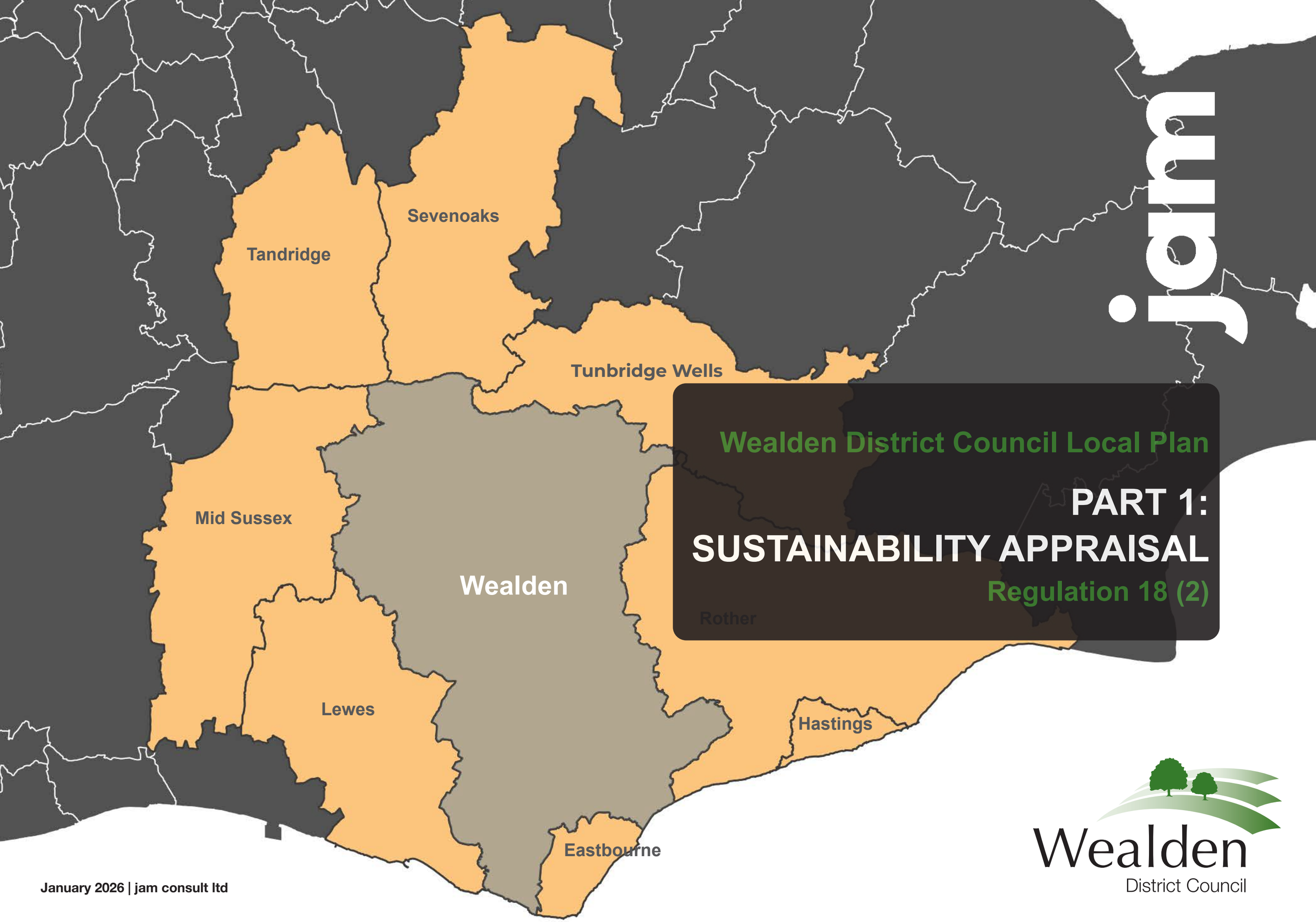



jam

# Wealden District Council Local Plan

# PART 1: SUSTAINABILITY APPRAISAL

## Regulation 18 (2)

Wealden District Council

January 2026 | jam consult ltd

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This report has been prepared using the evidence base provided by Wealden District Council. The conclusions and recommendations contained in this SA Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested and that such information is accurate. Information obtained by Jam Consult Ltd has not been independently verified, unless otherwise stated in the Report. The work described in this Report was undertaken between May 2025 - January 2026 and is based on the information made available during this period. The scope of this report and the services are accordingly factually limited by the timescale available. It is recognised that further information may become available after this report has been published, which may need to be considered in any further work undertaken.

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**The following information is provided in separate reports and should be referred to as part of the SA:**

## SA REPORT : PART 2
## Parish Site Assessments

**Appendix A :** Rejected Sites & Sites with Permission

**Appendix B :** Detailed Site Assessments

## SA REPORT : PART 3
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## APPENDICES

### Appendices 1- 4:

1. SA Regulations
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4. Local Plan Policies

# NON-TECHNICAL SUMMARY

## Introduction

N.1 This document provides the Sustainability Appraisal (SA) Report for Wealden District Council's Consultation Draft Regulation 18 (2) Local Plan. The District's new Local Plan will replace the current set of adopted development plan documents with a new planning framework for the District up to 2040.

N.2 The SA Report has been issued for consultation alongside Wealden District Council's Consultation Draft Regulation 18(2) Local Plan in order to:

- ❑ Ensure that sustainable development has been integrated in the formulation of the draft Regulation 18(2) Local Plan; and
- ❑ Verify that due consideration has been given to social, economic and environmental factors in the plan making process.

N.3 The SA process is intended to promote sustainable development in plan preparation by assessing the extent to which a Plan and its policies, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process will also help to ensure that the proposed policies and site allocations provided in the Local Plan are adequate and proportionate.

## Why is a Sustainability Appraisal needed?

N.4 Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental – of the plan. When conducting a Sustainability Appraisal an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12 (the SEA Regulations).

N.5 Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the 'National Planning Policy Framework (NPPF) 2023' and 'National Planning Practice Guidance (NPPG)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA Directive. The term SA is therefore used to refer to the combined assessment.

## Previous Stages of the SA

### Scoping Report

N.6 The first stage in the SA process is to produce a Scoping Report (**Stage A**), which sets out the context and scope of the SA in accordance with the regulations and best practice guidance (see **Figure N1**). A previous Scoping Report was consulted upon and published in 2020/2021 alongside the Direction of Travel consultation.

N.7 An updated Scoping Report was prepared in **June 2023** and issued to the three main statutory consultees (the Environment Agency, Natural England and Historic England), neighbouring authorities, local communities and other interested parties for a 6 week consultation period via the Council's Consultation portal. The updated Scoping Report was prepared to ensure the consideration of new and emerging evidence, legislation and policy changes.

N.8 A summary of the responses to the **Scoping Report (Update 2023)** are provided at **Appendix A2** of the **Initial SA Report Regulation 18 (1), 2024.**

# NON-TECHNICAL SUMMARY

## Initial SA Report - Regulation 18(1), 2024

N.9 The Initial SA Report was issued for consultation alongside the Regulation 18 Local Plan in March 2024 until May 2024. A total of 30 direct responses were received in relation to the Regulation 18 Initial SA report. Some additional responses in relation to the SA were made on other areas of the Local Plan, which have implications for the SA. This report seeks to capture all the relevant responses in relation to the SA for completeness.

N.10 Local Authorities are required to consult with statutory consultees when preparing the SA of the Local Plan, including:

- ❑ The Environment Agency
- ❑ Historic England
- ❑ Natural England.

N.11 With regards to the response from statutory consultees for the SA process: The Environment Agency did not raise any specific issues on the SA. Historic England considered it too early in the process to make detailed comments.

N.12 Natural England provided a detailed response and raised a range of issues, which are set out in **Appendix 3** of this report. In particular, Natural England had significant concerns about the Frant site allocations given the considerable direct impacts to the High Weald National Landscape and the effect this will have on the conservation of the natural beauty of the High Weald. Natural England is also concerned about the considerable amount of development proposed in the environs of Pevensey Levels SAC/ Ramsar site (within 500m-1km). These sites drain directly into the Pevensey SAC Ramsar. These applications should be considered together to fully inform cumulative impacts from such a large quantum of development on the international sites, and to adopt a masterplanning strategy, in order to avoid impacts and seek opportunities to secure a joined-up approach to SuDs and Green Infrastructure.

N.13 The Council also consulted neighbouring Councils and Duty to Co-operate Partners, Town and Parish Councils, Local Organisations and the Local Community.

N.14 Other key issues raised in the consultation included:

- ❑ **Spatial Strategy and Growth Options**

  Concern was raised by several respondents with regard to the Spatial Strategy and Growth Options, particularly the failure to meet the identified housing need for the District by approximately 4,000 homes. The Spatial Strategy and Growth Options are being reviewed as part of the next stage of the Local Plan, including the implications of the revised NPPF and Government guidance on housing need issued in December 2024. The revised Local Plan will then be subject to further sustainability appraisal and consultation.

- ❑ **Transport and Accessibility**

  National Highways has provided detailed comments on the impact of the Local Plan upon the Strategic Highway Network as well as the Transport Modelling needed to assess proposals. WDC has engaged with National Highways in the development of the Local Plan and will continue to do so as the Plan progresses. Various responses also raised the need to strengthen the use of sustainable modes of transport through the plan to reduce the related impacts upon climate change.

- ❑ **Frant and Horam**

  Several respondents consider the proposed allocations in Frant and Horam to be inappropriate and that options should be considered without these allocations. The inclusion of allocations in these locations will be reviewed as part of the Growth Option review.

- ❑ **Other Site Allocations**

  A range of other site allocations have received comments either in terms of objection or as a result of additional information made available by developers which may alter the results of assessment. Concern has also been raised regarding the accuracy of the assessments and some responses being contradictory. The proposed site allocations in question have been reviewed as part of the revised SA.

N.15 A summary of the responses is set out in the **Appendix 3** of this report, including a response to the issues raised from WDC and any proposed changes to the SA.

# NON-TECHNICAL SUMMARY

## What is this Report?

N.16 This Report sets out the key stages and tasks of the SA process. The Regulation 18 (2) SA Report addresses **Stage B** ('Developing and Refining Options and Assessing Effects') and **Stage C** ('Preparing the Sustainability Appraisal Report') of the SA process. **Appendix A1** signposts where the specific requirements of the regulations can be found within the SA reports.

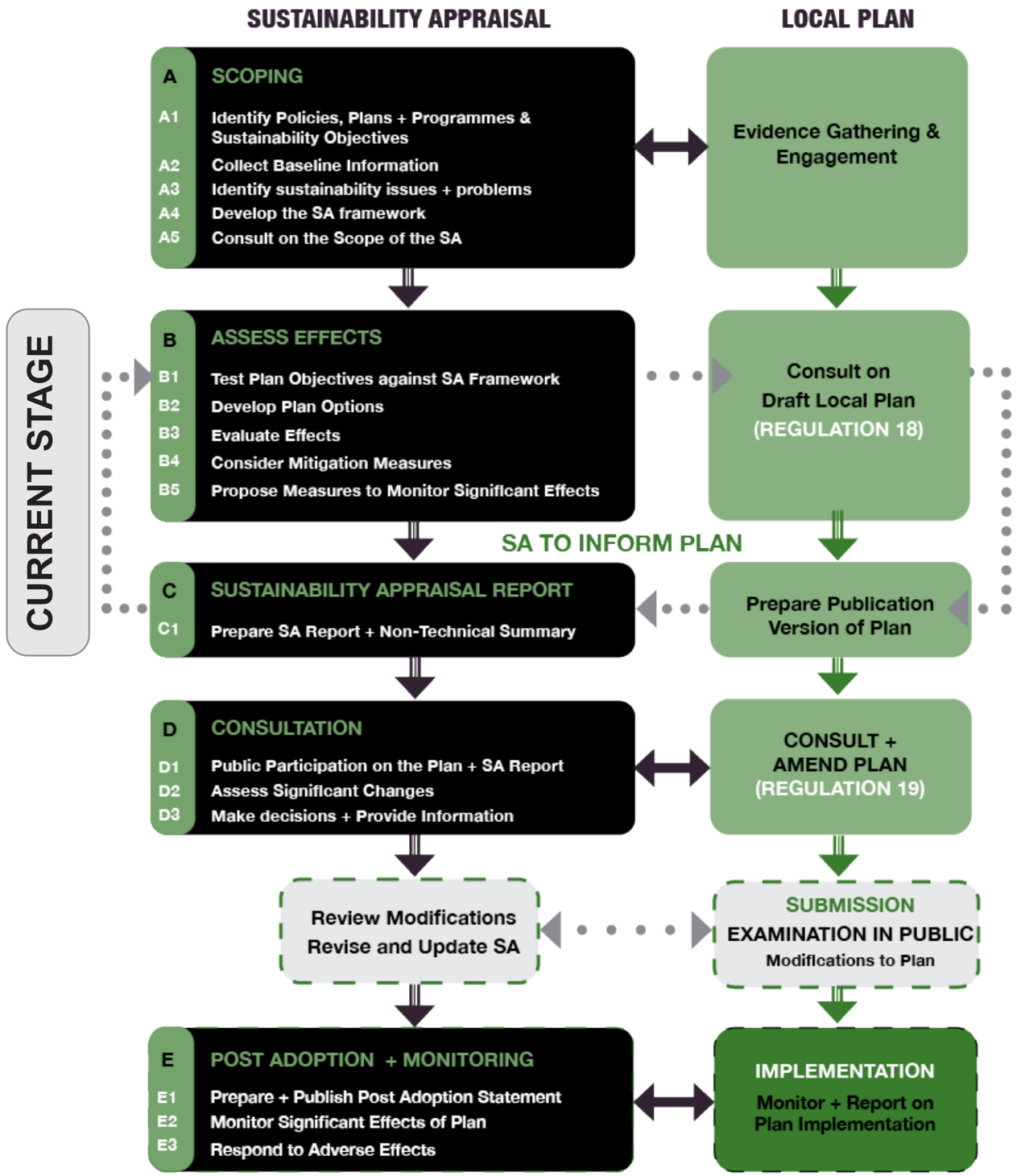



**Figure N1: Stages within the SA process and relationship to the Local Plan preparation**

# NON-TECHNICAL SUMMARY

## Method of Assessment

N.17 The regulations require the assessment to identify, describe and evaluate the likely significant sustainability effects of the Plan. When determining the likely significant effects on the environment, the SA should include the following issues:

- ❑ Biodiversity
- ❑ Population
- ❑ Human health
- ❑ Fauna and flora
- ❑ Soil
- ❑ Water
- ❑ Air
- ❑ Climatic factors
- ❑ Material assets
- ❑ Cultural heritage including architectural and archaeological heritage and landscapes.

N.18 The assessment should also consider the inter-relationships between the effects and the decision-making criteria set out in the SA Framework. The SA Framework sets out the Sustainability Objectives and Indicators which are used to carry out the assessment and can be found in Chapter 4 of the SA report.

N.19 The assessment must also assess:

- ❑ the probability, duration, frequency and reversibility of the effects
- ❑ the cumulative nature of the effects
- ❑ the risks to human health or the environment (e.g. due to accidents)
- ❑ the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)
- ❑ the value and vulnerability of the area.

N.20 The impacts have been scored as follows:

| Sustainability Appraisal Impacts |
|---|
| Major Positive |
| Minor Positive |
| Uncertain |
| Minor Negative |
| Major Negative |
| Not Significant |

N.21 A commentary accompanies the matrix to explain the reasons for the results. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary effects. The assessment of alternative options includes a summary of the reasons for selection and rejection to provide a clear audit trail and document a transparent approach to the assessment.

N.22 The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity.

## Options Considered in the Local Plan

N.23 Under the SEA Regulations, there is a requirement to consider 'reasonable alternatives' when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection. Options have been considered in the development of the draft Local Plan for the Spatial Strategy; the Local Plan Policies; and Site Allocations. The **Initial SA Report 2024 - Appendix 8**, sets out 'reasonable alternatives' considered in the development of the Plan's policies.

N.24 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

# NON-TECHNICAL SUMMARY

## Regulation 18 (1) Options

N.25 The Spatial Strategy is based upon focusing growth in and around sustainable settlements (including strategic extensions), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Tunbridge Wells), whilst also seeking to limit growth in those sustainable settlements that are located within or washed over by the High Weald National Landscape (HWNL) designation.

N.26 Seven options for growth were considered in the development of the Local Plan at Regulation 18(1) Stage in 2024, which were consulted upon alongside the SA and are summarised below.

### Spatial Option A

**To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement.**

### Spatial Option B

**To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells).**

### Spatial Option C

**To focus growth outside of the High Weald National Landscape, within sustainable settlements in the Low Weald (i.e. Uckfield, Hailsham, Polegate and Willingdon and other villages).**

### Spatial Option D

**To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements.**

### Spatial Option E

**To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement and to meet a small proportion of Eastbourne's unmet housing needs.**

### Spatial Option F

**To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).**

### Spatial Option G

**Combined option of B and D.**

## Regulation 18 (2) Options

N.27 The draft Spatial Strategy and associated strategic policies aim to deliver the Local Plan's vision and objectives by guiding development to the right locations and delivering sustainable growth, which takes account of people, places and the environment.

N.28 The Spatial Strategy is based upon focusing growth in and around sustainable settlements (including strategic extensions), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Tunbridge Wells), whilst also seeking to limit growth in those sustainable settlements that are located within or washed over by the HWNL designation.

N.29 Since the publication of the Regulation 18(1) Draft Local Plan and SA the following key changes have occurred, which need to be taken into account in the revised strategy, as a result of the revised NPPF (December 2024):

- **Housing Need Calculation** - increase in the housing need for the District.
- **Transport Modelling** - a move to a 'vision and validate' approach, instead of 'predict and provide'.

N.30 The representations to the Regulation 18(1) (**Appendix 3**) have also been taken into account, which identified the need for further Housing and Employment Allocations, as well as updates to the evidence base.

N.31 Four spatial options have been considered as part of the Regulation 18 (2) Local Plan, which have been tested as 'reasonable alternatives' for the purposes of the SA. The options have been drawn up prior to the SA of the strategic and smaller sites and may therefore be subject to change following consideration of the results and further evidence at the Regulation 19 stage. A summary of the key components of the options is summarised below and explained in more detail in **Sections 8-12** of this report.

N.32 Spatial Options considered at this stage include:

### OPTION 1:

#### Residential Development in / adjacent to Sustainable Settlements

**15,612 homes (63% Housing Need)**
**+ employment 175,421 sqm (82% Employment Need)**

### OPTION 2:

#### Small & Medium Sites around Sustainable Settlements

**19,011 homes (77% Housing Need)**
**+ employment 205,421 sqm (97% Employment Need)**

### OPTION 3:

#### Small & Medium Sites + Significant Extensions to Existing Settlements

**22,211 homes (90% Housing Need)**
**+ employment 262,421 sqm (124% Employment Need)**

### OPTION 4:

#### Small & Medium Sites + Hesmonds Stud + Laughton New Villages

**24,911 homes (100.6% Housing Need)**
**+ employment 315,921 sqm (149% Employment Need)**

# NON-TECHNICAL SUMMARY

## Plan Policies

N.33 The new Draft Local Plan will contain a number of policies that will implement the Plan and help achieve its objectives. A list of the proposed policies is set out in **Appendix 4.**

N.34 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

N.35 The new Draft Local Plan will contain a number of policies that will implement the Preferred Option and help achieve the objectives. All the policies within the Draft Local Plan were appraised against the sustainability objectives and a summary appraisal of the policies is contained within **Chapter 7** of the Initial SA Report, 2024. **Appendix A8** contains a full appraisal of each of the policies. Reasonable alternatives (options) were considered where appropriate for each of the policy areas within the Draft Local Plan and the reasons for selecting or rejecting the approaches provided. Most of the reasons for rejecting options were because the policy options did not comply with the NPPF or reflect local circumstances.

N.36 The majority of the Local Plan policies recorded a major or minor positive impact within the SA. A few areas of uncertainty was identified across the policies at the Regulation 18(1) stage, which have been addressed at the this stage of the Local Plan either through the consideration of further evidence or the identification of suitable mitigation measures.

N.37 The wording of the policies has been modified in some instances or a new policy introduced, which is set out in more detail in Section 14 of this report. The revised policies have been subject to further SA.

N.38 Overall, the policies are considered to perform well against the SA framework.

## Proposed Site Allocations

N.39 The sites submitted to the Council were initially assessed as part of the SHELAA and sites identified as suitable for development were then assessed as part of the SA. Where sites were identified as suitable under the previous SA, they have been carried forward for allocation. Sites which were previously rejected for allocation or sites where the situation has changed have been reconsidered and where appropriate have been subject to further SA alongside any new submissions.

N.40 A summary of the sites considered is set out in **Part 2: Parish Site Assessments,** which considers the suitability of sites by Parish. A list of those sites rejected or already with planning permission is set out in **Part 2: Parish Site Assessments Appendix A**. Detailed appraisals for the possible site allocations are set out within **Part 2: Parish Site Assessments Appendix B**.

N.41 There are 22 potential strategic sites under consideration for allocation within the draft Local Plan. Details of the potential strategic sites considered in the development of the Spatial Strategy and the proposed quantum of development, are set out in **Section 7** of this report, which have all been subject to SA. The detailed SA results for the Strategic Sites are set out in **Part 3: Strategic Site Assessments.**

N.42 There is still quite a lot of uncertainty regarding suitability of the sites as evidence for the Local Plan is not yet complete. Further testing of the proposed allocations against the updated evidence will be carried out at the next stage of the draft Local Plan (Regulation 19) and SA, which will include:

- ❑ Transport Modelling
- ❑ Habitats Regulations Assessment (HRA) including air quality modelling
- ❑ Specific Site Viability Testing.

N.43 It should be noted that all of the sites score minor negative effects against SO1 Climate change and SO6 Waste because all development will result in an increase in carbon emissions and waste prior to mitigation and will therefore have a negative impact. However, relevant Local Plan policies will provide mitigation and any development will need to be in accordance with these policies.

N.44 Where sites have not been allocated but have positive effects against some SA Objectives (such as housing) it is considered that the effects cannot be suitably mitigated through the application of the relevant Local Plan policies.

## Selection & Rejection of Options

N.45 As a result of the Sustainability Appraisal of options, Spatial Options 3 and 4 are considered the best performing Options at this stage in the process, as they both enable the identified need for housing and employment to be met. However, these options will be considered further at the next stage of the Local Plan (Regulation 19) once further evidence has been prepared, which is expected to provide greater certainty in determining the effects. The results of this consultation will also be taken into account.

N.46 Options which have been found to be unsuitable have not been selected for further consideration, although positive elements of these options could be considered.

N.47 The Preferred Option may therefore be a combination of options considered to date rather than one of the options presented in this report.

N.48 Further information on the options is provided in **Sections 6-13 of the Part 1: SA Report.**

# NON-TECHNICAL SUMMARY

## Mitigation Measures

N.49 The SA Regulations require that the SA process should consider ways of mitigating adverse effects and maximising beneficial effects and propose measures to monitor the significant effects of implementing the Plan.

N.50 Mitigation measures have been considered throughout the assessment process and will continue to be reviewed and updated, as appropriate, in future stages of the Local Plan and SA. The Local Plan policies will need to be taken into consideration with regard to all development, many of which identify specific measures for mitigation. Details of the specific mitigation measures, which could be applied are set out in the assessments of the policies and sites included in the Appendices.

## Monitoring

N.51 The Council currently produces an annual Authority Monitoring Report (AMR), which is the main mechanism for assessing the performance of the adopted planning policies. The AMR sets out how the Council's planning policies have been implemented and whether the planning policies are addressing the required issues.

N.52 The indicators set out in the Sustainability Appraisal Framework will be incorporated into the AMR to enable the specific impacts, which relate to the delivery of sustainable development to be assessed in the future. If the AMR identifies any changes that should be made to the policies, such changes will be reviewed, and a further SA undertaken if it is considered necessary.

## Cumulative Effects

N.53 The SEA Directive requires that cumulative and synergistic effects are considered when identifying likely significant effects. These effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the Plan (e.g. noise, dust and visual) have a combined effect.

N.54 The Draft SA Report has considered how the different policy areas and proposed site allocations of the Plan affect the various environmental, social and economic elements identified in the sustainability objectives, including the likely cumulative effects. It is also important to consider the effects of the plan implementation in itself and when combined with other plans i.e. neighbouring authorities.

N.55 An initial assessment of the cumulative impacts was carried out in support of the Plan at Regulation 18 (1) and is included in the **Initial SA Report - Appendix A13.** Consideration of the cumulative impacts of the individual site assessments is included within the assessments **Part 2: Parish Site Assessments - Appendix B and Part 3: Strategic Site Assessments**

N.56 The initial assessment shows that the majority of the Plan Policies perform well against the Sustainability Objectives. However, the assessment of the Spatial Strategy Options show a high degree of uncertainty as well as minor negative impacts. The Options will be further refined at the Regulation 19 Stage of the Local Plan.

N.57 The SA will be updated at the next stage of the Local Plan (Regulation 19) and will be informed by any new and updated evidence to support the Plan, which should enable more accurate results to be determined and the identification of appropriate mitigation measures to minimise any adverse effects.

# NON-TECHNICAL SUMMARY

## Uncertainties

N.58 The Draft SA will need to be reviewed at the next stage to identify any new information that may come forward, which could have implications for the proposed development and Local Plan policies.

N.59 Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work in relation to evidence, which is yet to be prepared, to support the policies or proposed development for site allocations. Specific attention will be given to the uncertain impacts identified when reviewing proposals. Details of the specific mitigation measures will also be provided in more detail as evidence is finalised and also at the planning application stage to ensure that any potential adverse impacts are suitably addressed.

N.60 There are also risks largely outside the Council's control, which could have an impact on development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

## Next Steps

N.61 The Council will consider all the consultation responses (representations) received during the Regulation 18 (2) Stage SA of the Draft Local Plan consultation period. The findings of the SA, together with the consultation responses and further evidence base work will be used to refine the draft Local Plan to produce a draft Publication Local Plan and SA Report for the next stage of the plan-making process (Regulation 19).

N.62 Following the Regulation 19 stage consultation, the draft Publication Local Plan and SA will be submitted for Examination in Public (EiP). If any major modifications are identified as a result of the EiP, the Council may need to carry out a further SA of the modifications. To ensure that the SA process is as concise as possible, and avoids unnecessary repetition, subsequent SA Reports will build on this SA Report.

Regulation 18(2) of Wealden District Draft Local Plan

# PART 1 : SUSTAINABILITY APPRAISAL (SA) REPORT

# 1 Introduction

## 1.1 What is this document?

1.1.1 This document provides the Sustainability Appraisal (SA) Report for Wealden District Council's Consultation Draft Regulation 18(2) Local Plan. The District's new Local Plan will replace the current set of adopted development plan documents with a new planning framework for the District up to 2042.

1.1.2 The SA Report has been issued for consultation alongside Wealden District Council's Consultation Draft Regulation 18(2) Local Plan in order to:

- ❑ Ensure that sustainable development has been integrated in the formulation of the draft Regulation 18 Local Plan; and
- ❑ Verify that due consideration has been given to social, economic and environmental factors in the plan making process.

1.1.3 To make the document more manageable the report has been split into 3 parts:

- ❑ **Part 1 - Sustainability Appraisal Report**
  The Non-Technical Summary; Methodology; Spatial Strategy; Policy Assessment; Cumulative Impacts & Mitigation
- ❑ **Part 2 - Parish Site Assessments**
  A summary of the characteristics of each Parish and the possible site allocation assessments has been prepared by Parish. **Appendix A** provides details of the rejected sites and sites which have planning permission. **Appendix B** provides the detailed site assessments of the sites which are considered suitable.
- ❑ **Part 3 - Strategic Site Assessments**
  22 potential strategic sites have been assessed in more detail, which comprise the larger more complex sites for proposed development.

1.1.4 The SA process is intended to promote sustainable development in plan preparation by assessing the extent to which a Plan and its policies, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The process will also help to ensure that the proposed policies and site allocations provided in the Local Plan are adequate and proportionate.

1.1.5 Public consultation and consultation with the Statutory Consultees (Natural England, the Environment Agency and Historic England) is required as part of the SA process.

1.1.6 This SA Report addresses **Stage B** ('Developing and Refining Options and Assessing Effects') and **Stage C** ('Preparing the Sustainability Appraisal Report') of the SA process.

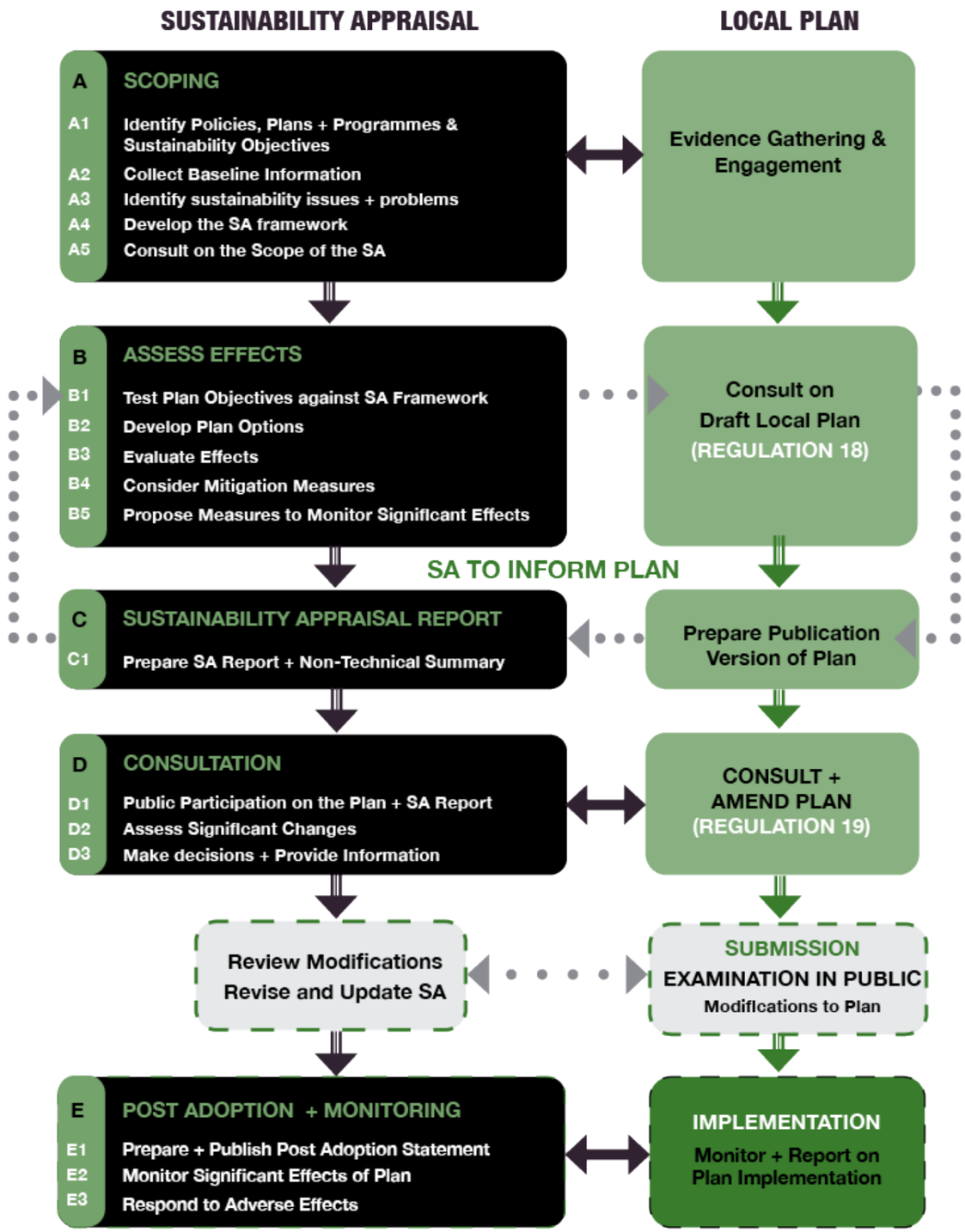



**Figure 1.1: Stages within the SA process and relationship to the Local Plan preparation**

# INTRODUCTION

## 1.2 Why is a Sustainability Appraisal needed?

1.2.1 The Town and Country Planning (Local Planning) Regulations (2012) require Local Plans throughout their evolution to be subject to SA, in accordance with section 19(5) of the Planning and Compulsory Purchase Act 2004. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met. The Strategic Environmental Assessment EU Directive (2001/42/EC) requires a 'Strategic Environmental Assessment' (SEA) of plans and programmes, including development plans, which is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (2004, Section 12) (commonly referred to as the SEA Regulations).

1.2.2 Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment. Sustainability Appraisals should be carried out in accordance with Government Policy and Guidance the 'National Planning Policy Framework (NPPF) 2023' and 'National Planning Practice Guidance (NPPG)'.

1.2.3 This Report sets out the key stages and tasks of the SA process. Appendix A1 signposts where the specific requirements of the regulations can be found within the SA reports.

## 1.3 Background to the Local Plan

1.3.1 The new Local Plan will provide an overarching planning framework for the local area excluding a small area in the south of the District, which forms part of the South Downs National Park. The South Downs National Park has planning powers for its own area.

1.3.2 The plan will replace the current set of adopted development plan documents (the Wealden Local Plan 1998 saved policies, the Core Strategy 2013 and the Affordable Housing Delivery Local Plan 2016) with a new planning framework for the District up to 2042.

1.3.3 The Local Plan will provide a vision for the District as well as a long-term spatial strategy for growth, including the locations where development should take place. The Plan will shape places and spaces, plan, monitor and manage future growth and change within the District. The Plan will be the key planning document against which decisions on planning applications will be assessed and made, unless material considerations indicate otherwise.

1.3.4 The Plan covers a broad range of spatial issues to contribute towards the creation of sustainable communities within the District, including the provision of housing, employment, retail, green and blue infrastructure, environmental and heritage protection and measures to help reduce carbon emissions.

1.3.5 Alongside the Plan, there are a number of Development Plan Documents which provide an overarching framework for managing and monitoring development across the District including:

- ❑ Sustainability Appraisal (SA)
- ❑ Local Development Scheme (LDS)
- ❑ Statement of Community Involvement (SCI)
- ❑ Neighbourhood Plans (Made and Emerging)
- ❑ Supplementary Planning Documents (SPDs)
- ❑ Authority Monitoring Report (AMR)
- ❑ Infrastructure Delivery Plan (IDP).

## 1.4 Previous Stages of the SA

### Stage A - Scoping Report

1.4.1 The first stage in the SA process is to produce a Scoping Report (Stage A), which sets out the context and scope of the SA in accordance with the Regulations and best practice guidance (see Figure 1).

1.4.2 An updated Scoping Report was published for consultation in 2023. Formal consultation was undertaken by the Council in line with regulatory and best practice guidance. The consultees included the Statutory Consultees: Natural England; The Environment Agency; and Historic England, as well as key local stakeholders.

1.4.3 Around fifty responses were received as part of the SA Scoping Report consultation, including the Environment Agency and Historic England. The Council did not receive a response from Natural England at this stage. A summary of the consultation responses is provided in **Appendix A2 - Initial SEA Report, 2024.**

1.4.4 In general, the view was that the Scoping Report provided an appropriate methodology and framework for the Sustainability Appraisal of the Local Plan. The key issues raised related to some changes to the baseline data, in particular Air Quality (Chapter 7) and Water (Chapter 14). The wording for the sustainability objectives and indicators was also refined in response to the consultation to remove any duplication and improve clarity. A number of Plans, Policies and Programmes were also added into Appendix A of the SA Scoping Report.

### Stage B - Initial SA Report (Regulation 18(1))

1.4.5 An Initial Draft SA Report was issued for consultation in 2024 alongside the Draft Local Plan Regulation 18(1). The Initial SA Report set out the key stages and tasks of the SA process.

1.4.6 The SA Report tested the proposed Spatial Strategy including seven growth options, the site assessments and an appraisal of all the draft policies.

1.4.7 The consultation responses expressed concern about the failure of the strategy to meet the identified housing and employment need for the District. A summary of the consultation responses can be found at **Appendix 3** of this report.

# INTRODUCTION

## 1.5 Equalities Impact Assessment (EqIA)

1.5.1 An EqIA is a tool which assists public authorities, including Local Authorities such as WDC, to comply with the requirements of the Public Sector Equality Duty (PSED) contained in section 149 of the Equality Act 2010.

1.5.2 The Equality Act is clear that Local Authorities must have due regard to a number of equality considerations when exercising their functions. The Duty requires the Council to consider how their policies and/or decisions affect people or the different groups living and working in their local area who are protected under the Equality Act and, this includes planning policies or decisions.

1.5.3 The Equality Act provides protection for people against discrimination in relation to nine 'protected characteristics', which include age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

1.5.4 The EqIA requirements have been considered as part of the SA process. The Council will also produce a separate EqIA for the Plan to ensure that the plan and its policies do not discriminate against those with protected characteristics and ensure that opportunities to address inequality are taken.

## 1.6 Health Impact Assessment

1.6.1 Although a Health Impact Assessment (HIA) is not a statutory requirement, the NPPF requires planning policies and decisions to:

**"enable and support healthy lifestyles, especially where this would address identified local health and wellbeing needs".**

1.6.2 The Council has decided not to undertake a separate Health Impact Assessment (HIA) of the Local Plan but will integrate the HIA into the SA. The integration of the HIA into the SA will ensure that health and well-being impacts, particularly those affecting vulnerable groups and associated with health inequalities, are identified and addressed appropriately within the Plan.

## 1.7 Habitats Regulations Assessment (HRA)

1.7.1 A Habitats Regulations Assessment (HRA) refers to the several distinct stages of Assessment which must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine if a plan or project may affect the protected features of a habitats site before deciding whether to undertake, permit or authorise it. European Sites and European Offshore Marine Sites identified under these regulations are referred to as 'habitats sites' in the NPPF.

1.7.2 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). Whilst the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment continues, as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019.

1.7.3 There are a number of sites designated as sites of European importance located within Wealden District. These include:

- ❑ Ashdown Forest Special Area of Conservation (SAC);
- ❑ Ashdown Forest Special Protection Area (SPA);
- ❑ Pevensey Levels SAC; and
- ❑ Pevensey Levels Ramsar site.

1.7.4 There are also SACs, SPAs and Ramsar Sites located in other districts and boroughs that the Council has considered as part of its HRA process. These include:

- ❑ Lewes Downs SAC; and
- ❑ Castle Hill SAC.

1.7.5 An HRA is being prepared alongside the development of the Local Plan to assess the potential threats and pressures to Habitats sites and analysis of potential impact pathways. An Interim Regulation 18 HRA, 2024 explored the potential for Likely Significant Effects (LSEs) at the above-mentioned sites and found that an Appropriate Assessment will be required regarding LSEs at Ashdown Forest SPA, Ashdown Forest SAC, Pevensey Levels SAC and Ramsar site and Lewes Downs SAC. The preliminary findings of the HRA indicated that mitigation will be required in relation to Ashdown Forest SPA and Pevensey Levels SAC Ramsar to conclude that the Local Plan will not cause any adverse harm to the integrity of the Habitats sites.

1.7.6 The Interim HRA provided an initial assessment of the Habitats sites located within and surrounding Wealden District to help inform the scope of the Habitats sites assessed, which will in turn inform the HRA for the Regulation 19 version of the Local Plan.

# 2 Sustainability Appraisal Methodology

## 2.1 Purpose of the Sustainability Appraisal

2.1.1 The purpose of the SA is to promote sustainable development through the integration of social, economic and environmental considerations into the plan making process. The SA must show how the requirements of the SEA Directive and UK regulations have been met (See Appendix A1).

2.1.2 The SA tests a Local Plan against sustainability objectives and identifies and reports on the likely significant effects of a plan's policies and proposals. The SA should ensure that the policies and proposals contained in the Local Plan contribute to the aims of sustainable development.

## 2.2 Planning Policy and Sustainable Development

2.2.1 The National Planning Policy Framework 2023 (NPPF) must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Planning policies and decisions must also reflect and, where appropriate, promote relevant EU obligations and statutory requirements. The NPPF refers to the most widely accepted objective of sustainable development as:

**"meeting the needs of the present without compromising the ability of future generations to meet their own needs".** [1]

2.2.2 The NPPF specifies that the purpose of the planning system is to achieve sustainable development, which has three overarching objectives: social, economic and environmental. These objectives should be delivered through the preparation and implementation of plans as follows:

### SUSTAINABLE DEVELOPMENT OBJECTIVES

- **An Economic Objective** - To help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- **A Social Objective** - To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- **An Environmental Objective** - To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

## 2.3 The Sustainability Appraisal Process

2.3.1 The SA process assesses the likely significant social, economic and environmental effects of the policies and proposals within a plan from the outset of its development. The SA is an iterative process as it evolves alongside, and feeds into, the development of the Local Plan. For the development of the District's Local Plan, the SA will inform the selection and refinement of policy and site allocation options.

2.3.2 The SA has been prepared by Council Officers in accordance with the relevant regulations and guidance:

- EU Directive (2001/42/EC) or SEA Directive
- Environmental Assessment of Plans and Programmes Regulations (2004) (commonly referred to as the SEA Regulations)
- Planning and Compulsory Purchase Act 2004, Section 19(5) and Section 39 (b)
- National Planning Policy Framework 2023
- Government's Planning Practice Guidance (PPG) on SEA and SA

2.3.3 The Council has also used Jam Consult Ltd, a sustainability and planning consultancy, as a 'critical friend' throughout the process to review the process and provide independent advice.

1 Resolution 42/187 of the United Nations General Assembly.

## 2.4 Stages in the SA Process

2.4.1 The Government's PPG on SA sets out five key stages in the preparation of Sustainability Appraisal for Local Plans. Each key stage is also divided up into a number of tasks.

**2.4.2** **Figure 2.1** shows the five stages within the SA process and sets out how the Local Plan process occurs simultaneously, which is illustrated in the Government's Planning Practice Guidance (PPG) on SEA and SA.

**2.4.3** **Stage A** (Setting the context and objectives, establishing the baseline and deciding on the scope) was addressed previously through the Scoping Report prepared in June 2023.

2.4.4 The Initial SA, met the requirements of **Stage B** (Developing and Refining Options and Assessing Effects) of the SA process and **Stage C** (Preparing the Sustainability Appraisal Report) of the SA process. As Figure 2.1 shows, these stages may be carried out more than once.

2.4.5 The **Regulation 18(2) SA Report** is an additional iteration of **Stages B and C** to reflect changes to legislation, policies, guidance and updated evidence. **Regulation 19** will provide a further iteration of the SA of the Local Plan before the Plan is submitted for examination

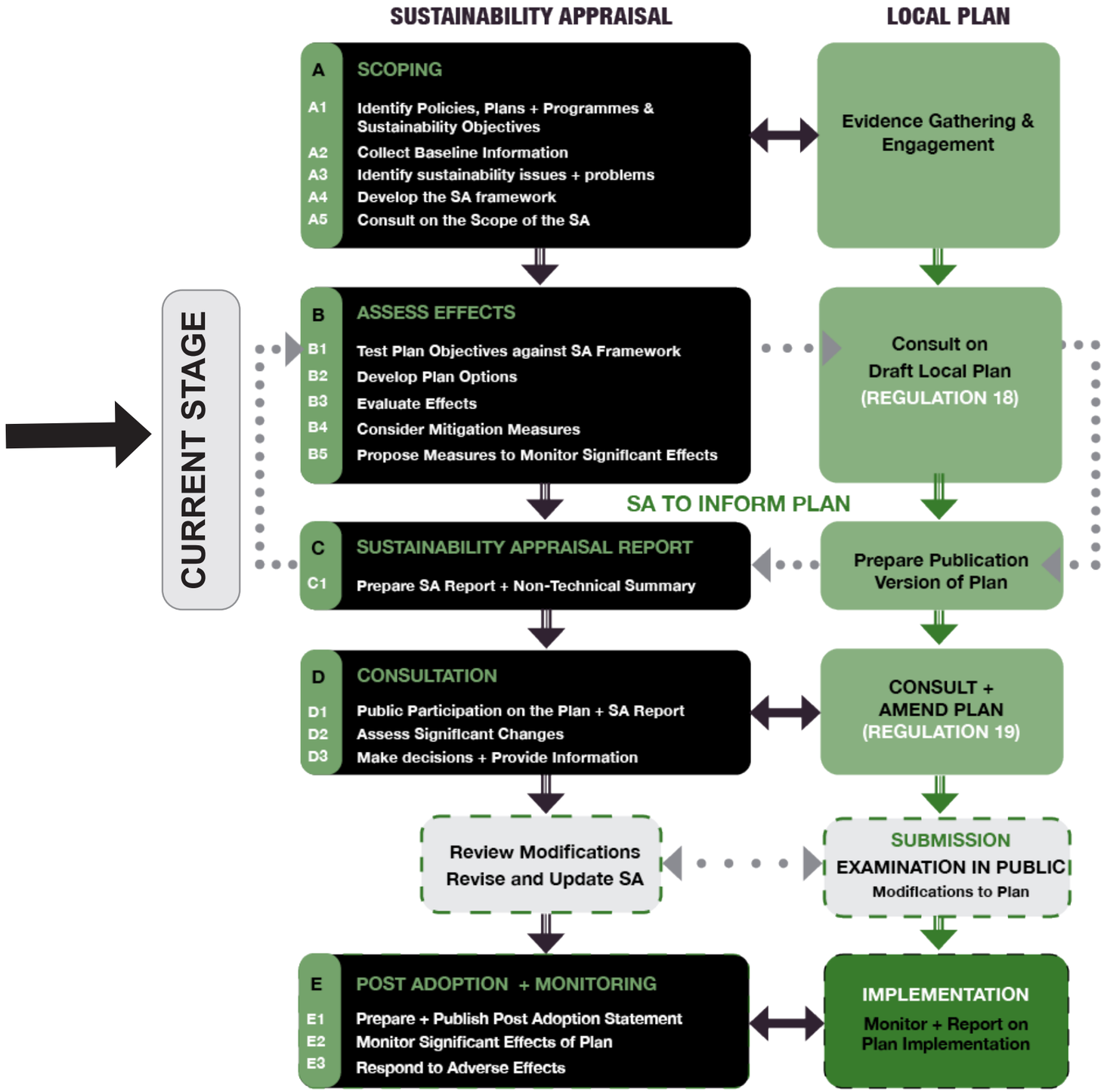



**Figure 2.1: Current Stage within the SA process and relationship to the Local Plan preparation**

## 2.5 Method of Assessment

2.5.1 The **Environmental Assessment of Plans and Programmes 2004 (Section 12)** sets out the requirements to be included in the SA, which are detailed in **Schedule 1 & 2** of the Regulations. The assessment will need to identify, describe and evaluate the likely significant sustainability effects of the Plan. When determining the likely significant effects on the environment, the SA should include the following issues:

- Biodiversity
- Population
- Human health
- Fauna and flora
- Soil
- Water
- Air
- Climatic factors
- Material assets
- Cultural heritage including architectural and archaeological heritage and landscapes.

2.5.2 The assessment should consider the inter-relationships between the effects (how they interact with one another) and the decision-making criteria set out in the SA Framework.

2.5.3 The assessment must also assess:

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

2.5.4 The assessment has been carried out in the form of a matrix and includes the identification of potential mitigation measures. The SA predicts and evaluates the likely significant effects including:

- short-, medium- and long-term effects
- temporary and permanent, direct and indirect effects
- cumulative or synergistic effects
- consideration of mitigation measures
- proposals to monitor the effects of the Plan.

2.5.5 The impacts are scored as follows:

| Sustainability Appraisal Impacts | |
|---|---|
| Major Positive | |
| Minor Positive | |
| Uncertain | |
| Minor Negative | |
| Major Negative | |
| No Significant Impact | |

2.5.6 A commentary accompanies the matrix to explain the reasons for the results. The results are assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary effects. The assessment of alternative options includes a summary of the reasons for selection and rejection to provide a clear audit trail and document a transparent approach to the assessment.

2.5.7 The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect. Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity.

2.5.8 The SEA checklist (**Appendix 1**) sets out the stages of the SA which have been completed according to the Regulations and provides a signpost to the relevant sections of the report.

## 2.6 Limitations of predicting effects

2.6.1 SA is a tool for predicting potential significant effects and is an objective process. Predicting effects relies on an evidence based approach and incorporates expert judgment. When predicting effects, it is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and / or the success of mitigation measures.

2.6.2 The assessments that have been undertaken in this report are based on the best publicly available information and every attempt has been made to predict effects using this information as accurately as possible. The 'reasonable alternatives' have been assessed using the same method. Where detailed or up-to-date data is unavailable, then reasonable assumptions have been made to inform the assessments. At this stage some effects remain uncertain. A further SA at the Regulation 19 Stage of the Local Plan should address any remaining uncertainty.

**2.6.3** **A** number of difficulties and limitations were experienced in the course of the SA including the following:

- In many instances detailed information is not available for the site assessments. Reasonable assumptions have, therefore, been made based on the information that is available.
- The evidence base upon which effects have been identified has continued to evolve and is updated throughout the plan preparation process. Every effort has been made to ensure that this version of the SA Report reflects the latest evidence base.
- Additional evidence and information is expected to be produced as the Local Plan process advances, which will be used to inform the subsequent versions of both the Local Plan and SA. This will include:
  - Transport modelling
  - Landscape Character Assessment
  - Habitats Regulations Assessment
  - Viability Assessment.

# 3 Baseline Information

## 3.1 Plans, Policies and Programmes

3.1.1 The relevant Plans, Policies and Programmes (PPPs) at the international, national, regional, sub-regional and local level, which could have implications for the SA were identified and reviewed to establish any issues relevant to the Local Plan.

3.1.2 The National Planning Policy Framework (NPPF) 2024 sets out the Government's planning policies for England and how these should be applied. The NPPF must be taken into account in preparing the development plan and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements. At the heart of the Framework is a presumption in favour of sustainable development as set out at **Paragraph 11 of the NPPF.**

3.1.3 The NPPF should be read in conjunction with National Planning Policy Guidance (NPPG), which adds further context and provides more detailed guidance on national planning policy.

3.1.4 Planning policies and decisions must also reflect the new requirements of the Environment Act 2021 ('the Act'). The Act sets out targets, plans and policies for protecting and improving the natural environment in the UK. The Act provides the UK's new legal framework for environmental protection. Given that the UK has now left the EU, the Act brings in new laws in relation to improving air and water quality, tackling waste and promoting resource efficiency, improving nature and biodiversity, protecting the climate, improving environmental reporting and making other environmental improvements.

**Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:**

**a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;**

**b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:**

i. **the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or**

ii. **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

**NPPF: Para 11**

3.1.5 In addition to the requirements of the NPPF (2024) and the Environment Act (2021), the relevant provisions in the Levelling Up and Regeneration Act 2023[2] (LURA) must be considered when preparing the development Plan. In general, the LURA aims to reverse the geographical disparities between different parts of the UK by spreading opportunity more equally. The Act is wide-ranging but has planning reform at its heart. The Act gained Royal Assent in October 2023, however many of the planning reforms are subject to secondary legislation and further consultation will be needed.

3.1.6 The LURA builds on targets set by the Environment Act 2021 to foster better environmental outcomes. The LURA introduces a new form of environmental assessment known as Environmental Outcome Reports (EOR). The intention is for Environmental Outcome Reports to replace the existing system of Sustainability Appraisals (SA), Strategic Environmental Assessments (SEA) and Environmental Impact Assessments (EIA). The exact form of the EORs will also be subject to further consultation in the future. This Local Plan is being prepared using the old planning system in accordance with the transitional arrangements.

3.1.7 A full list of relevant PPPs that are of relevance to the SA and the Local Plan are provided in full at **Appendix A, SA Scoping Report, 2024.**

## 3.2 Baseline Information

3.2.1 The Scoping Stage entailed an extensive review of information in relation to the existing baseline characteristics of the area to establish the evidence base, from which sustainability issues and constraints were identified. The baseline data is set out in **Sections 5.0 – 18.0 of the Scoping Report Update 2023** (updated to account for consultation responses January 2024).

2 Levelling - up and Regeneration Act 2023

# 4 Issues & Objectives

## 4.1 Key Sustainability issues

4.1.1 The key Sustainability issues were identified through the consideration of the baseline information and Policies, Plans and Programmes at the Scoping Stage. The baseline information and the PPPs will be kept under review to inform the key sustainability issues facing the District as the Plan progresses. The key sustainability issues are set out in the adjacent table.

## 4.2 Sustainability Objectives

4.2.1 The key sustainability issues have been used to inform the Sustainability Objectives. The objectives were initially developed at the Scoping Stage in 2020/2021 and were then refined following 'The Direction of Travel' Consultation. As part of Scoping Report Update 2023/24, the SA Objectives have been further refined and updated to reflect policy and regulatory changes, the assessment of new baseline data and the findings of the further review of the PPPs.

4.2.2 The updated SA Objectives have also been informed by the specific sustainability topics within Schedule 2 of the SEA Regulations, which the Council is required to include. The SA objectives are distinct from the Local Plan objectives though they may in some cases overlap with them.

## 4.3 The SA Framework

4.3.1 The Sustainability Appraisal Framework (SA Framework) is used to assess the sustainability effects of the plan. The framework includes the sustainability objectives, decision making criteria and indicators to be used when undertaking the appraisal. The indicators should be measurable to provide a way of checking whether the objectives are being met, for example, the number of homes built. The SA Framework can be found at **Appendix 2** of this Report.

| | |
|---|---|
| **POPULATION AND COMMUNITY** | A growing population will create a need for further housing and infrastructure including community infrastructure. An aging population is likely to increase demand in areas such as housing provision and health care services. There are some areas of deprivation within the District. |
| **CLIMATE CHANGE** | Challenging targets for emission reductions and emission reductions being too slow. Addressing the reliance on the private motorcar given the rural nature of the District. Balancing economic development alongside reducing greenhouse gas emissions. Ensuring that both existing and future development is protected from flood risk. |
| **AIR, LIGHT & NOISE** | Greater pressures on air quality and light pollution may occur through increases in development and increased traffic, which could lead to deteriorations in air and light pollution. An increase in development, if located inappropriately, may increase the potential for communities to be affected by noise. |
| **HEALTH & WELLBEING** | An increase in elderly residents (65+) and levels of people living with disability, long term illness and dementia. Health Care services and facilities as well as open spaces, sports and recreation facilities need to be available and accessible to all, taking into account increased demand from new housing. |
| **HOUSING** | The affordability of homes is an issue and there is a high demand for affordable housing (both rented and ownership). There is a need for older and specialist housing and the demand for this is likely to increase given the aging population. There is also a demand for more self-build / custom housing. There is a limited amount of Gypsy, Traveller and Travelling Showpeople Accommodation and demand to deliver new permanent pitches/plots. |
| **EDUCATION & SKILLS** | The District has a lower level of highly qualified residents (at level 4 or above) than the national average and there has also been a decrease in the number of apprenticeship completions. High house prices could lead to a shortage of key workers (i.e. teachers) particularly at the start of their careers, given the lower salaries on offer. There are constraints on availability of the workforce, skills and premises, which affects business performance and growth. |
| **ECONOMY** | Limited amount of flexible, modern, affordable business accommodation in the District. The average wage within Wealden has seen a decrease in recent years in comparison to the national average. Out-commuting for work is a considerable issue, which causes pressure on the transport network. Business, particularly small-to-medium sized enterprises (SMEs), need support to access and build skills, knowledge and capacity to reach net zero, and to minimise costs. The need to provide a greater variety and quantum of visitor accommodation to encourage overnight visitors who will financially contribute a greater amount to the economy. The District's town centres face threats from residents spending leakage to neighbouring areas |
| **HISTORIC ENVIRONMENT** | Large number of heritage assets within the District that require conservation and protection. There is a risk that adverse impacts could arise from development in the future. |
| **SOIL LAND & MINERAL RESOURCES** | Limited brownfield land in the District will result in development mostly on greenfield sites. Development on brownfield land or land at risk of contamination could cause the release of contaminants. Development could affect the availability of good quality agricultural land if this is not protected. The failure to protect soils in relation to compaction, erosion, disturbance could result in numerous adverse impacts such as the loss of carbon storage, the loss of biodiversity and the introduction of invasive species. |
| **WATER** | There is significant pressure on the region's water resources and water infrastructure, which is likely to increase with an increase in population. An improvement to the quality of water in water bodies is required to protect habitats and species and to achieve good ecological and chemical status. Development pressures result in greater areas of hard / impermeable surfacing being created which exacerbate surface runoff and the conveyance of chemicals / pollutants to water bodies. |
| **BIODIVERSITY** | International, national and local designated sites within the District may be at risk from damage as a result of development pressure and associated human disturbance. Greenfield development could contribute to biodiversity loss and fragmentation of habitats. |
| **LANDSCAPE & TOWNSCAPE** | New development has the potential to affect the High Weald National landscape, the setting of the South Downs National Park as well as other valued landscapes and townscapes including landscape features, character and local distinctiveness. |
| **TRANSPORT & CONNECTIVITY** | The rurality of the District brings challenges for transportation and connecting communities with employment, education, services and facilities. Nearly half of the District's population lives in rural or remote areas with no or very limited access to public transport. The network, frequency and connectivity of different services is currently poor. Transport infrastructure is at or near to capacity during peak times at certain locations / key junctions. There is poor broadband connectivity in some areas and the 4G mobile service lags behind the national average for coverage due to the rural infrastructure. There are constraints on the capacity and reliability of the Transmission Network Operators (TNOs) and Distribution Network Operators (DNOs) to enable sufficient EV charging infrastructure. |
| **WASTE** | An increase in households and businesses will lead to an increase in household waste generation including construction waste. |

**Figure 4.1: Key Sustainability Issues**

# 5 Local Plan Vision & Objectives

## 5.1 The Vision and Objectives

5.1.1 The new Local Plan includes a Vision and Objectives for the District in 2040. The vision forms the basis on which the Strategic Objectives and the Plan's Policies are built.

5.1.2 To implement the Vision, a set of Objectives have been identified for the Local Plan through pre-production engagement with Members and the production of the SA Scoping Report Update.

**LOCAL PLAN OVERARCHING VISION:**

**"Through careful planning and stewardship, Wealden District in 2040 will be a place where our natural environment has been protected, improved and restored. It will offer a safe, healthy and attractive place to live, contributing to quality of life and community cohesion. The District will have a fair, stable and sustainable economy, allowing people to live well, and both residents and visitors to our District will be able to enjoy the outstanding beauty of our countryside, enjoy the benefits of our green and blue infrastructure and our heritage."**

## 5.2 Assessment of Vision and Objectives

5.2.1 The Vision and Objectives were assessed against the Sustainability Assessment framework to check their compatibility. A summary table of the results is provided below. The majority of the Vision and Objectives were found to have a major or minor positive impact against the sustainability objectives. Some uncertainty was recorded for the vision and objectives (5 and 6), where the economic growth expected may have an adverse impact upon environmental factors and has not been addressed in these aspects of the vision and objectives. However, any negative impacts of growth will be addressed through appropriate policies within the Local Plan itself.

**Table 5.1 Summary of Vision & Objectives SA Results**

| SUSTAINABILITY OBJECTIVES | | Policy: Vision and Objectives | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|
| | | VO1 | VO2 | VO3 | VO4 | VO5 | VO6 | VO7 | VO8 |
| SO1 | CLIMATE CHANGE MITIGATION | | | | | | | | |
| SO2 | CLIMATE CHANGE ADAPTATION | | | | | | | | |
| SO3 | FLOOD RISK | | | | | | | | |
| SO4 | WATER RESOURCES & QUALITY | | | | | | | | |
| SO5 | SOIL, LAND & MINERALS | | | | | | | | |
| SO6 | WASTE | | | | | | | | |
| SO7 | POLLUTION | | | | | | | | |
| SO8 | GREEN & BLUE INFRASTRUCTURE | | | | | | | | |
| SO9 | BIODIVERSITY | | | | | | | | |
| SO10 | LANDSCAPE & TOWNSCAPE | | | | | | | | |
| SO11 | HISTORIC & CULTURAL HERITAGE | | | | | | | | |
| SO12 | DIGITAL INFRASTRUCTURE | | | | | | | | |
| SO13 | TRANSPORT & ACCESSIBILITY | | | | | | | | |
| SO14 | HOUSING | | | | | | | | |
| SO15 | HEALTH & WELLBEING | | | | | | | | |
| SO16 | QUALITY OF LIFE & PLACE | | | | | | | | |
| SO17 | SOCIAL INCLUSION | | | | | | | | |
| SO18 | ECONOMY & EMPLOYMENT | | | | | | | | |
| SO19 | TOWN & VILLAGE CENTRES | | | | | | | | |
| SO20 | EDUCATION & SKILLS | | | | | | | | |

# LOCAL PLAN VISION & OBJECTIVES

| Vision | Objectives |
|---|---|
| **Responding to the Climate Crisis** | |
| **1. We will have made significant progress towards being a net zero carbon district and we will be more prepared and resilient to the effects of the climate crisis through climate change prevention, adaptation and mitigation.** | a. To respond to the challenges of the climate crisis, ensuring a sustainable built and natural environment<br>b. Support the transition to a low carbon society by minimising greenhouse gas emissions<br>c. Reduce energy consumption and ensure resources are used effectively<br>d. Increase the use of renewable and low carbon energy<br>e. Protect and ensure the sustainable use of our natural resources and minimise waste. |
| **Supporting the delivery of infrastructure** | |
| **2. Infrastructure, services and community facilities will have been provided and key projects delivered to match the requirements and needs of new and existing communities and to contribute to healthy and sustainable living for all of our residents.** | a. Work with our partners to provide the right level of infrastructure and capacity, services, facilities and community assets to benefit both new and existing communities<br>b. Supporting communities by protecting existing infrastructure, services, facilities and community assets<br>c. Support opportunities that will reduce health inequalities, improve our communities' health, well-being and quality of life<br>d. Protect and improve the provision of our sport, leisure and recreation facilities<br>e. Maximise opportunities that will encourage social interaction, enhance mental and physical well-being, and reduce social exclusion. |
| **Living safe, inclusive and healthy lives** | |
| **3. Sustainable transport, active travel choices and accessible walkable and cyclable neighbourhoods will have contributed to positive outcomes for climate change, people and places allowing our communities to thrive, live healthy and inclusive lives, and meet their daily needs locally.** | a. Facilitate and promote the provision of a safe, sustainable and active transport network, supporting the take-up of low and zero emission vehicles, walking, wheeling and cycling<br>b. Facilitate greater connectivity through the provision of footpaths and cycle paths as well as greater integration between different modes of transport<br>c. Facilitate efficient patterns of movement to ensure access to employment and key local services and facilities. |
| **Delivering new homes for all** | |
| **4. We will have delivered new homes in the most accessible and sustainable locations and in a way that enhances and respects the distinctive qualities of our District.** | a. Deliver high quality, well-designed and energy efficient new homes to meet local need<br>b. Boost the provision of affordable and specialist homes, to ensure that there is suitable housing for everyone. |
| **Supporting a sustainable and prosperous economy allowing people to live well** | |
| **5. We will have supported our local economy to prosper, providing new sites to help meet the needs of both existing and future businesses and we will have delivered new well-paid jobs to meet the needs of our communities.** | a. Maintain high levels of employment within the District;<br>b. To support sustainable and inclusive economic and job prosperity and address barriers to investment<br>c. To retain, enhance and expand existing employment areas and premises<br>d. Reduce the need for out-commuting<br>e. To maintain a fair, stable and resilient economy to ensure business and employment opportunities for all<br>f. To improve and better align the skills of the workforce with employer's needs and achieve an increase in wages<br>g. To support and encourage business start-ups and encourage rural businesses to diversify<br>h. To support local businesses to adopt sustainable practices as well as support the implementation of a circular economy<br>i. Enhance the District's tourism, cultural and visitor accommodation offer and improve sustainable access to our attractions. |
| **Vibrant town and local centres** | |
| **6. Our towns and village centres will have been supported by both new and existing communities and will be successful in contributing to the character of our district. Our centres will act as vibrant and vital community hubs for both our residents and visitors.** | a. Ensure that new and existing communities can easily access and support town and local centres<br>b. Maintain and strengthen the role of our town and local centres; providing a strong and diverse core of town centre uses<br>c. Ensure that development makes a positive contribution to the distinctive qualities of our town and local centres including the public realm. |
| **Protecting our natural environment and increasing biodiversity** | |
| **7. We will have assisted in nature recovery and contributed to the halt of species decline and conserved and enhanced our water environments. Our biodiversity rich and beautiful countryside, coastal and water environments will continue to define our District.** | a. To protect and enhance biodiversity and geodiversity and extend areas for wildlife<br>b. Maintain and improve the quality and connectivity of our green and blue spaces and functional habitats and improve access to nature<br>c. Deliver net gains for biodiversity<br>d. Protect and improve our water environments. |
| **Attractive and locally distinctive places** | |
| **8. New development will be attractive, will respect our most valued landscapes, local distinctiveness and character and will have created sustainable buildings and connected places that incorporate high quality sustainable design, provides a sense of place and facilitates community cohesion.** | a. Conserve and enhance our historic environment and cultural heritage assets<br>b. To protect and enhance the district's urban and rural landscape, including the High Weald National Landscape, the setting of the South Downs National Park<br>c. Maintain a heritage and culture rich district<br>d. Ensure that developments are well-designed, are of high quality and are inclusive, safe and accessible for all. |

# SPATIAL STRATEGY

# 6 Spatial Strategy

## 6.1 Regulation 18(1) Options

6.1.1 Under the SA Regulations, there is a requirement to consider 'reasonable alternatives' when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection.

6.1.2 At the regulation 18(1) stage of the Local Plan seven options were considered for the Spatial Strategy. The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

### Spatial Option A

**To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement.**

### Spatial Option B

**To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells).**

### Spatial Option C

**To focus growth outside of the High Weald National Landscape, within sustainable settlements in the Low Weald (i.e. Uckfield, Hailsham, Polegate and Willingdon and other villages).**

### Spatial Option D

**To focus growth on the delivery of new strategic extensions at existing sustainable settlements. Continue to support growth through windfalls at those settlements.**

### Spatial Option E

**To maximise growth in all locations within the District to meet the Council's housing and employment needs requirement and to meet a small proportion of Eastbourne's unmet housing needs.**

### Spatial Option F

**To focus growth in and around all sustainable settlements (as defined in the SSS), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Royal Tunbridge Wells), with limited employment growth (i.e. without Ashdown Business Park).**

### Spatial Option G

**Combined option of B and D.**

### SPATIAL OPTION A

- Delivers c. **20,250 (net) dwellings** in or surrounding sustainable settlements
- c. 450 dwellings over Wealden District's overall housing need.
- Meets the full employment needs of the District and improve town and village centres through new jobs and homes.
- Major negative impacts of growth on the landscape of Wealden (including the High Weald National Landscape).
- Significant highway constraints along the SRN/MRN.

**OPTION REJECTED**

### SPATIAL OPTION C

- Delivers c. **15,000 (net) dwellings** in sustainable settlements
- c. 4,800 dwellings short of the overall housing need, the least of any option considered.
- Meet the full employment needs of the District and improve the town and village centres through new jobs and homes, at least within the Low Weald.
- No major negative impacts
- Minor negative impacts for climate change mitigation, waste, pollution, biodiversity and social deprivation.

**OPTION REJECTED**

### SPATIAL OPTION B

- Delivers c.**15,750 (net) dwellings** in sustainable settlements
- c. 4,000 dwellings short of overall housing need.
- Meets the full employment needs of the District and improve town and village centres through new jobs and homes.
- No major negative impacts
- Minor negative impacts for climate change mitigation, waste, pollution, biodiversity, landscape and heritage, although mitigation measures likely for some or all of these issues.
- Employment site at Ashdown Business Park currently uncertain, further work on this and other options for employment growth to be considered at the Regulation 19 stage.

**CONSIDER AT NEXT STAGE**

### SPATIAL OPTION D

- Deliver c. **15,500 (net) dwellings** in sustainable settlements
- c. 4,300 dwellings short of overall housing need.
- Meets the full employment needs of the District and improve the town and village centres through new jobs and homes.
- No major negative impacts
- Minor negative impacts for climate change mitigation, waste, pollution, biodiversity, landscape and heritage. Mitigation measures may be possible.
- Employment site at Ashdown Business Park and also a large mixed-use site, 'West of Uckfield' or Owlsbury are currently uncertain.

**CONSIDER AT NEXT STAGE**

# SPATIAL STRATEGY: REGULATION 18(1)

## SPATIAL OPTION E

- Deliver c. **21,200 (net) dwellings** in or surrounding sustainable settlements
- c. 1,400 dwellings over Wealden District's overall housing need
- Meets the full employment needs of the District and improve the town and village centres through new jobs and homes.
- Major negative impacts of this growth, namely the impact on the landscape of Wealden (including the High Weald National Landscape), the historic environment and pollution. There are also significant highway constraints within the District for growth along the SRN/MRN.
- The initial transport modelling work shows that it is unlikely that mitigation at junctions along the SRN/MRN will be achievable for all sites.

**OPTION REJECTED**

## SPATIAL OPTION G

- Deliver c.**17,750 (net) dwellings** in or surrounding sustainable settlements.
- c. 2,000 dwellings short of the overall housing target
- Meets the full employment needs of the District and will improve town and village centres through new jobs and homes.
- No major negative impacts
- Minor negative impacts for climate change mitigation, soil, land and minerals, waste, pollution, biodiversity, landscape and heritage
- Mitigation measures possible.
- Employment site at Ashdown Business Park and also a large mixed-use site, 'West of Uckfield' are currently uncertain.

**CONSIDER AT NEXT STAGE**

## SPATIAL OPTION F

- Deliver c. **15,750 (net) dwellings** in sustainable settlements
- c. 4,000 dwellings short of the overall housing need.
- Will not deliver the full employment needs of the District and will be 68,000 sqm short of the overall need for B2 and B8 uses (when accounting for completions). The option will continue to improve town and village centres through new jobs and homes.
- No major negative impacts, although minor negative impacts do occur for climate change mitigation, waste, pollution, biodiversity, landscape and heritage and social deprivation.
- Mitigation measures possible.

**PREFERRED OPTION**

### Selection And Rejection Of Options

6.1.3 As a result of the Sustainability Appraisal of options, **Option F** was considered the Preferred Option at the Regulation 18 stage in the Local Plan process. However, it was concluded that **Options B, D and G** should be included for further consideration alongside **Option F** at the next stage of the Local Plan once further work had been carried out, which would provide greater certainty in determining the effects. **Options A, C and E** were not considered suitable and have not been included for further consideration.

6.1.4 Since the preparation of the Regulation 18 Local Plan and SA it was decided that a further consultation on the draft Local Plan [**Regulation 18 (2)]** should be prepared to take account of the changes to policies and regulations, specifically the NPPF 2024 and changes to housing need, before proceeding to the Regulation 19 stage of the process.

6.1.5 Revised Spatial Options for the Local Plan have therefore been considered and are set out overleaf.

# 7 Spatial Strategy Regulation 18(2)

## 7.1 Spatial Option Overview

7.1.1 The draft Spatial Strategy and associated strategic policies aim to deliver the Local Plan's vision and objectives by guiding development to the right locations and delivering sustainable growth, which takes account of people, places and the environment.

7.1.2 The Spatial Strategy is based upon focusing growth in and around sustainable settlements (including strategic extensions), and to the edge of major towns that lie adjacent to the District (i.e. Eastbourne and Tunbridge Wells), whilst also seeking to limit growth in those sustainable settlements that are located within or washed over by the High Weald National Landscape (HWNL) designation.

7.1.3 Since the publication of the Regulation 18(1) Draft Local Plan and SA in March 2024 the following key changes have occurred, which need to be taken into account in the revised strategy, as a result of the revised NPPF (December 2024):

- **Housing Need Calculation** - increase in the housing need for the District.
- **Transport Modelling** - a move to a 'vision and validate' approach, instead of 'predict and provide'.

7.1.4 The representations to the Regulation 18(1) have also been taken into account, which identified the need for further Housing and Employment Allocations, as well as updates to the evidence base, see **Appendix 3** of this report.

## 7.2 Environmental / Landscape Designations

7.2.1 Wealden has a high-quality natural environment, reflected in the number of designations **(Figure 7.1),** which provide significant constraints to the location of development. Over 60% of the District is covered by protected landscape designations with around 53% of the District within the High Weald National Landscape and 7% within the South Downs National Park. Designations include:

- **High Weald National Landscape (HWNL)**
- **Ashdown Forest Special Protection Area (SPA) / Special area of Conservation (SAC)**
- **Biodiversity Opportunity Areas (BOA)**
- **Pevensey Levels SAC / Ramsar / Site of Special Scientific Interest (SSSI)**
- **South Downs National Park (SDNP)**
- **Flood Risk Areas.**

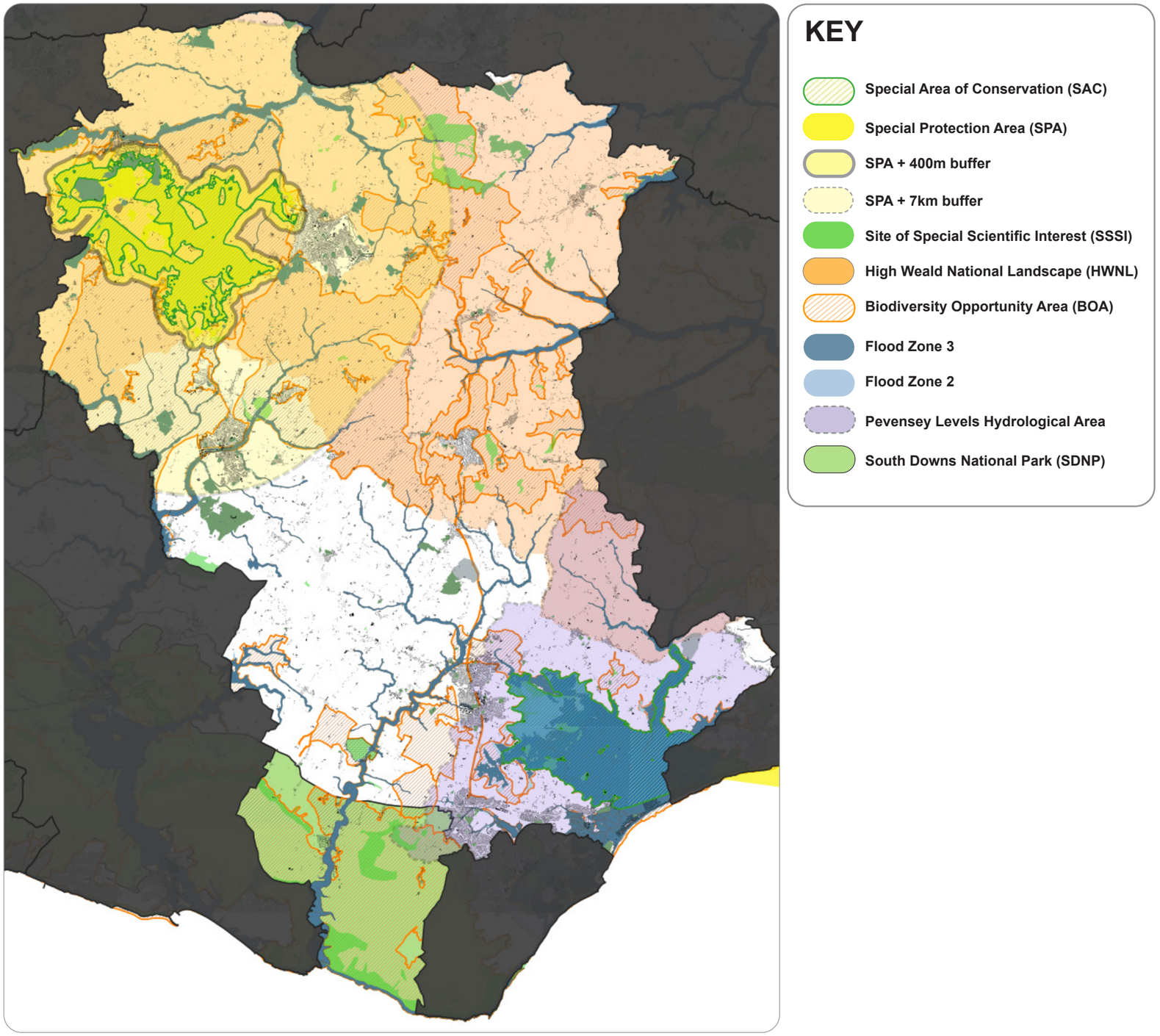



**Figure 7.1: Wealden District - Environmental Designations and Constraints**

# SPATIAL STRATEGY: REGULATION 18(2)

## 7.3 Housing Need

7.3.1 As a result of changes to the NPPF (December 2024) the housing need for Wealden is now calculated (as per the 'standard method') at **1,457** dwellings per annum (dpa). This equates to **24,769 (net)** dwellings over the Plan period from April 2025 to 31 March 2042, assuming adoption of the Local Plan in 2027. Commitments as of April 2025 account for **7,845** (net) dwellings and windfalls c.**2,000** dwellings.

7.3.2 The quantum of housing to meet housing need from all proposed allocations / suitable sites therefore equates to a residual need of **14,924** (after commitments and windfalls) over the lifetime of the Local Plan.

## 7.4 Employment Need

7.4.1 Employment need for the District over the proposed Plan period is identified as **47.8 hectares**, equating to **194,400 sqm** of floor space and a residual need for employment floor space based on current supply figures of **167, 290 sqm.**

7.4.2 The Draft Plan acknowledges that the District is part of several Functional Economic Market Areas (FEMAs), which includes Eastbourne to the south of the District. The previous Eastbourne Local Plan Growth Strategy Consultation (November 2022) identified that Eastbourne may have a shortfall in employment provision during their Plan period of some **23,184 sqm**.

## 7.5 Transport

7.5.1 The District is connected to the Major Road Network (MRN) principally via the A22 and A26, which provide access to and between Eastbourne, Tunbridge Wells and East Grinstead, as well as providing links to Gatwick and London via the A23/M23 and M25. The A27 in the southern part of the District, provides connections with Lewes and Brighton and Hove.

7.5.2 The public transport network within the District is currently considered poor. There are bus and rail services for some settlements to neighbouring larger key destinations, such as Eastbourne, Brighton and Tunbridge Wells as well as some services to smaller towns. Whilst rail services run through the day and evening, bus services can be less regular, often providing a limited frequency, especially at weekends or in the evenings.

7.5.3 Wealden has a number of railway stations connecting Frant and Wadhurst as well as Uckfield, Buxted, Crowborough and Eridge to London. Services also connect Pevensey, Westham, Polegate and Berwick to Hastings, Eastbourne, Brighton and Lewes, with an onward journey from these stations to Gatwick, London and Ashford from Hastings.

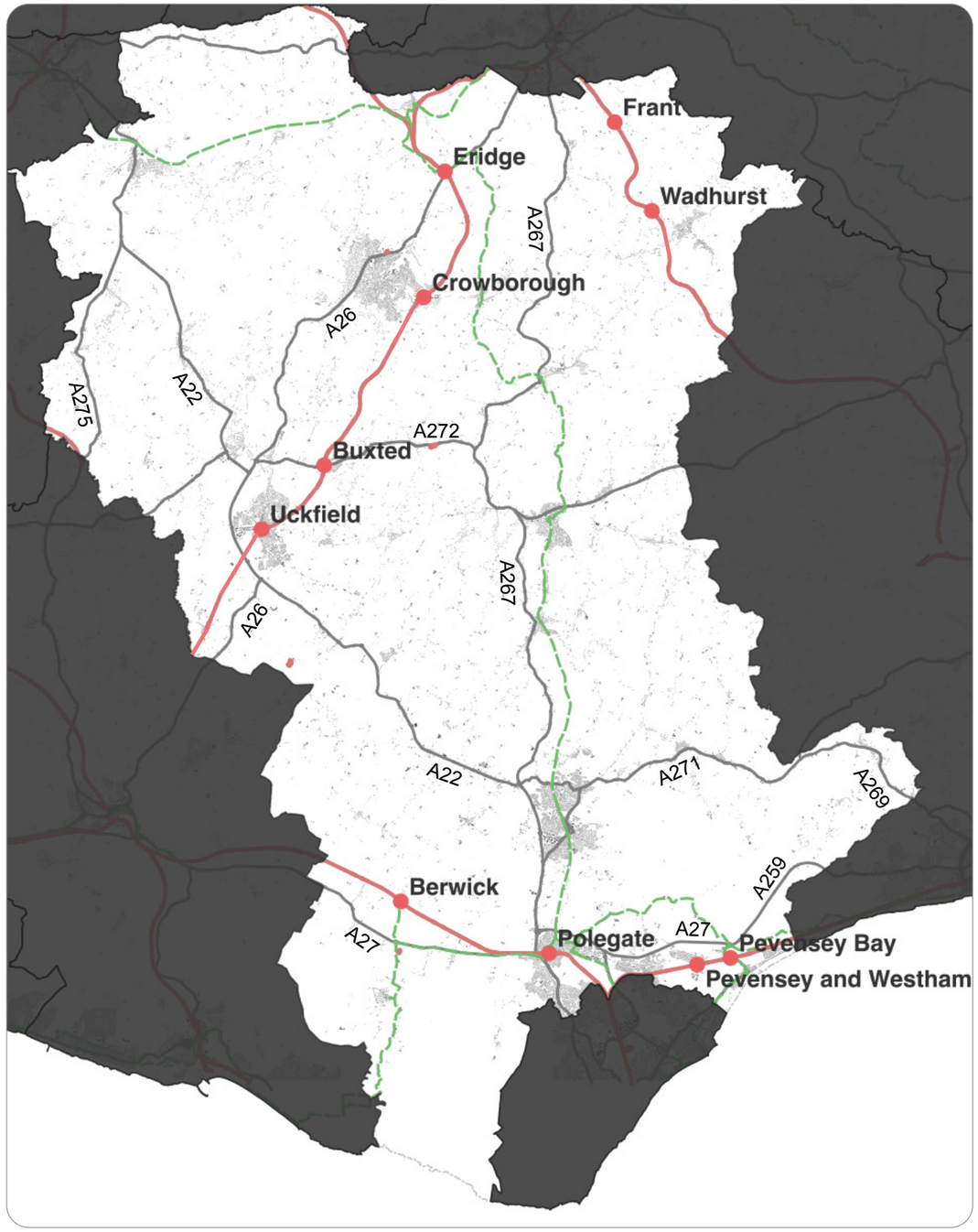



**Figure 7.2: Wealden District - Key transport networks**

**KEY**

- Railway Station
- Railway line
- Roads
- National Cycle Route

**BASELINE DATA**

Further information on the baseline data for the District used in the SA is set out in the **Scoping Report March 2024**.

# SPATIAL STRATEGY: REGULATION 18(2)

## 7.6 Sustainable Settlements

7.6.1 The draft Local Plan identifies the following Settlement Hierarchy for the District, listed in order of most sustainable:

| SETTLEMENT HIERARCHY | |
|---|---|
| **TYPE 1 - Town** | Crowborough, Hailsham, Heathfield, Uckfield |
| **TYPE 2 - Settlements that relate geographically to regional centre outside the District** | Polegate, Pevensey, Pevensey Bay, Stone Cross, Westham, Willingdon |
| **TYPE 3 - Primary Village** | Forest Row, Horam, Mayfield, Wadhurst |
| **TYPE 4 - Secondary Village** | Bells Yew Green, Berwick Station, Blackboys, Buxted, Cross in Hand, East Hoathly, Five Ash Down, Framfield, Frant, Groombridge, Hartfield, Herstmonceux, Isfield, Lower Horsebridge, Maresfield, Ninfield, Rotherfield |
| **TYPE 5 - Neighbourhood Settlement** | Broad Oak, Cade Street, Chelwood Gate, Coleman's Hatch, Danehill, Five Ashes, Eridge, Hadlow Down, Halland, Hellingly, High Hurstwood, Laughton, Lower Dicker, Little Horsted, Mark Cross, Maynards Green, Nutley, Punnetts Town, Rushlake Green, Selmeston, Upper Dicker, Upper Hartfield, Windmill Hill, Withyham |
| **TYPE 6 - Residential Settlement** | Arlington, Balls Green, Best Beech Hill, Blackham, Bodle Street Green, Boreham Street, Chalvington & Ripe, Chiddingly, Cowbeech, Cousley Wood, Fairwarp, Fletching, Hankham, Hooe, Magham Down, Muddles Green, Old Heathfield, Rosers Cross, Town Row, Vines Cross, Waldron, Warbleton, Wartling. |

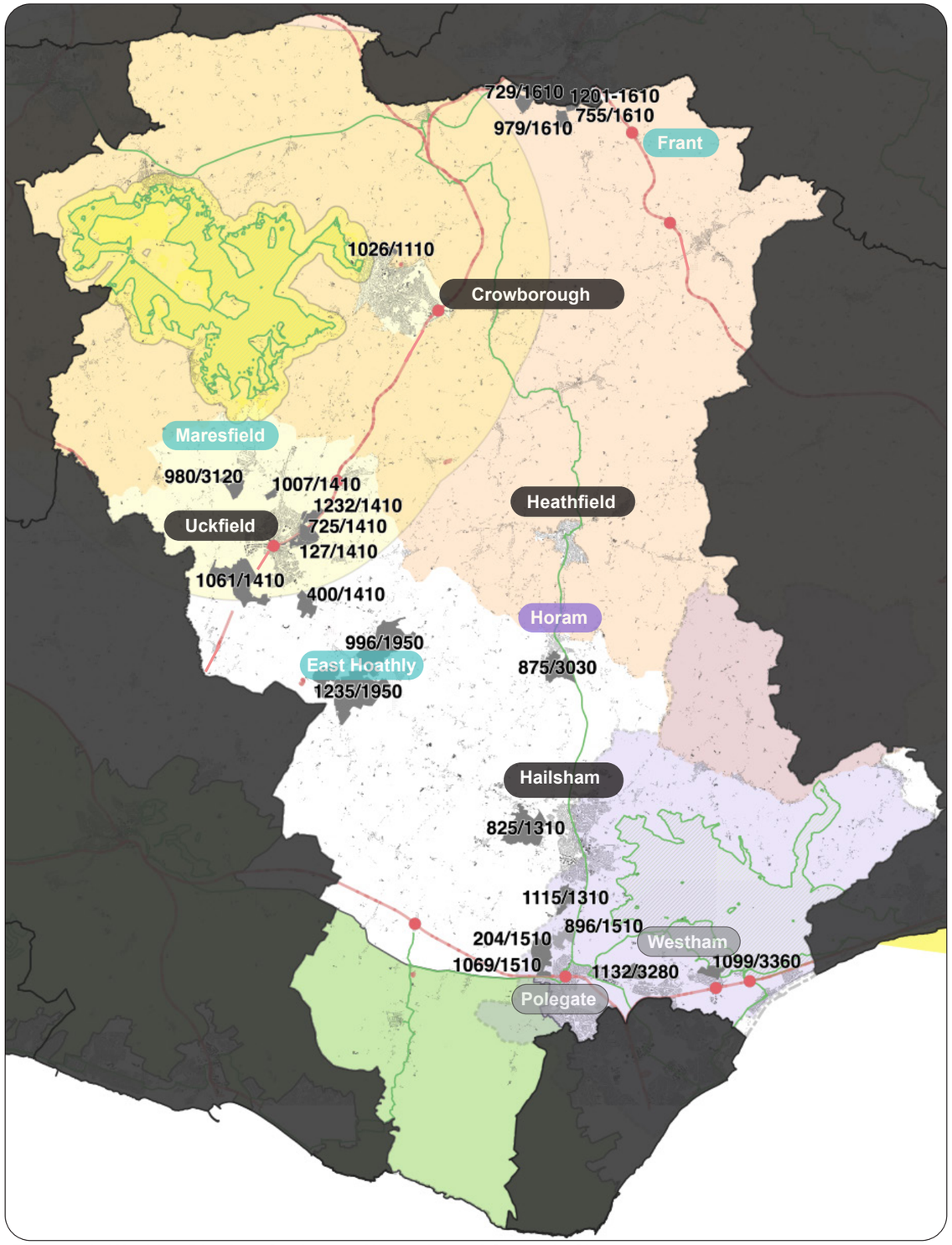



**Figure 7.3: Wealden District - Settlement Hierarchy and Strategic Sites**

## 7.7 Potential Strategic Sites

7.7.1 There are 22 potential strategic sites under consideration for allocation within the draft Local Plan as shown in the **Fig 7.3** opposite. Details of the potential strategic sites considered in the development of the Spatial Strategy and the proposed quantum of development, are set out in **Table 7.1** overleaf, which have all been subject to SA. The detailed SA results for the Strategic Sites are set out in **Part 3: Strategic Site Assessments.**

# SPATIAL STRATEGY: REGULATION 18(2)

## 7.8 Regulation 18(2) Options

7.8.1 Four options have been considered as part of the Regulation 18 (2) 'focussed' draft Local Plan, which have been tested as 'reasonable alternatives' for the purposes of the SA. The options have been drawn up prior to the SA of the strategic and smaller sites and may therefore be subject to change following consideration of the results and further evidence at the Regulation 19 stage.

7.8.2 A summary of the key components of the options is summarised below and explained in more detail in **Sections 8-12** of this report.

## 7.9 Option 1

7.9.1 **Option 1** proposes **15,612** (net) homes + **175,421 sqm** employment land, including 1,525 homes at Owlsbury (Ref. **1061/1410)** and 60,000 sqm of employment space at Ashdown Business Park **(980/3120**). Whilst this option will have the least impact upon the landscape and character of the existing settlements, it is not considered a 'reasonable alternative' for the following reasons:

- The options would fail to meet both the housing need (63%) and the employment need (82%) for the District.
- A lack of development will mean that improvements to infrastructure such as transport, education and community facilities are less likely to be provided.
- Town centres and villages struggling with vitality and viability will not benefit from an increase in population and the potential for economic prosperity.

**7.9.2** **Option 1** has therefore been **REJECTED** and not subjected to further assessment.

## 7.10 Options 2 to 4

7.10.1 **Options 2 to 4** have been considered in more detail as they are considered to be 'reasonable alternatives' for the Sustainability Appraisal. The findings are summarised overleaf and the detailed results are set out in the **Sections 8-12.**

**HOUSING NEED:**

**Total Homes - 24,769 (net) homes**

**Completions + Commitments - 7,845 (net) homes**

**Windfalls - c. 2,000 homes**

**Residual Need - 14,924 homes**

**EMPLOYMENT NEED:**

**Total Employment - 194,400 sqm**

**Residual Need - 167,290 sqm**

**[+ Potential Eastbourne Need - 23,184 sqm]**

**OPTION 1: 15,612 homes (63% Housing Need)**
**+ employment 175,421 sqm (90% Employment Need)**

**OPTION 2: 19,011 homes (77% Housing Need)**
**+ employment 205,421 sqm (106% Employment Need)**

**OPTION 3: 22,211 homes (90% Housing Need)**
**+ employment 262,421 sqm (135% Employment Need)**

**OPTION 4: 24,911 homes (100.6% Housing Need)**
**+ employment 315,921 sqm (163% Employment Need)**

**Figure 7.4: Local Plan Regulation 18(2) - Spatial Strategy Options**

# SPATIAL STRATEGY: REGULATION 18(2)

**Table 7.1: Wealden District - Potential Strategic Sites**

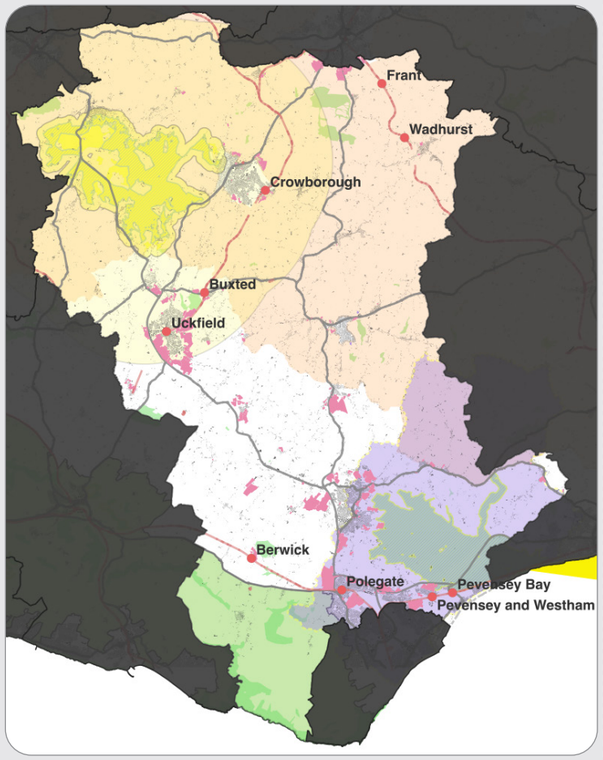
| PARISH | | SETTLEMENT | REF. NO. | ADDRESS | DEVELOPERS PROPOSALS | DEVELOPER / (AGENT) | SA REG. 18(1) | SELECT / REJECT | Option 1 | Option 2 | Option 3 | Option 4 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 01 | Arlington | Hailsham | 825/1310 | Land to north-west of Hempstead Lane | 1,500 homes in plan period (**Total 2,500**); 1 Primary School; New Community Facilities | Grosvenor | Y | Reject | | | | |
| 02 | Crowborough | Crowborough | 1026/1110 | Land at Beechenwood Farm | 120-150 dwellings; 1.79 ha green infra. & SANGS | Greymoor Homes | Y | Reject | | | | |
| 03 | East Hoathly W/ Halland | East Hoathly | 996/1950 | Hesmonds Stud | 925 homes in plan period (**Total 3,000**); 23,500 sqm emp.; 1 new primary / nursery provision; new secondary provision | Hesmond Studs (Parker Dann) | Y | Reject | | | | |
| 04 | East Hoathly W/ Halland | East Hoathly | 1235/1950 | Land at Laughton Park Farm (NEW) | 925 homes in plan period (**Total 4,000**); 30,000 sqm employment; 2 primary schools; new community centre | | N | | | | | |
| 05 | Framfield | Uckfield | 127/1410 | Land at Birds in Eye (North), Bird in Eye Hill | 240 homes; 1,000 sqm employment | Martin Grant Homes (Turley) | Y | Reject | | | | |
| 06 | Framfield | Uckfield | 400/1410 | Land at High Cross Farm, Eastbourne Rd | 450 homes | Thakeham | Y | Reject | | | | |
| 07 | Framfield | Uckfield | 725/1410 | Land at Hempstead Lane (NEW) | 300 homes; 1 2FE Primary school, Community Hub | Martin Grant Homes/ Harcourt Devts. (Turley) | N | | | | | |
| 08 | Frant | Tunbridge Wells | 729/1610 | Land at Ramslye Farm (Spratsbrook Farm) | 700 homes; Community facilities | Dandara (Stantec) | Y | Reject | | | | |
| 09 | Frant | Tunbridge Wells | 979/1610 | Pinewood Farm, Frant Road | 690 homes | (Savills) | Y | Select | | | | |
| 10 | Frant | Tunbridge Wells | 755/1610 | Tunbridge Wells Rugby Club & Chase Farm | 105 homes | Esquire Developments | | Select | | | | |
| 11 | Frant | Tunbridge Wells | 1201/1610 | Tunbridge Wells Rugby Club & Chase Farm | 240 homes; Redevelopment of Sports Pavilion / facilities | Esquire Developments | | Reject | | | | |
| 12 | Hailsham | Hailsham | 1115/1310 | Land east of A22, Hailsham | 1,000 homes; 16,750 sqm employment | Polegate Land | Y | Rej / Sel | | | | |
| 13 | Horam | Horam | 875/3030 | Coxlow Farm, Horam Road | 750 homes; 4,000 sqm emp.; 1,500 Community floorspace; 1 2FE Primary school; Community Hub; Country Park | Gladman Developments | Y | Select | | | | |
| 14 | Maresfield | Maresfield | 980/3120 | Ashdown Business Park Extension | Employment (60,000 sqm) | Summerthorne Estates (MJB Architecture) | Y | Reject | | | | |
| 15 | Polegate | Polegate | 1069/1510 | Polegate West | 1,075 homes (**Total 1,500**) | Taylor Wimpey (Turley) | Y | Reject | | | | |
| 16 | Polegate | Polegate | 204/1510 | Polegate West | 230 homes | Taylor Wimpey (Turley) | Y | Reject | | | | |
| 17 | Polegate | Polegate | 896/1510 | Land at North Polegate, A22 | Employment (87,000 sqm) | Formula Land (Framptons) | Y | Reject | | | | |
| 18 | Uckfield | Little Horsted | 1061/1410 | Owlsbury | 1,525 homes in plan period (**Total 1,700**); 60 ha SANGS; emp. / community space; 1 2FE Primary School / nursery provision | Fairfax Properties (Enplan) | Y | Reject | | | | |
| 19 | Uckfield | Ringles Cross | 1007/1410 | Land at White House Farm, London Rd | 240 homes | - | Y | Select | | | | |
| 20 | Uckfield | Uckfield | 1232/1410 | Hempstead Farm, Uckfield (NEW) | 200 homes; retirement care facility; improved sports provision | Hempstead Farm (DHA Planning) | N | | | | | |
| 21 | Westham | Westham | 1099/3360 | Land at Peelings Lane, Westham | 240 homes | Bellway (DHA Planning) | Y | Select | | | | |
| 22 | Westham | Stone Cross | 1132/3280 | Sharnfold Farm, Hailsham Rd, Stone Cross | 400 homes; 500 sqm open space / play space | (Ridge) | Y | Select | | | | |

# SPATIAL STRATEGY : REGULATION 18(2)

**Figure 7.6: Local Plan Regulation 18(2) - Summary of Spatial Strategy Options**

## Option 2

**Growth to Market Towns / Semi-dispersed growth**
**-**
**Owlsbury**
**-**
**Ashdown Business Park**
**+**
**Employment space along the A22**



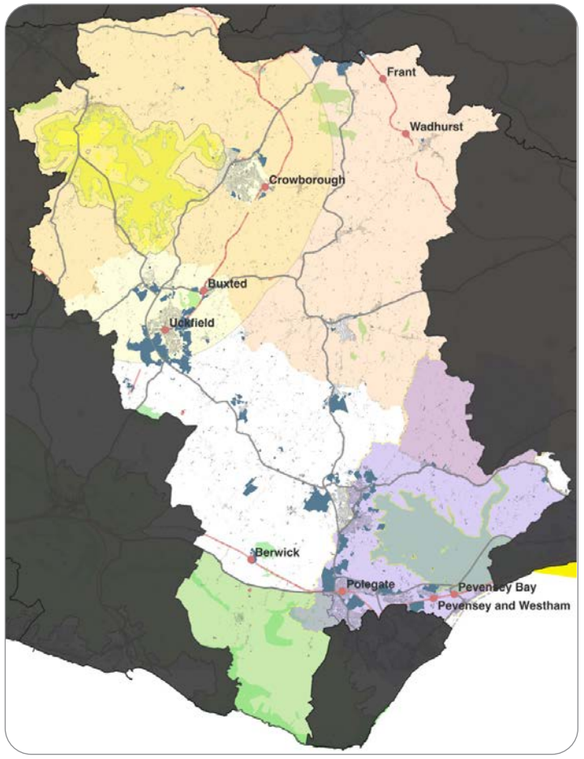

**Homes 19,011**
**Employment 205,421 sqm**

### KEY ISSUES:

- **HOUSING** - 77% of District's need met, 0% additional provision for neighbouring authorities
- **EMPLOYMENT** - 106% of identified need within District met
- **TRANSPORT** - less pressure on transport network but less opportunity for modal shift
- **POLLUTION** - less pollution from construction, transport, new development
- **LANDSCAPE** - Development directed to least sensitive areas
- **STRATEGIC SITES** -
  - West of Polegate - 230 homes
  - Employment space along the A22 - 90,000 sqm employment.

## Option 3

**Growth to Market Towns**
**+**
**Large Extensions to Existing Settlements**
**+**
**Owlsbury West of Polegate**
**+**
**Ashdown Business Park**
**+**
**North of Polegate**



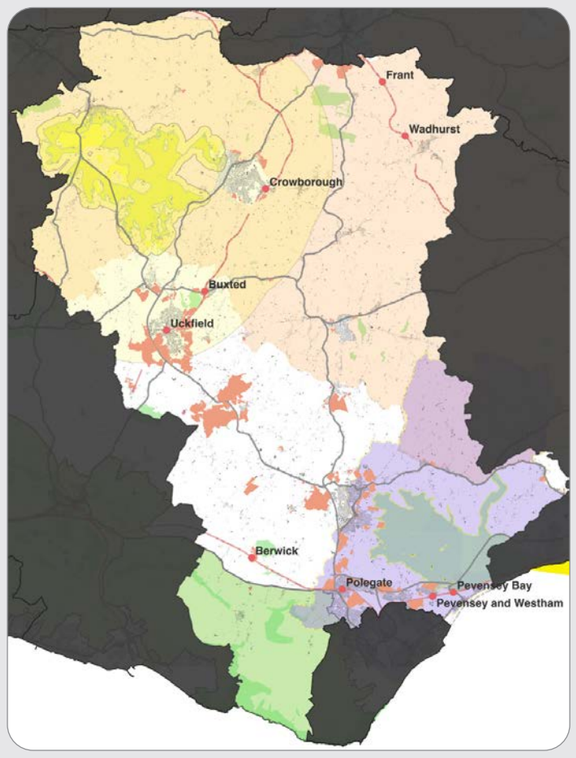

**Homes 22,211**
**Employment 352,421 sqm**

### KEY ISSUES:

- **HOUSING** - 90% of District's need met, 0% additional provision for neighbouring authorities
- **EMPLOYMENT** - 135% of identified need within District met with potential to meet unmet employment needs elsewhere
- **TRANSPORT** - some increased pressure on transport network, and potential for modal shift
- **POLLUTION** - increase in pollution from construction, transport, new development, which will need mitigation
- **LANDSCAPE** - Development directed to least sensitive areas but will encroach on some areas of moderate to high sensitivity
- **STRATEGIC SITES** -
  - Owlsbury - 1,525 homes within Plan period
  - West of Polegate -1,075 homes
  - Ashdown Business Park - 60,000 sqm employment
  - North of Polegate - 87,000 sqm employment

## Option 4

**Growth to Market Towns**
**+**
**Large Extensions to Existing Settlements**
**+**
**Village Settlements Hesmonds Stud Laughton**
**+**
**All employment space**




**Homes 24,911**
**Employment 405,921 sqm**

### KEY ISSUES:

- **HOUSING** - 100% of District's need met + 0.6% additional provision for neighbouring authorities
- **EMPLOYMENT** - 163% of identified need within District met with potential to meet unmet employment needs elsewhere
- **TRANSPORT** - increased pressure on transport network but potentially more opportunity for modal shift.
- **POLLUTION** - increase in pollution from construction, transport, new development which will need mitigation
- **LANDSCAPE** - Development will encroach on some areas of moderate to high sensitivity and areas of open countryside which could significantly change character of area in secondary villages
- **STRATEGIC SITES - As Option 3 (- West Polegate) +**
  - West of Hailsham - 1,450 homes within Plan period
  - Hesmonds Stud - 925 homes + 23,500 sqm employment
  - Laughton Park Farm - 925 homes + 30,000 sqm employment.

# SPATIAL STRATEGY : SPATIAL OPTION 1

## 8 Spatial Option 1:

### 8.1 Option Overview

8.1.1 The key elements of **Option 1** include:

- All Sites selected for allocation at regulation 18(1)
- Updated to take into account sites withdrawn, with planning permission or new numbers of dwellings
- Includes proposals at Owlsbury for 1,525 homes in the Plan period
- Ashdown Business Park - 60,000 sqm of employment space

### 8.2 Key Issues

8.2.1 **Option 1** proposes **15,612** (net) homes + **175,421 sqm** employment land, including 1,525 homes at Owlsbury (**Ref. 1061/1410)** and 60,000 sqm of employment space at Ashdown Business Park **(Ref. 980/3120**). Whilst this option will have the least impact upon the landscape and character of the existing settlements, it is not considered a 'reasonable alternative' for the following reasons:

- The options would fail to meet both the housing need (63%) and the employment need (90%) for the District.
- A lack of development will mean that improvements to infrastructure such as transport, education and community facilities are less likely to be provided.
- Town centres and villages struggling with vitality and viability will not benefit from an increase in population and the potential for economic prosperity.

### 8.3 Selection/Rejection

**8.3.1** **Option 1** has therefore been **REJECTED** and not subjected to further assessment.

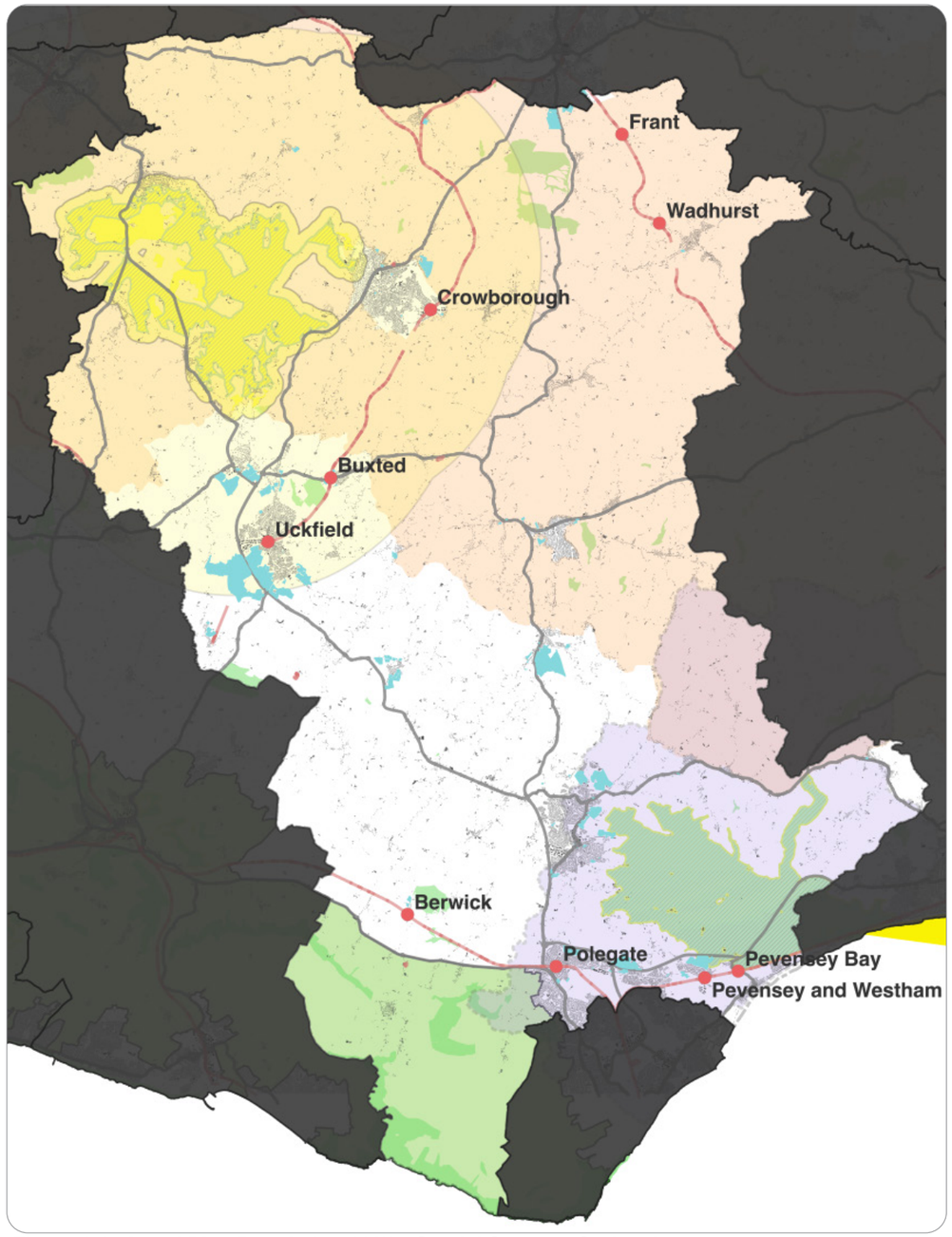



**Figure 8.1: Local Plan Regulation 18(2) - Spatial Strategy Option 1**

## SPATIAL OPTION 1

**Residential Development in / adjacent to Sustainable Settlements**

**ALL SITES IN REG 18(1)**
**+**
**UPDATED SITES / NUMBERS SINCE REG 18(1)**
**+**
**OWLSBURY (1,525 HOMES IN PLAN PERIOD)**
**+**
**ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)**

**TOTAL HOMES = 15,612 (63% need)**

**TOTAL EMPLOYMENT = 175,421 sqm (90% need)**

**OPTION REJECTED**

# 9 Spatial Option 2:

## 9.1 Option Overview

9.1.1 The key elements of **Option 2** include:

- All sites selected for allocation at regulation 18(1)
- Updated to take into account sites withdrawn, with planning permission or new numbers of dwellings
- Reconsiders sites which were dismissed as unsuitable at Regulation 18(1)
- Includes the potential strategic site at West of Polegate for 1,025 homes within the Plan period
- Includes all small and medium sites for employment (90,000 sqm) along the A22 around Hellingly and Lower Dicker
- Provides a total of 205,421 sqm of employment space.

## 9.2 Key Issues

9.2.1 The key issues relevant to this option include:

- **HOUSING** - 77% of District's identified housing need met, 0% additional provision for neighbouring authorities
- **EMPLOYMENT** - 106% of identified employment need within District met
- **TRANSPORT** - less pressure on transport network but less opportunity for modal shift
- **POLLUTION** - less pollution from construction, transport, new development
- **LANDSCAPE** - Development directed to least sensitive areas
- **STRATEGIC SITES** -
  - West of Polegate - 1,025 homes within Plan period
  - Employment space along the A22 - 90,000 sqm employment.

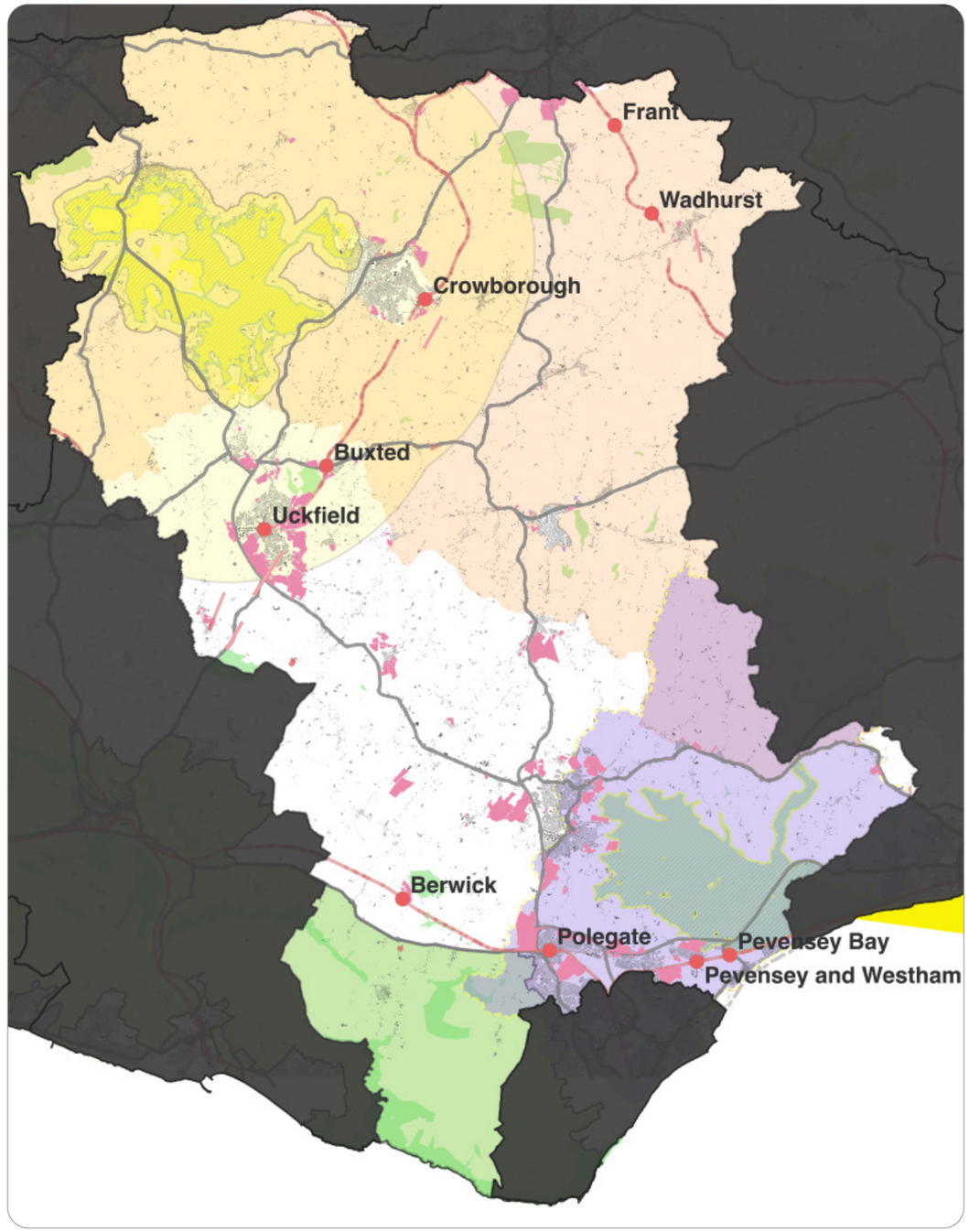



**Figure 9.1: Local Plan Regulation 18(2) - Spatial Strategy Option 2**

# SPATIAL STRATEGY : SPATIAL OPTION 2

## SPATIAL OPTION 2

### Small & Medium Sites around Sustainable Settlements

**ALL SITES IN REG 18(1)**
**+**
**UPDATED SITES / NUMBERS SINCE REG 18(1)**
**+**
**RECONSIDERS DISMISSED SITES FROM REG 18(1)**
**+**
**WEST OF POLEGATE (1,075) HOMES**

**+**
**SMALL/ MEDIUM SITES FOR EMPLOYMENT ALONG A22 - AROUND HELLINGLY, LOWER DICKER**

**-**
**SITES PREVIOUSLY REJECTED WITHOUT PP**
**-**
**DOES NOT INCLUDE OWLSBURY (1,525 HOMES)**
**-**
**DOES NOT INCLUDE ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)**

**TOTAL HOMES = 19,684 (79.5% need)**
**TOTAL EMPLOYMENT = 205,421 sqm (106% need)**

## 9.3 Positive Impacts

9.3.1 Positive impacts are considered likely for:

- **HOUSING** - 79.5% of the District's housing need will be met, including provision for affordable housing and a mix of type and tenure, however, provision would fall considerably below the level of need.
- **ECONOMY AND EMPLOYMENT** - 106% of the District's employment needs will be met.
- **LANDSCAPE & TOWNSCAPE -** Development is directed to the areas of least sensitivity around the existing settlements, maintaining the existing character of the area as far as possible.
- **TRANSPORT** - The location of development will put less pressure on the existing transport network.
- **TOWNS & VILLAGES** - The increase in development should have a minor positive impact upon the vitality and viability of existing villages and centres.
- **GREEN & BLUE INFRASTRUCTURE -** Minor improvements to green and blue infrastructure are likely as a result of new development, including the need to meet the requirement for Biodiversity Net Gain.
- **FLOOD RISK -** The majority of development is located in Flood Risk Zone 1. Where development includes areas of flood or surface water flood risk, suitable mitigation measures will need to be identified.

## 9.4 Uncertain Impacts

9.4.1 The delivery of sites has an element of uncertainty, in particular the quantum of development that comes forward within the Plan period. Further evidence is also being prepared in relation to the Transport modelling, an updated Landscape Character Assessment and an updated Habitats Regulations Assessment (HRA). Consideration will also need to be given to the capacity of Education and Health provision and the need for additional services.

## 9.5 Mitigation

**9.5.1** **Option 2** supports a smaller quantum of development than the identified need for the District, which may have a reduced impact upon the environment but is likely to be less positive in providing for the social and economic needs of the District. The Local Plan policies will provide additional mitigation to many of the likely impacts in controlling how development proposals are implemented. The majority of the larger strategic sites have also provided details of potential mitigation measures to support their proposals.

## 9.6 Negative Impacts

9.6.1 Negative Impacts are considered likely for:

- **HOUSING** - Housing provision will be 20% below the identified need for the District and does not take into account housing need beyond the Plan period.
- **ECONOMY AND EMPLOYMENT** - Although the employment needs of the District would be met, there is the potential that Eastbourne's unmet needs will not be met. There are also issues with site access and suitability along the A22 around hellingly and Upper Dicker, which may result in the quantum of available space being substantially lower.
- **LANDSCAPE & TOWNSCAPE** - Development will still have an impact on the open countryside and rural character of the area, including the setting of the South Downs National Park and High Weald National Landscape.
- **TRANSPORT** - The majority of development is situated within or adjacent to existing settlements, however, some of the major strategic sites included are not near a railway and may encourage use of the private vehicle. There will be less opportunity to encourage modal shift through the provision of new infrastructure and services.
- **POLLUTION -** Development will result in an increase in light pollution in areas of 'darker skies'. Noise and air pollution will increase during construction but mitigation is considered possible.
- **HISTORIC ENVIRONMENT** - The increase in development may lead to negative impacts upon designated heritage assets and their surroundings.
- **COMMUNITY** - The development may result in a slight increase in the provision of new services and facilities but is unlikely to provide the necessary growth to support new infrastructure.
- **CLIMATE CHANGE -** All development will result in an increase in carbon emissions and as a consequence there will be a negative impact upon climate change.
- **WASTE & MATERIALS -** All development will result in an increase in waste & materials and as a consequence there will be a negative impact upon climate change.

## 9.7 Selection/Rejection

**9.7.1** **Option 2** will fail to meet the District's Housing need and the although the District's employment need will be met the provision of unmet employment need for Eastbourne is uncertain. The option is likely to have more limited environmental impacts but will also have less beneficial social and economic impacts, as a result of more constrained development. **Option 2** is therefore rejected.

**OPTION REJECTED**

# 10 Spatial Option 3:

## 10.1 Option Overview

10.1.1 The key elements of **Option 3** include:

- Sites selected for allocation at regulation 18(1)
- Updated to take into account sites withdrawn, with planning permission or new numbers of dwellings
- Includes the potential Strategic Sites for housing at: **Owlsbury** - 1,525 homes; **West of Polegate** - 1,075 homes and **West of Hailsham** - 1,500 homes, within the plan period
- A total of **262,421 sqm** of employment space including Ashdown Business Park and North of Polegate and potential to meet unmet employment needs elsewhere.

## 10.2 Key Issues

10.2.1 The key issues relevant to this issue include:

- **HOUSING** - **90%** of District's need met, **0%** additional provision for neighbouring authorities
- **EMPLOYMENT** - **135%** of identified need within District met with potential to meet unmet employment needs elsewhere
- **TRANSPORT** - some increased pressure on transport network, and potential for modal shift
- **POLLUTION** - increase in pollution from construction, transport, new development, which will need mitigation
- **LANDSCAPE** - Development directed to least sensitive areas but will encroach on some areas of moderate to high sensitivity
- **STRATEGIC SITES** -
  - Owlsbury - 1,525 homes
  - West of Polegate -1,075 homes
  - West of Hailsham - 1,450 homes
  - Ashdown Business Park - 60,000 sqm employment
  - North of Polegate - 87,000 sqm employment.

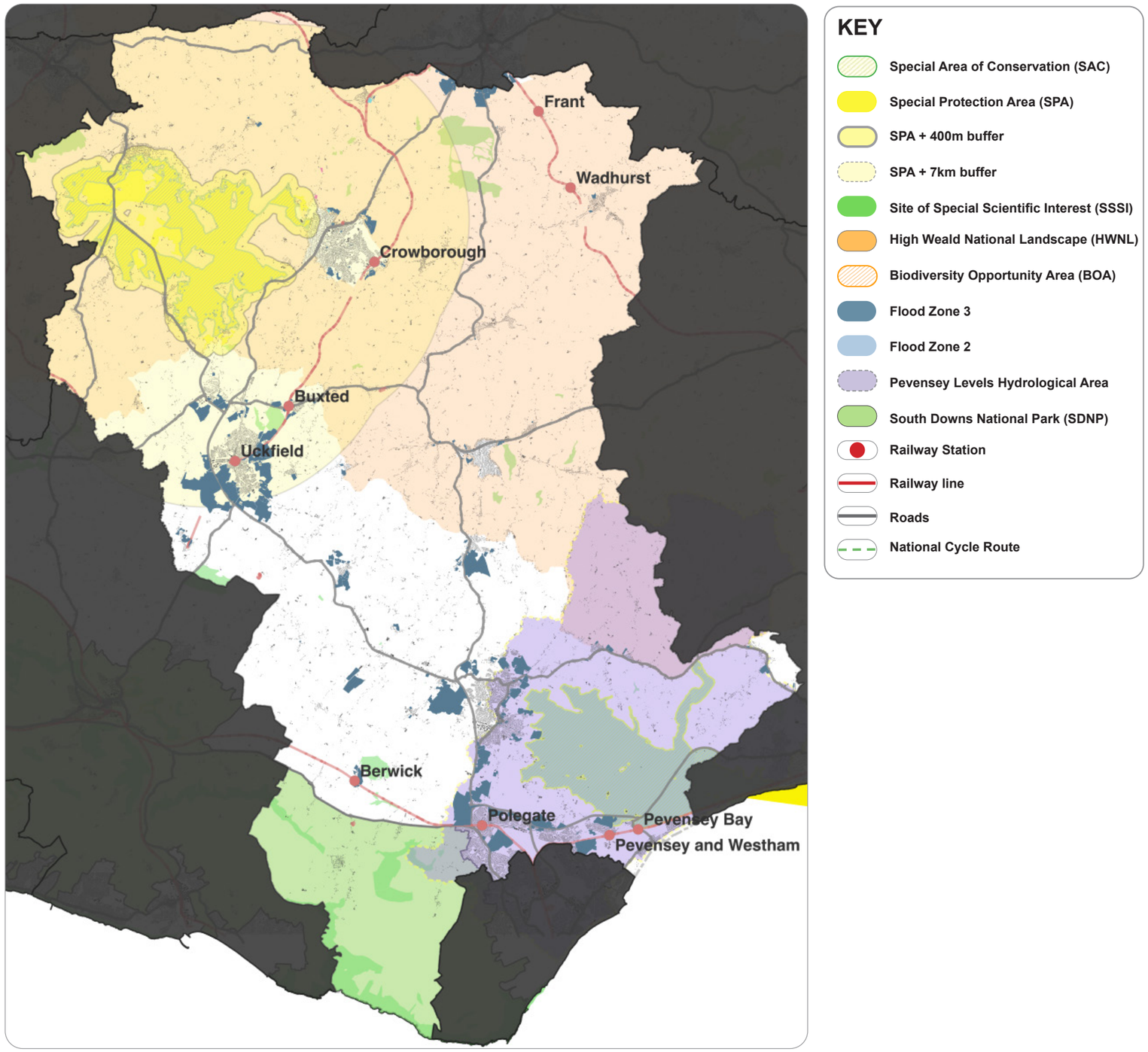



**Figure 10.1: Local Plan Regulation 18(2) - Spatial Strategy Option 3**

# SPATIAL STRATEGY : SPATIAL OPTION 3

## SPATIAL OPTION 3

### Small & Medium Sites + Significant Extensions to Existing Settlements

**ALL SITES IN REG 18(1)**
**+**
**UPDATED SITES / NUMBERS SINCE REG 18(1)**
**+**
**RECONSIDERS DISMISSED SITES FROM REG 18(1)**
**+**
**OWLSBURY (1,525 HOMES) WEST OF HAILSHAM (1,500 HOMES) AND WEST POLEGATE (1,075 HOMES)**

**+**
**ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)**
**+**
**NORTH OF POLEGATE (87,000 SQM)**

**[POTENTIAL EASTBOURNE NEED (23,184 SQM)]**

**TOTAL HOMES = 22,211 (90% need)**
**TOTAL EMPLOYMENT = 262,421 sqm (135% need)**

## 10.3 Positive Impacts

10.3.1 Positive impacts are considered likely for:

- **HOUSING** - 90% of the District's housing need will be met, including provision for affordable housing and a mix of type and tenure. The strategic sites included are likely to be largely delivered within the Plan period.
- **ECONOMY AND EMPLOYMENT** - 135% of the District's employment needs will be met, including: the Ashdown Business Park Extension; the site North of Polegate; as well as 23,184sqm for Eastbourne's potential unmet needs.
- **TRANSPORT** - The quantum of development will provide opportunities to encourage modal shift through the provision of new infrastructure and services.
- **COMMUNITY** - The development is likely to result in an increase in the provision of new services and facilities as it will provide the necessary growth to support new infrastructure.
- **TOWNS & VILLAGES** - The increase in development should have a positive impact upon the vitality and viability of existing towns, villages and centres as a result of the increase in population and economic prosperity.
- **GREEN & BLUE INFRASTRUCTURE -** Improvements to green and blue infrastructure are likely as a result of new development, including the provision of new areas of open space; SANGS; and the need to meet the requirements for Biodiversity Net Gain.

## 10.4 Uncertain Impacts

10.4.1 The delivery of sites has an element of uncertainty, in particular the quantum of development that comes forward within the Plan period. Further evidence is also being prepared in relation to the Transport modelling, an updated Landscape Character Assessment and an updated Habitats Regulations Assessment (HRA). Consideration will also need to be given to the capacity of Education and Health provision and the need for additional services.

## 10.5 Mitigation

10.5.1 **Option 3** supports a slightly smaller quantum of development than the identified housing need for the District, which may have an increased impact upon the environment but is likely to be more positive in providing for the social and economic needs of the District. The Local Plan policies will provide additional mitigation to many of the likely impacts in controlling how development proposals are implemented. The majority of the larger strategic sites have also provided details of potential mitigation measures to support their proposals.

## 10.6 Negative Impacts

10.6.1 Negative Impacts are considered likely for:

- **HOUSING** - Housing provision will be 10% below the identified need for the District, with the majority of large sites expected to be delivered in the Plan period. The selected sites are largely to be delivered within the Plan period, leaving little provision for beyond the Plan period.
- **ECONOMY AND EMPLOYMENT** - Whilst the employment needs of the District will be met, the quantum of development is above the actual need, although this enables the Plan to meet potential unmet needs of neighbouring authorities.
- **LANDSCAPE & TOWNSCAPE** - Development is directed to the areas of least sensitivity around the existing settlements, maintaining the existing character of the area as far as possible but will encroach on some areas of moderate to high sensitivity. The quantum of development and the strategic sites included will also have a significant impact on the open countryside and rural character of the area, including the setting of the South Downs National Park and High Weald National Landscape.
- **TRANSPORT** - The quantum of development is likely to put pressure on the transport network. The majority of development is situated within or adjacent to existing settlements, however, some of the major strategic sites included are not near a railway station and may encourage use of the private vehicle.
- **POLLUTION -** Development will result in an increase in light pollution in areas of 'darker skies'. Noise and air pollution are also likely to increase during construction but mitigation is considered possible.
- **FLOOD RISK -** The majority of development is located in Flood Risk Zone 1, however the strategic sites include areas of flood risk or surface water flood risk where suitable mitigation measures will need to be identified.
- **HISTORIC ENVIRONMENT -** The increase in development may lead to negative impacts upon designated heritage assets and their surroundings
- **CLIMATE CHANGE -** All development will result in an increase in carbon emissions and as a consequence there will be a negative impact upon climate change.
- **WASTE & MATERIALS -** All development will result in an increase in waste & materials and as a consequence there will be a negative impact upon climate change.

## 10.7 Selection/Rejection

10.7.1 **Option 3** will meet most of the District's Housing need and all the Employment need, including provision for Eastbourne's potential unmet employment needs. The option will result in environmental impacts but it is considered that many of these could be mitigated. The option will also result in positive social and economic impacts as a result of new development. The option is therefore taken forward for consideration at Regulation 19.

**CONSIDER AT NEXT STAGE**

# 11 Spatial Option 4:

## 11.1 Option Overview

11.1.1 The key elements of Option 4 include:

- Sites selected for allocation at regulation 18(1)
- Updated to take into account sites withdrawn, with planning permission or new numbers of dwellings
- Includes the potential Strategic Sites for housing at: **Owlsbury** - 1,525 homes; **West of Hailsham** - 1,500 homes; Hesmonds Stud - 925 homes and Laughton Park Farm - 925 homes, within the plan period
- A total of **315, 921 sqm** of employment space, including: Ashdown Business Park and North of Polegate and 53,500 sqm from new settlements and potential to meet unmet employment needs elsewhere.

## 11.2 Key Issues

11.2.1 The key issues relevant to this issue include:

- **HOUSING** - **100%** of District's need met **+ 0.6%** additional provision for neighbouring authorities
- **EMPLOYMENT** - **163%** of identified need within District met with potential to meet unmet employment needs elsewhere
- **TRANSPORT** - increased pressure on transport network but potentially more opportunity for modal shift.
- **POLLUTION** - increase in pollution from construction, transport, new development, which will need mitigation
- **LANDSCAPE** - Development will encroach on some areas of moderate to high sensitivity and areas of open countryside which could significantly change character of area in secondary villages
- **STRATEGIC SITES - As Option 3 (- West Polegate) +**
  - West of Hailsham - 1,450 homes
  - Hesmonds Stud - 925 homes + 23,500 sqm employment
  - Laughton Park Farm - 925 homes + 30,000 sqm employment.

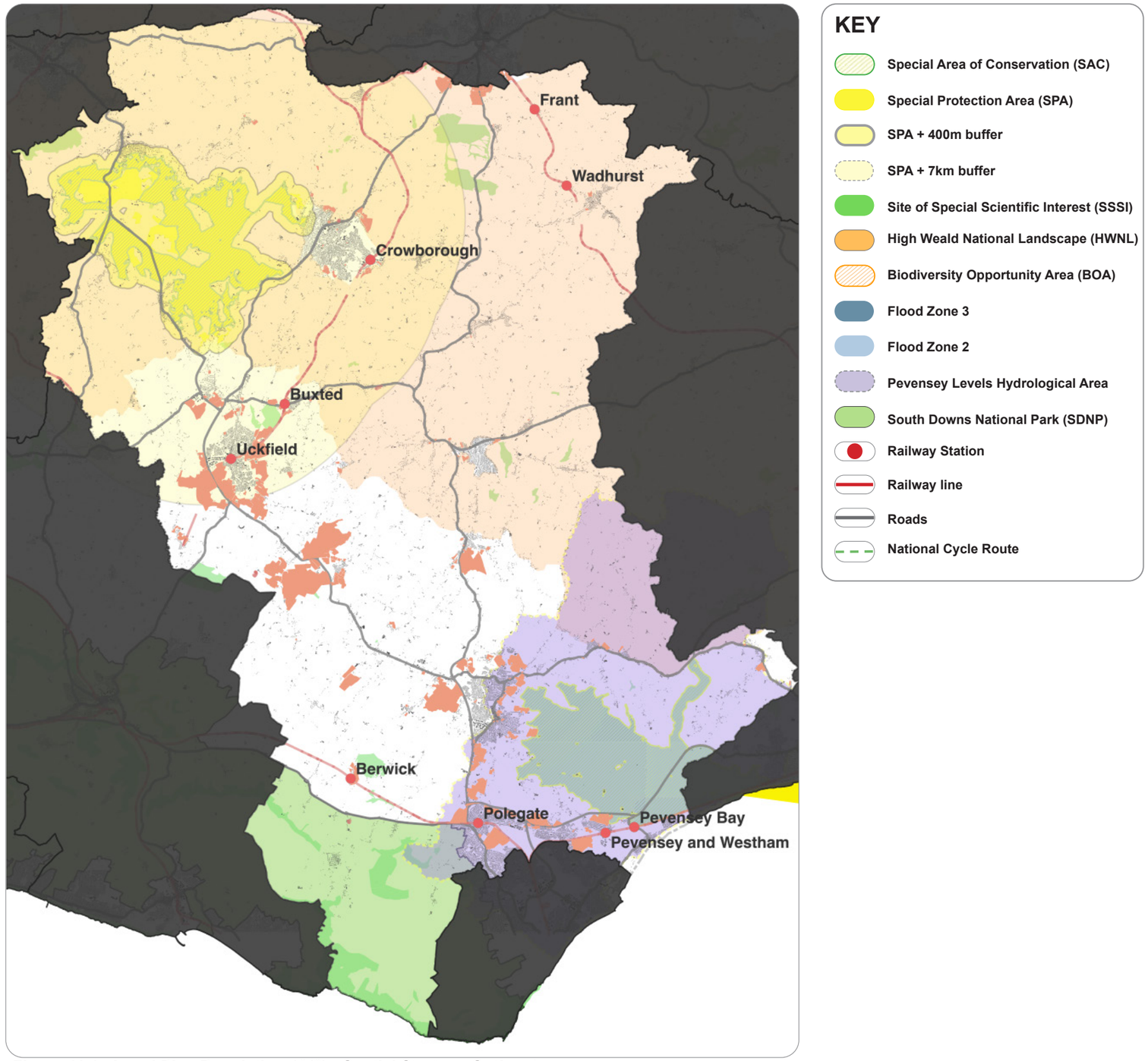



**Figure 11.1: Local Plan Regulation 18(2) - Spatial Strategy Option 4**

# SPATIAL STRATEGY : SPATIAL OPTION 4

## SPATIAL OPTION 4

### Small & Medium Sites + Hesmonds Stud + Laughton New Villages

**ALL SITES IN REG 18(1)**
**+**
**UPDATED SITES / NUMBERS SINCE REG 18(1)**
**+**
**RECONSIDERS DISMISSED SITES FROM REG 18(1)**
**+**
**OWLSBURY (1,525 HOMES) WEST OF HAILSHAM (1,500 homes) + HESMONDS STUD (925 homes in Plan period, 3,000 Total), LAUGHTON (925 homes in Plan period, 4,000 Total)**

**ASHDOWN BUSINESS PARK EXTENSION (60,000 SQM)**
**+**
**NORTH OF POLEGATE (87,000 SQM)**
**+**
**ADDITIONAL EMPLOYMENT FROM NEW SETTLEMENTS (53,500 sqm)**

**[POTENTIAL EASTBOURNE NEED (23,184 SQM)]**

**TOTAL HOMES = 26,382 (100.5% need)**
**TOTAL EMPLOYMENT = 315,921 sqm (163% need)**

## 11.3 Positive Impacts

11.3.1 Positive impacts are considered likely for:

- **HOUSING** - 100.5% of the District's housing need will be met, including provision for affordable housing and a mix of type and tenure. Two of the strategic sites are likely to deliver only the first phase of development within the Plan period, leaving significant provision for beyond the Plan period.
- **ECONOMY AND EMPLOYMENT** - 163% of the District's employment needs will be met, including: the Ashdown Business Park Extension and the site North of Polegate; 53,500 sqm from new settlements, as well as 23,184sqm for Eastbourne's potential unmet needs.
- **TRANSPORT** - The quantum of development will provide opportunities to encourage modal shift through the provision of new infrastructure and services.
- **COMMUNITY** - The development is likely to result in a significant increase in the provision of new services and facilities as it will provide the necessary growth to support new infrastructure.
- **TOWNS & VILLAGES** - The increase in development is likely to have a positive impact upon the vitality and viability of existing towns, villages and centres as a result of the increase in population and resulting economic prosperity.
- **GREEN & BLUE INFRASTRUCTURE -** improvements to green and blue infrastructure are likely as a result of new development, including the provision of new areas of open space and the need to meet the requirements for Biodiversity Net Gain.

## 11.4 Uncertain Impacts

11.4.1 The delivery of sites has an element of uncertainty, in particular the quantum of development that comes forward within the Plan period. Further evidence is also being prepared in relation to the Transport modelling, an updated Landscape Character Assessment and an updated Habitats Regulations Assessment (HRA). Consideration will also need to be given to the capacity of Education and Health provision and the need for additional services.

## 11.5 Mitigation

**11.5.1** **Option 4** supports a larger quantum of development than the identified need for the District, which is likely to have an increased impact upon the environment but could be more positive in providing for the social and economic needs of the District. The Local Plan policies will provide additional mitigation to many of the likely impacts in controlling how development proposals are implemented. The majority of the larger strategic sites have also provided details of potential mitigation measures to support their proposals.

## 11.6 Negative Impacts

11.6.1 Negative Impacts are considered likely for:

- **HOUSING** - Only part of the allocation of the strategic sites included is likely to be delivered within the Plan period.
- **ECONOMY AND EMPLOYMENT** - Whilst the employment needs of the District will be met, the quantum of development is substantially above the actual need, although this would enable for the potential employment need of Eastbourne to be met, the quantum is still likely to exceed need. The issue of phasing with the new settlements, however, may result in a delay to the provision of employment floorspace within the Plan period.
- **LANDSCAPE & TOWNSCAPE** - Development will encroach on some areas of moderate to high sensitivity as well as areas of open countryside. The quantum of development and the strategic sites included will also have a significant impact on the rural character of the area, which could significantly change the character of the secondary villages. Development will also have an impact upon the setting of the South Downs National Park and High Weald National Landscape.
- **TRANSPORT** - The quantum of development is likely to put pressure on the transport network. The majority of development is situated within or adjacent to existing settlements. The proposed major new settlements are not near a railway station and are likely to encourage the use of the private vehicle.
- **POLLUTION** - A significant amount of development will result in an increase in light pollution in areas of 'darker skies', which cannot be mitigated. Noise and air pollution are also likely to increase during construction but mitigation is considered possible.
- **FLOOD RISK -** The majority of development is located in Flood Risk Zone 1, however the strategic sites include areas of flood or surface water flood risk where suitable mitigation measures will need to be identified.
- **HISTORIC ENVIRONMENT -** The increase in development may lead to negative impacts upon designated heritage assets and their surroundings
- **CLIMATE CHANGE -** All development will result in an increase in carbon emissions and as a consequence there will be a negative impact upon climate change.
- **WASTE & MATERIALS -** All development will result in an increase in waste & materials and as a consequence there will be a negative impact upon climate change.

## 11.7 Selection/Rejection

11.7.1 **Option 4** will meet more than the District's Housing and Employment need, including provision for Eastbourne's employment need. The option will result in greater environmental impacts but it is considered that some of these could be mitigated. The option will also result in positive social and economic impacts as a result of development and identifies areas for future growth beyond the Plan period. The option is therefore taken forward for consideration at Regulation 19.

**CONSIDER AT NEXT STAGE**

# 12 The Preferred Option

12.7.1 The assessment of the Options show that **Options 3 and 4** are the best performing options for the Spatial Strategy in order to meet the District's housing and employment needs.

## Housing Need

12.7.2 Although **Option 3** allocates slightly less housing, a total of **22,211 homes**, as a result of the proposed phasing compared to compare to a total allocation of **26,382 homes** in **Option 4**.

12.7.3 Whilst Option 4 provides a higher allocation, the expected delivery in the Plan period is expected to be about the same as Option 3, although Option 4 does identify sites for beyond the Plan period as required in the NPPF. Consideration will therefore need to be given to a balance between providing delivery within the Plan period and identifying sites for future needs. It should also be noted that sites that are not allocated within this Plan could be considered in future Plans.

## Employment Need

12.7.4 The employment space allocation for **Option 3** is **262,421 sqm (135% of need)** which compares to **315, 921 sqm (163% of need)** in **Option 4**. Both Options would result in a significant allocation above need although will offer the potential for unmet employment needs of neighbouring authorities to be met.

12.7.5 It should be noted that the Spatial Strategy options were identified before the SA of sites was undertaken and before the revised Economic Strategy was available. An over estimate of the amount of employment need was therefore made. In addition, the SA of sites has found that the majority of sites along the A22 are not suitable for development (See **Part 2: Parish Assessments and Part 3: Strategic Site Assessments**).

## Further Evidence

12.7.6 The Local Plan evidence has been used to inform the results, however, it should be noted that some evidence is not yet complete. The Spatial Options and sites will be subject to further testing of the evidence at the next stage of the draft Local Plan (Regulation 19) and SA, which will include:

- ❑ Transport Modelling
- ❑ Habitats Regulations Assessment (HRA) update
- ❑ Landscape Character Assessment update
- ❑ Specific Site Viability Testing.

## Preferred Option

12.7.7 Following this consultation, the Spatial Options will be further refined and subjected to additional SA in consideration of the updated evidence and representations. A Preferred Option will then be selected as part of the **Regulation 19 Stage** of the Local Plan, which will also be published for consultation.

# 13 Site Assessments

## 13.1 Site Assessment Methodology

13.1.1 The sites submitted to the Council as part of the SHELAA were reviewed to identify if any sites, which were previously rejected, should be assessed again in the SA. A total of over 1200 sites were submitted to the Council, of these c. 130 sites were identified for re-assessment. The total sites includes new and amended sites, which have also been considered in the SA.

13.1.2 Given the quantum of sites, the assessment has been carried out by Parish, in order to consider the specific characteristics of each area and to understand the cumulative impacts of such development more clearly. Maps have been prepared for each Parish to capture the level of development proposed and environmental constraints in a more visual format, to aid understanding of the results. A summary of the results is provided by Parish in alphabetical order (see **SA Part 2: Parish Site Assessments Report**).

13.1.3 It should be noted that the SHELAA is a live document and changes will have occurred since the SA was undertaken as a result of planning permissions being granted; sites being withdrawn or amended; or new sites coming forward. The SA will be updated at the **Regulation 19** stage to reflect any changes.

13.1.4 Sites which were rejected in the Regulation 18(1) SHELAA and SA as well as the Regulation 18(2) internal site review and SA or which have been granted planning permission, are shown for completeness in **SA Part 2: Parish Site Assessments - Appendix A.**

13.1.5 Sites that were considered unsuitable in the Reg 18(1) SHELAA and SA but are now considered a possibility owing to a change in circumstances have been re-assessed in the SA following an internal site review. A summary table of the sites assessed, which are considered suitable, is included in the main body of the report including reasons for selecting or rejecting a site. Detailed appraisals for the possible sites are set out by Parish in **SA Part 2: Parish Site Assessments - Appendix B.**

13.1.6 Where sufficient information is not yet available or a clear conclusion cannot be made, the result has been scored uncertain. Uncertain sites will be reassessed as part of the **Regulation 19 SA.** Sites that have been withdrawn, are under construction or are too small for assessment are not shown in the Parish table of sites but are included in the SHELAA, which will be published at the Regulation 19 stage.

## 13.2 Strategic Sites

13.2.1 The Parish Assessments include a summary of the potential **Strategic Sites** for the Local Plan. These sites have been assessed in more detail, owing to the likely significant impacts that could result from larger development. A summary of the potential Strategic Sites sites considered is set out in **Chapter 7 - Figure 7.5** of this report and the detailed results are set out in **SA Part 3: Strategic Site Assessments.**

13.2.2 It should be noted that in all of the site assessments, minor negative effects are recorded against SO1 Climate Change and SO6 Waste because all development will result in an increase in carbon emissions and waste prior to mitigation and will therefore have a negative impact. However, relevant Local Plan policies will provide mitigation and any development will need to be in accordance with these policies. This applies to all sites assessed within all Parishes.

# 14 Planning Polices

## 14.1 Development of the Plan Policies

14.1.1 The new Draft Local Plan will contain a number of policies that will implement the Preferred Option and help achieve the Plan's objectives. A list of the policies is set out in **Appendix 4** of this report.

14.1.2 Under the SEA Regulations, there is a requirement to consider reasonable alternatives when undertaking the assessment and to set out an outline of the options considered and the reasons for their selection or rejection. Options have been considered in the development of the draft Local Plan for the Spatial Strategy; the Local Plan Policies; and Site Allocations. The **Initial SA Report 2024 - Appendix 8**, sets out 'reasonable alternatives' considered in the development of the Plan's policies.

14.1.3 The option of 'do nothing' or 'no new plan' was not considered a 'reasonable alternative' as it would not address the need to plan for the required housing and economic growth in the District or address recent changes in planning and environmental legislation and guidance.

## 14.2 Assessment of Plan Policies

14.2.1 The Initial SA 2024 considered 'reasonable alternatives' (options) for each of the policy areas within the Draft Local Plan and the reasons for selecting or rejecting the approaches. An appraisal of the draft policies was undertaken including the reasons why the policies were selected. The full assessment of the policies is contained within the I**nitial SA Report 2024** - **Appendix A9.**

14.2.2 Since the Initial SA report, the following policies have been amended:

**Policy CC8: Sustainable Drainage / Pevensey Levels**

**Policy HO8: Affordable Housing**

**Policy HO9: Gypsy, Traveller Travelling Showpeople Site Criteria**

### Policy CC8 Sustainable Drainage/ Pevensey Levels

14.2.3 **Policy CC8 (Sustainable Drainage/ Pevensey Levels)** has been amended as it has been necessary to update the mapping and boundary in relation to the Pevensey Levels Hydrological Catchment Area. This now accurately reflects the area in which this policy is to be implemented and is consistent with neighbouring local planning authorities (notably Rother District Council (RDC)) and the Habitats Regulations Assessment. The update also provides an opportunity to respond to key feedback received during the previous public consultation on the Regulation 18 Draft Local Plan (March 2024).

14.2.4 The Lead Local Flood Authority (LLFA) and the Pevensey & Cuckmere Water Level Management Board (P&CWLMB) have recommended amendments to the policy to improve clarity and technical accuracy. These are reflected in the revised draft version of the Local Plan.

14.2.5 The policy now includes distinct sections on sustainable drainage, water quality and treatment, the protection of the Pevensey Levels SAC and Ramsar site and implementation and maintenance, with the final section providing clarity on the implementation and management of surface water schemes. In addition, reference to surface water entering foul drainage has been removed, as this is prohibited under the Water Act 1981and rainwater reuse has been added to the discharge hierarchy.

### Policy HO8: Affordable Housing

**14.2.6** **Policy HO8 (Affordable Housing)** is included in the focused draft Regulation 18 Local Plan consultation as it has been necessary to update the affordable housing policy given the changes within the NPPF (2024) at paragraph 66, which includes more emphasis in terms of Social Rented homes being required. In addition, the requirement to deliver a minimum of 25% of affordable housing as 'First Homes' has been removed as set out in 'Affordable Homes' Written Ministerial Statement dated 24 May 2021.

14.2.7 As a result of the above changes, the updated affordable housing policy is required to consider a new affordable housing tenure mix. The Council has published its update to the Local Housing Needs Assessment (LHNA) (January 2026), which considers affordable housing need in the context of the new national planning policy.

14.2.8 The update to the policy also provides the opportunity to respond to key feedback received during the previous public consultation on the Regulation 18(1) draft Local Plan (March 2024). At the previous stage, there was only one comment from a statutory consultee on the Affordable Housing policy from the National Health Service (NHS) who supported the policy in principle.

14.2.9 The development industry, however, was clear that the proportion of First Homes expected as part of the Regulation 18(1) draft Local Plan (March 2024) would be a significant obstacle to delivery and that alternative options should be revisited. Others also stated that the level of provision of First Homes would significantly reduce the level of provision of shared ownership, which impacts the ability of affordable housing providers to acquire and offer rented properties.

14.2.10 The issue concerning First Homes, alongside national planning policy changes have been reflected within the amended version of the policy with a reduced 'First Homes' proportion and an increase in the Shared Ownership tenure.

14.2.11 There were discordant views on the overall percentage of affordable housing to be provided by the affordable housing policy. The Council will keep this under review as it moves towards the Regulation 19 Local Plan. The current tenure mix has been supported by viability evidence at the level of 35%.

# POLICY ASSESSMENTS

## Policy HO9: Gypsy, Traveller Travelling Showpeople (GTTSP) Site Criteria

14.2.12 Since the publication and consultation on the Regulation 18 Local Plan in March 2024, there have been updates to national policy in planning for GTTSP and further collaborative working with the neighbouring local planning authorities has also been undertaken. These changes can be summarised as follows:

1. The updated Planning Policy for Traveller Sites (PPTS) document (December 2024) made significant changes to the definition of gypsies, travellers and travelling showpeople in Annex 1 of the PPTS, following domestic and European Court judgements. The definition was broadened to ensure it included 'all other persons with a cultural tradition of nomadism or of living in a caravan' rather than solely persons of a nomadic habit of life, whether they have ceased to travel, permanently or temporarily, or not. As a result, the policy wording and content of supporting text must be reviewed and updated in all applicable policies in this focused draft Regulation 18 Local Plan (i.e. Policies SS3: Gypsy, Traveller and Travelling Showpeople – Accommodation Needs and HO9: Gypsy, Traveller and Travelling Showpeople – Site Criteria).
2. In terms of collaborative working, the Duty to Cooperate Gypsy and Traveller Accommodation Needs group, which includes all local planning authorities in East Sussex has been held regularly since Autumn 2024, to work collaboratively to ensure appropriate coordination and planning for the cross-boundary strategic planning issues such as the provision of Gypsy, Traveller and Travelling Showpeople sites. As part of this, a joint 'Call for Sites' was undertaken in Autumn 2025. The publication and assessment of these sites form part of the evidence base associated with this focused draft Regulation 18 Local Plan, the outcomes of which required an update to Policy SS3 (Gypsy, Traveller and Travelling Showpeople – Accommodation Needs), in how these needs may be met on individual sites.

14.2.13 The proposed amendments to the Local Plan reflect the most up to date evidence on planning for the needs of GTTSP, both in terms of policy requirements and suitable sites. The consultation provides an opportunity for stakeholders and the public to comment on whether the policies and sites are appropriate, and whether the evidence justifies this change in approach.

14.2.14 There were limited responses to draft Wealden Local Plan (March 2024) in relation to Policy HO9 (Gypsy, Traveller and Travelling Showpeople – Site Criteria). However, there were several statutory consultees who made comments on the policy that either provided direct support for the policy or suggested minor changes to the policy wording (most notably Natural England and Rother District Council) to improve clarity. These comments have largely been taken on board, and the policy has been updated to reflect the comments where agreed.

## Policy CC9 - Coastal Change Management Area

14.2.15 The new policy on Coastal Management has been introduced as a result of two significant developments, which provide new and clearer evidence regarding coastal erosion risk in the District:

1. The publication of the updated National Coastal Erosion Risk Mapping (NCERM) dataset by the Environment Agency on 28 January 2025 provides the most up-to-date national picture of coastal erosion risk for England. This dataset incorporates over a decade of additional coastal monitoring data and reflects the latest shoreline management approaches. It also includes future scenarios accounting for climate change, such as sea level rise, based on UK Climate Projections (UKCP18). In Pevensey Bay, the updated mapping now clearly identifies that residential properties may be at risk if existing coastal defences are not maintained, representing a material change in the evidence base.

2. The establishment of the Pevensey Bay to Eastbourne Coastal Management Scheme (PevEb) has replaced the former Pevensey Coastal Defence Ltd (PCDL) arrangement. The PevEb scheme covers a broader area and reflects a more integrated and strategic approach to long-term coastal management, encompassing both Eastbourne and Pevensey Bay.

14.2.16 The Council is therefore proposing a Policy for Coastal Change Management (CC9) and the associated spatial designation of a Coastal Change Management Area (CCMA). These proposals ensure the Local Plan reflects the most current and nationally recognised evidence on coastal erosion risk and acknowledges the risk of coastal erosion and flooding to residents, business and infrastructure within the Pevensey Bay area.

14.2.17 A summary of the SA results is provided overleaf.

## Spatial Policies

14.2.18 Following this consultation the Spatial Policies will need to be revised to take into account the consultation responses. The policies will then be reassessed at the **Regulation 19 Stage**, to test the final Spatial Options and policies that will relate to the Spatial Strategy.

# POLICY ASSESSMENTS

## SUMMARY OF POLICY ASSESSMENTS

| Policy No. | Subject | Sustainability Objectives | | | | | | | | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| | | SO1 Climate Change Mitigation | SO2 Climate Change Adaptation | SO3 Flood Risk | SO4 Water Resources | SO5 Soil, Land & Minerals | SO6 Waste & Materials | SO7 Pollution | SO8 Green & Blue Infrastructure | SO9 Biodiversity | SO10 Landscape & Townscape | SO11 Historic & Cultural Heritage | SO12 Digital Infrastructure | SO13 Transport & Accessibility | SO14 Housing | SO15 Health & Wellbeing | SO16 Quality of Life & Place | SO17 Social Inclusion | SO18 Economy & Employment | SO19 Town & Village Centres | SO20 Education & Skills |
| Policy CC8 | Sustainable Drainage / Pevensey Levels | | ++ | ++ | ++ | + | | | + | + | + | | | | | + | + | | | | |
| Policy HO8 | Affordable Housing | | | | | | | | | | + | | | | + | + | + | ++ | + | | |
| Policy HO9 | Gypsy, Traveller Travelling Showpeople Site Criteria | | | | | | | + | | | + | | | + | + | + | + | ++ | | | |
| Policy CC9 | Coastal Change Management Area (NEW) | + | ++ | ++ | ++ | + | | | + | ++ | + | | | | + | + | + | | + | | |

## SUMMARY OF FINDINGS

| Policy No. | Subject | Commentary |
|---|---|---|
| Policy CC8 | Sustainable Drainage / Pevensey Levels | Development proposals which could affect drainage on or around the site must incorporate Sustainable Drainage Systems (SuDS) designed and implemented in accordance with the latest local, regional and national guidance and, where relevant, demonstrate that surface water management will not adversely affect the integrity of the Pevensey Levels SAC and Ramsar site where the development proposal falls within the Pevensey Levels Hydrological Catchment (PLHC). SuDS should be integrated as a fundamental part of site design and sufficient space should be provided within the site layout. The systems should be multi-functional to ensure flood risk reduction; water quality improvement; biodiversity enhancement; and green/blue infrastructure. For phased developments, a strategic drainage approach should be provided across all phases. The policy is likely to result in major positive impacts by ensuring SuDS are introduced according to the drainage hierarchy, which will protect the Pevensey Levels hydrological catchment area and have additional positive impacts for the issues of green and blue infrastructure, landscape and biodiversity. |
| Policy HO8 | Affordable Housing | The policy sets out the requirements for on-site affordable housing, which will be expected to be provided at a level of 35% of the total number of dwellings. Proposals with a higher affordable housing contribution will be considered on a case-by-case basis and will only be supported where mixed and balanced communities would be delivered with sufficient infrastructure. The Council expects a tenure mix of 55% social rent, 25% affordable rent and 20% through other affordable routes to home ownership. Where First Homes are provided, a discount of at least 30% will be expected to ensure that the cost is genuinely affordable for first time buyers within Wealden. Where it can be proven that the affordable housing requirement cannot be achieved, due to economic viability, there will be flexibility in meeting stated targets. The design, quality and appearance of the affordable homes should be indistinguishable from market housing. The policy supports CLTs, Co-Housing and Almhouse schemes that provide affordable housing subject to other policies within the Local Plan. The policy is likely to have a major positive impact for the objective of Social Inclusion as well as minor positive impacts in relation to Landscape & Townscape; Housing; Health & Wellbeing; Quality of Life & Place and the Economy & Employment. |
| Policy HO9 | Gypsy, Traveller Travelling Showpeople Site Criteria | The policy sets out the criteria for determining applications for GTTSP sites including: a clearly defined need; the site is well related to a sustainability settlement and its services; new sites in rural areas are of an appropriate scale; areas of flood risk are avoided; the inclusion of safe vehicular and pedestrian access; proper consideration of environmental impacts; appropriate water and waste facilities; be well designed and screened. The policy is likely to have a major positive impact in relation to Social Inclusion and minor positive impacts with regard to Pollution; Landscape & townscape; Transport & Accessibility; Housing; Health & Wellbeing; and Quality of Life & place. |
| Policy CC9 | Coastal Change Management | New permanent residential development, including proposals involving change of use, will not be supported within the Pevensey Bay Coastal Change Management Area (CCMA), which is considered to be within a short-term risk area for coastal change. Any other forms of development including infrastructure provision within the CCMA will only be considered acceptable where demonstrated by a Coastal Change Vulnerability Assessment. Adaptation of existing buildings, infrastructure or land uses within the CCMA will be supported where it reduces vulnerability and/or increases resilience. Proposals for coastal change measures, including the decommissioning, or relocation of existing development and infrastructure will be supported where it is demonstrated to be unsustainable and at risk of loss within the next 20 years (short term). Where development or land management activities are permitted within the CCMA it must be demonstrated that there will be no adverse impact on the Beachy Head East Marine Conservation Zone (MCZ). The policy is likely to result in major positive impacts by ensuring measures are put in place to protect against erosion and flooding as a result of climate change. The policy will also have benefits for the natural environment and biodiversity; those living and working within the CCMA; and any necessary infrastructure, which may be vulnerable to the impacts of coastal change. |

# 15 Conclusions & Next Steps

## 15.1 Cumulative Impacts of the Plan

15.1.1 The SEA Directive requires that cumulative and synergistic effects are considered when identifying likely significant effects. These effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the Plan (e.g. light pollution, landscape and visual impacts) have a combined effect.

15.1.2 The Initial SA Report, 2024 considered how the different policy areas and proposed site allocations of the Plan would affect the environmental, social and economic elements identified in the sustainability objectives, including the likely cumulative effects. It is also important to consider the effects of the plan implementation in itself and when combined with other plans i.e. neighbouring authorities.

15.1.3 An initial assessment of the cumulative impacts was carried out in support of the Draft Plan and was included in the **Initial SA Report - Appendix 13**. The assessment showed that the majority of the draft Plan Policies perform well against the Sustainability Objectives. The majority of the Draft Plan policies have not changed since the Regulation 18(1) assessment and therefore the cumulative impact is unlikely to have changed significantly. The cumulative impact of the Plan policies will therefore be reviewed and updated at the **Regulation 19** stage.

15.1.4 Where the Initial SA report did show a high degree of uncertainty as well as minor negative impacts was with the regard to the options for growth. The focus of this SA has therefore concentrated on these areas of uncertainty in the Plan. Likely cumulative impacts have therefore been identified where there is sufficient information.

15.1.5 The consideration of cumulative impacts has therefore been included in the assessment of the proposed Site Allocations **(SA Part 2 - Parish Site Assessments and Part 3 - Strategic Site Assessments),** however has been limited where there is a lack of detail for proposals or evidence is still to be updated.

15.1.6 The cumulative impacts of the policies and proposals will continue to be refined as part of the next stage of the Local Plan and SA, including the impact of proposals on neighbouring authorities. The implementation of development will be in line with the policies within the Wealden Local Plan, which will determine the overall effect and will be monitored as part of the Plan implementation.

## 15.2 Mitigation Measures

15.2.1 The SA regulations require that the SA process should consider ways of mitigating adverse effects and maximising beneficial effects and propose measures to monitor the significant effects of implementing the Plan.

15.2.2 Mitigation measures have been considered throughout the assessment process and will continue to be reviewed and updated, as appropriate, in future stages of the Local Plan and SA. The Local Plan policies will need to be taken into consideration with regard to all development, many of which identify specific measures for mitigation.

15.2.3 Details of the specific mitigation measures, which could be applied are set out in the assessments of the policies and sites where available.

## 15.3 Monitoring

15.3.1 The Council currently produces an Authority Monitoring Report (AMR) annually, which is the main mechanism for assessing the performance of the adopted planning policies. The AMR sets out how the Council's planning policies have been implemented and whether the planning policies are addressing the required issues.

15.3.2 The indicators set out in the Sustainability Appraisal Framework will be incorporated into the AMR to enable the specific impacts, which relate to the delivery of sustainable development to be assessed in the future. If the AMR identifies any changes that should be made to the policies, such changes will be reviewed and a further SA undertaken if it is considered necessary.

## 15.4 Uncertainties

15.4.1 The Draft SA will need to be reviewed at the next stage to identify any new information that may come forward, which could have implications for the proposed development and Local Plan policies.

15.4.2 Uncertain impacts have been identified in relation to several of the Sustainability Objectives. The uncertainty should be removed as a result of further work in relation to evidence, which is yet to be prepared, to support the policies or proposed development for site allocations. Specific attention will be given to the uncertain impacts identified when reviewing proposals. Details of the specific mitigation measures will also be provided in more detail as evidence is finalised and also at the planning application stage to ensure that any potential adverse impacts are suitably addressed.

15.4.3 There are also risks largely outside the Council's control, which could have an impact on development proposals such as the economic climate, changes to the planning and building regulations and the impact of climate change. Consideration of these issues should be included within the monitoring and implementation plan.

## 15.5 Next Steps

15.5.1 The Council will consider all the consultation responses (representations) received during the **Regulation 18 (2) Stage SA** of the Draft Local Plan consultation period. The findings of the SA, together with the consultation responses and further evidence base work will be used to refine the draft Local Plan to produce a draft Publication Local Plan and SA Report for the next stage of the plan-making process (Regulation 19).

15.5.2 Following the **Regulation 19 stage** consultation, the draft Publication Local Plan and SA will be submitted for Examination in Public (EiP). If any major modifications are identified as a result of the EiP, the Council may need to carry out a further SA of the modifications.

15.5.3 To ensure that the SA process is as concise as possible, and avoids unnecessary repetition, subsequent SA Reports will build on this SA Report. The next iteration of this report will take account of any policy or strategy changes that may occur between the Regulation 18 Draft Plan and the Regulation 19 Draft Submission Plan / before the draft Local Plan is submitted to the Planning Inspectorate for Examination.

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