the main towns both within and outside the District.
- Consider the need for a high level of water efficiency in new development in Hailsham/Hellingly, Polegate, Willingdon and Jevington, Chiddingly and Westham.

**Option 3**

- Further consideration may be needed to the relevant mitigation measures required to prevent recreational pressure on the Ashdown Forest SPA from new residents in the vicinity. However, the role and type of mitigation required for development in Crowborough in Option Three, as opposed to Option Two which is less half the amount of additional growth, may be more significant.
- Avoid inappropriate development in the vicinity of Herstmonceux Castle/Place Historic Park and Garden.
- A key supplementary policy to the development strategy would be to include a substantial contribution to improving walking and cycling facilities and improving connectivity by bus between Polegate and Hailsham, and between rural areas and the main towns both within and outside the District.
To minimise the requirement for greenfield sites it may be a key part of the development strategy to identify locations where high density development would be appropriate.

Include a high level of water efficiency in new development across the District but with particular regard to development in Hailsham, Hellingly, Polegate, Willingdon and Jevington, Chidingly, Pevensey and Westham.

Option 4

The strategy could be supplemented by the requirement for contributions to support access by public transport to services in the main towns from more remote AONB settlements.

Option 5

Ensure that development in the Parish of Herstmonceux has no adverse impact on Herstmonceux Castle/Place Historic Park and Garden.

Option 7

Flood risk assessment is likely to be necessary if substantial development is proposed in Uckfield, Forest Row and the south of Wealden.

Option 10

Benefits could be improved by linking opportunities for education/skills to the benefit of both urban and rural areas.

Reasons for Selecting Options

Compliance with the SEA Directive:

The Environmental Report should provide information on: “Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with” (Article 5.1 and Annex I (h))

6.15 The following table (6.1) indicates the decisions the Council has taken in respect of the foregoing options and outlines the reasons for their selection in progressing the Core Strategy.
Table 6.1 Reasons for Selecting Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Reasons for Selecting Alternatives</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Strategic Spatial Housing Options</strong></td>
<td></td>
</tr>
<tr>
<td>Option 1</td>
<td><em>Not taken forward</em> - the option does not give due consideration to the unique character of individual settlements, the settlement hierarchy or the overall needs of the District. Does not conform to the South East Plan and does not address economic and social needs of south Wealden or environmental needs of the District.</td>
</tr>
<tr>
<td>Option 2</td>
<td><em>Selected</em> - option focuses on centres with aspirations for growth and regeneration and centres with more ability to create self-sufficient settlements with an emphasis to provide for their surrounding rural hinterland. At the strategic level takes account of environmental constraints and conservation requirements.</td>
</tr>
<tr>
<td>Option 3</td>
<td><em>Not taken forward</em> - option does not meet the north, south growth aspirations of the South East Plan and does not address economic and social needs of south Wealden. Polegate is not deemed suitable for significant growth, due to the Town Council aspirations and reflecting the limited service centre function and possibility for growth.</td>
</tr>
<tr>
<td>Option 4</td>
<td><em>Selected</em> - option performed well in consultation and is favourable due to the fundamental sustainability principles it follows in reflecting affordable housing need, accessibility and environmental concerns.</td>
</tr>
<tr>
<td>Option 5</td>
<td><em>Selected</em> - option performed well in consultation and is favourable due to the fundamental sustainability principles it follows in reflecting affordable housing need, accessibility and existing services and facilities.</td>
</tr>
<tr>
<td>Option 6</td>
<td><em>Not taken forward</em> - option does not conform with the South East Plan; further concern over delivery of the railway line and the significant quantity of growth in small settlements such as Isfield required in order to facilitate building of the line.</td>
</tr>
<tr>
<td><strong>Strategic Employment Options</strong></td>
<td></td>
</tr>
<tr>
<td>Option 7</td>
<td><em>Not taken forward</em> - the option does not give due consideration to sustainability principles of accessibility and environmental impact.</td>
</tr>
<tr>
<td>Option 8</td>
<td><em>Selected</em> - option is based upon sounder sustainability principles seeking readily accessible town and service centres where employment can be delivered at lower environmental impact and in balance with new housing growth.</td>
</tr>
<tr>
<td>Option 9</td>
<td><em>Selected</em> - option follows sustainability principle of making best use of land and buildings and can encourage the regeneration of employment areas,</td>
</tr>
</tbody>
</table>

Wealden District Council Local Development Framework

6 Plan Issues and Options

Sustainability Appraisal

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meeting the recommendations in the South East Plan and taking into account market demand and economies of scale building on existing business locations.

| Option | Selected - option would direct new jobs to locations that could help address issues of deprivation by providing new opportunities in the south of the district, while building on the success of businesses in the area e.g. Polegate. Option should meet employment needs in line with new housing growth in Hailsham and help with addressing pockets of unemployment in Crowborough. |
7 Sustainability Appraisal of the Settlement Hierarchy

Introduction

7.1 Sustainability Appraisal is an iterative process and informs and aids the process of moving from a strategic focus to a settlement focus. The next stage in developing the spatial distribution is to identify the most appropriate levels of development for the settlements in the District. For this work the towns have been considered separately from the smaller settlements and this is presented in Chapter 8. This chapter documents the methodology and appraisal of the smaller rural settlements classification.

7.2 Taking forward the principles ascertained from the SA and consultation responses of the Spatial Development Options the rural settlements in the District have been placed in a settlement hierarchy according to their accessibility and their relative self-sufficiency in terms of services and facilities. The SA was carried out on a hierarchy for settlements in the north of the District and on a hierarchy of settlements in the south based upon the Sussex Coast Sub-Region. The SA Framework was then used to determine a settlements relative sustainability for accommodating future growth.

7.3 Information that underpins the settlement hierarchy including accessibility to services and facilities and the relative public transport accessibility links with other settlements offering a range of services, facilities and employment has contributed to SA where appropriate. This has been considered alongside environmental factors including proximity to ecological conservation areas, the potential for the use of greenfield land and potential for flood risk and water quality issues. Economic data informing the SA has been based upon the presence of significant employment opportunities, business areas and tourism opportunities as well as economic indicators at the Parish level including average household income and educational attainment.

7.4 The caveat to this SA work is that it is a relatively crude assessment designed to provide a quick sustainability check of the settlement hierarchy, which in itself is based upon sustainability principles.

Results

7.5 The full results comprising the assessment matrices for each settlement can be found in SA Background Paper 3. Here is presented a summary of the results for the north and south by broad category of social, environmental and economic highlighting anomalies between the settlement hierarchy and the sustainability appraisal hierarchy and overall conclusions drawn. The SA is not intended to necessarily change the settlement hierarchy, but can indicate where new development in settlements might be required to help to deliver certain benefits either socially, economically or environmentally to mitigate local particulars.

The South

7.6 The results for the SA of the rural settlement hierarchy for the south of the District are presented in Table 7.1.
Table 7.1 SA of Settlement Hierarchy for South of the District

<table>
<thead>
<tr>
<th>Settlement Hierarchy</th>
<th>Sustainability Hierarchy</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Social</td>
</tr>
<tr>
<td>1 Stone Cross</td>
<td>1</td>
</tr>
<tr>
<td>2 Herstmonceux</td>
<td>7</td>
</tr>
<tr>
<td>3 Ninfield</td>
<td>2</td>
</tr>
<tr>
<td>4 Pevensey</td>
<td>3</td>
</tr>
<tr>
<td>5 Pevensey Bay</td>
<td>4</td>
</tr>
<tr>
<td>6 Berwick Station</td>
<td>5</td>
</tr>
<tr>
<td>7 East Dean</td>
<td>14</td>
</tr>
<tr>
<td>8 Lower Horsebridge</td>
<td>15</td>
</tr>
<tr>
<td>9 Westham</td>
<td>13</td>
</tr>
<tr>
<td>10 Hellingly</td>
<td>6</td>
</tr>
<tr>
<td>11 Magham Down</td>
<td>9</td>
</tr>
<tr>
<td>12 Windmill Hill</td>
<td>11</td>
</tr>
<tr>
<td>13 Berwick</td>
<td>16</td>
</tr>
<tr>
<td>14 Alfriston</td>
<td>17</td>
</tr>
<tr>
<td>15 Upper Dicker</td>
<td>10</td>
</tr>
<tr>
<td>16 Ripe</td>
<td>12</td>
</tr>
<tr>
<td>17 Selmeston</td>
<td>8</td>
</tr>
</tbody>
</table>

Wealden District Council Local Development Framework
Sustainability Appraisal
7.7 Anomalies between the settlement hierarchy and SA social hierarchy include East Dean, Alfriston and Upper Dicker featuring higher up the hierarchy in SA terms. This anomaly arises in part due to the positive effect for the social inclusion objective and the apparent vibrancy of these settlements coupled with a good range of services and facilities. Lower Horsebridge features lower in the SA hierarchy than the settlement hierarchy in terms of social aspects this is due to there being limited land potential for housing development, whilst there is an identified affordable housing need, coupled with a lack of health facilities, basic facilities and community facilities.

7.8 In environmental terms the SA differences with the settlement hierarchy include Windmill Hill and Selmeston featuring much higher in the SA environmental hierarchy. A reason for settlements performing better in the sustainable environmental hierarchy than the settlement hierarchy is due to proximity of settlements to sites designated for nature conservation and landscape importance and also a settlement’s resources in terms of local produce and its ability to contribute to reducing the impact of consumption of resources. Settlements that feature lower in the SA environmental hierarchy than in the settlement hierarchy are Pevensey Bay, Pevensey, Herstmonceux and East Dean. The main issues here are concerning water; waste water capacity in the case of Herstmonceux, water quality and hydrology issues for Pevensey and East Dean and flood risk for Pevensey and Pevensey Bay. The potential for greenfield land development is also a concern and biodiversity issues for Pevensey and East Dean.

7.9 Anomalies when considering the SA economic indicators include East Dean, Westham, Alfriston and Upper Dicker featuring higher in the SA economic hierarchy than the settlement hierarchy, due to the presence of business areas, a strong tourist economy and above average household income averages. Ninfield and Herstmonceux feature lower in the SA economic hierarchy due to rural prosperity concerns arising from below average household incomes.

7.10 It can be concluded that on balance the settlement hierarchy represents a broadly appropriate ranking of settlements when the issues of environment, social and economic factors are considered holistically. There are however three anomalies of note, where the SA findings indicate the settlement may be more or less sustainable relative to the others in the hierarchy.

7.11 Herstmonceux features lower down the sustainability rankings than in the settlement hierarchy, the appropriate place in SA terms would be around the 9th /10th most sustainable settlement. This ranking difference arises due to the poorer economic and environmental performance in SA terms balanced by a strong social performance due to the availability of local health and community services and facilities. The environmental performance of Herstmonceux in SA terms is scored low in part due to the wastewater treatment capacity issue, which is being resolved and could therefore be mitigated in SA terms.

7.12 Alfriston and Upper Dicker rank better in SA terms than the settlement hierarchy indicates and would feature around positions 8/9 in the SA hierarchy of settlements. Alfriston does have environmental constraints that may result in smaller development being directed to it than the social and economic conditions would imply could be
reasonable. The lack of health facilities in Upper Dicker should be a consideration when directing new development to this village. The reasons for discrepancies between the SA and Settlement hierarchies can in part be contributed to the relatively crude method of appraisal; full detailed studies of all the settlements would be required to more accurately assess their relative sustainability, which is not practicable, for this strategic level of assessment.

The North

7.13 The results for the SA of the rural settlement hierarchy for the north of the District are presented in Table 7.2 below.

Table 7.2 SA of Settlement Hierarchy for North of the District

<table>
<thead>
<tr>
<th>Settlement Hierarchy</th>
<th>Sustainability Hierarchy</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Social</td>
</tr>
<tr>
<td>1 Wadhurst</td>
<td>1 Wadhurst</td>
</tr>
<tr>
<td>2 Forest Row</td>
<td>3 Buxted</td>
</tr>
<tr>
<td>3 Buxted</td>
<td>16 East Hoathly</td>
</tr>
<tr>
<td>4 Frant</td>
<td>4 Frant</td>
</tr>
<tr>
<td>5 Mayfield</td>
<td>5 Mayfield</td>
</tr>
<tr>
<td>6 Groombridge</td>
<td>6 Groombridge</td>
</tr>
<tr>
<td>7 Hartfield</td>
<td>11 Horam</td>
</tr>
<tr>
<td>8 Maresfield</td>
<td>19 Framfield</td>
</tr>
<tr>
<td>9 Danehill</td>
<td>10 Rotherfield</td>
</tr>
<tr>
<td>10 Rotherfield</td>
<td>7 Hartfield</td>
</tr>
<tr>
<td>11 Horam</td>
<td>12 Five Ash Down</td>
</tr>
<tr>
<td>12 Five Ash Down</td>
<td>2 Forest Row</td>
</tr>
<tr>
<td>13 Isfield</td>
<td>13 Isfield</td>
</tr>
<tr>
<td>14 Little Horsted</td>
<td>17 Fletching</td>
</tr>
</tbody>
</table>
There are a few anomalies with the settlement hierarchy when considering the social aspects and this may be largely due to housing land potential and therefore the settlement potential to address affordable housing need and deliver housing. Of note East Hoathly features higher in the social sustainability hierarchy, as does Framfield, whereas Forest Row, Danehill and Maresfield do less well.

Differences with the settlement hierarchy when considering environmental objectives include Isfield, Rushlake Green and Laughton featuring higher in the sustainability hierarchy and Forest Row and Hartfield featuring considerably lower. Again settlements with no land potential do less well as they are not able to contribute to reducing flood risk (through development in areas of lowest flood risk) or making efficient use of land by prioritising brownfield sites for development.

A reason for settlements performing better in the sustainable environmental hierarchy than the settlement hierarchy is due to proximity of settlements to sites designated for nature conservation importance and also a settlement’s resources in terms of local produce and its ability to contribute to reducing the impact of consumption of resources.

Anomalies between the settlement hierarchy and SA hierarchy for economic factors include Buxted, Frant, Maresfield and Isfield featuring lower in the SA rankings, identifying...
requirements for economic mitigation, through development where appropriate to stimulate the local economies and provide more local jobs. Rotherfield and Little Horsted feature high in the SA rankings in economic terms due in part to their locally important employment opportunities.

7.18 It can be concluded that on balance the settlement hierarchy represents a broadly appropriate ranking of settlements when the issues of environment, social and economic factors are considered holistically. There are however three anomalies of note, where the SA findings indicate the settlement may be more or less sustainable relative to the others in the hierarchy. Forest Row and Maresfield both rank lower in SA terms than in the Settlement Hierarchy. Forest Row is due to its particular environmental constraints and likelihood for adverse impacts on biodiversity and due to the lack of available housing land potential and access to health facilities in social terms. Maresfield is largely due to social factors, including social exclusion and access to health and other services and facilities, opportunities therefore may exist to improve the social issues in Maresfield with appropriate new development that includes community and health facilities.

7.19 Rotherfield, Horam and East Hoathly perform well in sustainability terms and feature higher in the SA hierarchy, due to strong social and economic assessments. East Hoathly has poor environmental performance and this is due to housing land potential being identified on Greenfield land and likelihood of increased car use with new development due to poor accessibility.

Conclusions

7.20 As a quick check the SA has been able to verify that the settlement hierarchy is an appropriate way of categorising the settlements as broadly more or less sustainable and therefore appropriate in terms of directing levels of growth. It has provided a useful indication of where mitigation might be appropriate and where development could be dependent upon such mitigation being delivered. In Core Strategy terms the strategic direction of growth can to a certain extent be verified by the SA findings. This SA work can be further used to inform the production of later DPDs such as those dealing with the allocation of sites where greater detail of the type of development appropriate to settlements will be discussed.

7.21 The settlement hierarchies have been merged for the purposes of the Core Strategy Settlement Classification, which sets out the general role of individual towns and villages in Wealden as a basis for the distribution of development through the settlement hierarchy. The key elements of the settlement hierarchy that underpin the Spatial Strategy are set out in Table 7.3.
Table 7.3 The Wealden Settlement Classification

<table>
<thead>
<tr>
<th>Settlement type</th>
<th>Function</th>
<th>Towns/ villages/ hamlets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Primary Centre</td>
<td>A large accessible settlement by road and public transport with a centre containing a large range of shops, including the sale of high order goods, a range of leisure opportunities and facilities including a hospital with Accident and Emergency services. Settlement meets all its own needs.</td>
<td>Tunbridge Wells/ Tonbridge and Eastbourne (All outside of the District boundaries)</td>
</tr>
<tr>
<td>Secondary Centre</td>
<td>An accessible settlement by road and public transport containing a range of shops, including high street chains, and facilities including a hospital. Settlement meets the majority of its own needs.</td>
<td>East Grinstead and Haywards Heath (All outside of the District boundaries)</td>
</tr>
<tr>
<td>District Centre</td>
<td>An accessible settlement by road and public transport containing a range of shops, employment opportunities and facilities including secondary school. Not reliant upon other centres within the District to meet day to day needs, but requires support from other secondary or primary centres to meet needs of the residents.</td>
<td>Crowborough, Uckfield and Hailsham</td>
</tr>
<tr>
<td>Service Centre</td>
<td>Sustainable locations with a range of jobs, services and facilities, serving predominantly nearby communities and the wider rural area but with accessibility to larger centres.</td>
<td>Heathfield, Polegate, Stone Stone Cross, Wadhurst</td>
</tr>
<tr>
<td>Local service centre</td>
<td>Settlements that have a more limited supply of social and economic infrastructure and where local residents depend upon other centres to meet a broad range of needs with some form of accessibility to those centres.</td>
<td>Forest Row, Mayfield, Frant, Buxted, Herstmonceux, Ninfield, Pevensey, Pevensey Bay, Horam, Alfriston, Groombridge, Hartfield, Rotherfield, Westham</td>
</tr>
</tbody>
</table>
## Neighbourhood Centre

A settlement with limited basic or no facilities but with access to another centre or a settlement with facilities but poor accessibility or access only to a service or local centre.

| East Hoathly, Maresfield, Danehill, Rotherfield, East Dean, Five Ash Down, Berwick Station, Broad Oak, Withyham, Fletching, Nutley, Boreham Street, Laughton, High Hurstwood, Little Horsted, Isfield, Upper Dicker, Lower Horsebridge, Hellingly, Ripe, Selmeston, Magham Down, Windmill Hill, Rushlake Green, Mark Cross, Bells Yew Green, Cross in Hand, Chelwood Gate |

## Other unclassified settlements

This category covers a wide range of settlements with few or no facilities and services, and where further development would be unsustainable.

| All other settlements in Wealden |

### 7.22

On Subsequent review of the settlement hierarchy in light of updated information on services and facilities including bus services, a number of changes are proposed to the settlement classification. The changes are listed below:

- **Change:** Westham from Neighbourhood Centre to Local Service Centre
  - **Reason:** incorrect facilities recorded (Westham mixed with Pevensey)
- **Change:** Rotherfield from Neighbourhood Centre to Local Service Centre
  - **Reason:** good bus service to Tunbridge Wells and Uplands Community College
- **Change:** Bells Yew Green from unclassified to Neighbourhood Centre
  - **Reason:** on balance bus journey to Uplands Community College and Tunbridge Wells considered to be fair
- **Change:** Chelwood Gate (with Chelwood Common) from unclassified to Neighbourhood Centre
  - **Reason:** change in recorded bus frequency from 2 hourly to hourly
- **Change:** Cross in Hand from unclassified to Neighbourhood Centre
  - **Reason:** change in recorded bus frequency from 2 hourly to hourly
- **Change:** Mark Cross from unclassified to Neighbourhood Centre
- Reason: on balance bus journey to Uplands Community College and Tunbridge Wells considered to be fair

- Remove: **Framfield** from Neighbourhood Centre Classification
  - Reason: change in facilities combined with poor bus services means that settlement is unclassified

- Remove: **Berwick** from Neighbourhood Centre
  - Reason: incorrect information - assumed that Berwick Village is Berwick Station - incorrect facilities documented
7 Sustainability Appraisal of the Settlement Hierarchy
8 Sustainability Appraisal of the Plan Alternatives

Compliance with the SEA Directive:

The Environmental Report should provide information on:
“Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with” (Article 5.1 and Annex I (h))

Introduction

8.1 This chapter presents the Sustainability Appraisal of the Council’s further work on alternatives. The alternatives and options discussed in this chapter flow from the consultation and assessment of earlier options. This includes alternatives for the overall spatial distribution, the broad locations, the economic element of the strategy and affordable housing. Each area will be discussed in turn and the summary of results will be presented, whilst the full appraisal matrices can be found in SA Background Papers 4 - 7.

8.2 The approach taken to the appraisal of the broad locations has used slightly different criteria to that described in the methodology chapter. This was in order to facilitate the SA being undertaken in consultation as a group exercise. It also recognises that the phased development of locations over time/the plan period can result in movement towards or away from the achievement of the SA Objectives in broad/strategic terms. The criteria used are presented in the table below (8.1).

Table 8.1 Criteria used for the Assessment of the Broad Locations

| Option moving towards achievement of SA Objective | Option moving away from achievement of SA Objective |
| Unknown: depend on how option will be implemented | Neutral: no relationship with SA Objective |

8.3 The structure for the rest of this chapter will be as follows: presentation of a summary of the results will be next: firstly the SA for the overall spatial distribution, followed by the SA of the broad locations, then the economic alternatives and lastly the alternatives for affordable housing. After the results are presented the decisions taken on which alternatives go forward into the Plan will be discussed and the reasons for the selection or rejection of alternatives will be made clear.
8.4 There are two initial scenarios for testing based upon the housing figures allocated by the South East Plan: Scenario A reflects the South East Plan distribution and Scenario B is a contingency if infrastructure testing, prior to submission, shows that the south of the District is unable to accommodate the quantum of growth stipulated in the South East Plan. This work was carried out in early 2010.

8.5 The distribution of housing in Scenario A is based on the South East Plan distribution of 7000 dwellings in the south of the District and 4000 dwellings in the north of the District. In the north, growth would be focused at Uckfield in recognition of its relatively limited environmental constraints and good accessibility by rail and road. In the south, development would be focused on Hailsham, Polegate and Stone Cross.

8.6 If the Scenario can be delivered, performance against the social objectives would be positive as the provision of new housing will meet identified housing needs. In focusing delivery on major service centres in the south where deprivation levels are highest for the District such provision offers the potential to reduce social exclusion, deprivation and inequalities by improving people’s access to quality services and living environments. There are concerns that this distribution would not actually be deliverable over the whole life of the plan as wastewater and highway infrastructure capacity issues may prevent the full allocation for Hailsham, Stone Cross, Polegate and Willingdon being achieved and also concerns are raised as to whether the market could deliver such quantities of growth at Hailsham. Land values around the southern and south eastern side of Hailsham could present additional issues for delivering the proposed distribution of Scenario A. Furthermore the concentration of development in the south could result in opportunities for improving services and facilities in the rural settlements being lost.

8.7 Performance against environmental objectives is inevitably adverse as such quantities of development results in potentially significant impacts on natural resources including direct land take, demand for water and energy, the generation of waste, greenhouse gases and additional traffic on the road network. There may be some benefits of Scenario A compared to Scenario B for the Ashdown Forest SPA and the High Weald AONB due to less development directed to the north of the District. The distribution figures in both Scenario A and Scenario B would result in mitigation requirements for impacts on the Ashdown Forest SPA as highlighted by the Habitat Regulations Assessment.

8.8 In terms of the economic objectives the scenarios do not detail the distribution of new employment floorspace. Focusing the majority of new housing development in the south of the District provides good access to employment centres such as Eastbourne and Brighton. In terms of delivering new employment, a lack of opportunities has raised further questions over the ability to deliver Scenario A. The scenario may result in exacerbating the employment situation in the north of the District particularly the pattern of out commuting to work.
8.9 The distribution of housing in Scenario B reflects a contingency approach if infrastructure testing prior to submission, shows that the south of the District is unable to accommodate the quantum of growth stipulated in the South East Plan. In Scenario B, 1,000 more housing units would be directed to the north of the District.

8.10 Performance against the social objectives is improved by this distribution as it would seem at this stage of infrastructure testing that there is a greater certainty of delivering this scenario over the lifetime of the Plan. This is due to the lower levels proposed for the south of the District and greater opportunities to address social exclusion on a wider scale, particularly in rural areas through the ability to improve services and facilities and accessibility for rural residents.

8.11 Performance against environmental objectives is inevitably adverse as such quantities of development results in potentially significant impacts on natural resources including direct land take, demand for water and energy, the generation of waste, greenhouse gases and additional traffic on the road network. Adverse effects for Scenario B are likely to be greater as more development will be directed within proximity to the Ashdown Forest SPA and within the High Weald AONB. Although this last point regarding the AONB should be largely mitigated through the careful positioning of development and the design and quality of materials used, performance in this category has positive aspects in relation to facilitating access to quality countryside for more people.

8.12 In terms of the economic objectives the scenarios do not detail the distribution of new employment floorspace. Focusing the majority of new housing development in the south of the District provides good access to employment centres such as Eastbourne and Brighton. With a greater proportion of development directed to rural service centres in Scenario B, this could help to support and enhance local settlement centres as well. The detailed assessment can be found in SA Background Paper 4.

8.13 Scenario C emerges as a result of more detailed infrastructure testing and assessment of risk and the emergence of the Infrastructure Delivery Plan, as well as the results of the SA of Scenarios A and B and ongoing work on the Appropriate Assessment. Whereas Scenarios A and B look at alternative distributions to fit 11,000 new dwellings into the District, which is not supported by infrastructure capacity or environmental constraints, Scenario C seeks to maximise housing delivery within acknowledged capacity constraints and directs growth to areas of need and with local aspiration. Scenario C therefore seeks to distribute development based on local issues for settlements, which totals 9,600. In sustainability terms this approach would be more beneficial overall as it places less pressure on environmental resources on infrastructure and on communities and is evidence-based at a local level using the most up to date evidence. The detailed Sustainability Appraisal of Scenario C, for the purposes of this report is presented in Background Paper 8 as policy WCS 2 and WCS 6 as this is the final distribution.

Broad Locations for the Towns

8.14 The results for the SA of the Broad Locations for the towns are presented, by town, in the tables below summarised by SA Objective. This is presented as a comparative analysis summary, identifying the differences between the broad locations in terms of
predicted impacts on the SA Objectives. The indication of the development capacity of the broad locations was derived from the SHLAA (March 2010) and may have subsequently been subject to change as detailed in the addendum dated October 2010. The SA of the broad locations as identified in the Wealden Core Strategy is contained within the individual assessments presented in SA Background Paper 5.

Figure 8.1 SA of the Broad Locations for Development in Uckfield

Table 8.2 SA of Broad Locations for Uckfield

<table>
<thead>
<tr>
<th>SOCIAL OBJECTIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home</td>
</tr>
<tr>
<td>There is a continued and high demand for affordable housing in Uckfield. In terms of deliverability of the locations for housing and therefore the opportunity to move towards achieving this objective the central, eastern and western locations offer the best potential individually due to their proximity and connectivity to central services. The southern area could offer significant potential if considered holistically as part of a major urban extension providing new neighbourhoods complete with new services and facilities. The northern locations offers the least potential due to deliverability constraints and dislocation from the town.</td>
</tr>
<tr>
<td>Improve the health and well being of the population</td>
</tr>
<tr>
<td>The assessment of the locations in relation to achieving this objective will largely depend upon the implementation in each case, with the exception of the town centre location which should deliver benefits due to it's ability to place more people in close proximity to central health facilities. There is pressure for new and upgraded GP facilities in Uckfield and the smarter use of provision, therefore it would seem sensible to explore opportunities to make better use of/direct improvements to the community hospital near</td>
</tr>
</tbody>
</table>
the eastern location for example. The western location would offer good access to recreational green space and sporting facilities.

**Promote social inclusion and create/ sustain vibrant communities**
The central and western locations provide good potential to move toward achieving this objective through their ability to strengthen the vibrancy of the town centre community and link into this community that has good accessible opportunities for all. The northern and southern communities have been assessed as moving away from achieving this objective through their relative isolation, not being well related to existing communities and their inability to improve community cohesion to any significant degree. Pockets of isolation in the eastern area and poor transport links along the Framfield Road reduce the ability of the eastern broad area to deliver improved social cohesion and connectivity to the town. A footbridge would be an essential requirement in terms of mitigation for this location.

**To ensure a safe environment including reducing crime and the fear of crime**
No significant issues have been identified for the locations in relation to crime and the fear of crime - all new development should be designed with the mind to design out opportunities for crime and to reduce the fear of crime. In particular where new connectivity is being considered and new pedestrian and cycle links are to be created safety of users will be an important factor.

**To provide accessible and high quality public services and facilities**
It has been determined that all locations would have the ability to some degree to move toward this objective depending upon the implementation of development and how new services, facilities and links to existing may be provided through a particular scheme. Mitigation measures in terms of improving accessibility particularly for the eastern location would be required.

**ENVIRONMENTAL OBJECTIVES**

**To reduce the risk of flooding and the consequential damage to property and public well being**
The developable areas within the broad locations and the associated approximate dwelling numbers for each location are wholly within Flood Zone (FZ) 1 and do not include any land in FZ 2 or FZ 3. Due to the strategic nature of the Core Strategy and the identification of broad areas there will be land within the broad area as a whole that may lie in FZ 2 or FZ3, however this is not proposed for new housing development. Such land could however be used for biodiversity improvements, flood alleviation, open space etc. Therefore flood risk will not be a major feature in site comparison.

**Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities**
The only location to use brownfield land is the town centre location - all others would involve development on greenfield land. The town centre location is also the only location where high density development may be appropriate.
### Reduce air pollution and ensure local air quality continues to improve

Generally speaking development and particularly the scale of development being identified for Uckfield would not reduce air pollution per se. Opportunities to reduce the likelihood of raising pollution levels can be identified for the town centre and western locations in the delivery of mixed use developments. The proximity of the broad locations to public transport and a number of facilities, which reduces the need to travel by car will help limit the increase in emissions from travel. The congestion in the Framfield Road area could be heightened if the eastern location is developed and this could have an impact on local air quality in this area of the town.

### Reduce emissions of greenhouse gases

Development will not reduce overall emissions of greenhouse gases. Mitigate through sustainable construction, energy/thermal efficiency, renewable energy.

### Conserve and enhance the biodiversity of the District

The central location has the least direct biodiversity loss due to its urban location - consideration could still be given to attracting biodiversity and linking areas of wildlife as well as improving the ecological status of the River Uck in this area. The south eastern location is near to an SNCI and mitigation should be considered to ensure no detrimental affects to this site. The areas to the south and west of Uckfield all have pockets of ancient woodland that would need to be preserved and the biodiversity value of greenfield land that would be lost. The potential for increased recreational pressure on the Ashdown Forest would require mitigation.

### Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment

The central, northern and eastern locations have no significant landscape constraints in terms of visual impacts, though the northern area does include a buffer for the historic Buxted Park and helps maintain a gap between settlements. The southern areas have no major landscape issues and present opportunities to improve the fringe between countryside and development. The western location does have landscape issues being that it is on higher ground and is visually separated from the town. There are excellent opportunities for green infrastructure provision around the southern side of Uckfield; if the areas from east to west encompassing the south were to be considered holistically green infrastructure provision could be extensive and linked.

### Reduce the need to travel by car and promote alternative methods of transport

Only central and western locations can realistically move towards this objective through the ability to deliver car free development (central), and good connectivity with services, facilities and employment. The western location offers good potential to link in with main line bus services. The northern, eastern and southern locations would be likely to encourage car use through their proximity to the road network as well as their means of linking to the town centre. Mitigation should be considered including green travel plans, particularly where employment provision is being considered and traffic management measures where appropriate; emphasis on cycle and footpaths should made and improving bus links into and out of town.
**Sustainability Appraisal**

Wealden District Council Local Development Framework

<table>
<thead>
<tr>
<th>Minimise waste, maximise the re-use of materials, recycling and composting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minimise waste through sustainable construction techniques, sustainable waste management opportunities should be maximised in all new development opportunities.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency</th>
</tr>
</thead>
<tbody>
<tr>
<td>There are no major issues for groundwater and surface water quality; in all cases it is likely that land will need to be set aside for swales and balancing ponds for SuDS as ground conditions are likely to be unsuitable for infiltration.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Promote energy efficiency measures and encourage the use of renewable energy</th>
</tr>
</thead>
<tbody>
<tr>
<td>All new development will need to ensure energy efficiency standards in line with building regulations and opportunities for renewable energy should be maximised.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sustainable construction techniques should help contribute to this objective.</td>
</tr>
</tbody>
</table>

### ECONOMIC OBJECTIVES

<table>
<thead>
<tr>
<th>Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy</th>
</tr>
</thead>
<tbody>
<tr>
<td>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, further assessment may be undertaken when site-specific detail is proposed through subsequent DPDs.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Promote sustainable tourism</th>
</tr>
</thead>
<tbody>
<tr>
<td>Not directly related to the assessment of broad locations for Uckfield.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Ensure high and stable levels of employment and provide support for small firms and local businesses</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central, southern and western locations provide good opportunities to deliver new employment facilities to support a range of jobs that meets local need, the western location has particularly good links with the neighbouring industrial estates. The northern and eastern locations are not suitable to support the delivery of employment premises. The nearby Ashdown Business Park could help form part of the employment strategy for Uckfield through the improvement of cycle links as well as the provision of serviced plots.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Develop and maintain a skilled workforce to support long term competitiveness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Similar to the above objective the central, southern and western locations have the potential to move towards this objective through the implementation of development. Education facilities and information regarding proposals for improved facilities will be informed by ESCC. The northern and eastern locations would appear to have less potential to move toward this objective.</td>
</tr>
</tbody>
</table>
Stimulate regeneration of town centres
The central and western locations have potential to help stimulate the regeneration of the town centre, particularly the central location. Regeneration of the town centre is an important part of enhancing the service centre role of Uckfield. All other locations are too far removed to significantly move towards achieving this objective.

Develop a dynamic, diverse, and knowledge based economy
Next generation broadband has been assessed and Uckfield has the best potential in the district for full coverage by 2017. Development will need to ensure implementation includes broadband connectivity and other requirements for knowledge-based high tech economy and to facilitate work from home.

Figure 8.2 SA of the Broad Locations for Development in Heathfield

Table 8.3 SA of Broad Locations for Heathfield

<table>
<thead>
<tr>
<th>SOCIAL OBJECTIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure that everyone has the opportunity to live in a good quality, sustainably</td>
</tr>
<tr>
<td>constructed and affordable home</td>
</tr>
<tr>
<td>There is a high housing demand in Heathfield for both market and affordable housing.</td>
</tr>
<tr>
<td>There has been no provision of affordable housing over the last few years.</td>
</tr>
<tr>
<td>The northeastern location raises question over deliverability and marketability of</td>
</tr>
<tr>
<td>the location for housing development, visual impacts may also make this location</td>
</tr>
<tr>
<td>difficult to deliver. The locations to the west and northwest could help to move</td>
</tr>
<tr>
<td>toward this objective though the implementation will determine how much of the</td>
</tr>
<tr>
<td>areas could be developed for housing.</td>
</tr>
<tr>
<td>Improve the health and well being of the population</td>
</tr>
<tr>
<td>The northeastern area is more isolated from the community and health facilities</td>
</tr>
<tr>
<td>being severed by the main road and a busy junction, the topography furthermore</td>
</tr>
<tr>
<td>makes the area feel dislocated from the town. The western and northwestern locations are well located to central GP and health services.</td>
</tr>
</tbody>
</table>
**Promote social inclusion and create/ sustain vibrant communities**
There is no obvious potential for the northeastern location to strengthen the community. The west and northwestern locations are in closer proximity to the town centre and with implementation focused on community cohesion there are opportunities to create benefits for Heathfield.

**To ensure a safe environment including reducing crime and the fear of crime**
No significant issues have been identified for the locations in relation to crime and the fear of crime - all new development should be designed with the mind to design out opportunities for crime and to reduce the fear of crime.

**To provide accessible and high quality public services and facilities**
The northwestern area has good access to the community centre on the edge of the town and a pub, recreation and play area and school and is also on the bus route. The northwestern location has good connectivity with the town and opportunity to improve links to central services. The western location has possible accessibility issues due to the sloping topography of the area.

**ENVIRONMENTAL OBJECTIVES**

**To reduce the risk of flooding and the consequential damage to property and public well being**
No significant issues for flood risk.

**Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities**
All the broad locations would result in the use of greenfield land.

**Reduce air pollution and ensure local air quality continues to improve**
New development in the countryside on the edge of the town, which has relatively poor public transport links is not likely to help reduce air pollution as car travel is likely to increase – consider ways of implementing development that closely links with services and facilities in close proximity.

**Reduce emissions of greenhouse gases**
Development will not reduce overall emissions of greenhouse gases. Mitigate through sustainable construction, energy/thermal efficiency, renewable energy.

**Conserve and enhance the biodiversity of the District**
The northeastern location is adjacent to a SSSI and an area of ancient woodland and development here would therefore potentially not be moving toward achieving this objective. The western location is also close to ancient woodland and implementation would need to conserve this. The northwestern site is not directly adjacent to any conservation designations although there will be a biodiversity value to the area and mitigation should be considered to retain wildlife links where possible.
### Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment

The northeastern area is visually prominent in the landscape and forms a buffer zone to the adjacent registered park. The western location may provide opportunities to improve the fringe edge to the AONB and is less sensitive in landscape terms than the alternative locations, with good potential for access to quality countryside. The northwestern location is reasonably sensitive in landscape terms and mitigation would need to be considered to lessen the potential impacts.

### Reduce the need to travel by car and promote alternative methods of transport

Heathfield lacks the public transport connections necessary to cater for travel demand to destinations further a field such as access to the rail network and key employment/retail centres such as Eastbourne and Tunbridge Wells. The location to the northeast would be likely to encourage car use as it is not well related to the town centre. The western and northwestern areas may be able to reduce adverse impacts through enhancing connectivity with the town centre and by delivering a mix of uses.

### Minimise waste, maximise the re-use of materials, recycling and composting

Minimise waste through sustainable construction techniques, sustainable waste management opportunities should be maximised in all new development opportunities.

### Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency

The locations in the north east and north west drain into ancient and ghyll woodland, which will be sensitive to changes in water quality and quantity. There are a number of springs that could be adversely affected in the north western location. It is likely that land will need to be set aside for swales and balancing ponds with all three locations.

### Promote energy efficiency measures and encourage the use of renewable energy

All new development will need to ensure energy efficiency standards in line with building regulations and opportunities for renewable energy should be maximised.

### Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products

Sustainable construction techniques should help contribute to this objective.

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**ECONOMIC OBJECTIVES**

### Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy

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, further assessment may be undertaken when site-specific detail is proposed through subsequent DPDs.

### Promote sustainable tourism

Not directly related to the assessment of broad locations for Heathfield.
Ensure high and stable levels of employment and provide support for small firms and local businesses
There is not a significant need for employment space in Heathfield, nonetheless the suitability of areas must be considered for delivering employment uses. The west and northwestern locations may offer potential to deliver employment floorspace as part of mixed use schemes. The northeastern location is well related to the employment area to the north, though it may not be appropriate to extend employment in this area.

Develop and maintain a skilled workforce to support long term competitiveness
Maybe some potential to support local workforce requirements in each of the areas.

Stimulate regeneration of town centres
The northeastern area is too far removed from the town centre to stimulate regeneration. The western and northwestern locations offer some regeneration potential with good links to the town centre.

Develop a dynamic, diverse, and knowledge based economy
Maybe some potential to deliver employment premises that encourage knowledge based and high tech industries and home working with all the locations.

Figure 8.3 SA of the Broad Locations for Development in Crowborough

Table 8.4 SA of Broad Locations for Crowborough

<table>
<thead>
<tr>
<th>SOCIAL OBJECTIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home</td>
</tr>
<tr>
<td>There is a need for family housing in Crowborough both affordable and market. The central, north and northeastern locations offer good potential to move toward this</td>
</tr>
</tbody>
</table>
improve the health and well being of the population
All locations would offer good potential to move toward achieving this objective either through their proximity to health facilities, leisure, sport or open/green space.

promote social inclusion and create/sustain vibrant communities
The central location has good potential to improve the vibrancy and vitality of the town centre. The northern location is well located to sports and leisure facilities and has reasonable access to the town centre therefore it offers opportunities for promoting community vibrancy. The southern location, whilst removed from the town centre is well located to the neighbourhood centre of Jarvis Brook and has potential to provide further facilities and contribute to maintaining the vibrancy of the community.

to ensure a safe environment including reducing crime and the fear of crime
No significant issues have been identified for the locations in relation to crime and the fear of crime - all new development should be designed with the mind to design out opportunities for crime and to reduce the fear of crime.

to provide accessible and high quality public services and facilities
The locations all have potential for improving access to services through good connectivity with the town centre and/or opportunities to deliver new facilities. Development of the north eastern location should require the development of new facilities to compensate the comparatively poor connectivity to existing services and facilities.

ENVIRONMENTAL OBJECTIVES

To reduce the risk of flooding and the consequential damage to property and public well being
There are no major issues with flood risk for the Crowborough locations; the southern area has an unclassified watercourse, which would need to be retained with suitable buffer strips.

Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities
Southeast and central locations would deliver development on previously developed land, which is in line with the Plan Objective for Crowborough.

Reduce air pollution and ensure local air quality continues to improve
The train station and public transport links to the south of the town mean that new development in the south and southeast locations could be focused on green travel priorities in order to help to reduce future air pollution. There will be a need to ensure no increase in congestion, which can cause an increase in air pollution. Central locations have good opportunity to reduce the need to travel by car and help reduce future air pollution, the northern and northeastern locations will need to mitigate their potential
impacts through the creation of good sustainable transport links with the town centre including cycle ways and footpaths.

### Reduce emissions of greenhouse gases
Development will not reduce overall emissions of greenhouse gases. Mitigate through sustainable construction, energy/thermal efficiency, renewable energy.

### Conserve and enhance the biodiversity of the District
The north and northeastern locations have ancient woodland in proximity which will need to be retained and the central location has ancient and ghyll woodland. There is an indication that there have been records of some protected species in proximity of the southern location and an EIA would provide further confirmation and mitigation. Potential for increased recreational pressure on the Ashdown Forest would require mitigation.

### Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment
All the locations offer good potential for development that does not adversely affect the landscape and offer opportunities to improve visual aspects and links with the surrounding countryside for access by residents. Ensure central location development adds a positive contribution to the townscape.

### Reduce the need to travel by car and promote alternative methods of transport
Southeastern, southern and central locations offer the potential to reduce the need to travel due to their proximity to sustainable transport modes, facilities and services. The northeastern location could have the reserve effect and encourage use of the car due to its proximity to the road network and links to Tunbridge Wells. The northern location may have potential to mitigate this aspect through improving connections with the town centre.

### Minimise waste, maximise the re-use of materials, recycling and composting
Minimise waste through sustainable construction techniques, sustainable waste management opportunities should be maximised in all new development opportunities.

### Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency
Land may need to be set aside for SuDS for swales and balancing ponds if ground condition are unsuitable to support infiltration SuDS.

### Promote energy efficiency measures and encourage the use of renewable energy
All new development will need to ensure energy efficiency standards in line with building regulations and opportunities for renewable energy should be maximised.

### Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products
Sustainable construction techniques should help contribute to this objective.
## Economic Objectives

**Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy**

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, further assessment may be undertaken when site-specific detail is proposed through subsequent DPDs.

**Promote sustainable tourism**

There is a Plan Objective for Crowborough to promote High Weald tourism; it is not considered likely that the broad locations would significantly affect this Plan or SA Objective.

**Ensure high and stable levels of employment and provide support for small firms and local businesses**

Developing a mix of uses as part of comprehensive development schemes can be a preferred method of ensuring vibrant communities which support and ensure high and stable levels of employment. All the locations have some potential to contribute to achieving this objective. The north location is more limited in potential, the northeast and the south broad areas have perhaps the greatest potential to deliver significant employment floorspace, subject to transport constraints and provide for small firms and local businesses. The central location is optimised for high density employment facilities.

**Develop and maintain a skilled workforce to support long term competitiveness**

The development of substantial locations in and around towns can be a real opportunity to maintain a skilled workforce and support the long term competitiveness of a town. The northeast location has good access to education as well as potential to improve the employment offer; the southern, southeast and central locations have good proximity to and connectivity with employment areas and the potential to improve the vibrancy of the employment areas.

**Stimulate regeneration of town centres**

The central location is the only broad location to have been assessed as having potential to stimulate regeneration of the Town Centre, this may be achieved through the development of new employment facilities, housing provision and contributions to improving public realm and connectivity.

**Develop a dynamic, diverse, and knowledge based economy**

Most locations have the potential to create employment spaces that promote take up for knowledge-based and high tech low impact industries or facilitate work from home opportunities through improved broadband and phone connectivity.
Figure 8.4 SA of the Broad Locations for Development in Stone Cross

Table 8.5 SA of Broad Locations for Stone Cross

<table>
<thead>
<tr>
<th>SOCIAL OBJECTIVES</th>
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<tbody>
<tr>
<td><strong>Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home</strong></td>
</tr>
<tr>
<td>The eastern and northern locations have been assessed as presenting the best opportunity to deliver market and affordable housing. The western location maybe more appropriate for employment, but does have potential to deliver housing depending upon other sustainability and plan objectives. The southeastern location is constrained by landscape issues, which raises questions over the deliverability of all the broad area for new housing.</td>
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</table>

<table>
<thead>
<tr>
<th><strong>Improve the health and well being of the population</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>The southeastern location has the best access to health facilities based at Langney. The north location is in close proximity to the road network which could affect health - implementation should focus on maximising health benefits.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Promote social inclusion and create/ sustain vibrant communities</strong></th>
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<tbody>
<tr>
<td>The western location would not strengthen community vibrancy or reduce social exclusion as much as the other areas. The northern location has good connectivity with the settlement centre and offers good potential to create a more cohesive community. Development of the eastern location would need to focus on enhancing community vibrancy to overcome its geography at the edge of the settlement. The southeastern location has strong associations with the Langney centre to the south and could contribute to the regeneration of Langney.</td>
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<table>
<thead>
<tr>
<th><strong>To ensure a safe environment including reducing crime and the fear of crime</strong></th>
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</thead>
<tbody>
<tr>
<td>No significant issues have been identified for the locations in relation to crime and the fear of crime - all new development should be designed with the mind to design out opportunities for crime and to reduce the fear of crime.</td>
</tr>
</tbody>
</table>
To provide accessible and high quality public services and facilities
Northern and southeastern locations have good connectivity with neighbourhood centres which provide a range of services and facilities. Other locations have less potential to provide good connectivity to services and facilities, mitigation may include the provision of new facilities.

ENVIRONMENTAL OBJECTIVES

To reduce the risk of flooding and the consequential damage to property and public well being
No flood risk issues have been identified.

Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities
All the broad locations would result in the use of greenfield land.

Reduce air pollution and ensure local air quality continues to improve
All locations raise air pollution issues due to the topography of the area and the proximity to the road network. Good public transport links to Eastbourne help to mitigate this aspect but all new development in the area should focus on reducing future air pollution through enhancing public transport links, walking and cycling routes.

Reduce emissions of greenhouse gases
Development will not reduce overall emissions of greenhouse gases. Mitigate through sustainable construction, energy/thermal efficiency, renewable energy.

Conserve and enhance the biodiversity of the District
All locations would deliver development on greenfield land so there will be some loss in biodiversity, however there are no significant biodiversity constraints other than for the eastern location which includes pockets of ancient woodland. Would need to ensure that development of the southeastern location does not adversely affect the ecology of the Eastbourne Levels.

Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment
East and southeastern locations raise landscape issues when considering new development, this may reduce the developable area to facilitate the inclusion of buffer zones and edging techniques. Good access to the countryside will be achievable. Northern and western locations may offer less potential for access to the countryside.

Reduce the need to travel by car and promote alternative methods of transport
Good public transport links with Eastbourne mean all locations have excellent potential to promote modes of transport other than the car (particularly bus), and this will be important in mitigating the good access to the road network.
### Minimise waste, maximise the re-use of materials, recycling and composting
Minimise waste through sustainable construction techniques, sustainable waste management opportunities should be maximised in all new development opportunities.

### Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency
In all cases ground conditions are unlikely to support infiltration for SuDS so land will need to be set aside for swales and balancing ponds. There would be a need to ensure there is no reduction in water quality of surface water run-off and drainage into the Eastbourne Levels and further that there is no increase in run-off levels.

### Promote energy efficiency measures and encourage the use of renewable energy
All new development will need to ensure energy efficiency standards in line with building regulations and opportunities for renewable energy should be maximised.

### Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products
Sustainable construction techniques should help contribute to this objective.

### ECONOMIC OBJECTIVES

#### Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy
Growth in the towns can help support and enhance the prosperity of the district, this has been assessed in higher level options, further assessment may be undertaken when site-specific detail is proposed through subsequent DPDs. Stone Cross has good transport links and is well placed in terms of the strategic road network, which make a strong case for helping to support the prosperity of the District.

#### Promote sustainable tourism
This objective is not directly related to the assessment of the broad locations for Stone Cross.

#### Ensure high and stable levels of employment and provide support for small firms and local businesses
The only location to positively address this objective is the western location due to its relationship with employment floorspace along the Dittons Road area and good access to the road network and A27, important for business. Other locations would not be suitable for the delivery of new employment facilities.

#### Develop and maintain a skilled workforce to support long term competitiveness
In terms of contributions to meeting this objective the western and southeastern locations may help through providing employment opportunities and ability to maintain a skilled workforce respectively. The southeastern location has good access to Eastbourne schools and could help deliver regeneration to Langney.
Stimulate regeneration of town centres
The northern and southeastern locations have potential to help stimulate regeneration of neighbourhood centres.

Develop a dynamic, diverse, and knowledge based economy
Only the western location offers potential to deliver opportunities for high tech and knowledge based industries. Other locations could ensure new housing receives good connectivity for broadband and communications to facilitate home-working and home-based businesses.

Figure 8.5 SA of the Broad Locations for Development in Polegate

Table 8.6 SA of Broad Locations for Polegate

<table>
<thead>
<tr>
<th>SOCIAL OBJECTIVES</th>
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</thead>
<tbody>
<tr>
<td>Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home</td>
</tr>
<tr>
<td>The east Willingdon broad location offers good potential to deliver a significant quantity of new housing. There may be marketability issues for the northern location due to proximity to the road and industrial areas as well as multiple ownership.</td>
</tr>
<tr>
<td>Improve the health and well being of the population</td>
</tr>
<tr>
<td>Potential for adverse effects from the northern location due to road noise and isolation from community and existing concerns over the health facilities in the north of Polegate. The east Willingdon location offers good potential to positively address this objective through new leisure, open space and health facilities, plus the location is near to the proposed new GP services in Willingdon, the playing fields and recreational space.</td>
</tr>
<tr>
<td>Promote social inclusion and create/ sustain vibrant communities</td>
</tr>
<tr>
<td>Both locations have the opportunity to positively affect this objective, the northern location should capitalise on opportunities to improve the living environment and deliver new</td>
</tr>
</tbody>
</table>
services and facilities. The east Willingdon location offers good potential for the provision of a comprehensive community with new facilities; this area also has good links to Polegate and Willingdon.

**To ensure a safe environment including reducing crime and the fear of crime**
Anecdotal evidence of perception of safety issues in the north of the town. All new development should be designed with the mind to design out opportunities for crime and to reduce the fear of crime.

**To provide accessible and high quality public services and facilities**
The northern area is severed by the railway and presents limited opportunities to deliver new services and facilities; area would need to overcome issues of links to existing facilities. The east Willingdon location offers good potential for the provision of a comprehensive community with new facilities; this area also has good links to Polegate and Willingdon.

### ENVIRONMENTAL OBJECTIVES

**To reduce the risk of flooding and the consequential damage to property and public well being**
The developable areas within the broad locations and the associated approximate dwelling numbers for each location are wholly within FZ 1 and do not include any land in FZ 2 or FZ 3. Due to the strategic nature of the Core Strategy and the identification of broad areas there will be land within the broad area as a whole that may lie in FZ 2 or FZ3, however this is not proposed for new housing or employment development. Such land could however be used for biodiversity improvements, flood alleviation, open space etc. Numerous unclassified watercourses exist in both broad locations and these will need to be retained and buffered.

**Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities**
All the broad locations would result in the use of greenfield land.

**Reduce air pollution and ensure local air quality continues to improve**
The east Willingdon location presents specific concerns over the potential for increased use of the wider strategic highway network and associated potential for congestion and air pollution.

**Reduce emissions of greenhouse gases**
Development will not reduce overall emissions of greenhouse gases. Mitigate through sustainable construction, energy/thermal efficiency, renewable energy.

**Conserve and enhance the biodiversity of the District**
There are no significant biodiversity constraints, however watercourses will require protection and there are historic records of protected species on the northern site - Environmental Impact Assessment at the project level would confirm their presence and propose mitigation at the planning application stage.
**Conserve, enhance and make accessible for enjoyment, the District’s countryside**
(in particular protecting the best and most versatile agricultural land), landscape, historic and built environment

Landscape Assessment shows that the east Willingdon broad location has a greater potential to accommodate new development and both have good potential for improving access to the countryside.

**Reduce the need to travel by car and promote alternative methods of transport**
Both areas have good potential for promoting sustainable transport with excellent links to Eastbourne and for the northern area to Hailsham; both have good access to the train station. Ensure opportunities for cycle and footpath links are maximised.

**Minimise waste, maximise the re-use of materials, recycling and composting**
Minimise waste through sustainable construction techniques, sustainable waste management opportunities should be maximised in all new development opportunities.

**Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency**
The northern location would need to consider the long term attenuation requirements for water quality purposes; there are also a number of watercourses across the area that would need to be retained and buffered and where possible their water quality enhanced. The east Willingdon location may have potential attenuation considerations for run-off to the Willingdon Levels and land will need to be set aside for swales and balancing ponds.

**Promote energy efficiency measures and encourage the use of renewable energy**
All new development will need to ensure energy efficiency standards in line with building regulations and opportunities for renewable energy should be maximised.

**Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products**
Sustainable construction techniques should help contribute to this objective.

**ECONOMIC OBJECTIVES**

**Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy**

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, further assessment may be undertaken when site-specific detail is proposed through subsequent DPDs.

**Promote sustainable tourism**
Not directly related to the assessment of the broad locations for Polegate.

**Ensure high and stable levels of employment and provide support for small firms and local businesses**
Neither area would be well suited to employment provision through new employment floorspace, particularly the northern location. There is some limited potential for sensitive
Develop and maintain a skilled workforce to support long term competitiveness
The east Willingdon location may offer better potential to deliver new school places/facilities and has good links to Eastbourne.

Stimulate regeneration of town centres
Northern location may adversely affect this objective as the association with the town centre is weak. For east Willingdon broad area opportunities exist for improving the environmental character of the area linking to the town centre with the possibility of recreational/leisure/cultural provision.

Develop a dynamic, diverse, and knowledge based economy
Potential land availability for low impact employment floorspace which may be suitable for high tech and knowledge based industries. Ensure new development has opportunities for communications and broadband to facilitate home-based work and businesses.

Figure 8.6 SA of the Broad Locations for Development in Hailsham

Table 8.7 SA of the Broad Locations for Hailsham

<table>
<thead>
<tr>
<th>SOCIAL OBJECTIVES</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ensure that everyone has the opportunity to live in a good quality, sustainably constructed and affordable home</td>
</tr>
<tr>
<td>Northern and eastern locations present the better opportunities for new housing delivery, the northern area has the higher land values and may be more attractive to developers so there may be some mitigation required to ensure the eastern location with excellent connectivity potential to the town centre is not unduly overlooked. The eastern location has an issue surrounding odour from the wastewater treatment works as well as possible</td>
</tr>
</tbody>
</table>
requirement for piling due to ground conditions, which could make the area less attractive for development from a marketing and financial perspective. The potential to extend the southern location to the east should be explored in order to make this location more viable. The southeastern location may have potential but will need to overcome contamination and lower land values which may affect viability.

**Improve the health and well being of the population**
The northern area shows the best potential for beneficial effects on this objective, due to potential to deliver new health facilities and open space as well as links to the new development at Hellingly Hospital that includes sports facilities, a community hall and cycle ways. The east and southeast locations could adversely affect the health objective (if not mitigated to reduce this nuisance) due to the significant odour issues that would likely affect new residents on a prolonged basis and could further add stigma issues. The southern area is not well related to existing health facilities, though if additional area is suitable a larger development opportunity may arise which could deliver new health facilities.

**Promote social inclusion and create/ sustain vibrant communities**
Odour issues aside (which may cause isolation through stigmatisation), the eastern locations proximity to the town centre offers good potential to strengthen community cohesion and offer some regeneration of the more deprived area of Hailsham East. The north and southeast location are both located some distance from the town and in the north isolated by virtue of the A271. Development of the northern area could be mitigated through the 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. The southern location offers lower potential for delivering new facilities and making new residents feel part of the community and may adversely affect this objective.

**To ensure a safe environment including reducing crime and the fear of crime**
No significant issues have been identified for the locations in relation to crime and the fear of crime - all new development should be designed with the mind to design out opportunities for crime and to reduce the fear of crime.

**To provide accessible and high quality public services and facilities**
North and east location should have beneficial effects on this objective through delivering a new neighbourhood centre and creating good links to the town respectively. Southern location may adversely effect this objective as a small area not well connected to the town would result in increasing the number of people removed from services and facilities.

**ENVIRONMENTAL OBJECTIVES**

**To reduce the risk of flooding and the consequential damage to property and public well being**
The developable areas within the broad locations and the associated approximate dwelling numbers for each location are wholly within FZ 1 and do not include any land in FZ 2 or FZ 3. Due to the strategic nature of the Core Strategy and the identification
of broad areas there will be land within the broad area as a whole that may lie in FZ 2 or FZ3, however this is not proposed for new housing development. Such land could however be used for biodiversity improvements, flood alleviation, open space etc. Unclassified watercourses on all locations would need to be retained and buffered.

**Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities**

All the broad locations would result in the use of greenfield land except the southeastern area which has potential to remediate former brownfield land.

**Reduce air pollution and ensure local air quality continues to improve**

The northern and southern locations could have significant adverse affects on the objective to reduce air pollution. Development of the northern location due to the potential scale and distance from the town centre could encourage car use, even when mitigated through the creation of a new neighbourhood centre. The east and southeast locations have the potential to reduce future air pollution through their proximity to the town centre and opportunities for encouraging sustainable modes of transport. However these areas do suffer from odour issues, which is air pollution of a kind, and mitigation measures are likely to be required in order to fully develop these areas.

**Reduce emissions of greenhouse gases**

Development will not reduce overall emissions of greenhouse gases. Mitigate through sustainable construction, energy/thermal efficiency, renewable energy.

**Conserve and enhance the biodiversity of the District**

Proximity of the Pevensey Levels is a concern for the Hailsham locations impacts on the hydrology and dependent ecology will need to be minimised or eliminated, the northern and southern locations have pockets of ancient woodland and any development in these areas should seek to conserve this. The Cuckoo trail in the south presents opportunities for enhancing the green corridor.

**Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment**

The Landscape Assessment shows the east and southeast locations are particularly sensitive in terms of visual impacts due to their visibility from the low-lying Pevensey Levels; they are also less able to deliver good access to the countryside due to the restricted access across much of the Pevensey Levels. Northern area is less visually impacting according the Landscape Assessment and the southern area is relatively sensitive.

**Reduce the need to travel by car and promote alternative methods of transport**

Northern and southern locations offer good proximity to the road network and could therefore encourage travel by car; the northern area might be mitigated to some extent by the provision of mixed use development and a good range of services and facilities including employment opportunities. The east and southeastern locations do not encourage travel by car in the same way due to their proximity to the town centre and
the nature of the road network in this location therefore they offer potential to enhance links to the town centre and encourage sustainable modes of transport.

**Minimise waste, maximise the re-use of materials, recycling and composting**
Minimise waste through sustainable construction techniques, sustainable waste management opportunities should be maximised in all new development opportunities.

**Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency**
Potential for adverse impacts on water quality through development of the eastern and southeastern locations due to wastewater treatment capacity issues for discharge and due to locations proximity to the Pevensey Levels - long term attenuation for water quality may be necessary and greater land take will be needed than for traditional SuDS systems. The northern and southern locations are also affected by wastewater treatment capacity issues and attenuation requirements, but may be less impacting on the Pevensey Levels.

**Promote energy efficiency measures and encourage the use of renewable energy**
All new development will need to ensure energy efficiency standards in line with building regulations and opportunities for renewable energy should be maximised.

**Reduce the global, social and environmental impact of consumption of resources by using sustainably produced and local products**
Sustainable construction techniques should help contribute to this objective.

### ECONOMIC OBJECTIVES

**Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy**
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, further assessment may be undertaken when site-specific detail is proposed through subsequent DPDs.

**Promote sustainable tourism**
Not directly related to the assessment of broad locations for Hailsham.

**Ensure high and stable levels of employment and provide support for small firms and local businesses**
All locations bar the southern location have the potential to beneficially address this objective through the provision of employment floorspace as part of a mixed use development scheme.

**Develop and maintain a skilled workforce to support long term competitiveness**
If new employment opportunities are delivered through a mix use scheme this can help maintain a skilled work - need to ensure provision of a range of employment premises that meets local and anticipated need. The southern location may not be able to support the delivery of employment and may not contribute to securing the long term competitiveness of the town.
Stimulate regeneration of town centres
Only the eastern location offers the potential to stimulate regeneration of the town centre with good links possible to any new development in this area.

Develop a dynamic, diverse, and knowledge based economy
All locations should ensure new development facilitates broadband connectivity and good communications for knowledge-based, high tech industries and home working.

Economic Alternatives

8.15 The following options have been generated and assessed under an Adopted South East Plan regime, which sought to generate a step-change in economic growth in the Sussex-Coast Sub-Region to tackle deprivation and under performance in the economy in this area. The options for employment growth are therefore separate for the north and south of the District recognising the South East Plan division of the area into Sussex Coast sub-region and the north of the District. The starting point for the SA in assessing the options is that they are all realistic and achievable options. The options are derived from the evidence base and particularly the Employment Land Review, which was reviewed in light of changes in the economy since its first publication. The full appraisal can be found in Background Paper 6. The options and summary SA are as follows:

8.16 For the north:

- **Option 1:** Maintain current balance (New ELR Base Case). Broadly maintain the current balance between the number of workers in the District and the number of jobs i.e. seek to match the growth in the number of workers in the District with the growth in the number of jobs by allocating an additional 14,544sqm of employment floorspace

8.17 Option is supportive of the economic SA Objectives and should have a beneficial effect, however the effect may not be significant in terms of enhancing prosperity and supporting the rural economy and vitality of villages as growth in employment floorspace is limited to that required to support employment opportunities aligned with growth in workers. As such this may not address existing unemployment issues or the issue of residents seeking jobs outside the District, furthermore the employment needs of people moving into the District as a consequence of new housing growth may not be met within the District. The option does not appear to be preparing for growth in the economy and may not be sufficient to support growth in the rural economy and vibrancy of villages. The option may not sufficiently conform with the Plan and the South East Plan objectives to generate economic growth as the option is really maintaining the status quo in light of new housing growth, though this in itself may boost the economy to some extent.

- **Option 2:** Promote past higher growth trends in the North (past completion rates). Promote a high rate of economic growth through the allocation of an additional 44,452sqm of employment floorspace reflecting the past completions rate (1997-2004), experienced during a time of strong growth in the local and regional economy.
As long as the viability of delivering such a quantum of growth is there and associated infrastructure agreed then this option should provide wide economic and employment benefits for the north of the District and should help support the villages and rural economy as well as the towns. Such a quantum of new employment floorspace could help to encourage entrepreneurial activity, business activity and inward investment. There are adverse implications for the environmental objectives as likely increases in greenhouse gas emissions, use of greenfield land and vehicle movements would occur. Option is supportive of the Plan Objective to encourage economic growth and in line with the South East Plan aspirations to encourage a strong economy.

- **Option 3**: Encourage a moderate economic step change (Scenario A): Aim to encourage a step change in economic growth through reducing the employment growth rate gap by half (by increasing employment growth from 0.47% to 0.645% per annum), increase the resident economic activity rate to the SEEDA target (from 82% to 85%), and reduce the unemployment so that the gap with the South East average is halved (from 6.6% to 5.2% of the economic active resident population) through the provision of an additional 21,636sqm employment floorspace.

As long as the viability of delivering such a quantum of growth is there and associated infrastructure then this option should provide wide economic and employment benefits for the north of the District and should help support the villages and rural economy as well as the towns. Such a quantum of new employment floorspace could help to encourage entrepreneurial activity, business activity and inward investment. Option will have potential for less significant environmental effects than option 2 due to the smaller quantum of growth. Option is supportive of the Plan Objective to encourage economic growth and in line with the South East Plan aspirations to encourage a strong economy.

- **Option 4**: Encourage a more radical economic step change (Scenario B) Aim to encourage a step change in economic growth through closing the employment growth rate gap (by increasing employment growth from 0.47% to 0.82% per annum, a 75% improvement on the base case), increase the resident economic activity rate to the SEEDA target (from 82% to 85%), and close the unemployment gap with the South East average (from 6.6% to 3.8% of the economic active resident population) through the provision of an additional 39,051sqm employment floorspace.

As long as the viability of delivering such a quantum of growth is there and associated infrastructure then this option should provide wide economic and employment benefits for the north of the District and should help support the villages and rural economy as well as the towns. Such a quantum of new employment floorspace could help to encourage entrepreneurial activity, business activity and inward investment. There are adverse implications for the environmental objectives as likely increases in greenhouse gas emissions, use of greenfield land and vehicle movements would occur. Option is supportive of the Plan Objective to encourage economic growth and in line with the South East Plan aspirations to encourage a strong economy.

- **Option 5**: Alternative Base Case - Reflecting latest job forecasts on the basis of the SEP housing allocations (Cambridge Scenario 2). An alternative base case scenario using the latest Cambridge Econometric job forecasts and different floorspace ratios
from the ELR (taken from SEEPB advice) to determine floorspace requirements. Assumes 'business as usual' through allocating an additional 4,662sqm of employment floorspace.

8.21 Option may have little or no significant events for the short and medium term of the Plan, however over the long term and toward the end of the Plan period there may be some significant adverse effects for social and economic objectives, as new housing growth will have out-paced employment growth and this could lead to a rise in unemployment and associated deprivation issues. Option is unlikely to encourage inward investment or provide the necessary incentive for new business formation and local small business expansion. The option is unlikely to have significant effects on the environmental objectives, except on prioritising brownfield land, where the option is likely to be delivered largely on brownfield land. Option does not conform to aspiration for economic growth as identified by the Plan Objective or the South East Plan.

- **Option 6**: Based on the original 'business as usual' base case, prior to inclusion of adopted SE Plan housing allocations. (Original ELR base case) Option based on the original ELR 'business as usual' base case but does not reflect any Policy ambitions of the SE Plan, nor does it include the increase in housing numbers of 600 units to 4,000 units total in the north following the adoption of the South East Plan. This option seeks the additional provision of 10,011sqm floorspace.

8.22 Option may have little or no significant events for the short and medium term of the Plan, however over the long term and toward the end of the Plan period there may be some significant adverse effects for social and economic objectives, as new housing growth will have out-paced employment growth and this could lead to a rise in unemployment and associated deprivation issues. Option is unlikely to encourage inward investment or provide the necessary incentive for new business formation and local small business expansion. Option does not conform to aspiration for economic growth as identified by the Plan Objective or the South East Plan.

8.23 For the south:

- **Option 1**: Maintain current balance (New ELR Base Case). Broadly maintain the current balance between the number of workers in the District and the number of jobs i.e. seek to match the growth in the number of workers in the District with the growth in the number of jobs by allocating an additional 23,606sqm of employment floorspace.

8.24 Option is supportive of the economic SA Objectives and should have a beneficial effect, however the effect may not be significant in terms of enhancing prosperity and inducing economic regeneration, supporting the rural economy and improving the vitality of villages as growth on employment floorspace is limited to that required to support employment opportunities aligned with new housing growth. The option is not necessarily preparing for growth in the economy and may not be sufficient to support growth in the rural economy and vibrancy of villages. Potential for the gap in economic performance to widen between the south and north of the District and for the south of the District to further fall behind the economic growth rates of the south east region. Option is not conforming
to the South East Plan requirement for economic regeneration of the Sussex Coast sub-region.

- **Option 2:** Encourage a moderate economic step change (Scenario A)
  Aim to encourage a step change in economic growth through reducing the employment growth rate gap by half (by increasing employment growth from 0.47% to 0.645% per annum), increase the resident economic activity rate to the SEEDA target (from 82% to 85%), and reduce the unemployment so that the gap with the South East average is halved (from 6.6% to 5.2% of the economic active resident population) through the provision of an additional 22,480sqm employment floorspace.

8.25 Option is supportive of the economic SA Objectives and should have a beneficial effect, however the effect may not be significant in terms of enhancing prosperity and inducing economic regeneration, supporting the rural economy and improving the vitality of villages as growth on employment floorspace is limited to that required to support employment opportunities aligned with new housing growth. The option is not necessarily preparing for growth in the economy and may not be sufficient to support growth in the rural economy and vibrancy of villages. Potential for the gap in economic performance to widen between the south and north of the District and for the south of the District to further fall behind the economic growth rates of the south east region. Option is not conforming the South East Plan requirement for economic regeneration of the Sussex Coast sub-region.

- **Option 3:** Encourage a more radical economic step change (Scenario B)
  Aim to encourage a step change in economic growth through closing the employment growth rate gap (by increasing employment growth from 0.47% to 0.82% per annum, a 75% improvement on the base case), increase the resident economic activity rate to the SEEDA target (from 82% to 85%), and close the unemployment gap with the South East average (from 6.6% to 3.8% of the economic active resident population) through the provision of an additional 35,960sqm employment floorspace.

8.26 Option presents an opportunity to put economic growth central to the strategy for the south of the District and could encourage inward investment and in-migration of skilled workers. The assessment naturally assumes the viability of such an option is realistic, but further detail as to the phasing and application of such a new quantum of employment floorspace would add certainty to the assessment findings. Mitigation would be required in terms of sustainable transport infrastructure, particularly ensuring good cycle and pedestrian links between town centres and edge of town employment sites and quality bus routes. Adverse impacts on the Pevensey Levels will need to be avoided and quality habitat and landscape buffering will need to be maintained. Conforming with South East Plan policy aspirations for economic regeneration of the Sussex Coast sub-region.

- **Option 4:** Alternative Base Case - Reflecting latest job forecasts on the basis of the SEP housing allocations (Cambridge Scenario 2). An alternative base case scenario using the latest Cambridge Econometric job forecasts and different floorspace ratios from the ELR (taken from SEEPB advice) to determine floorspace requirements. Assumes 'business as usual' through allocating an additional 14,700sqm of employment floorspace.
8.27 Option may have little or no significant events for the short and medium term of the Plan, however over the long term and toward the end of the Plan period there may be some significant adverse effects for social and economic objectives, as new housing growth will have out-paced employment growth and this could lead to a rise in unemployment and associated deprivation issues. Option is unlikely to encourage inward investment or provide the necessary incentive for new business formation and local small business expansion. Option does not conform to aspiration for economic growth and the economic regeneration of the Sussex Coast sub region as envisaged by the South East Plan.

- **Option 5**: Based on the original 'business as usual' base case, prior to inclusion of adopted SE Plan housing allocations. (Original ELR base case) Option based on the original ELR 'business as usual' base case but includes Eastbourne requirements and provision in the south also. Does not reflect any Policy ambitions of the SE Plan re economic change in the Sussex Coast Sub-region, nor does it reflect the increase in housing numbers of 2,400 units to 7,000 units total in the south following the adoption of the South East Plan. This option seeks the additional provision of 47,140sqm floorspace. (About 12,000sqm to Wealden)

8.28 Option may not contribute to the social or economic objectives. Planning for economic growth below that of new housing growth to lead to increased unemployment and associated social deprivation issues including poorer health and well-being, increased crime rates and social exclusion. In economic terms the south could become further separated from the north of the District in prosperity and economic competitiveness. Potential for the gap in economic performance to widen between the south and north of the district and for the south of the district to further fall behind the economic growth rates of the south east region. Option is not conforming the South East Plan requirement for economic regeneration of the Sussex Coast sub-region.

Affordable Housing

8.29 The options and SA for affordable Housing have been revised in light of the revocation of the South East Plan. The options are derived for the percentage of affordable housing and for the threshold at which affordable housing would be required. The detailed appraisal can be found in Background Paper 7. The options for affordable housing and summary SA are as follows:

**Percentage**

- **Option 1**: (Current approach) 30% of dwellings will be in the affordable category which should comprise around 25% subsidised housing to rent and around 5% shared ownership or discounted market housing, the exact proportions of which will be determined on a site by site basis.

8.30 Current policy is not delivering affordable housing on the smaller sites, particularly within the towns. The Housing Viability Study shows that higher percentages of affordable housing are viable and achievable and the Housing Needs Study shows justification for a higher level of requirement. Option does not maximise opportunities to deliver higher
proportions of affordable housing in areas of the District where this is viable. Concern whether it will deliver sufficient affordable housing over the Plan period to significantly address the affordable housing need and the SA Objective to ensure everyone has the opportunity to live in an affordable home.

- **Option 2**: Council will seek to secure affordable housing as follows: Within the areas defined (Housing Viability Assessment) as Hailsham and Rural South and Eastbourne Fringe and Polegate - 35% will be sought and elsewhere 40%. Site Allocations may be higher. Of total affordable provision 80% social rented.

8.31 The option presents an improvement in sustainability terms compared to option 1, this is due to the requirement for affordable dwellings being increased from 30% to 35% for southern areas of the District and 40% for the rest of Wealden. In recognising the economic and affordability disparities between the north and the south of the District the option should present a more tailored approach to provision throughout the District and remain viable. This approach is more in line with the findings of the HMA and the Housing Viability Study.

- **Option 3**: Council will seek to secure affordable housing as follows: Within the areas defined (Housing Viability Assessment) as Hailsham and Rural South and Eastbourne Fringe and Polegate - 35% will be sought and elsewhere 40%, rural areas and specified settlements 50%. Site Allocations may be higher. Of total affordable provision 80% social rented.

8.32 The option presents an improvement in sustainability terms compared to option 1 and 2, this is due to the requirement for affordable dwellings being increased from 30% to 35% for the south of the District and 40% for the rest of Wealden, a further increase to 50% is identified for the rural areas and within specified rural settlements (more information will subsequently provide for more detailed assessment). In recognising the economic and affordability disparities between the north and the south and between the towns and the rural settlements of the District the option should present a more tailored approach to provision throughout the District and remain viable. This approach is more in line with the findings of the HMA and the Housing Viability Study.

- **Option 4**: 35% across the district, with flexibility for Site Allocations to tailor requirements on a site-by-site basis. 80% social rented.

8.33 The option provides a potentially more realistic approach to affordable housing provision across the District, which is not governed by postcode lines which may be subsequently open to challenge. This more straightforward option will provide the baseline expectation for delivery across the District with the ability of certain sites to provide more being explored at the Site Allocations stage. As expected the option would be beneficial for the social objectives and help to support some economic objectives. The ability to deliver this option is reasoned to be greater than with other options and less open to difficulties in its administration.

8.34 Options two and three could offer the best potential to maximise affordable housing provision if the Housing Viability Study market analysis is still relevant and if the
demarcation of the District stands up to scrutiny. Option 3 however would need the rural area and settlements defined and such a policy could be more complex to administer and further open up potential disputes as to where the boundaries should be. Option 4 may offer a more realistic and achievable approach less susceptible to challenge. Recent permissions for sites around Hailsham are showing that 35% is not currently viable on these sites, however the SA would not advise lowering the threshold as viabilities are in constant flux, the affordable housing need is high and the plan period is until 2030. Furthermore the flexibility in Options 2, 3 and 4 that Site Allocations may alter the requirement on a site-by-site basis allows the best approach to be taken as more detailed appraisal and viability work is undertaken.

Threshold

8.35 It is not considered realistic to test a threshold of 0 as the administrative requirements for processing every application for affordable housing would be too onerous and not financially viable for the Council to operate. Therefore the following options are considered realistic and are tested for sustainability.

- **Option A:** (current approach) A threshold of 10 or more dwellings for the towns of Crowborough, Uckfield, Heathfield, Hailsham and Polegate and a threshold of 3 or more dwellings elsewhere.

8.36 Evidence is showing that this approach is not delivering sufficient affordable housing, particularly it is not maximising opportunities to deliver affordable housing within the town parishes. If this approach continues the housing need will continue to rise and there could be significant issues in the long term for housing needs, health, well being and social exclusion and deprivation.

- **Option B:** A threshold of 10 or more dwellings for the towns of Crowborough, Uckfield, Heathfield, Hailsham and Polegate and a threshold of 0 or more dwellings elsewhere.

8.37 Option is not maximising opportunities to deliver affordable housing within the town parishes. There should be more scope to achieve higher levels of affordable housing delivery in the rural areas with this option but not all additional potential will be realised on site as the smallest sites may not be viable to deliver on site.

- **Option C:** A threshold of 5 across the District.

8.38 Option should provide an opportunity to deliver a greater amount of affordable housing within the towns and maximise opportunities for provision on smaller sites. The situation for the rural areas is less clear as the option raises the existing threshold from 3 to 5 and the evidence regarding residential completions does not distinguish between sites of 3 and 5. It is likely however that sites of between 3 and 5 may not deliver the affordable component on-site due to viability reasons. It may be assumed therefore that the slight increase in the rural threshold would not unduly limit the provision of affordable housing, whilst the reduction in the threshold for towns from 10 to 5 would significantly increase the amount of affordable housing that could be delivered.
8.39 Option C offers the best potential to maximise affordable housing delivery on sites across the District. Options A and B would not address the current problem of high affordable housing need or capture provision on the higher proportion of sites in town parishes.

Reasons for Selecting or Rejecting Alternatives

Compliance with the SEA Directive:

The Environmental Report should provide information on:
“Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme” and give “an outline of the reasons for selecting the alternatives dealt with” (Article 5.1 and Annex I (h))

8.40 Prior to the announcement of the revocation of Regional Spatial Strategies in July 2010, the Sustainability Appraisal considered two strategic distributions of growth. Scenario A followed the South East Plan distribution of 7000 dwellings to south Wealden (within the Sussex Coast Sub Region) and 4000 to north Wealden. Scenario B redistributed a proportion of the housing growth from south Wealden to north Wealden. This alternative was required due to concerns regarding the deliverability of 7000 dwellings to south Wealden. The deliverability of both Scenario A and Scenario B were in the process of being tested, and strategies developed, at the time of the announcement of the revocation of the South East Plan. The outstanding infrastructure issues are contained within the LDF Sub Committee Report of 7th July 2010. Since the revocation further assessment was undertaken based on the emerging evidence base, as a result of this information a third option (Scenario C) was developed, which seeks to match growth with infrastructure capacity and meet the aspirations and needs of our local communities. Table 8.8 indicates all three options for the strategic spatial distribution of housing and the reason for selecting options. Table 8.9 indicates which options the Council selected for the broad locations, the economic strategy and affordable housing.

Table 8.8 Options Selected and the Reasons

<table>
<thead>
<tr>
<th>Option</th>
<th>Reason for Selecting Options</th>
</tr>
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<tbody>
<tr>
<td>Scenario A (South East Plan Distribution)</td>
<td>Not taken forward - Scenario A is in accordance with South East Plan, however infrastructure testing has shown that there is not the infrastructure capacity or likelihood of delivery in the Plan period of the infrastructure necessary to support the distribution of this quantum of growth. Furthermore there are additional concerns over the environmental impact of the delivery of this distribution with issues for the impacts on the Pevensey Levels if appropriate wastewater infrastructure cannot be supported. Realism in terms of the marketability</td>
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</table>
Reason for Selecting Options

<table>
<thead>
<tr>
<th>Option</th>
<th>Reason for Selecting Options</th>
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<tr>
<td>of such a quantum of new growth over such a timescale, particularly for the Hailsham area further compounds the concern over this Scenario.</td>
<td></td>
</tr>
<tr>
<td>Scenario B (Alternative to South East Plan Distribution)</td>
<td><strong>Not taken forward</strong> - Scenario B reflected initial concerns regarding deliverability in south Wealden, with particular regard to transport infrastructure in south Wealden and the ability of the market to deliver in Hailsham. Further work on infrastructure capacity testing and the Infrastructure Delivery Plan has shown that this distribution would not be achievable within the Plan period without significant risk to the Pevensey Levels Ramsar site due to wastewater infrastructure capacity and the risk of delivery of alternative wastewater infrastructure. Furthermore the distribution does not reflect local circumstances in north Wealden in terms of capacity for employment provision to support housing growth and environmental constraints including the Ashdown Forest SPA and SAC.</td>
</tr>
<tr>
<td>Scenario C (Infrastructure capacity-led Alternative)</td>
<td><strong>Selected</strong> - Scenario C distributes growth in line with acknowledged infrastructure capacity and is realistic in terms of the likelihood of the provision of new infrastructure to support growth. This distribution places less pressure on resources both environmental and social and enables a more realistic balance of housing growth with employment provision. Broadly in line with Parish responses to requirements for new growth it should meet the needs of local communities. The predicted environmental effects for this Scenario are less adverse than for Scenario A or B and the selection of this option is therefore more likely to achieve the vision for Wealden of protecting and enhancing the essential rural character and high quality environment.</td>
</tr>
</tbody>
</table>

Table 8.9 Options Selected and the Reasons

<table>
<thead>
<tr>
<th>Option</th>
<th>Reason for Selecting Options</th>
</tr>
</thead>
<tbody>
<tr>
<td>Broad Locations Uckfield</td>
<td><strong>Not taken forward</strong> - option would not deliver appropriate opportunities to meet the regeneration aspirations of Uckfield. Its distance from the existing population, community and facilities does not make this location practicable for enhancing social inclusion and providing for the wider community of Uckfield.</td>
</tr>
</tbody>
</table>
### Centre
**Selected** - option presents good opportunity to deliver development on previously developed land, making best use of land and buildings, to 'kick start' the regeneration of the area and benefit the wider community and provides excellent accessibility to the main services and facilities of the town.

### East
**Not taken forward** - option presents a location that has reasonable links to the town centre when mitigated by the essential requirement of a footbridge linking the area closest to the town with the main heart of the town. However, evidence has not been provided that the legal issues preventing the provision of such mitigation have been overcome. Issues surrounding traffic impacts would need further investigation and mitigation. Concern is raised regarding the ability of the area to accommodate employment growth as required in Uckfield, due to the highway network at Framfield Road and within the Town Centre. Notwithstanding the need to provide employment, as part of mixed used development, a stand alone urban housing extension in this general location is not considered to be as able, compared to other locations, to meet wider community needs or foster social cohesion due to its geographical location and separation from the wider community.

### Southeast
**Not taken forward** - Concerns over the distance of the location to the town centre and its ability to deliver regeneration; further concern over the propensity of any new development here to be car dominated. Mitigation in the form of the provision of new neighbourhood facilities, but this may not provide for Uckfield as a whole.

### South
**Not taken forward** - Concerns over the distance of the location to the town centre and its ability to deliver regeneration; further concern over the propensity of any new development here to be car dominated. Mitigation in the form of the provision of a new neighbourhood facilities could be achieved, but this may not provide for Uckfield as a whole.

### West
**Selected** - the option presents good opportunity for connectivity with the town centre and the industrial estate and new and existing employment opportunities. The location is such that a comprehensive mixed use scheme would be achievable, enabling employment uses alongside residential, community and leisure uses. Location offers potential to incorporate green infrastructure links and to assist with the regeneration of Uckfield town centre and wider communities. Mitigation in the form of landscape buffering and in eliminating odour issues may be required.

### Broad Locations Heathfield

### Northeast
**Not taken forward** - option raises concern over its physical dislocation from the town centre and its ability to incorporate development into the Heathfield community. Further concern with this option over the possible adverse environmental impacts on the SSSI to the south.
West | **Not taken forward** - option is well located in relation to the town centre providing opportunities for good connectivity. The option offers relatively minimal landscape impacts. Transport implications were subsequently assessed and the area deemed unsuitable.

Northwest | **Selected** - option is well located in relation to the town centre providing opportunities for good connectivity. The option offers relatively minimal landscape impacts.

**Broad Locations Crowborough**

North | **Contingency** - option will remain as the first contingency in order to remain flexible if the southern location cannot be delivered. Area is within the AONB, though relatively close to local centre with good transport links by bus and car to Tunbridge Wells.

Northeast | **Not taken forward** - Option is within the AONB and a relative distance from the town centre, although with good transport links by bus and car to Tunbridge Wells. Option would not benefit the regeneration of the town centre and is not in close proximity to the Jarvis Brook Secondary Centre.

Southeast | **Selected** - options presents opportunity to deliver development on previously developed land in line with the Plan Objective for Crowborough, location is wholly outside AONB. Option is in close proximity to the train station and neighbourhood centre at Jarvis Brook.

South | **Selected** - option is accepted but at a limited scale due to potential traffic impact upon the road network in the area. Option is outside AONB and has relatively good proximity to the train station and neighbourhood centre at Jarvis Brook.

Centre | **Selected** - option presents the opportunity to develop on previously developed land in line with the Plan Objective for Crowborough, to stimulate regeneration in Crowborough and deliver wider benefits for the communities of Crowborough. New development would be well placed for access to the main services and facilities available in Crowborough. Option is outside the AONB.

**Broad Locations Stone Cross**

West | **Selected** - option is within walking distance of Stone Cross Centre with links to Polegate and Dittons Road.

North | **Selected** - option is in close proximity to the centre of Stone Cross and existing population presenting opportunities for enhancing social inclusion. Option may need to deliver neighbourhood facilities to benefit the wider community of Stone Cross.
### 8 Sustainability Appraisal of the Plan Alternatives

<table>
<thead>
<tr>
<th>Broad Locations</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>East</strong></td>
<td>Selected - option would deliver an extension to the existing development area with good links to existing communities and opportunities to enhance social inclusion. Mitigation may be required in the form of landscape buffer zones and to ensure no adverse effects on the Eastbourne Levels.</td>
</tr>
<tr>
<td><strong>Southeast</strong></td>
<td>Selected - option is in close proximity to the well established community of Langney, which has community, employment and retail facilities and development here may help to encourage the regeneration of the area and improve social cohesion and vibrancy. Mitigation for potential adverse landscape impacts and adverse impacts on the Eastbourne Levels will be required.</td>
</tr>
<tr>
<td><strong>North</strong></td>
<td>Selected - option has potential to deliver employment to meet local needs. Concerns over the relative suitability of the option to deliver new housing growth due to difficulties in pedestrian connectivity and lack of opportunities to deliver wider community benefits including improved social cohesion and vibrancy.</td>
</tr>
<tr>
<td><strong>South Polegate &amp; East Willingdon</strong></td>
<td>Selected - option presents greater opportunity for connectivity with Polegate and Willingdon and to deliver wider community benefits including in the delivery of new leisure and recreation facilities as part of green infrastructure provision. Concern over potential for increased traffic congestion and mitigation may be necessary through means in addition to good pedestrian connectivity.</td>
</tr>
<tr>
<td><strong>Hailsham</strong></td>
<td>Selected - option presents a good opportunity for substantial development with new neighbourhood centre to benefit the wider population. Concern over potential traffic impact and localised flood risk - further research in these area will be necessary in order to master plan any development.</td>
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<table>
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<tr>
<th>Broad Locations</th>
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<tbody>
<tr>
<td><strong>North</strong></td>
<td>Selected - option is well located in relation to the town centre and presents good opportunity to positively impact on the regeneration of Hailsham and to provide benefits for the wider community including for social cohesion and community vibrancy. Mitigation will be required to eliminate odour issues and investigations into this and into necessary ground works will be required.</td>
</tr>
<tr>
<td><strong>Southeast</strong></td>
<td>Not taken forward - concerns over delivery due to relatively low land values and potential odour mitigation requirements and accessibility. Broad location is located on rural and residential roads with current poor accessibility to Hailsham Town Centre. The lack of provision of public transport in this area could affect the connectivity of the area.</td>
</tr>
</tbody>
</table>
### Economic Strategy

| South | Not taken forward - option is isolated from the town centre and doesn't meet the social objectives of the existing population and Hailsham town. Small location would not deliver a comprehensive development for Hailsham.
|
| North | **Selected** - offers a reasonable range of potential new floorspace that is achievable to deliver, balanced with proposed new housing growth whilst offering some potential for encouraging entrepreneurial activity, local business expansion and attracting some inward investment. |
| North | Not taken forward - uncertainty over deliverability. |
| North | **Selected** - offers a reasonable range of potential new floorspace that is achievable to deliver, balanced with proposed new housing growth whilst offering some potential for encouraging entrepreneurial activity, local business expansion and attracting some inward investment. |
| North | Not taken forward - uncertainty over deliverability. |
| North | Not taken forward - inability to deliver beneficial effects for the economic and social SA Objectives. Such a low quantum of planned new floorspace, compared to the proposed level of new housing growth could result in issues in the long-term of rising unemployment, reduced opportunities for business and a decline in the prosperity of the district. |
| North | Not taken forward - inability to deliver beneficial effects for the economic and social SA Objectives. Such a low quantum of planned new floorspace, compared to the proposed level of new housing growth could result in issues in the long-term of rising unemployment, reduced opportunities for business and a decline in the prosperity of the district. |
| South | **Selected** - broadly appropriate levels of employment floorspace that could contribute to beneficial effects for the social and economic SA Objectives. The level of employment floorspace associated with this option may not deliver the radical economic step change envisaged by the South East Plan, but the economic situation has changed somewhat since the Plan was written and higher levels of floorspace may not be viable in today's market conditions and for the life span of Core Strategy. |
| South | **Selected** - broadly appropriate levels of employment floorspace that could contribute to beneficial effects for the social and economic SA Objectives. The level of employment floorspace associated with this option may not deliver the radical economic step change envisaged by the South East Plan, but the economic situation has changed somewhat since the Plan was written. |
### South Option 3
- **Not taken forward** - Option is not over the life span of this Plan period considered deliverable due to the current economic and market conditions.

### South Option 4
- **Not taken forward** - likelihood over the long term that an under provision of employment floorspace could lead to a rise in unemployment and a decline in prosperity and this in an area already identified as under performing economically and with high levels of deprivation relative to the rest of the district and the south east as a whole.

### South Option 5
- **Not taken forward** - Option is not over the life span of this Plan period considered deliverable due to the current economic and market conditions.

### Affordable Housing

<table>
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<tr>
<th>Option</th>
<th>Description</th>
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<tbody>
<tr>
<td><strong>Option 1</strong></td>
<td><strong>Not taken forward</strong> - not currently delivering high enough volumes of affordable housing, particularly smaller sites within towns are not contributing to the supply of affordable housing.</td>
</tr>
<tr>
<td><strong>Option 2</strong></td>
<td><strong>Not taken forward</strong> - although flexible and with good potential to maximise affordable housing gain, the division of the district is flawed in places and doesn't offer a robust enough policy option.</td>
</tr>
<tr>
<td><strong>Option 3</strong></td>
<td><strong>Not taken forward</strong> - complex and over-burdensome to deliver.</td>
</tr>
<tr>
<td><strong>Option 4</strong></td>
<td><strong>Selected</strong> - a more robust policy option to improve affordable housing provision, with flexibility for greater gains on allocated sites in future documents.</td>
</tr>
<tr>
<td><strong>Option A</strong></td>
<td><strong>Not taken forward</strong> - approach is not delivering sufficient affordable housing, particularly it is not maximising opportunities to deliver affordable housing within the town parishes.</td>
</tr>
<tr>
<td><strong>Option B</strong></td>
<td><strong>Not taken forward</strong> - would not maximise opportunities to deliver affordable housing within the town parishes.</td>
</tr>
<tr>
<td><strong>Option C</strong></td>
<td><strong>Selected</strong> - opportunity to deliver a greater amount of affordable housing within the towns and maximise opportunities for provision on smaller sites.</td>
</tr>
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</table>

### Any Proposed Mitigation Measures

8.41 Mitigation measures have been identified for consideration in policy formulation and lower tier options generation. They are listed below:

- Uckfield Centre: make best use of land and buildings, to ‘kick start’ the regeneration of the area
- Uckfield West: landscape buffering and eliminating odour issues
Stone Cross North: neighbourhood facilities to benefit the wider community
Stone Cross East: landscape buffer zones and water and contamination management to minimise impact on Pevensey Levels
Stone Cross Southeast: landscape buffer zones and water and contamination management to minimise impact on Pevensey Levels
South Polegate & East Willingdon: pedestrian connectivity and Green Travel Plan
Hailsham East: eliminate odour issues and carry out ground works investigations
Employment Options North 1 and 3 and South 1 and 2:
  - Remain flexible in the quantum of floorspace proposed that should market conditions improve over the Plan period the higher level of delivery can be achieved
  - Focus on redevelopment of underused industrial and employment areas to maximise brownfield land use and minimise new Greenfield land requirements
  - Opportunities to deliver a wider range of floorspace including retail, tourism, community and leisure uses could be used in place shaping to deliver benefits to communities
  - Create strong links by public transport and cycle and pedestrian ways between employment areas and nearby residential communities and town centres
  - Consider how the delivery of employment floorspace can be achieved in town centres to help stimulate their regeneration
  - Consider ways to minimise waste from construction and operation of new employment floorspace and ensure new development incorporates re-use, recycling and composting opportunities where possible
  - Encourage industries that have a strong environmental focus and seek to build sustainable buildings, maximising green energies
8 Sustainability Appraisal of the Plan Alternatives
9 Sustainability Appraisal of the Plan Policies

Introduction

9.1 This next chapter presents the summary findings of the SA of the Submission Core Strategy Development Plan Document. The Policies and Strategies that make up the Core Strategy DPD have been informed by all the preceding work on objectives and options testing through the SA process. They have been progressed in light of a local evidence base, which includes infrastructure testing. The outcome in policy and strategy terms is now subject to SA to understand the sustainability implications of the Plan as a whole.

9.2 The Plan Policies and Spatial Strategies are listed below:

- WCS 1 - Provision of homes and jobs 2006-2030
- WCS 2 - Distribution of Housing Growth
- WCS 3 - Distribution of Employment and Retail
- WCS 4 - Strategic Development Areas (not subject to SA)
- WCS 5 - Managing the release of housing land (not subject to SA)
- Town Strategies:
  - Crowborough
  - Heathfield
  - Uckfield
  - Hailsham / Hellingly
  - Polegate / Willingdon / Stone Cross
- WCS 6 - Rural areas strategy
- WCS 7 - Effective provision of Infrastructure
- WCS 8 - Affordable Housing
- WCS 9 - Rural Exception
- WCS 10 - The Travelling Community
- WCS 11 - The Travelling Community
- WCS 12 - Biodiversity
- WCS 13 - Green Infrastructure

9.3 Background Paper 8 provides the full Policy wording and the detailed, individual appraisal of the Policies and Strategies in the Core Strategy Submission DPD. The table below is the Summary Table for the effects of the Core Strategy Policies and Strategies on the SA Framework. Green donates potentially beneficial effects, amber/orange indicates uncertainty which may depend upon implementation detail and red indicates potentially adverse effects.
9 Sustainability Appraisal of the Plan Policies

Table 9.1 Summary of the SA of the Core Strategy Policies and Strategies
9.4 The sections below provide a description of the SA results - presented holistically by SA Objective, and an understanding of how social, environmental and economic problems have been considered in developing the final Policies and Strategies. In compliance with the Directive and SA Guidance the SA presents the effects of the Plan as a whole on each of the SA Objectives, thereby enabling an understanding of the predicted environmental, social and economic impacts of the Plan.

9.5 A consideration to bear in mind when understanding the significant social, economic and environmental effects of the Core Strategy is the strategic nature of the document. Detailed policies such as those often referred to as 'Development Control' or 'Development Management' policies that are found in the old Local Plan style of document are not to be found in this Core Strategy. Such policies will follow in subsequent DPDs including the Site Allocations DPD. For the SA this results in some uncertainty around the effects of some Policies, particularly some of the environmental SA Objectives.

**Significant Social, Environmental and Economic Effects of the Preferred Policies**

**Compliance with the SEA Directive:**

Information to be provided in the Environmental Report include:

“The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects” (Annex I (f) and footnote)

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

9.6 The SA Scoping Report highlighted the current need for affordable housing is 16 times greater than the current rate of supply and furthermore the house price to income ratio is significantly greater in Wealden than regional and national averages. The recommendation for the LDF flowing from this issue at the Scoping stage is to ensure housing is accessible to all through an increase in the supply of market and affordable housing, in sites for Gypsies and Travellers and in housing suitable for the elderly. The focus of the Spatial Policies and Strategies within the Core Strategy to provide an adequate supply of land for a range of homes to meet the needs of all sectors of the society and communities of Wealden will therefore provide significant beneficial effects for this SA Objective. There is a clear and pressing need for affordable housing in Wealden and Policies WCS 1, 2, 6, 10, 11, 12, 13 and the 5 Town Strategies contribute to ensuring that everyone has the opportunity to live in a good quality and affordable home. All affordable homes receiving grant will be built to at least Code for Sustainable Homes Level 3 helping to ensure that sustainable construction is also achieved. Particular attention to affordable housing need in WCS8 and in rural areas through the rural exception policy WCS9 should particularly help to address housing need within the District, which should
consequently reduce over the Plan Period. WCS10 and WCS11 aimed at improving the
provision of suitable homes for Gypsy and Traveller communities and providing a fair and
beneficial approach to determining appropriateness of sites for development of homes
for the Travelling Community should benefit this cultural group and contribute to the
significant beneficial effects for this objective.

2. Improve the health and well being of the population

9.7 Within the remit of the Core Strategy the health and well being of the population is
mainly addressed through the provision of homes and job opportunities, which underpin
people's well being, and the provision of open space, leisure and recreation facilities as
well as connectivity by foot and cycle. Consultation on the draft Scoping Report in 2007
highlighted concern about accessibility to health and dental provision. The provision of
new health facilities during this Plan Period is addressed in the Infrastructure Delivery
Plan and will be subject to later consideration in the Site Allocation DPDs. There are a
multitude of factors that can affect people’s health in varying degrees and those Policies
and Strategies that will improve residents quality of life are judged to have a beneficial
effect on this SA Objective. Overall the Core Strategy is judged to have a significant
beneficial effect for improving the health and well being of the population. In particular
individual policies WCS1, 8 and 9 are judged to have significant beneficial effects for the
health and well being of the population as they deal with the provision of housing to meet
local need. WCS13 regarding Green Infrastructure should also have significant beneficial
effects as there are strong links between a green infrastructure network and health - green
infrastructure enabling low cost recreation, leisure and healthy activities as well as reducing
air pollution which can lead to asthma and heart disease.

3. Promote social inclusion and create/ sustain vibrant communities

9.8 There are pockets of deprivation within Wealden. The LDF can address the issues
of social exclusion and accessibility for disadvantaged groups through the ability to direct
employment and housing growth, and regeneration incentives to areas where it can best
serve communities in need. Most of the Policies and Strategies within the Core Strategy
contribute to promoting social inclusion and creating and sustaining vibrant communities.
This results from consideration of these issues all the way through the production of the
Core Strategy. The need to reduce deprivation was highlighted at the Scoping stage of
the SA and the need for and distribution of growth in the District has been identified based
upon the ability of such growth to address the needs of residents and to stimulate
revitalisation of communities. The broad locations for growth associated with the Town
Strategies are specifically chosen where strong links by walking, cycling and public
transport can be made with existing town centres and communities in order to ensure the
promotion of social inclusion with new development schemes. Where broad locations
are removed from hubs then new neighbourhood centres will be included to create new
community hubs offering access to basic community services. Policies regarding affordable
housing WCS8 and 9, and the Travelling Community WCS10 and 11 are particularly
aimed at reducing inequalities in the provision of housing and in so doing ensuring that
new housing does not socially exclude due to its location and connectivity. The Green
Infrastructure Policy WCS13 will also be important for this SA Objective by providing
through all new development access for residents to low-cost recreation and leisure and connectivity to other services and facilities by low cost and attractive means.

4. To ensure a safe environment including reducing crime and the fear of crime

9.9 Overall the crime rate in Wealden is comparatively low, however it is important to continue to consider the perception of safety when planning for communities. Community safety through planning can be addressed in a number of ways: the provision of adequate housing and jobs can help to underpin safe communities; the provision of facilities including youth and young people’s facilities; addressing the needs of under represented cultural groups such as Gypsies and Travellers; and design and layout of new development can all contribute to reducing crime and the fear of crime. The Core Strategy is not the place for detailed proposals and so the effects on this SA Objective are not as significant as they may be in subsequent DPDs such as the Site Allocations DPD. There are beneficial effects from Policies WCS1, 8, 10 and 11, which deal with the provision of housing and jobs, affordable housing and the provision and criteria for the location of pitches for the Travelling Community. Allocating authorised sites for the Gypsy and Traveller community will help the Council to take more effective enforcement action against unauthorised sites. The Strategies for the towns have not been assessed as having a particular significant effect on this objective, but regeneration proposals in later DPDs may show abilities to contribute to safer communities.

5. To provide accessible and high quality public services and facilities

9.10 The distribution of housing and employment growth in the Core Strategy including in the Strategies for the Towns and the Rural Area is concentrated on placing people in good connection with existing services and facilities. Therefore these areas of the Core Strategy are judged to have a beneficial effect for this SA Objective. The Settlement Hierarchy, the basis for the Rural Areas Policy WCS6, has been heavily informed by the services and facilities within settlements alongside their accessibility by public transport. This is a good example of where sustainability considerations have been embedded within the preparation of the Core Strategy. Cumulatively across the Core Strategy Policies there should be significant positive effects. The Core Strategy does not however detail the provision of new services or facilities in any great depth as individually they are not strategic in nature, therefore policies often have qualified beneficial effects as their significance cannot readily be judged without more detail. The Site Allocations DPD and other subsequent DPDs and SPD will provide detail of specific new services and facilities that might be provided in any particular scheme which will be assessed in more detail through the accompanying SA. The Scoping Stage of the SA process highlighted a need for improving access to sports facilities and schools and for improvements to public transport systems.

6. To reduce the risk of flooding and the consequential damage to property and public well being

9.11 Flooding is an issue in the District and it can place a considerable risk on development in affected areas. The Core Strategy is committed to ensuring the safety of residents and reducing the economic impact of flooding by avoiding the allocation of land...
for employment or housing in areas subject to medium or high flood risk, taking into account the predicted impact of climate change. Therefore it is considered that there will be no detrimental affect on this SA Objective from the Core Strategy. The Policies for the Distribution of housing (WCS2), the Rural Area (WCS6) and the Town Strategies therefore are judged to have a beneficial effect for reducing flood risk by placing more people out of risk of flooding. Furthermore Sustainable Drainage Systems will be implemented within the Broad Locations to prevent flood risk arising from new developments.

7. **Make the most efficient use of land by prioritising Brownfield sites for development, the re-use of existing buildings and promoting higher development densities**

9.12 Government guidance strongly promotes making best use of land (including usage of brownfield land), but no longer sets a target minima for residential densities at 30dph. Wealden has a limited supply of brownfield land, which is not unusual for a rural district the majority of which falls within protected landscapes. There is some uncertainty with regard to the specific effects of the Core Strategy on this SA Objective as the Core Strategy does not provide detail of how broad locations will be delivered, for example at what density. Furthermore the broad locations are not defined with site boundaries at this stage and so exact proportions of brownfield land and agricultural land quality is not known. There are some early indications that a large proportion of greenfield land will be required and so WCS2 is judged to have an adverse effect on this objective. Employment locations include making best use of existing employment areas and brownfield sites so this should be beneficial. Likewise the Strategy for Crowborough has a strong focus on brownfield land development, which should be positive for this Objective. Other Town Strategies provide some balance between regeneration of town centres to make the most efficient use of land but also have substantial greenfield allocations - these include Uckfield and Hailsham and the effects maybe considered neutral. More detail at the Site Allocations Stage may highlight issues for a change in the assessment.

8. **Reduce air pollution and ensure local air quality continues to improve**

9.13 Air quality in Wealden is generally considered to be good, but there is a high reliance on the private car and congestion occurs in the main towns due to road capacity issues exacerbated by limited bus and rail services. The growth and development of land proposed within the Core Strategy are likely to have an adverse effect on the SA Objective to reduce air pollution. The results of new housing growth are likely to be an increase in emissions from increased energy use and from vehicle movements. At the construction stage and then through the operational phases there is a potential for an increase in the number of cars in the District and on local roads by the end of the Plan Period. The results of new employment growth may additionally create new car journeys and also generate journeys by vans and lorries through supply and distribution needs. Technical mitigation measures may need to be considered at the Site Allocations DPD stage. The concentration of the main settlements in the District may also lead to an increase in air pollution - it is not entirely clear whether the concentration of development may cause higher levels of congestion in these areas and therefore have a negative effect on air quality or whether promoting sustainable modes of transport (e.g. cycling and walking) and limiting the
amount of development outside these areas would have positive effects on air quality for the District as a whole.

9. Reduce emissions of greenhouse gases

9.14 Wealden has higher carbon dioxide emissions per capita from domestic sources than county or national averages and, as expected for a rural community, higher emissions per capita from transport. Policies and Strategies proposing growth and development in the Core Strategy are contributing to the potential for a rise in greenhouse gas emissions. The construction and operation of new dwellings and employment space will generate greenhouse gas emissions, in particular carbon dioxide through their requirement for energy in the first place and also through emissions from traffic generated by the development. Opportunities for renewable energy and energy efficiencies on a site-by-site basis will be explored at the Site Allocations stage which could help to mitigate the adverse effects predicted for this SA Objective.

10. Conserve and enhance the biodiversity of the District

9.15 There is a high proportion of designated land in the District and whilst there is a significant amount of legislation and policy in place to protect designated sites of International and National importance, there is still a requirement for local authorities to understand the full range of biodiversity within their areas and integrate into documents such as the Core Strategy considerations for conserving and enhancing this important resource. The broad locations for development have been chosen with biodiversity implications in mind and on a strategic level 'least worst options' in terms of impact on biodiversity were progressed. There is still uncertainty over the specific impacts on biodiversity from the spatial policies and strategies and these will be explored and understood further at the Site Allocations Stage. The Core Strategy has two policies that will have significant beneficial effects for biodiversity, WCS12 and WCS13 aim to put biodiversity central to considerations when planning and designing development areas and this should help to mitigate overall impacts on biodiversity on a district wide level.

11. Conserve, enhance and make accessible for enjoyment, the District’s countryside (in particular protecting the best and most versatile agricultural land), landscape, historic and built environment

9.16 The protection and enhancement of historic buildings, Conservation Areas and archaeological sites was identified at the Scoping stage as a sustainability issue for Wealden. The need to consider and address the conflict between economic and social needs of development against the pressure of maintaining the landscape. This is an interesting SA Objective in that it is not always the case that making the countryside, landscape and historic environment accessible for enjoyment is conserving or enhancing it. However both aspects, the preservation and the access are considered when appraising the policies and strategies against it. The detail of development sites is not known at this stage and so particulars of type of agricultural land, local landscape impacts and connectivity with the countryside and Public Rights of Way are not known. These issues will be better addressed at the Site Allocations Stage. It is worth noting that the Strategic Housing Land Availability Assessment, which informed the identification of the Broad
Locations, assessed the impact of available land in terms of landscape impact and also in terms of impact on the historic environment. The Sustainability Assessment of the Broad Locations for development has also been guided by Landscape Appraisal work. Broad Locations that would cause obvious harm to the AONB and National Park have been avoided and locations prominent in the landscape have been considered carefully and alternatives sought. The resulting Broad Locations may have some adverse impacts, where mitigation will be required, but these have been minimised. Policy WCS13 on Green Infrastructure should have a significant beneficial effect for protecting landscape quality and for connectivity and access to the countryside.

12. Reduce the need to travel by car and promote alternative methods of transport

9.17 The development of the spatial approach to the Core Strategy through the Issues and Options work, the Spatial Development Options work and further work on alternatives has been heavily guided by the need to reduce the need to travel by car. As a rural district the issues of high car ownership and patchy public transport are known and the need to reduce their impact for people, the environment and the economy has been at the forefront of developing the Spatial Strategy. In the SA Scoping Report satisfaction with local bus services was recorded as significantly below that recorded for East Sussex and the national average. Consequently locations for development have been chosen where good connectivity to jobs, services and facilities can be gained. Overall the Core Strategy should have a beneficial effect for this SA Objective and improve connectivity for people to their local services and facilities for their everyday needs thus reducing the need to travel. Policy WCS13 on Green Infrastructure will significantly contribute to the beneficial effects promoting the ability to cycle and walk between home and local services.

13. Minimise waste, maximise the re-use of materials, recycling and composting

9.18 The SA Scoping Report highlights that Wealden has lower recycling rates and higher proportions of waste going to landfill than the county averages. The need to encourage recycling and waste reduction has therefore been highlighted as a sustainability issue for the LDF to address. The Core Strategy does not explicitly deal with this SA Objective. At the strategic level the County Council Waste Core Strategy will set the overall framework for minimising waste and maximising the re-use of materials, recycling and composting in the district. At the Site Allocations stage there is an opportunity to consider waste facilities within new development and it is a recommendation of this SA that measures be taken to ensure the waste hierarchy is addressed.

14. Maintain and where appropriate improve quality of groundwater and surface waters in the District and promote water efficiency

9.19 River quality in Wealden by biological status is comparatively good, whilst chemical status is below average. The SA Scoping Report highlights the conservation of water quality as a sustainability issue. There are two policies within the Core Strategy that should ensure significant beneficial effects on this SA Objective WCS7 and WCS13 Infrastructure and Green Infrastructure require no detrimental effects on watercourses and ground water. WCS13 looks for ecological gains including for wildlife connectivity, which can be achieved through the protection and management of watercourses. The
issue of wastewater impacts on the Pevensey Levels wetland system is the subject of an
Appropriate Assessment and the mitigation measured proposed by this piece of work are
carried through in the Core Strategy and are further emphasised by the Infrastructure
Policy. The context to the Biodiversity Policy WCS12 refers to the Water Framework
Directive and that the Site Allocations Stage will have heed to this piece of legislation.
The Policy itself however does not make explicit reference to the water environment
however ecology can be taken to include the water ecosystems. Water efficiency was
also highlighted in the Scoping Report as a sustainability issue. Wealden's domestic
water consumption per capita was documented as substantially above the national average
and this is significant as the south east is considered an area of serious water stress. It
is noted that demand management measures have been proposed as part of South East
Water, Water Management Plan and all measures proposed by this plan will need to be
further considered as part of subsequent DPDs.

15. Promote energy efficiency measures and encourage the use of renewable energy

9.20 The Core Strategy does not address this objective in any detail. There are no
policies that are considered to have a significant effect on promoting energy efficiency
and encouraging the use of renewable energy. The Affordable Housing Policy WCS8
has an indirect beneficial affect due to the requirements for new affordable homes receiving
grant to build to Code for Sustainable Homes Level 3, which relates to a certain level of
energy savings. There is a passage in the Core Strategy, which highlights the need for
sustainable construction and proposes that development in Wealden will be guided by
the Government's revisions to the Building Regulations. It further commits that
opportunities for renewable and decentralised energy will be explored at the Site Allocations
Stage. Therefore the Core Strategy is setting the framework for the promotion of energy
efficiency and renewable energy.

16. Reduce the global, social and environmental impact of consumption of resources by
using sustainably produced and local products

9.21 This SA Objective may be better addressed at the Site Allocations Stage and at
subsequent DPD and SPD stages where the detail of specific proposals may be set out.
The strategic nature of the Core Strategy means that the resourcing of materials for
construction for example is too detailed. The commitment to retaining and supporting the
livestock market at Hailsham and establishing as a central feature of the town a Farmers
Market in Crowborough, in the Core Strategy results in positive effects for this SA Objective.
The significance however is not as great as if there were more detailed policies seeking
to support the use of local products in construction for example and this is identified by
the SA as an option for consideration at the next stage of planning.

17. Maintain and enhance the prosperity of the District and increase the vitality of villages
and the rural economy

9.22 The majority of the Core Strategy Policies and Strategies contribute to achieving
this SA Objective. The prosperity of the District as a whole underpins this strategic
document and all the aspects of growth and development within the settlements and the
rural area aim to enhance the prosperity of the District. There is particular focus on
regenerating the town centres in Hailsham and Uckfield and in redressing the economic disparity between the north and south of the District through regeneration and growth in employment opportunities. This aim is set against the backdrop of the recognition of the importance of the rural nature of the District, one of a high quality environment, which in itself is an economic asset. Resources such as the countryside, coast, wetlands, urban parks, street trees and their ecosystems are seen as critical for sustainable economic growth and social goals, not just a way of supporting wildlife and the environment. Green Infrastructure (Policy WCS13) is important for enhancing this resource and supporting jobs in rural tourism, agriculture and managing the land. The Policies and Strategies of the Core Strategy are therefore judged to have a significant beneficial effect for maintaining and enhancing the prosperity of the District and increasing the vitality of villages and the rural economy.

18. Promote sustainable tourism

9.23 The promotion of sustainable tourism is identified as a sustainability issue in the SA Scoping Report. It has the ability to contribute to quality of life in terms of village and town vitality and local services and amenities, as well as contribute to environmental conservation and economic vibrancy. Sustainable tourism is recognised by the Core Strategy as having an important role within the economy of Wealden. Specifically the context in the Economy section highlights the importance and the commitment to support sustainable tourism. The Spatial Strategy for Crowborough seeks to improve the tourism offer through additional accommodation, interpretation facilities and other attractions, which should be beneficial for promoting tourism in the north of the District. The Green Infrastructure Policy (WCS13) should also have beneficial effects for promoting sustainable tourism by supporting jobs in rural tourism and maintaining an attractive environment to encourage tourism and sustainable transport through interconnectivity.

19. Ensure high and stable levels of employment and provide support for small firms and local businesses

9.24 In allocating land for employment premises, including office and industrial, retail and small business units the Core Strategy should have a significant beneficial effect for this SA Objective. The Spatial Strategies for the towns commit to a delivery of employment space as well as in most cases employment opportunities through the regeneration of town centres and improvements in the retail offer. The Site Allocations Stage will be important for determining the type of employment space provided and the necessary linkages with services and facilities to best promote the offer. Small firms and businesses are an important sector of the economy and their ability to expand and locate in the right employment space should be supported and this will be further assessed at the next stage of the planning process. Support for small firms and businesses was raised as a sustainability issue in the SA Scoping Report as Wealden was showing slightly less employment growth in this area than county and national averages. The framework is set through the Core Strategy for a wide range of provision and also for the continued support of appropriate farm diversification, which supports a number of rural businesses and small businesses across the District. It would seem particularly important during this Plan Period with the uncertainty of economic performance that support for small businesses
and a focus on strengthening the local economy is retained. This Core Strategy supports and recognises the uncertain times and the need for continued economic focus through a realistic quantum of employment land to be delivered through WCS1 and the more detailed Spatial Strategies for the Towns.

20. Develop and maintain a skilled workforce to support long term competitiveness

9.25 The education and skills training of the workforce is a matter more directly affected by the County Council through their role as education provider. There is no higher education provision identified for Wealden, however the improvement in job opportunities created by the Core Strategy should help to maintain a skilled workforce and support long term competitiveness. There is a requirement within the Hailsham Spatial Strategy for some education provision as part of the extension to the urban area north of Hailsham. The Core Strategy is therefore deemed to have a beneficial effect for this objective but the significance of this is only moderate without the significant improvement to higher education provision. The SA Scoping Report did highlight the development of a skilled workforce as a sustainability issue; with a decline in people of working age with NVQ Level 4 and above in the District, accessibility to learning resources in new development will be important.

21. Stimulate regeneration of town centres

9.26 The Core Strategy should have significant beneficial effects for this objective due to its commitment to the regeneration of three of its main town centres, Crowborough, Hailsham and Uckfield. The Site Allocations DPD will provide more detail of the retail, employment and connectivity improvements proposed by the regeneration plans, which will then be assessed by the SA in more detail. The distribution of housing and particularly of employment is such that it should support and stimulate the regeneration of town centres through the ability to improve connectivity between people and town centres and improve the efficiency and efficacy of town centres through new employment and retail space.

22. Develop a dynamic, diverse, and knowledge-based economy

9.27 The SA Scoping Report identified the encouragement of dynamic and knowledge based economic development with a diverse rural economy as a sustainability issue. Employment in growth and high value sectors in Wealden is behind county and national averages. The context of the Core Strategy sets out the ways in which the Council's strategy is to encourage and support business and includes support for improving broadband coverage, supporting rural diversification and flexible business premises, which should contribute to addressing this SA Objective. At the Site Allocations DPD Stage when the detail of employment provision by type and design will be better known, the impacts on this SA Objective will be clearer. The Core Strategy is broadly supportive of the need to develop a diverse and dynamic knowledge based economy and sets the framework for the provision of a wide range of new employment space to fit market requirements. The flexibility of policies within the Core Strategy and the realistic quantum of floorspace allocated should facilitate a suitable diversity of new employment premises that promotes high tech industries.
Cumulative and Synergistic Effects

9.28 Table 9.2 below documents the likely cumulative and synergistic effects of the Policies and Strategies of the Core Strategy. Green is generally beneficial with the darker green indicating more significant effects. Amber indicates uncertain effects that may depend upon implementation and red indicates adverse effects with the darker red symbolising more significant adverse effects.

Table 9.2 Cumulative and Synergistic Effects of the Core Strategy

<table>
<thead>
<tr>
<th>Sustainability Objective</th>
<th>Assessment</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Short</td>
<td>Medium</td>
</tr>
<tr>
<td>SA1 Housing</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SA2 Health</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SA3 Social Inclusion</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SA4 Safety</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
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<tr>
<td>SA5 Access to Services</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SA6 Flooding</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SA7 Efficient Use of Land</td>
<td></td>
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<td></td>
<td></td>
<td></td>
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<tr>
<td>SA8 Air Pollution</td>
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</tr>
</tbody>
</table>

WCS 1, WCS 2, Town Strategies, WCS 6, WCS 8, WCS 9, WCS 10 & WCS 11 all contribute to significant beneficial cumulative effects.

All Policies and Strategies have beneficial effects for improving health and well being.

All Policies and Strategies (except WCS 12 biodiversity) have beneficial effects for social inclusion.

Depends upon implementation to a large degree though WCS 8, 10 & 11 should contribute to beneficial effects. Site Allocations will provide more detail.

Particularly WCS 2, Spatial Strategies, WCS 9, 11 and 13.

Distribution of development through WCS 2 and Spatial Strategies and WCS 11 & 12 should place more people in areas away from high risk of flooding.

WCS 2 may lead to cumulative adverse effects for this objective. Uncertainty over WCS 6 for Rural Area more detail at Site Allocations.

Potential for significant adverse effects at cumulative scale for air pollution through increases in traffic associated.
<table>
<thead>
<tr>
<th>Objective</th>
<th>Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>SA9 Greenhouse Gas Emissions</td>
<td>Potential for significant adverse effects at cumulative scale for greenhouse gas emissions through increases in traffic and demand for energy associated with growth in WCS 1 and Spatial Strategies</td>
</tr>
<tr>
<td>SA10 Biodiversity</td>
<td>Uncertain impact on this objective - dependent upon mitigation or compensation that occurs when development takes place. Likelihood of more detail on effects on biodiversity at Site Allocations Stage</td>
</tr>
<tr>
<td>SA11 Landscape</td>
<td>Uncertain impact on this objective - dependent upon mitigation or compensation that occurs when development takes place. These resources are afforded protection but to ensure impacts are kept to a minimum a strong design policy needs to be followed and sites that do not harm these assets prioritised</td>
</tr>
<tr>
<td>SA12 Reduce Need to Travel</td>
<td>WCS 2, 3, 6, 11 and 13 should contribute to significant cumulative benefits for this SA Objective through the distribution of development in the most accessible locations and the provision of connectivity at the heart of new development enhanced by WCS 13 Green Infrastructure</td>
</tr>
<tr>
<td>SA13 Waste</td>
<td>Minimisation of waste may be achieved but policy of this issue is determined through the ESCC Waste Core Strategy. Opportunities for recycling opportunities etc may be present at Site Allocations Stage</td>
</tr>
<tr>
<td>SA14 Water</td>
<td>Potential for beneficial effects through WCS 7, 12 &amp; 13. Some uncertainty still present, however opportunities at the Site Allocations Stage to enhance the water resources and water environment</td>
</tr>
<tr>
<td>Sustainability Appraisal of the Plan Policies</td>
<td></td>
</tr>
<tr>
<td>---------------------------------------------</td>
<td></td>
</tr>
<tr>
<td><strong>SA15 Energy Efficiency</strong></td>
<td>The Core Strategy as a strategic document will not have great impact on the energy efficiency objective. The SA at the Site Allocations Stage will provide direction to ensure energy efficiency measures and renewable energy options are maximised.</td>
</tr>
<tr>
<td><strong>SA16 Sustainable Local Produce</strong></td>
<td>The Core Strategy is too strategic in nature to provide much detail of local produce requirements. Spatial Strategies for Crowborough and Hailsham do contribute to supporting this objective through livestock market retention and a central farmers market, but at a district scale and cumulatively speaking the impact may not be significant.</td>
</tr>
<tr>
<td><strong>SA17 Prosperity</strong></td>
<td>WCS 1, 2, 6, 7, 8, 9, 12 and 13 all service to underpin prosperity and cumulatively should have significant beneficial effects.</td>
</tr>
<tr>
<td><strong>SA18 Tourism</strong></td>
<td>The Core Strategy Policy WCS 13 and the Spatial Strategies for Crowborough and Hailsham should cumulatively have beneficial effects for sustainable tourism.</td>
</tr>
<tr>
<td><strong>SA19 Employment</strong></td>
<td>WCS 1, WCS 3 and the Spatial Strategies will lead to cumulatively significant beneficial effects for employment.</td>
</tr>
<tr>
<td><strong>SA20 Skilled Workforce</strong></td>
<td>WCS 1, 8 and 11 and Spatial Strategies particularly Hailsham, Uckfield and Polegate help contribute to cumulative beneficial effects for the workforce. Significance is minor due to no major new higher education provision within the Core Strategy.</td>
</tr>
<tr>
<td><strong>SA21 Town Centres</strong></td>
<td>WCS 2 and the Spatial Strategies for the towns should lead to significant cumulative benefits for town centres in the District.</td>
</tr>
<tr>
<td><strong>SA22</strong></td>
<td>WCS 1 and the Spatial Strategies for Uckfield, Hailsham and Polegate could...</td>
</tr>
</tbody>
</table>
Overall there are significant beneficial cumulative and synergistic effects for the social and economic SA Objectives and this is broadly in line with the Sustainable Community Strategy Priorities. Improving the housing and job offer and improving communities environment and connectivity can produce synergistic effects of improving health, motivation, vibrancy, sense of community and quality of life. The SA has identified uncertainty around the cumulative impacts for biodiversity and landscape and more detail will be known at the Site Allocations DPD Stage, which should feed into the SA at that stage. The effectiveness of the Biodiversity Policy WCS12 in mitigating any adverse effects will be monitored. Potential for significant adverse effects cumulatively for the SA Objective to reduce greenhouse gas emissions and for reducing air pollution are identified, however the Site Allocations Stage will consider opportunities for energy efficiencies and renewable energy. Advances in green technologies over the Plan Period may also contribute to lessening the adverse impact of the development of land for additional housing and employment facilities.

How Social, Environmental and Economic Problems were Considered in Developing the Policies and Proposals

The Core Strategy has fully integrated the Sustainability Appraisal Process and sustainability principles in its development. The SA has been carried out for the main part 'in-house' and has used a collaborative approach inclusive of planning officers in the policy and development management arenas as well as specialists in housing. The Environment Agency has also been instrumental in the process attending SA assessment sessions on broad locations analysis and the sustainability of infrastructure capacity.

This central consideration of SA has led to a spatial development pattern which seeks to integrate new development with settlements in a positive manner for connectivity and social cohesion, whilst minimising environmental impacts and maximising economic opportunities. The District's problems of social inequality and deprivation have been considered in the spatial approach and growth directed to areas where it can benefit communities in providing improved access to services.

In accordance with the results of the Strategic Flood Risk Assessment the Core Strategy will not direct development to areas at medium or high risk of flooding and opportunities for Sustainable Drainage Systems will be taken to ensure no increase in flood risk arising from developments.

Overcoming environmental problems such as water quality in the Pevensey Levels has been guided by the Appropriate Assessment process carried out under the Habitats Regulations, in consultation with the Environment Agency and Natural England. This led to a Core Strategy approach which seeks to minimise impacts through controlling the level of growth in this area and mitigating any potential adverse effects through
commitments to Sustainable Drainage Systems. The Appropriate Assessment concludes that as long as the mitigation is implemented then physical development, limited by waste water works capacity, should not be constrained within the hydrological catchment of the Pevensey Levels.

9.34 The consideration of the impact of the Core Strategy on the Ashdown Forest SPA and SAC under the Habitat Regulations Assessment has identified the need for mitigation and avoidance measures in relation to impacts on air quality and from recreational pressure. An exclusion zone of 400m around the Ashdown Forest SPA, which prohibits a net gain in new dwellings has been recommended by the Habitat Regulations Assessment in order to protect the bird species including the Dartford Warbler and the nightjar. Within 7km additional green space including natural green space will be required to provide an alternative for residents of the District to help limit recreational impacts and recreational traffic accessing the Ashdown Forest. This is outlined in the Core Strategy and will be developed in subsequent DPDs.

9.35 Work undertaken through the Strategic Housing Land Availability Assessment to assess the suitability of available land has informed the proposals of the Core Strategy and this SA. The SHLAA considered the potential impacts of developing submitted sites on landscape quality, the historic environment, biodiversity and flood risk. This helped to inform the choice for broad locations and inform the SA in the assessment of the broad locations for development.
10 Mitigation Measures

Introduction

10.1 This chapter, in accordance with the SEA Directive, SEA and SA guidance, looks at mitigation measures designed to prevent, reduce or offset the significant adverse environmental, social and economic effects of the Plan Policies and Strategies. Mitigation measures can also include recommendation for enhancing the beneficial effects of options. Mitigation measures are wide-ranging and can include:

- Changes to the DPD as a whole by bringing forward new options or deleting options
- Refining policy options by strengthening criteria contained within
- Technical measures

Compliance with the SEA Directive:

The Environmental Report should provide information on:
“...The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme…” (Annex I (g))

Proposed Mitigation Measures

10.2 Mitigation measures have been considered through the SA process at the Issues and Options Stage and the further work on alternatives. Avoidance of development in flood risk areas, in close proximity to the Ashdown Forest and a relative constraint on development affecting the Pevensey Levels are all mitigation measures implemented within the Submission Core Strategy. The policy wording and details of the Town Strategies has been informed by the SA process and further specific wording changes at this stage are not considered necessary. The requirement for mitigation measures of a more technical or detailed solution will be required to be considered at the Site Allocations Stage but will include:

- Connectivity with settlements including by foot and public transport
- Biodiversity conservation, enhancement or compensation
- Landscape impact mitigation
- Greenspace provision for leisure, recreation, health & connectivity
- Sustainable drainage solutions
- Further flood mitigation measures
- Energy measures for efficiency and production
- Opportunities for higher provision of affordable housing
- Addressing the sustainable management of waste through design
Uncertainties and Risks

10.3 Sustainability Appraisal is an inherently unscientific process that involves making predictions concerning environmental and sustainability conditions on the basis of often limited or inadequate data. Most of the impact predictions made in this report are, therefore, subject to some uncertainty and entail risks.

10.4 Such risks cannot be avoided but measures to reduce or contain them can be taken during the monitoring phase of the Sustainability Appraisal. Where impacts are uncertain and / or the risk of negative effects is significant, recommendations are made for monitoring the implementation of the DPD.

10.5 The key uncertainties identified are as follows:

- Incomplete / unavailable baseline data in SA Scoping;
- The strategic nature of the plan identifies broad areas for development and therefore there are uncertainties regarding the assessment; the detailed site-appraisal of successive plans is required to increase the information within the SA and produce more certainty with respect particularly to biodiversity, landscape and land efficiency;
- Policies at this strategic scale are necessarily overarching and do not contain details concerning for example implementation measures so their SA is correspondingly strategic; and
- The true nature of cumulative and synergistic effects will only become apparent as the plan period progresses when the interaction of the policies is underway, and the construction of developments and infrastructure have taken place.
11 Implementation

Introduction

11.1 This chapter examines the links with other plans and programmes and the monitoring proposals.

The SEA Directive says:

"Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action".

11.2 Monitoring allows the identification of the actual significant environmental effects of implementing the plan, which can be compared to those predicted. Unforeseen effects can be identified and future predictions made more accurately. Monitoring needs to consider both adverse and beneficial effects and must be clearly linked to the SA process.

Links to other Tiers of Plans and Programmes and the Project Level

11.3 The SA has identified a range of mitigation measures, which have links to subsequent DPDs. The Council is currently developing a list of documents that will be incorporated into the LDF and which will address these requirements in due course, specifically:

- Strategic Sites DPD; and
- Delivery and Site Allocations DPD

Monitoring

11.4 Monitoring helps to verify whether policies are achieving their objectives particularly concerning sustainable development or whether they may have had unintended consequences. Monitoring should assess whether:

- Predictions of sustainability effects are accurate;
- The plan is contributing to the achievement of the desired SA objectives and targets;
- If mitigation measures are performing as well as expected;
- If there are any adverse effects, including unforeseen adverse effects; and
- Whether any effects are within acceptable limits or remedial action is desirable.

11.5 Both the requirements for Strategic Environmental Assessment and the guidance regarding Sustainability Appraisal place emphasis on closely monitoring those parts of the plan where the appraisal has found both significantly negative and positive effects, to assess both whether the plan is performing sustainably and that any agreed mitigation is functioning in a way it was expected to.
11 Implementation

Significant Positive Effects Include

- Objective 1 to ensure everyone has the opportunity to live in a good quality, affordable home;
- Objective 2 to improve health and well being;
- Objective 3 to promote social inclusion;
- Objective 5 to improve access to services;
- Objective 12 to reduce the need to travel;
- Objective 17 to enhance the prosperity of the District;
- Objective 19 ensure high and stable levels of employment; and
- Objective 21 to stimulate regeneration of town centres.

Significant Adverse Effects Include

- Objective 8 to reduce air pollution; and
- Objective 9 to reduce emissions of greenhouse gases.

11.6 In the case of biodiversity at this stage of plan making it is unclear as to the likely significant effects and monitoring will be necessary to ensure any proposed mitigation measures implemented through the Habitats Regulations Assessment and through the biodiversity policy are effective. SA Objective 6 to reduce the risk of flooding will be monitored as flooding is an important issue in the District. SA Objective 7 regarding the effective use of land will also be monitored as the results of the assessment are unclear.

11.7 Plan monitoring and monitoring of the Sustainability Appraisal should be closely linked due to the fact that the SA objectives and the appraisal framework were used to help refine the policies within the Core Strategy document. Therefore, where possible the same indicators will be used in both documents. Also by using the same indicators it will be possible to highlight where potential gaps exist within the monitoring frameworks for both documents. It is expected that the SA will be monitored like the Core Strategy through the Annual Monitoring Report (AMR) and using East Sussex in Figures. It is worth noting at this point that the Core Strategy will monitor the Spatial Objectives contained within it and that other parts of the SA Framework will also be monitored through subsequent DPDs.

11.8 The monitoring framework is shown in Table 11.1.


**Table 11.1 Monitoring Framework**

<table>
<thead>
<tr>
<th>Objective &amp; Assessment Criteria</th>
<th>Reference</th>
<th>Indicator name</th>
<th>Indicator description</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Ensure everyone has the opportunity to live in a good quality, affordable home</td>
<td>AMR</td>
<td>Affordable Housing</td>
<td>Affordable housing completions as a percentage of all completions</td>
<td>30% (Plan target)</td>
</tr>
<tr>
<td></td>
<td>AMR (H2b NI194)</td>
<td>Housing</td>
<td>Housing completions per annum</td>
<td>In line with housing trajectory</td>
</tr>
<tr>
<td></td>
<td>ESIF Future AMR</td>
<td>Homelessness</td>
<td>Total homeless households in priority need</td>
<td>Reduce from current level</td>
</tr>
<tr>
<td>2. Improve the health and well being of the population</td>
<td>ESIF Future AMR</td>
<td>Sports</td>
<td>Population within 20 minutes of a sports facility</td>
<td>Increase from current level</td>
</tr>
<tr>
<td></td>
<td>WDC Future AMR</td>
<td>ANGST</td>
<td>Natural England standards for accessible natural green space for towns</td>
<td>An accessible natural green space of at least 2 ha in size, no more than 300 metres (5 mins walk) from home</td>
</tr>
<tr>
<td></td>
<td>Future AMR</td>
<td>Access to GP</td>
<td>Annual amount of new residential development within 30 minutes public transport time of a GP</td>
<td>100% of new development on strategic sites to be within 30 minutes public transport of a GP</td>
</tr>
<tr>
<td>3. Promote social inclusion and create and sustain vibrant communities</td>
<td>WDC (NI 175) Future AMR</td>
<td>Access to services</td>
<td>Access to services and facilities by public transport walking and cycling</td>
<td>Increase above current level</td>
</tr>
<tr>
<td></td>
<td>ESIF Future AMR</td>
<td>Unemployment rate</td>
<td>The number of people who are unemployed and actively seeking</td>
<td>No target</td>
</tr>
<tr>
<td>Objective &amp; Assessment Criteria</td>
<td>Reference</td>
<td>Indicator name</td>
<td>Indicator description</td>
<td>Target</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------</td>
<td>-----------------</td>
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<td>---------------------------------------------------------------------------------------</td>
<td>---------------------------------------------</td>
</tr>
<tr>
<td>• Facilitating the provision of more affordable housing in rural areas</td>
<td></td>
<td></td>
<td>work as a percentage of the working age population.</td>
<td></td>
</tr>
<tr>
<td>• Consulting, informing, including and engaging all sections of the District's community when making decisions and delivering change</td>
<td>ESIF Future AMR</td>
<td>IMD</td>
<td>Indices of multiple deprivation - Super Output Areas</td>
<td>Reduction of SOAs in bottom 20% nationally</td>
</tr>
<tr>
<td>5. Provide accessible and high quality public services and facilities</td>
<td>Future AMR</td>
<td>Access to GP &amp; primary school</td>
<td>Annual amount of new residential development within 30 minutes public transport time of a GP and primary school</td>
<td>100% of new development on strategic sites to be within 30 minutes public transport of a GP and primary school</td>
</tr>
<tr>
<td>• Improving access to services and facilities</td>
<td></td>
<td></td>
<td>Access to services by public transport walking and cycling</td>
<td>Increase above current level</td>
</tr>
<tr>
<td>• Delivering new development accessible by public transport, walking and cycling</td>
<td>WDC (NI 175)</td>
<td>Access to services</td>
<td>Access to services and facilities by public transport walking and cycling</td>
<td></td>
</tr>
<tr>
<td>6. Reduce the risk of flooding</td>
<td>AMR (E1)</td>
<td>Risk of flooding</td>
<td>Number of planning permissions granted contrary to Environment Agency Advice on flooding or water quality grounds</td>
<td>No applications approved contrary to advice</td>
</tr>
<tr>
<td>• Delivering new development free from risk of flooding</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reducing risk of flooding to existing development</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Make the most efficient use of land</td>
<td>AMR (BD2)</td>
<td>Employment floorspace on PDL</td>
<td>Total amount of new employment floorspace on previously developed land</td>
<td>60%</td>
</tr>
<tr>
<td>• Prioritising brownfield land</td>
<td></td>
<td>Dwellings on PDL</td>
<td>New and converted dwellings on previously developed land</td>
<td>60%</td>
</tr>
<tr>
<td>• Remediating contaminated land</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Re-using existing buildings</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Promoting higher densities</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Objective &amp; Assessment Criteria</td>
<td>Reference</td>
<td>Indicator name</td>
<td>Indicator description</td>
<td>Target</td>
</tr>
<tr>
<td>---------------------------------</td>
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<td>----------------------</td>
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</tr>
<tr>
<td>(H3)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Reduce air pollution</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reducing air pollution from transport</td>
<td>WDC Future AMR</td>
<td>Nitrogen Dioxide</td>
<td>Nitrogen dioxide concentrations</td>
<td>Target required</td>
</tr>
<tr>
<td>• Reducing air pollution from buildings</td>
<td>WDC Future AMR</td>
<td>AQMA</td>
<td>Air Quality Management Areas</td>
<td>No reduction in air quality</td>
</tr>
<tr>
<td>• Helping to remove pollutants from the air</td>
<td>WDC Future AMR</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. Reduce emissions of greenhouse gases</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reducing emissions from domestic sources</td>
<td>ESIF Future AMR</td>
<td>CO₂ per capita</td>
<td>Carbon dioxide emissions per capita</td>
<td>ESCC - reduction of 5.9 tonnes per capita by 2010/11 on 2008</td>
</tr>
<tr>
<td>• Reducing emissions from industrial sources</td>
<td>ESIF Future AMR</td>
<td>CO₂ tonnes</td>
<td>Carbon dioxide emissions tonnes</td>
<td>UK target to reduce greenhouse gas emissions by 80% by 2050</td>
</tr>
<tr>
<td>• Reducing emissions from road transport</td>
<td>ESIF Future AMR</td>
<td>CO₂ by sector</td>
<td>Carbon dioxide emissions by sector</td>
<td>UK targets to reduce greenhouse gas emissions by 80% by 2050</td>
</tr>
<tr>
<td>10. Conserve and enhance the biodiversity of the District</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Encouraging biodiversity especially BAP target habitat and species</td>
<td>ESIF Future AMR</td>
<td>LNR</td>
<td>Area of land designated as Local Nature Reserve (ha per 1,000 residents)</td>
<td>Maintain or increase</td>
</tr>
<tr>
<td>• Maintaining and enhancing protected sites</td>
<td>AMR</td>
<td>SSSI condition</td>
<td>Proportion of SSSI favourable or unfavourable recovering</td>
<td>95%</td>
</tr>
<tr>
<td>• Protecting and maintaining open spaces</td>
<td>AMR</td>
<td>Ancient Woodland</td>
<td>Area of ancient woodland</td>
<td>No loss</td>
</tr>
</tbody>
</table>

11 Implementation
### Objective & Assessment Criteria

<table>
<thead>
<tr>
<th>Reference</th>
<th>Indicator name</th>
<th>Indicator description</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Future AMR NI 197</td>
<td>Local Sites</td>
<td>Proportion of local sites where active conservation management is being achieved</td>
<td>Increase above current level</td>
</tr>
<tr>
<td>AMR</td>
<td>SNCI</td>
<td>Area of land in SNCI</td>
<td>Maintain or increase</td>
</tr>
</tbody>
</table>

**12. Reduce the need to travel by car and promote alternative methods of transport**

- Improving accessibility to work, services and facilities
- Improving access to public transport
- Improving access to cycle and foot ways
- Reducing road congestion

<table>
<thead>
<tr>
<th>Reference</th>
<th>Indicator name</th>
<th>Description</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESIF Future AMR</td>
<td>Distance to work</td>
<td>Distance travelled to work by residents</td>
<td>No target</td>
</tr>
<tr>
<td>ESIF Future AMR</td>
<td>Mode of travel</td>
<td>Travel to mode</td>
<td>No target</td>
</tr>
<tr>
<td>ESIF Future AMR</td>
<td>Commuting flow</td>
<td>Commuting flows into and out of the District</td>
<td>Reduce out commuting</td>
</tr>
<tr>
<td>WDC</td>
<td>Bus services</td>
<td>Satisfaction with local bus services</td>
<td>No target</td>
</tr>
</tbody>
</table>

**17. Maintain and enhance the prosperity of the District and increase the vitality of villages and the rural economy**

- Accommodating the growth and encouraging the retention of existing businesses
- Supporting rural based enterprises
- Increasing the number of businesses & shops in rural areas

<table>
<thead>
<tr>
<th>Reference</th>
<th>Indicator name</th>
<th>Description</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESIF Future AMR</td>
<td>Agriculture</td>
<td>Business units in agriculture, fishing, energy &amp; water</td>
<td>No target</td>
</tr>
<tr>
<td>ONS Future AMR</td>
<td>Rural VAT based enterprises</td>
<td>Rural VAT based enterprises</td>
<td>No target</td>
</tr>
<tr>
<td>AMR (BD1)</td>
<td>Employment floorspace</td>
<td>Quantity of new employment floorspace delivered - rural &amp; urban</td>
<td>38,190sqm by 2030</td>
</tr>
</tbody>
</table>

**19. Ensure high and stable levels employment and provide support for small and local businesses**

- Accommodating the growth in existing businesses

<table>
<thead>
<tr>
<th>Reference</th>
<th>Indicator name</th>
<th>Description</th>
<th>Target</th>
</tr>
</thead>
<tbody>
<tr>
<td>ESIF Future AMR</td>
<td>Small businesses</td>
<td>Small businesses showing employment growth</td>
<td>No target</td>
</tr>
<tr>
<td>Objective &amp; Assessment Criteria</td>
<td>Reference</td>
<td>Indicator name</td>
<td>Indicator description</td>
</tr>
<tr>
<td>------------------------------------------------------------------------------------------------</td>
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<td>----------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>• Encouraging new businesses into the District</td>
<td>ESiF Future AMR</td>
<td>Employment rate</td>
<td>The proportion of working age people who are in employment</td>
</tr>
<tr>
<td>• Encouraging growth in employment</td>
<td>ESiF Future AMR</td>
<td>Business Registration</td>
<td>New business registration rate</td>
</tr>
<tr>
<td></td>
<td>ESiF Future AMR</td>
<td>Business De-registration</td>
<td>New business de-registration rate</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>20. Stimulate the regeneration of town centres</td>
<td>WDC Future AMR</td>
<td>Vacant units</td>
<td>Vacant units in town centres</td>
</tr>
<tr>
<td></td>
<td>AMR (BD4)</td>
<td>Retail</td>
<td>Quantity of new retail floorspace delivered</td>
</tr>
<tr>
<td></td>
<td>WDC Future AMR</td>
<td>Masterplans</td>
<td>Town Centre Masterplans</td>
</tr>
</tbody>
</table>
11 Implementation